HEEC Cable Removal
Reserved Channel and Boston Harbor
Boston, Massachusetts

Notice of Intent (NOI) Application

Boston Conservation Commission

October 31, 2018

Prepared for:

Harbor Electric Energy Company, a wholly owned subsidiary of NSTAR Electric Company d/b/a Eversource Energy

Prepared by:

Stantec Consulting Services Inc.

Stantec Consulting Services Inc.
400 Crown Colony Drive Suite 200, Quincy MA 02169-0982

October 31, 2018
File: 195601525

Boston Conservation Commission
Boston City Hall
1 City Hall Square
Room 709
Boston, MA 02201

Dear Commission Members,

Reference: Notice of Intent Filing
HEEC Cable Removal
Reserved Channel and Boston Harbor

On behalf of Harbor Electric Energy Company, a wholly owned subsidiary of NSTAR Electric Company d/b/a Eversource Energy, we are filing a Notice of Intent in support of the removal of an approximately 8,000 linear foot section of an existing electric cable from Land Under the Ocean, Land Subject to Tidal Action, Land Subject to Coastal Storm Flowage and a Designated Port Area within the Reserved Channel and Boston Harbor between the K Street Substation and extending to a location 500- feet east of the Federal Shipping Channel. The remainder of the cable to the east, extending to Deer Island, will be retired in place. The purpose of the project is to remove the cable to enable the U.S. Army Corps of Engineers to perform deep dredging operations within the Project Area.

If you have any questions or comments on the project, please do not hesitate to contact me at 508.591.4396 or lisa.carrozza@stantec.com.

Regards,

Stantec Consulting Services Inc.

Lisa Carrozza
Senior Project Manager

Phone: (508) 591-4396
Lisa.Carrozza@stantec.com

Attachment: NOI and Supporting Documents
City Filing Fee

c. Massachusetts DEP, Northeast Regional Office
Massachusetts Division of Marine Fisheries, North Shore Office

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LIST OF APPENDICES

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:

MassDEP File Number

Document Transaction Number

Boston
City/Town

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

Note: Before completing this form consult your local Conservation Commission regarding any municipal bylaw or ordinance.

A. General Information

1. Project Location (**Note:** electronic filers will click on button to locate project site):

Reserved Channel and Boston Harbor — a. Street Address
Boston — b. City/Town
c. Zip Code

Latitude and Longitude:
42-20-31.95 N — d. Latitude
71-01- 42.63 W — e. Longitude

f. Assessors Map/Plat Number
g. Parcel /Lot Number

2. Applicant:

Matthew — a. First Name
Waldrip — b. Last Name

Harbor Electric Energy Company, a wholly owned subsidiary of NSTAR Electric Company d/b/a Eversource Energy — c. Organization

247 Station Drive, SE 2122 — d. Street Address

Westwood — e. City/Town
MA — f. State
02090 — g. Zip Code

781-441-8247 — h. Phone Number
i. Fax Number
matthew.waldrip@eversource.com — j. Email Address

3. Property owner (required if different from applicant): ☐ Check if more than one owner

a. First Name
b. Last Name

c. Organization

d. Street Address

e. City/Town
f. State
g. Zip Code

h. Phone Number
i. Fax Number
j. Email address

4. Representative (if any):

Lisa — a. First Name
Carrozza — b. Last Name

Stantec Consulting Services Inc. — c. Company

400 Crown Colony Drive — d. Street Address

Quincy — e. City/Town
MA — f. State
02169 — g. Zip Code

508-591-4396 — h. Phone Number
i. Fax Number
lisa.carrozza@stantec.com — j. Email address

5. Total WPA Fee Paid (from NOI Wetland Fee Transmittal Form):

$1,500 BCC fee + $712.50 WPA — a. Total Fee Paid
$712.50 — b. State Fee Paid
$1,500 Boston fee — c. City/Town Fee Paid

A. General Information (continued)

6. General Project Description:

An approximate 8,000 linear foot section of existing electric transmission cable will be removed from the bottom of the Reserved Channel and Boston Harbor from the vicinity of the K Street Substation site to a location 500 feet to the east of the Federal Shipping Channel within Boston Harbor; the eastern and western limits will be cut, capped and left in place.

7a. Project Type Checklist: (Limited Project Types see Section A. 7b.)

1. ☐ Single Family Home
2. ☐ Residential Subdivision
3. ☐ Commercial/Industrial
4. ☐ Dock/Pier
5. ☒ Utilities
6. ☐ Coastal engineering Structure
7. ☐ Agriculture (e.g., cranberries, forestry)
8. ☐ Transportation
9. ☐ Other

7b. Is any portion of the proposed activity eligible to be treated as a limited project (including Ecological Restoration Limited Project) subject to 310 CMR 10.24 (coastal) or 310 CMR 10.53 (inland)?

1. ☐ Yes ☒ No

If yes, describe which limited project applies to this project. (See 310 CMR 10.24 and 10.53 for a complete list and description of limited project types)

2. Limited Project Type

If the proposed activity is eligible to be treated as an Ecological Restoration Limited Project (310 CMR10.24(8), 310 CMR 10.53(4)), complete and attach Appendix A: Ecological Restoration Limited Project Checklist and Signed Certification.

8. Property recorded at the Registry of Deeds for:

a. County
b. Certificate # (if registered land)
c. Book
d. Page Number

B. Buffer Zone & Resource Area Impacts (temporary & permanent)

1. ☐ Buffer Zone Only – Check if the project is located only in the Buffer Zone of a Bordering Vegetated Wetland, Inland Bank, or Coastal Resource Area.
2. ☐ Inland Resource Areas (see 310 CMR 10.54-10.58; if not applicable, go to Section B.3, Coastal Resource Areas).

Check all that apply below. Attach narrative and any supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

For all projects affecting other Resource Areas, please attach a narrative explaining how the resource area was delineated.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. ☐ Bank	1. linear feet	2. linear feet
b. ☐ Bordering Vegetated Wetland	1. square feet	2. square feet
c. ☐ Land Under Waterbodies and Waterways	1. square feet 3. cubic yards dredged	2. square feet

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
d. ☐ Bordering Land Subject to Flooding	1. square feet 3. cubic feet of flood storage lost	2. square feet 4. cubic feet replaced
e. ☐ Isolated Land Subject to Flooding	1. square feet 2. cubic feet of flood storage lost	3. cubic feet replaced
f. ☐ Riverfront Area	1. Name of Waterway (if available) - **specify coastal or inland**	

2. Width of Riverfront Area (check one):

   ☐ 25 ft. - Designated Densely Developed Areas only

   ☐ 100 ft. - New agricultural projects only

   ☐ 200 ft. - All other projects

3. Total area of Riverfront Area on the site of the proposed project: _____ square feet

4. Proposed alteration of the Riverfront Area:

   a. total square feet _____ b. square feet within 100 ft. _____ c. square feet between 100 ft. and 200 ft. _____

5. Has an alternatives analysis been done and is it attached to this NOI? ☐ Yes ☐ No

6. Was the lot where the activity is proposed created prior to August 1, 1996? ☐ Yes ☐ No

3. ☒ Coastal Resource Areas: (See 310 CMR 10.25-10.35)

Note: for coastal riverfront areas, please complete **Section B.2.f**. above.

B. Buffer Zone & Resource Area Impacts **(temporary & permanent)** (cont'd)

Check all that apply below. Attach narrative and supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

Online Users: Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. ☒ Designated Port Areas	Indicate size under Land Under the Ocean, below	
b. ☒ Land Under the Ocean	708,340 sf / 16.26 acres (1. square feet) 235,251 (2. cubic yards dredged)	
c. ☐ Barrier Beach	Indicate size under Coastal Beaches and/or Coastal Dunes below	
d. ☐ Coastal Beaches	1. square feet	2. cubic yards beach nourishment
e. ☐ Coastal Dunes	1. square feet	2. cubic yards dune nourishment

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
f. ☐ Coastal Banks	1. linear feet	
g. ☐ Rocky Intertidal Shores	1. square feet	
h. ☐ Salt Marshes	1. square feet	2. sq ft restoration, rehab., creation
i. ☐ Land Under Salt Ponds	1. square feet 2. cubic yards dredged	
j. ☐ Land Containing Shellfish	1. square feet	
k. ☐ Fish Runs	Indicate size under Coastal Banks, inland Bank, Land Under the Ocean, and/or inland Land Under Waterbodies and Waterways, above 1. cubic yards dredged	
l. ☒ Land Subject to Coastal Storm Flowage	708,340 sf/ 16.26 acres (1. square feet)	

4. ☐ Restoration/Enhancement
If the project is for the purpose of restoring or enhancing a wetland resource area in addition to the square footage that has been entered in Section B.2.b or B.3.h above, please enter the additional amount here.

a. square feet of BVW | b. square feet of Salt Marsh

5. ☐ Project Involves Stream Crossings

a. number of new stream crossings | b. number of replacement stream crossings

C. Other Applicable Standards and Requirements

☐ This is a proposal for an Ecological Restoration Limited Project. Skip Section C and complete Appendix A: Ecological Restoration Limited Project Checklists – Required Actions (310 CMR 10.11).

Streamlined Massachusetts Endangered Species Act/Wetlands Protection Act Review

1. Is any portion of the proposed project located in **Estimated Habitat of Rare Wildlife** as indicated on the most recent Estimated Habitat Map of State-Listed Rare Wetland Wildlife published by the Natural Heritage and Endangered Species Program (NHESP)? To view habitat maps, see the *Massachusetts Natural Heritage Atlas* or go to http://maps.massgis.state.ma.us/PRI_EST_HAB/viewer.htm.

   a. ☐ Yes ☒ No

   If yes, include proof of mailing or hand delivery of NOI to:

   Natural Heritage and Endangered Species Program
   Division of Fisheries and Wildlife
   1 Rabbit Hill Road
   Westborough, MA 01581

   August 2017
   b. Date of map

   If *yes*, the project is also subject to Massachusetts Endangered Species Act (MESA) review (321 CMR 10.18). To qualify for a streamlined, 30-day, MESA/Wetlands Protection Act review, please complete Section C.1.c, and include requested materials with this Notice of Intent (NOI); *OR* complete Section C.2.f, if applicable. *If MESA supplemental information is not included with the NOI, by completing Section 1 of this form, the NHESP will require a separate MESA filing which may take up to 90 days to review (unless noted exceptions in Section 2 apply, see below).*

   c. Submit Supplemental Information for Endangered Species Review*

      1. ☐ Percentage/acreage of property to be altered:

         (a) within wetland Resource Area _____ percentage/acreage

         (b) outside Resource Area _____ percentage/acreage

      2. ☐ Assessor's Map or right-of-way plan of site

2. ☐ Project plans for entire project site, including wetland resource areas and areas outside of wetlands jurisdiction, showing existing and proposed conditions, existing and proposed tree/vegetation clearing line, and clearly demarcated limits of work **

   (a) ☐ Project description (including description of impacts outside of wetland resource area & buffer zone)

   (b) ☐ Photographs representative of the site

* Some projects **not** in Estimated Habitat may be located in Priority Habitat, and require NHESP review (see http://www.mass.gov/eea/agencies/dfg/dfw/natural-heritage/regulatory-review/). Priority Habitat includes habitat for state-listed plants and strictly upland species not protected by the Wetlands Protection Act.

** MESA projects may not be segmented (321 CMR 10.16). The applicant must disclose full development plans even if such plans are not required as part of the Notice of Intent process.

C. Other Applicable Standards and Requirements (cont'd)

(c) ☐ MESA filing fee (fee information available at http://www.mass.gov/dfwele/dfw/nhesp/regulatory_review/mesa/mesa_fee_schedule.htm). Make check payable to "Commonwealth of Massachusetts - NHESP" and ***mail to NHESP*** at above address

*Projects altering **10 or more acres** of land, also submit:*

(d) ☐ Vegetation cover type map of site

(e) ☐ Project plans showing Priority & Estimated Habitat boundaries

(f) OR Check One of the Following

1. ☐ Project is exempt from MESA review.
Attach applicant letter indicating which MESA exemption applies. (See 321 CMR 10.14, http://www.mass.gov/dfwele/dfw/nhesp/regulatory_review/mesa/mesa_exemptions.htm; the NOI must still be sent to NHESP if the project is within estimated habitat pursuant to 310 CMR 10.37 and 10.59.)

2. ☐ Separate MESA review ongoing.
a. NHESP Tracking # _____ b. Date submitted to NHESP _____

3. ☐ Separate MESA review completed.
Include copy of NHESP "no Take" determination or valid Conservation & Management Permit with approved plan.

3. For coastal projects only, is any portion of the proposed project located below the mean high water line or in a fish run?

a. ☐ Not applicable – project is in inland resource area only b. ☒ Yes ☐ No

If yes, include proof of mailing, hand delivery, or electronic delivery of NOI to either:

South Shore - Cohasset to Rhode Island border, and the Cape & Islands:

Division of Marine Fisheries -
Southeast Marine Fisheries Station
Attn: Environmental Reviewer
1213 Purchase Street – 3rd Floor
New Bedford, MA 02740-6694
Email: DMF.EnvReview-South@state.ma.us

North Shore - Hull to New Hampshire border:

Division of Marine Fisheries -
North Shore Office
Attn: Environmental Reviewer
30 Emerson Avenue
Gloucester, MA 01930
Email: DMF.EnvReview-North@state.ma.us

Also if yes, the project may require a Chapter 91 license. For coastal towns in the Northeast Region, please contact MassDEP's Boston Office. For coastal towns in the Southeast Region, please contact MassDEP's Southeast Regional Office.

C. Other Applicable Standards and Requirements (cont'd)

Online Users: Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

4. Is any portion of the proposed project within an Area of Critical Environmental Concern (ACEC)?

a. ☐ Yes ☒ No If yes, provide name of ACEC (see instructions to WPA Form 3 or MassDEP Website for ACEC locations). **Note:** electronic filers click on Website.

b. ACEC

5. Is any portion of the proposed project within an area designated as an Outstanding Resource Water (ORW) as designated in the Massachusetts Surface Water Quality Standards, 314 CMR 4.00?

a. ☐ Yes ☒ No

6. Is any portion of the site subject to a Wetlands Restriction Order under the Inland Wetlands Restriction Act (M.G.L. c. 131, § 40A) or the Coastal Wetlands Restriction Act (M.G.L. c. 130, § 105)?

a. ☐ Yes ☒ No

7. Is this project subject to provisions of the MassDEP Stormwater Management Standards?

a. ☒ Yes. Attach a copy of the Stormwater Report as required by the Stormwater Management Standards per 310 CMR 10.05(6)(k)-(q) and check if:

1. ☐ Applying for Low Impact Development (LID) site design credits (as described in Stormwater Management Handbook Vol. 2, Chapter 3)

2. ☐ A portion of the site constitutes redevelopment

3. ☐ Proprietary BMPs are included in the Stormwater Management System.

b. ☐ No. Check why the project is exempt:

1. ☐ Single-family house

2. ☐ Emergency road repair

3. ☐ Small Residential Subdivision (less than or equal to 4 single-family houses or less than or equal to 4 units in multi-family housing project) with no discharge to Critical Areas.

D. Additional Information

☐ This is a proposal for an Ecological Restoration Limited Project. Skip Section D and complete Appendix A: Ecological Restoration Notice of Intent – Minimum Required Documents (310 CMR 10.12).

Applicants must include the following with this Notice of Intent (NOI). See instructions for details.

Online Users: Attach the document transaction number (provided on your receipt page) for any of the following information you submit to the Department.

1. ☒ USGS or other map of the area (along with a narrative description, if necessary) containing sufficient information for the Conservation Commission and the Department to locate the site. (Electronic filers may omit this item.)

2. ☒ Plans identifying the location of proposed activities (including activities proposed to serve as a Bordering Vegetated Wetland [BVW] replication area or other mitigating measure) relative to the boundaries of each affected resource area.

D. Additional Information (cont'd)

3. ☐ Identify the method for BVW and other resource area boundary delineations (MassDEP BVW Field Data Form(s), Determination of Applicability, Order of Resource Area Delineation, etc.), and attach documentation of the methodology.

4. ☒ List the titles and dates for all plans and other materials submitted with this NOI.

Figures 1- 6: USGS, Aerial Photograph, NOAA Map, Plan and Profile, FEMA Map, Natural Heritage Map

Stantec Consulting Services
b. Prepared By

c. Signed and Stamped by

d. Final Revision Date

variable
e. Scale

f. Additional Plan or Document Title

g. Date

5. ☐ If there is more than one property owner, please attach a list of these property owners not listed on this form.

6. ☐ Attach proof of mailing for Natural Heritage and Endangered Species Program, if needed.

7. ☒ Attach proof of mailing for Massachusetts Division of Marine Fisheries, if needed.

8. ☒ Attach NOI Wetland Fee Transmittal Form

9. ☐ Attach Stormwater Report, if needed.

E. Fees

1. ☐ Fee Exempt: No filing fee shall be assessed for projects of any city, town, county, or district of the Commonwealth, federally recognized Indian tribe housing authority, municipal housing authority, or the Massachusetts Bay Transportation Authority.

Applicants must submit the following information (in addition to pages 1 and 2 of the NOI Wetland Fee Transmittal Form) to confirm fee payment:

4901
2. Municipal Check Number

10/25/2018
3. Check date

579044
4. State Check Number

10/24/2018
5. Check date

Stantec Consulting Services Inc.
6. Payor name on check: First Name

7. Payor name on check: Last Name

F. Signatures and Submittal Requirements

I hereby certify under the penalties of perjury that the foregoing Notice of Intent and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge. I understand that the Conservation Commission will place notification of this Notice in a local newspaper at the expense of the applicant in accordance with the wetlands regulations, 310 CMR 10.05(5)(a).

I further certify under penalties of perjury that all abutters were notified of this application, pursuant to the requirements of M.G.L. c. 131, § 40. Notice must be made by Certificate of Mailing or in writing by hand delivery or certified mail (return receipt requested) to all abutters within 100 feet of the property line of the project location.

1. Signature of Applicant	2. Date: October 24, 2018
3. Signature of Property Owner (if different)	4. Date: 10/25/2018
5. Signature of Representative (if any)	6. Date

For Conservation Commission:
Two copies of the completed Notice of Intent (Form 3), including supporting plans and documents, two copies of the NOI Wetland Fee Transmittal Form, and the city/town fee payment, to the Conservation Commission by certified mail or hand delivery.

For MassDEP:
One copy of the completed Notice of Intent (Form 3), including supporting plans and documents, one copy of the NOI Wetland Fee Transmittal Form, and a **copy** of the state fee payment to the MassDEP Regional Office (see Instructions) by certified mail or hand delivery.

Other:
If the applicant has checked the "yes" box in any part of Section C, Item 3, above, refer to that section and the Instructions for additional submittal requirements.

The original and copies must be sent simultaneously. Failure by the applicant to send copies in a timely manner may result in dismissal of the Notice of Intent.

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

NOI Wetland Fee Transmittal Form

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

A. Applicant Information

1. Location of Project:

a. Street Address	b. City/Town
Reserved Channel and Boston Harbor	Boston
c. Check number	**d. Fee amount**

2. Applicant Mailing Address:

a. First Name	b. Last Name
Matthew	Waldrip

Harbor Electric Energy Company, a wholly owned subsidiary of NSTAR Electric Company d/b/a Eversource Energy

247 Station Drive, SE 2122
d. Mailing Address

e. City/Town	f. State	g. Zip Code
Westwood	MA	02090

h. Phone Number	i. Fax Number	j. Email Address
781-441-8247		matthew.waldrip@eversource.com

3. Property Owner (if different):

a. First Name	b. Last Name

c. Organization

d. Mailing Address

e. City/Town	f. State	g. Zip Code

h. Phone Number	i. Fax Number	j. Email Address

B. Fees

To calculate filing fees, refer to the category fee list and examples in the instructions for filling out WPA Form 3 (Notice of Intent).

Fee should be calculated using the following process & worksheet. ***Please see Instructions before filling out worksheet.***

Step 1/Type of Activity: Describe each type of activity that will occur in wetland resource area and buffer zone.

Step 2/Number of Activities: Identify the number of each type of activity.

Step 3/Individual Activity Fee: Identify each activity fee from the six project categories listed in the instructions.

Step 4/Subtotal Activity Fee: Multiply the number of activities (identified in Step 2) times the fee per category (identified in Step 3) to reach a subtotal fee amount. Note: If any of these activities are in a Riverfront Area in addition to another Resource Area or the Buffer Zone, the fee per activity should be multiplied by 1.5 and then added to the subtotal amount.

Step 5/Total Project Fee: Determine the total project fee by adding the subtotal amounts from Step 4.

Step 6/Fee Payments: To calculate the state share of the fee, divide the total fee in half and subtract $12.50. To calculate the city/town share of the fee, divide the total fee in half and add $12.50.

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

NOI Wetland Fee Transmittal Form

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

B. Fees (continued)

Step 1/Type of Activity	Step 2/Number of Activities	Step 3/Individual Activity Fee	Step 4/Subtotal Activity Fee
4h. dredging	1	$1,450	$1,450

Step 5/Total Project Fee: $1,450

Step 6/Fee Payments:

Total Project Fee:	$1,450 a. Total Fee from Step 5
State share of filing Fee:	$712.50 b. 1/2 Total Fee **less $**12.50
City/Town share of filling Fee:	BCC fee based on Cost = $1,500

C. Submittal Requirements

a.) Complete pages 1 and 2 and send with a check or money order for the state share of the fee, payable to the Commonwealth of Massachusetts.

Department of Environmental Protection
Box 4062
Boston, MA 02211

b.) **To the Conservation Commission:** Send the Notice of Intent or Abbreviated Notice of Intent; a **copy** of this form; and the city/town fee payment.

To MassDEP Regional Office (see Instructions): Send a copy of the Notice of Intent or Abbreviated Notice of Intent; a **copy** of this form; and a **copy** of the state fee payment. (E-filers of Notices of Intent may submit these electronically.)

STANTEC CONSULTING SERVICES INC.
SCSI-NORTHEAST

4901

32-1/1110 TX
0

DATE 10/25/18

PAY TO THE ORDER OF Boston Conservation Commission $ 1500.00

One thousand five hundred and —— 00/100 DOLLARS

Bank of America

FOR NOI 1956015251 202.2 DNEIN

⑈004901⑈ ⑆111000012⑆ 442 778 2431⑈

Stantec Consulting Services Inc.
Check Date: Oct 24, 2018

Vendor Name: Commonwealth Of Massachusetts
Vendor Number: 68422

Check Number: **579044**

Invoice Number	Invoice Date	Invoice Amount	Discount Taken	Amount Paid
MANCK.OCT2318	23-Oct-18	712.50	0.00	712.50

Net Check Amount:
(US Dollars) 712.50

VISIONCRAFT 800-265-6080

Stantec

Stantec Consulting Services Inc.

Bank Of America
Delkalb County
Atlanta, GA
061112788

64-1278
611 GA

579044

DATE 1 0 2 4 2 0 1 8
M M D D Y Y Y Y

PAY **********Seven Hundred Twelve Dollars And Fifty Cents

$******712.50**

US Funds

TO THE ORDER OF

Commonwealth Of Massachusetts
Department of Environmental Protection
Box 4062
Boston, MA 02211

THIS DOCUMENT CONTAINS A GRADIENT COLOUR BACKGROUND • INVISIBLE FLUORESCENT PATTERN UNDER CONVENIENCE FIELD XXX • SECURITY MICROPRINTING • TRUE WATERMARK

⑈057904⑆ ⑆061112788⑆ 329 902 7492⑈

Checklist for Filing a Notice of Intent with Boston Conservation Commission

In order for the Boston Conservation Commission to effectively process your Notice of Intent, BCC requests that you complete the checklist below and include it with your submission. If you should need assistance please contact Commission staff: 617-635-3850 (cc@boston.gov).

To the Conservation Commission:

- ☑ Eight copies (a signed original and 7 copies) of a completed Notice of Intent (WPA Form 3)
- ☑ Eight copies of plans (reduced to 11" X 17") in their final form with engineer's stamp affixed supporting calculations and other documentation necessary to completely describe the proposed work and mitigating measures. Plans must include existing conditions, the proposed project, erosion controls and mitigation measures, and all wetland resource areas and associated buffer zones.
- ☑ Eight copies of an 8 ½" x 11" section of the USGS quadrangle map of the area, containing sufficient information for the Conservation Commission and the Department to locate the site of the work.
- ☑ (If applicable) Eight copies the Federal Emergency Management Agency Flood Insurance Rate Map for the project site. FEMA Flood Maps: https://msc.fema.gov/portal.
- ☑ Determination regarding the Natural Heritage and Endangered Species Program: Review Section C. Other Applicable Standards and Requirements of the Notice of Intent, page 4 of 8, pertaining to wildlife habitat. The Conservation Commission and the Natural Heritage & Endangered Species Program have the maps necessary to make this determination.
- ☐ N/A (If applicable) Two hard copies and a digital copy of a Stormwater Report to document compliance with the Stormwater Management Standards per 310 CMR 10.05(6)(k)-(q), including associated drainage calculations for rooftops, parking lots, driveways, etc., for the required design storm events.
- ☐ N/A Details of the stormwater management system, including: catch basins, oil separating tanks, detention basins, outfalls, sewer connections, etc.
- ☐ Any photographs related to the project representing the wetland resource areas.
- ☑ A project narrative describing the following: a brief overview of the entire project, the work proposed within wetland resource areas and/or buffer zones; how the performance standards specific to the wetland resource areas will be met; construction equipment and material involved; and measures to protect wetland resource areas and mitigate impacts.
- ☐ **Electronic copies. Documents may be submitted via email, or via an email link to downloadable documents.**
- ☑ Abutter Notification, filed concurrently with the Notice of Intent.
- ☐ N/A (If applicable) Completed BRA Climate Preparedness Questionnaire (for new buildings). This can be completed online at http://www.bostonredevelopmentauthority.org/planning/planning-initiatives/climate-change-preparedness-and-resiliency. Please print the pdf that you will receive via email after completion and include it in your submission.

To minimize the use of non-recyclable materials ***please do not include vinyl or plastic binders, bindings, folders or covers with the filing.*** Staples and binder clips are good choices.

1.0 NOTICE OF INTENT APPLICATION

1.1 BACKGROUND AND PURPOSE

Harbor Electric Energy Company (HEEC), a wholly owned subsidiary of NSTAR Electric Company d/b/a Eversource Energy, is proposing to decommission and remove an approximate 8,000- linear foot (1.48 mile) portion of the existing 4.09- mile electric cable line which extends from the South Boston K Street Substation to the Massachusetts Water Resources Authority's Deer Island Treatment Plant. The cable will be removed from the Reserved Channel and Boston Harbor (Project [see Figures 1 through 3]) for the Project location mapping on a USGS Map, Aerial Photograph and NOAA Map, respectively.

Following installation and commissioning of the new HEEC cable (authorized under a separate permit: Amended Order of Conditions DEP 006-1560), an 8,000 +/- linear foot section of the existing cable will be removed from the Reserved Channel and Boston Harbor 500- feet east of the Federal Shipping Channel (Project Area). The remaining 2.61 miles of the cable to Deer Island will be retired in place. More than half of the cable removal route, 5,290 linear feet, is coincidental with the Boston Harbor Deep Draft Navigation Improvement Project (BHDDNIP) which is scheduled to be dredged by the U.S. Army Corps of Engineers (USACE) in the fall of 2019. The BHDDNIP will deepen the Reserved Channel and adjacent sections of the Federal Shipping Channel from a depth of -40 feet (mean lower low water [MLLW] to a depth of -49 feet MLLW. The 8,000 linear foot section of cable within the Project Area must be removed to facilitate scheduled dredging within the BHDDNIP.

1.2 EXISTING CONDITIONS

Along the existing cable alignment in the Project Area, there are three buried 3.9- inch diameter cables (herein referred to as “the cable”). The three cables are situated within a 2- foot wide trench and buried below the mudline. When the cable was installed in 1990, an approximate 1,980 linear foot section in the Reserved Channel was placed over an area of bedrock and was not installed at the intended depth of -60 feet MLLW. This section of the cable will conflict with the planned dredging of the Reserved Channel to be conducted as part of the BHDDNIP. The USACE is requiring that an 8,000 +/- linear foot section of existing cable be removed prior to the planned dredging. The remainder of the cable located 500 feet east of the Federal Shipping Channel will remain in place.

The cable varies in depth below the mudline between an average of 15 feet in the Reserved Channel, to a depth of 25 feet east of the Federal Shipping Channel. A bathymetric survey of the Project Area was completed on October 27, 2018 and included the cable path and an area within 100 feet of either side of the cable. See Figure 4 for a plan and profile showing a bathymetric survey of the existing cable. The sediment above the cable varies from unconsolidated to firmly consolidated material including silt, blue clay, till and weathered rock.

2.0 PROPOSED WORK

Approximately 8,000 linear feet of cable will be removed from the Project Area; the eastern and western limits will be cut, capped and retired in place. The cable will be removed by barge mounted equipment, beginning approximately

75 feet from the edge of the steel sheet pile bulkhead along Summer Street, continuing east through the Reserved Channel, crossing the Federal Shipping Channel, and extending 500 feet east of the Federal Shipping Channel within Boston Harbor.

The existing cable contains dielectric fluid (an electrical insulator) that must be drained prior to the removal of the cable. The entire length of cable between the substation and Deer Island will be purged of fluid using the existing system's pump facilities based at the K Street substation site. The cables will remain in place during flushing. The fluid will be collected in closed reserve tanks, pumped into tanker trucks and disposed of at an off-site location.

2.1 CONSTRUCTION MEANS AND METHODS

Surveys have been performed to locate the cable, and physically evaluate the substrate in order to determine the sediment types with respect to suitability for quantification of sediment volumes and disposal. Based on results of suitability testing and analysis, it is anticipated that sediment removal methods will vary within the Project Area based on the nature of the material above the cable and ease of access to remove the cable. The exact nature of the overlying material along each portion of the cable to be removed will be sampled and confirmed during construction, and a suitable disposal method will be selected by the contractor from the alternatives described below.

There are three conventional methods for material removal to uncover the cables, all dependent on the type and consistency of material over the cable as verified during removal. These include:

- Direct pull with winch: This represents the least invasive method by dredging to recover the cable ends and winching the cable from a barge; if not practical based on- site conditions, then the contractor will use one of the following alternative removal methods;
    - Mechanical jetting: For softer sediments and unconsolidated material, a jetting ring (donut) will be fitted around the cable bundle. The jet donut will be advanced forward around the cable, into the seabed, while the barge exerts tension on the cables. The jet donut will liquefy the soil near the cables and assist the barge in extracting the cables form the seabed.
    - Mechanical excavation: Localized excavation with clamshell bucket to expose cable and ends to be cut and capped. Dredge material will be placed in hopper barge or dumps scow for disposal (anticipated disposal sites are described below).

The method of cable removal is anticipated to vary within the Project Area and will be dependent upon site conditions, including the sediment type and depth observed by the contractor during installation. If the existing cable cannot be winched or jetted from the seabed, the overlying sediment may need to be dredged and disposed of to access the existing cable for removal.

2.1.1 Cable Removal Sequencing

The cable removal is expected to begin at the Summer Street bridge end and proceed east towards Boston Harbor as follows:

- Perform pre-installation bathymetric survey (completed October 2018);

- New cable is installed and operational (authorized under a separate permit; DEP File #006-1560) scheduled for Fall, 2019;
- Depower cable to be removed;
- Drain cable of dielectric fluid;
- Cut cable on seabed floor;
- Recover stub ends of cut cable to barge deck and cap;
- Lower capped ends to seabed floor;
- Recover working ends of cable to barge deck and winch cable aboard barge; if refusal encountered, then proceed with one or a combination of:
    - Jetting of the cable; and/or
    - Mechanical excavation.
- Store removed cable on barge for transport to an approved upland scrap / disposal facility upon completion;
- Continue cable recovery until eastern cut-point is reached at 500 feet east of the Federal Shipping Channel;
- Cut eastern cable end, cap, and lower to seabed;
- Lower capped 'stray' cable ends beneath grade by means of diver jetting / air-lift / water-lift; and
- Perform post-installation bathymetric survey to verify bathymetry of sea floor following cable removal.

2.1.2 Dredging Areas and Volumes

The estimated volume of dredge material was determined based on the removal technique that would represent the anticipated worst case or greatest amount of material, where the sediment along the entire length of the cable would require mechanized excavation to the depth of the cable with an excavator bucket. The total estimated volume of material to be dredged, including a 20% overdredge factor, is estimated to be approximately 235,251 cubic yards, based on a variable width trench between 64 and 94 feet, with 3:1 side slopes along the length of cable removal route. The trench width will vary based on the depth of the cable and the estimated dredge volume accounts for this variation.

Cable removal methods will require the operation of equipment from barges. Once the cable is removed by winch/pull and/or mechanical jetting methods, the sediment is expected to resettle by gravity over the disturbed area. Dredge material generated by any of the employed cable removal methods, including residual dredge spoils generated from the winch pull and/or mechanical dredging as well as dredge material from mechanical excavation, will be loaded onto a dump scow for transport to an off-shore disposal site and/or a hopper barge and processed prior to upland disposal.

2.1.3 Dewatering and Dredged Material Disposal

Once the dredge material is loaded on the scow or hopper barge, it will be transported from the Project Area to the disposal site. There are two options for disposal, namely Massachusetts Bay Ocean Dredged Disposal Site (MBDS) or an approved upland site. For disposal at MBDS loaded barges will be towed to the placement area by a tug and emptied by bottom dumping in accordance with the MBDS's Site Management and Monitoring Plan. For confined upland disposal, the material will be transported by barge from the Project Area to a designated landside staging location, dewatered and loaded onto trucks for ground transport to a designated facility.

2.2 STORMWATER MANAGEMENT

According to the MassDEP Stormwater Standards, by definition, the Project is not exempt from the Stormwater Standards however the standards do not apply to the Project because there will be no stormwater runoff and associated stormwater management required for dredging activities. Since the Project is technically not exempt, a Stormwater Checklist is provided in Appendix B as a formality; the response to all standards is "not applicable."

3.0 RESOURCE AREAS

The following resource areas regulated under the Massachusetts Wetlands Protection Act are located within the Project Area where work is proposed within the Reserved Channel and Boston Harbor.

3.1 LAND UNDER OCEAN

Land Under the Ocean (LUO) is the land extending from mean low water line elevation 0.35 feet (MLLW datum) seaward to the municipal boundary; the entire Project Area is located within LUO.

3.2 DESIGNATED PORT AREA

The South Boston Designated Port Area is mapped between the western side of Summer Street and extending east to the easterly limit of the Federal Shipping Channel. With the exception of a 500- foot portion of cable to be removed east of the Federal Shipping Channel, the remainder of the Project Area is located within the South Boston Designated Port Area.

3.3 LAND SUBJECT TO COASTAL STORM FLOWAGE

Land Subject to Coastal Storm Flowage (LSCSF) is land subject to inundation caused by coastal storms up to and including the 100-year storm, surge of record or storm of record whichever is greater; LSCSF is considered a Special Flood Hazard Area. Within the Project Area, the Federal Emergency Management Agency (FEMA) has mapped the following flood zones or LSCSF: Zone AE elevation 13 feet NAVD 88 (7.49 feet MLLW) and VE 15 feet NAVD 88 (9.49 feet MLLW) FIRM Panel 25025C0084J effective March 16, 2016, and Zone AE elevation 13 feet NAVD 88 (7.49 feet MLLW) FIRM Panel 25025C0083J effective March 16, 2016. See Figure 5 for Massachusetts Geographic Information Systems (MassGIS) FEMA mapping. The entire Project Area is located within LSCSF.

3.4 LAND SUBJECT TO TIDAL ACTION

Land Subject to Tidal Action (LSTA) is an overlay area defined as land subject to the periodic rise and fall of a coastal water body, including spring tides. There is a 9.5- foot tidal range within the Project Area and the entire Project Area is located within LSTA.

3.4.1 Other Resources

According to the MassGIS Massachusetts Natural Heritage and Endangered Species (NHESP) datalayer, there is no mapped Priority Habitat of Rare Species, Estimated Habitat of Rare Wildlife or mapped eelgrass beds within the Project Area. See Figure 6 for MassGIS NHESP data layer mapping. The Project Area is not mapped within an Area of Critical Environmental Concern.

There are no mapped Massachusetts Department of Environmental Protection (MassDEP) eelgrass beds within the Project Area, in part, due to the heavy navigational usage and dredging within the Federal Shipping Channel and water depths of greater than approximately 20 feet within the Project area.

The Massachusetts Division of Marine Fisheries (MDMF) has mapped Winter flounder habitat within Boston Harbor; the Harbor also provides passage for anadromous fish runs in the Charles and Mystic Rivers including alewife, shad, American eel, Atlantic tomcod, and white perch. The Project may result in short-term temporary effects to marine fisheries by the operation of equipment and potential suspension of sediment in the water column. The potential effects will be mitigated through the use of an environmental bucket when excavating softer sediments and turbidity monitoring by on board personnel. In addition, the Project will adhere to the time of year (TOY) restrictions for Winter flounder between February 1st and June 30th during in-water, silt-producing activities.

4.0 ALTERNATIVES

The applicant has conducted a thorough analysis of alternatives for the Project that includes retiring in place, providing protective cover over the cable, complete cable removal, and a partial removal alternative combined with assessment of different removal means and methods.

4.1.1 Alternative 1 - Retire Cable in Place

Under this alternative, the existing cable would be retired in place. This alternative is not an option since the cable must be removed to facilitate the BHDDIP project.

4.1.2 Alternative 2 - Protective Covering

To obviate the need for removing the existing cable, HEEC previously considering covering the existing cable with matting to protect it from the BHDDNP and other dredging activities in the same area. However, it was determined that the existing cable needed to be removed due to the high likelihood that these areas would be deepened even further in the future and directly impact the cable. Additionally, installation of cable protection over the existing cable would result in permanent impacts to the Land Under the Ocean, which does not represent the least damaging alternative. Therefore, cable protection was dismissed from further consideration.

4.1.3 Alternative 3 – Full Cable Removal

Under this alternative, the full length of the existing cable from the K Street Substation through Boston Harbor to Deer Island would be removed. This alternative would require unnecessary impacts to Land Under the Ocean as the USACE and the BHDDIP dredging project requires removal from only the shipping channels to be dredged. Costs to remove the full cable length would also be considerably greater than removal of only those portions that are required for planned dredging and harbor maintenance. For these reasons, this alternative is not practical and is not the preferred alternative.

4.1.4 Preferred Project – Partial Cable Removal

Under this alternative, only those portions of the cable will be removed that are necessary for the subsequent implementation of the BHDDIP. The existing cable was not buried to the intended depth within the Reserved Channel and, though it was buried to the intended depth within the Federal Shipping Channel, the existing cable is not buried deep enough to allow for the deepening of the Federal Shipping Channel. Since this alternative allows for minimizing alteration to Land Under the Ocean and will removal just those portions of existing cable that may interfere with planned dredging, as required by the USACE, this alternative was selected as the preferred alternative.

Once the option of retiring in place was eliminated, the next step was to consider the least damaging alternative method(s) for removing the cable which is dependent upon means and methods. There are three conventional construction methods that will be used to remove the cable, all dependent upon the nature of the sediment over the cable and the ease of removal. From direct pull winching to dredging, for each segment of cable removal, the contractor will decide the most efficient and least-invasive technique for cable removal. Regardless of the method employed, impacts will be minimized through the implementation of the best management mitigation practices as discussed in Section 7.0.

5.0 RESOURCE AREA IMPACTS

5.1 LAND UNDER THE OCEAN

The extent of alteration to LUO will be dependent upon the construction methods selected by the contractor during cable removal activities which will vary due to overburden conditions. For this application, the method that results in the most alteration to LUO, mechanized excavation, was used for conservative quantification purposes. The length of cable removal will be 8,000 linear feet at a depth between 10 and 15 feet below the mudline. The anticipated 4 foot-wide bottom trench width, transitioning to a surface width between 64 and 94 feet, results in a 708,340 square foot (16.26 acre) temporary alteration to LUO. The trench width and corresponding alteration to LUO will vary based on the depth of the cable and the estimated temporary impact to LUO accounts for this variation.

Once the cable is removed, the area is expected to resettle and naturally accrete or fill in; no long-term alterations to LUO are expected. Of the 8,000 linear foot disturbance, the USACE dredging overlap (scheduled to be conducted in 2019) will be approximately 5,290 linear feet. Essentially the Project represents an interim condition, as the majority of the area will be dredged and altered by the USACE as part of the BHDDNIP Project.

5.2 DESIGNATED PORT AREA

With the exception of a 500- foot portion of cable to be removed east of the Federal Channel, the remainder of the cable removal will be performed within the South Boston Designated Port Area.

5.3 LAND SUBJECT TO COASTAL STORM FLOWAGE AND LAND SUBJECT TO TIDAL ACTION

Although the cable removal activities will be located in an area physically mapped as LSCSF and LSTA, there will be no impacts to these resource areas as the removal of the cable will occur at or below the mudline and will not obstruct nor impair storm damage prevention, redirection of wave action, or increase coastal flooding.

6.0 CONFORMANCE WITH PERFORMANCE STANDARDS

6.1 LAND UNDER OCEAN

In accordance with 310 CMR 10.25 (1) LUO is considered significant to marine fisheries, storm damage prevention, flood control and protection of wildlife habitat. The following addresses how the Project conforms with the following interests.

6.1.1 Marine Fisheries

The Project may result in short-term temporary effects to marine fisheries from the operation of equipment and potential suspension of sediment in the water column; the contractor will use the least invasive removal alternative to remove the cable. To minimize adverse effects to marine fisheries, an environmental bucket will be used during excavation of softer sediments and turbidity will be monitored by on-board staff. In addition, to avoid and minimize impacts to marine fisheries, the Project will adhere to the time of year (TOY) restrictions for Winter flounder between February 1st and June 30th during in-water, silt-producing activities. As such, the project will not result in long term impacts to marine fisheries.

6.1.2 Storm Damage Prevention

The removal of the cable will not influence or impact storm damage prevention nor flood control because the removal will occur at or below LUO and will not obstruct wave action or flooding. Since the work will occur entirely within the waterway, it will not result in impacts to adjacent coastal banks or engineering structures with respect to storm damage prevention.

6.1.3 Flood Control

The removal of the cable will not influence or impact flood control because the removal will occur at or below LUO and will not obstruct wave action or flooding. Since the work will occur entirely within the waterway, it will not result in impacts to adjacent coastal banks or engineering structures with respect to flood control.

6.1.4 Protection of Wildlife Habitat

There is no mapped Priority Habitat of Rare Species, Estimated Habitat of Rare Wildlife or mapped eelgrass beds within the Project Area therefore the Project will not impact wildlife habitat. Additionally, work is proposed to occur outside of the Winter flounder time of year window and an environmental bucket will be used to limit the resuspension of sediments into the water column.

6.2 DESIGNATED PORT AREA

The performance standards for the Designated Port Area (DPA) are the same as LUO. In addition, according to 310 CMR 10.26 (3), when LUO in the DPA is found to be significant to the protection of marine fisheries, storm damage prevention and flood control, the Project must be constructed using best practical measures to minimize effects on marine fisheries caused by changes in water circulation and water quality. LUO in the Project area is considered significant to the protection of marine fisheries; it is not significant to storm damage prevention and flood control as previously discussed in 6.1.2 and 6.1.3.

6.2.1 Marine Fisheries Water Circulation

Cable removal operations from barge mounted equipment will not interfere with water circulation within the Project Area. The Reserved Channel and Shipping Channel approach to Boston Harbor serve water-dependent industrial uses for shipping and the three-month temporary operation of equipment is not expected to affect water circulation.

6.2.2 Marine Fisheries Water Quality

The Project may result in short-term temporary effects to water quality by the operation of equipment and potential suspension of sediment in the water column. To minimize adverse effects to marine fisheries, an environmental bucket will be used during excavation of softer sediments and turbidity will be monitored by on-board staff. In addition, to avoid and minimize impacts to marine fisheries, the Project will adhere to the time of year (TOY) restrictions for Winter flounder between February 1st and June 30th during in-water, silt-producing activities that could influence the level of dissolved oxygen, temperature or turbidity and introduction of pollutants. The Project will also have a hazardous material contractor on call 24/7. The implementation of these measures will protect the potential construction term and long- term water quality impacts to marine fisheries.

6.3 LAND SUBJECT TO COASTAL STORM FLOWAGE

The Massachusetts Wetlands Protection Act does not include performance standards for Land Subject to Coastal Storm Flowage, however such areas are significant to storm damage prevention and flood control. Neither the operation of barge mounted equipment during a three- month construction period nor the removal of the cable located beneath LUO will influence storm damage prevention, nor will it lead to an increase in coastal flooding.

7.0 CONSTRUCTION PHASE MITIGATION MEASURES

Construction phase mitigation measures will be implemented to address resource area performance standards. The contractor will be required to follow best management practices during construction, including:

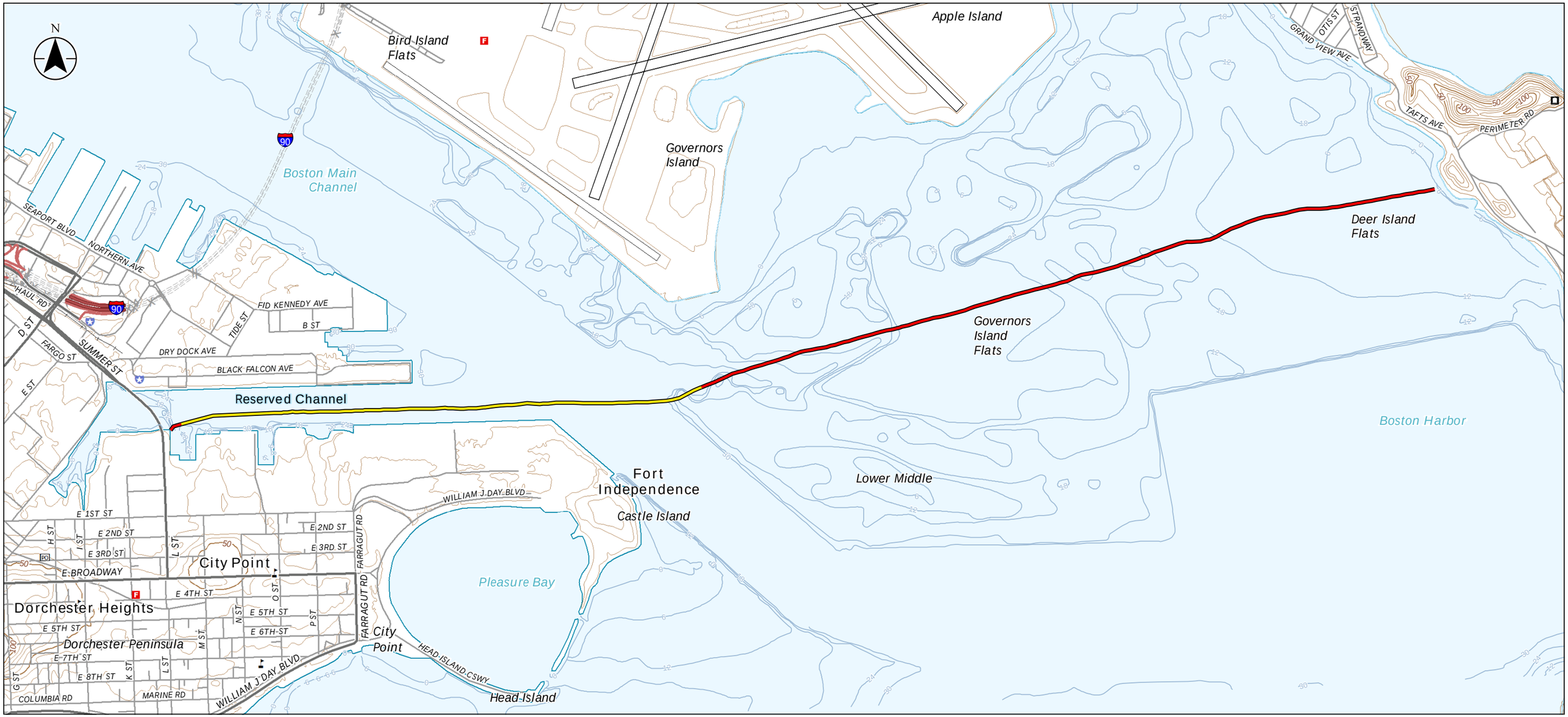
- Use the least invasive removal alternative, based on site conditions, in the following order: direct pull, mechanical jetting and mechanical excavation;
- Limit footprint of work to avoid overdredge;
- Avoid in- water silt producing activities during the Winter flounder TOY restriction;
- Monitoring of turbidity by on- board staff;
- Use of closed clam shell bucket for softer sediments and conventional excavator bucket for harder sediments during mechanical excavation;
- Maintain hazardous materials contractor on call 24/7.

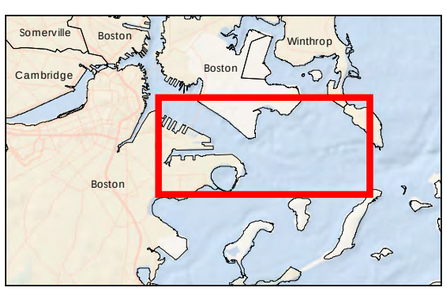
8.0 SUMMARY

The Project compiles with the performance standards of the MA Wetlands Protection Act, will be conducted within a previously disturbed areas and will not result in long-term alterations to resource areas. Temporary best management practices will be implemented to minimize impacts during cable removal and result in compliance with the performance standards for protected resource areas.

The installation of the new HEEC cable and removal of portions of the existing HEEC cable are of the utmost importance to the Massachusetts Port Authority (MassPort), the Massachusetts Water Resources Authority (MWRA), the USACE, and HEEC, and provides a public benefit to the Commonwealth of Massachusetts by assisting in the federal and state navigation improvement projects planned for Boston Harbor and by providing a power to MWRA's Deer Island Wastewater Treatment Plant. The cable removal must be completed for the USACE and MassPort's new berth construction at Conley Terminal and the BHDDNIP.

As such, HEEC respectfully requests that the Boston Conservation Commission find this proposal protective of the interests outlined in the Massachusetts Wetlands Protection Act and issue an Order of Conditions allowing the project to proceed as outlined herein.





Legend

- Existing Cable Route to Remain
- Portion of Existing Cable to be Removed
- Depth Contour (feet)
- Land Under Ocean and Land Subject to Tidal Action

0 900 1,800 Feet

1:18,000 (At original document size of 11x17)

Notes

1. Coordinate System: NAD 1983 StatePlane Massachusetts Mainland FIPS 2001 Feet
2. Soundings and bathymetry contours extracted from NOAA ENC Direct to GIS website (https://encdirect.noaa.gov). Depths shown are in feet.
3. Base map features provided by the USGS Topo Map Vector Data geodatabases of the 1:24,000 Boston South and Hull Massachusetts quadrangles.

Stantec

Project Location 195601525

Boston Harbor
Boston, Massachusetts

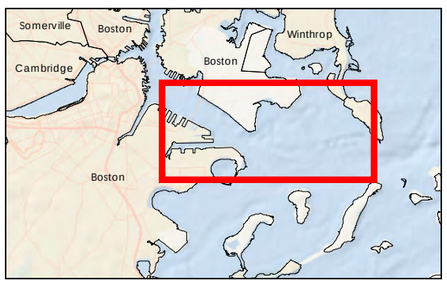
Prepared by GAC on 2018-10-23
Reviewed by DGN on 2018-10-23

Client/Project
HEEC Cable Removal

Figure No.
1

Title
U.S.G.S. Locus Map

Revised: 2018-10-23 By: gcarpenter
V:\1956\active\195601525\03_data\gis_cad\gis\MXDs\NDJ Figures\10525_01_Location0SGS.mxd



Legend

- Existing Cable Route to Remain
- Portion of Existing Cable to be Removed

0 900 1,800 Feet

1:18,000 (At original document size of 11x17)

Notes

1. Coordinate System: NAD 1983 StatePlane Massachusetts Mainland FIPS 2001
2. Base map: ESRI World Imagery and World Boundaries and Places web mapping services. World Imagery photo dated 4/30/2017.

Stantec

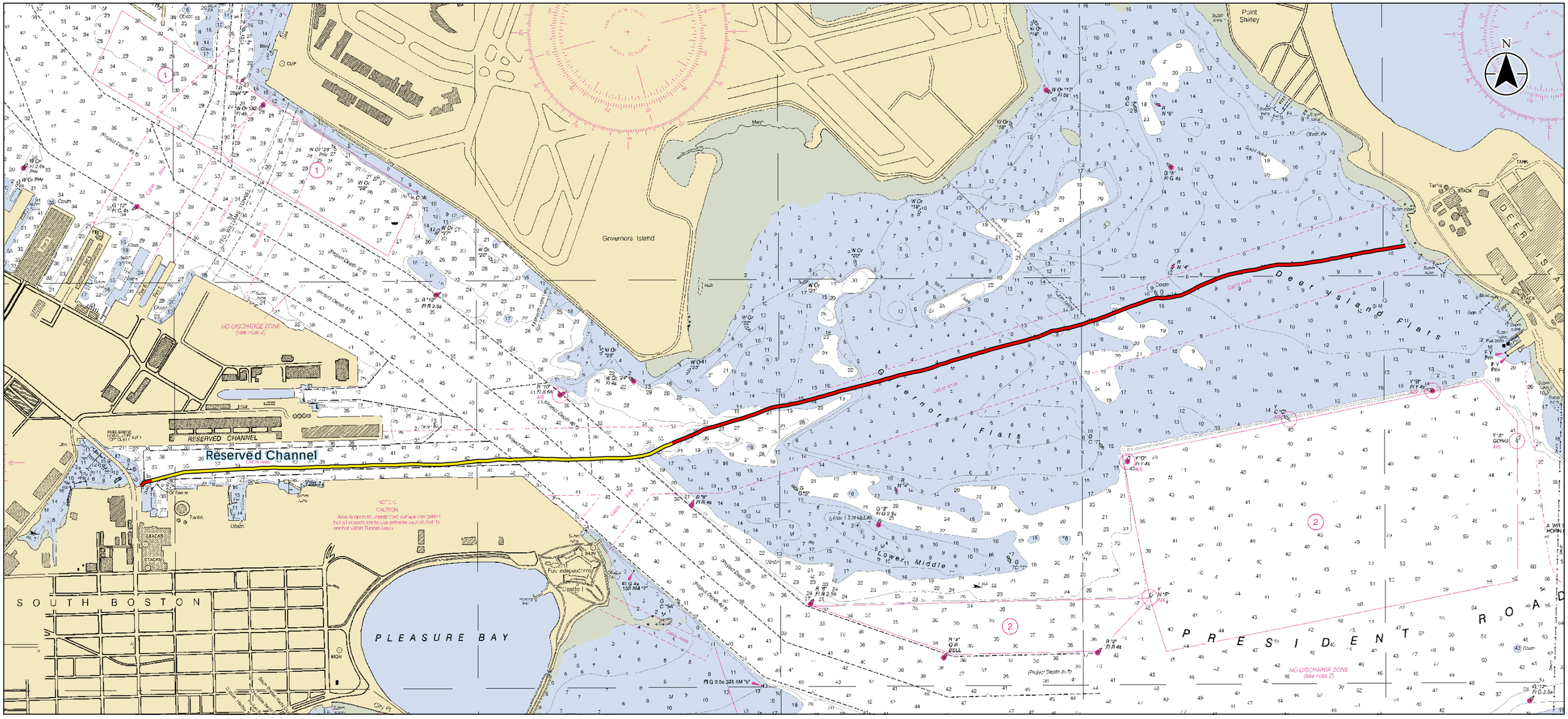
Project Location
Boston Harbor
Boston, Massachusetts

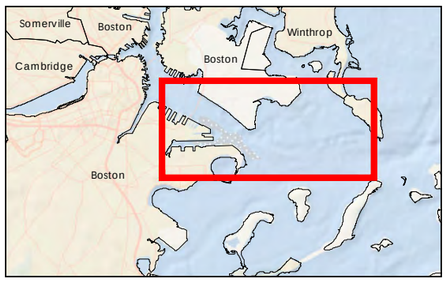
195601525
Prepared by GAC on 2018-10-23
Reviewed by DGN on 2018-10-23

Client/Project
HEEC Cable Removal

Figure No.
2

Title
Aerial Photograph





Legend

- Existing Cable Route to Remain
- Portion of Existing Cable to be Removed

0 900 1,800 Feet

1:18,000 (At original document size of 11x17)

Notes

1. Coordinate System: NAD 1983 StatePlane Massachusetts Mainland FIPS 2001
2. Base map: NOAA Chart 13272 - Boston Inner Harbor, 2018.

Stantec

Project Location
Boston Harbor
Boston, Massachusetts

195601525
Prepared by GAC on 2018-10-23
Reviewed by DGN on 2018-10-23

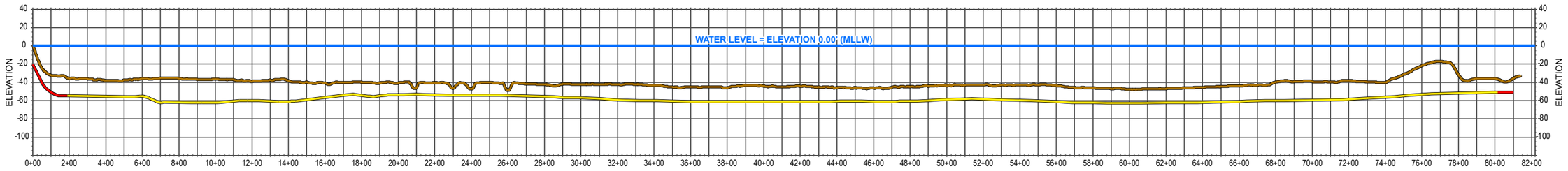
Client/Project
HEEC Cable Removal

Figure No.
3

Title
NOAA Map

Plan View

Profile View



Notes

1. Coordinate System: NAD 1983 StatePlane Massachusetts Mainland FIPS 2001
2. Bathymetric data have been certified by CR Environmental, Inc. (ACSM Hydrographer #266) to comply with USACE's 2013 guidance *Engineering and Design - Hydrographic Surveying, Manual No. EM 1110-2-1003* of 0.2 ft tide bias and 0.8 ft vertical uncertainty. Beam angle and cross-line statistics documented negligible tide bias (0.018 ft) and a vertical uncertainty of 0.34 ft.
3. Base map: ESRI World Imagery web mapping service. World Imagery photo dated 4/30/2017.

Stantec

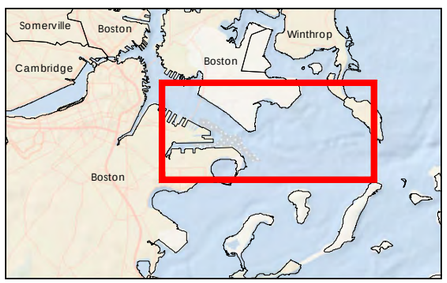
Project Location
Boston Harbor
Boston, Massachusetts

195601525
Prepared by GAC on 2018-10-23
Reviewed by DGN on 2018-10-23

Client/Project
HEEC Cable Removal

Figure No.
4

Title
Plan and Profile



Legend

- Existing Cable Route to Remain
- Portion of Existing Cable to be Removed

National Flood Hazard Layer

- AE: 1% Annual Chance of Flooding/ Land Subject to Coastal Storm Flowage
- VE: High Risk Coastal Area
- X: 0.2% Annual Chance of Flooding

0 900 1,800 Feet

1:18,000 (At original document size of 11x17)

Stantec

Project Location 195601525

Boston Harbor
Boston, Massachusetts

Prepared by GAC on 2018-10-23
Reviewed by DGN on 2018-10-23

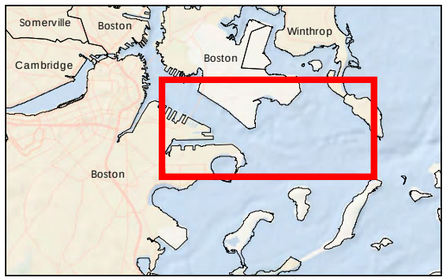
Client/Project
HEEC Cable Removal

Figure No.
5

Title
FEMA Map

Notes

1. Coordinate System: NAD 1983 StatePlane Massachusetts Mainland FIPS 2001
2. Base map: ESRI World Imagery and World Boundaries and Places web mapping services. World Imagery photo dated 4/30/2017.
3. The National Flood Hazard Layer provided by the FEMA Map Service Center.



Legend

- Existing Cable Route to Remain
- Portion of Existing Cable to be Removed
- Priority Habitats of Rare Species
- Estimated Habitats of Rare Wildlife

0 900 1,800 Feet

1:18,000 (At original document size of 11x17)

Notes

1. Coordinate System: NAD 1983 StatePlane Massachusetts Mainland FIPS 2001
2. Base map: ESRI World Imagery and World Boundaries and Places web mapping services. World Imagery photo dated 4/30/2017.
3. NHESP data provided by Massachusetts Office of Geographic Information (MassGIS).

Stantec

Project Location
Boston Harbor
Boston, Massachusetts

195601525

Prepared by GAC on 2018-10-23
Reviewed by DGN on 2018-10-23

Client/Project
HEEC Cable Removal

Figure No.
6

Title
Natural Heritage Priority and Estimated Habitats of Rare Species

Appendix A ABUTTER INFORMATION

HEEC Cable Removal, Reserved Channel and Boston Harbor, Boston, MA

Abutter's List based on City of Boston On-Line Assessor's Database and Mapping October, 2018

Parcel ID	**Parcel Address**	**Owner**	**Owner's Mailing Address**
0603406010	Summer Street South Boston, MA 02127	Massachusetts Port Authority	1 Harborside Drive Suite #200 East Boston, MA 02128
0603406045	Summer Street South Boston, MA 02127	Massachusetts Port Authority	1 Harborside Drive Suite #200S East Boston, MA 02128
0603407025	E. First Street South Boston, MA 02127	Massachusetts Port Authority	East First Street, South Boston, MA 02127
0603411010	E. First Street South Boston, MA 02127	Massachusetts Port Authority	1 Harborside Drive Suite #200 East Boston, MA 02128
0603411000	800-900 E. First Street South Boston, MA 02127	Massachusetts Port Authority	1 Harborside Drive Suite #200S East Boston, MA 02128
0603413000	Farragut Road South Boston, MA 02127	City of Boston	Farragut Road South Boston, MA 02127
0603417000	20 Farragut Road South Boston, MA 02127	Commonwealth of Massachusetts	20 Farragut Road South Boston, MA 02127
0602674185	10 Terminal Street Boston, MA 02110	Economic Development and Industrial Corporation of Boston	1 City Hall Square 9th floor Boston, MA 02201
0602674190	Terminal Street Boston, MA 02210	Economic Development and Industrial Corporation of Boston	1 City Hall Square 9th floor Boston, MA 02201
0602674016	88 Black Falcon Avenue South Boston, MA 02127	Div. Black Falcon LLC	125 High Street 21st floor Boston, MA 02110
0104126001	Maverick Street East Boston, MA 02128	Commonwealth of Massachusetts Department of Public Works	Maverick Street East Boston, MA 02128
0104126000	Maverick Street East Boston, MA 02128	Massachusetts Port Authority	1 Harborside Drive Suite #200S East Boston, MA 02128

AFFIDAVIT OF SERVICE

Under the Massachusetts Wetlands Protection Act

I, Lisa Carrozza (for Stantec Consulting Services Inc.), hereby certify under the pains and penalties of perjury that on October 31, 2018, I gave notification to abutters in compliance with the second paragraph of Massachusetts General Laws Chapter 131, Section 40, the DEP guide to Abutter Notification dated April 8, 1994, in connection with the following matter:

A Notice of Intent was filed under the Massachusetts Wetlands Protection Act (WPA) by Harbor Electric Energy Company, a wholly owned subsidiary of NSTAR Electric Company d/b/a Eversource Energy, on October 31, 2018 for the removal of an existing electric cable beneath the Reserved Channel and Boston Harbor in Boston, Massachusetts. Portions of the work will occur within Land Under the Ocean, Land Subject to Tidal Action, Land Subject to Coastal Storm Flowage and a Designated Port Area.

The form of the notification, and a list of the abutters to whom it was given and their addresses are attached to this Affidavit of Service.

10-31-18

Lisa Carrozza for Stantec Consulting Services Inc. Date

Notification to Abutters Under the
Massachusetts Wetlands Protection Act

In accordance with the second paragraph of the Massachusetts General Laws Chapter 131, Section 40, you are hereby notified (via certified mail) of the following.

A. The name of the applicant and Project is: **Harbor Electric Energy Company, a wholly owned subsidiary of NSTAR Electric Company d/b/a/ Eversource Energy, HEEC Cable Removal Project**

B. The applicant has filed a Notice of Intent with the Conservation Commission for the municipality of: **Boston** seeking an Order of Conditions under the Wetlands Protection Act (General Laws Chapter 131, Section 40).

C. The address of the lot where the activity is proposed is: **Reserved Channel and Boston Harbor.**

D. The Notice of Intent may be examined at: **Boston Environment Department**
1 City Hall Square
Room 709
Boston, MA 02201

E. Copies of the Notice of Intent may be obtained from: **Stantec Consulting Services Inc.**
Attn: Lisa Carrozza
508-591-4396

F. Information regarding the date, time, and place of the public hearing may be obtained from: **Boston Conservation Department at 617-635-3850 or Lisa Carrozza of Stantec Consulting Services Inc. at 508-591-4396**

G. Notice of the public hearing, including its date, time, and place, will be published at least five (5) days in advance in the following newspaper: **Boston Herald**

Note: Notice of the public hearing, including its date, time, and place, will be posted in the City Hall not less than forty-eight (48) hours in advance also refer to https://www.boston.gov/public-notices

Note: You also may contact the Boston Environment Department or the nearest Department of Environmental Protection (DEP) Regional Office for more information about this application or the Wetlands Protection Act. To contact DEP, call:

Central Regional Office:	508-792-7650	**Northeast Regional Office:**	**617-654-6500**
Southeast Regional Office:	508-946-2800	Western Regional Office:	413-784-1100

Appendix B STORMWATER MANAGEMENT CHECKLIST

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

A. Introduction

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

A Stormwater Report must be submitted with the Notice of Intent permit application to document compliance with the Stormwater Management Standards. The following checklist is NOT a substitute for the Stormwater Report (which should provide more substantive and detailed information) but is offered here as a tool to help the applicant organize their Stormwater Management documentation for their Report and for the reviewer to assess this information in a consistent format. As noted in the Checklist, the Stormwater Report must contain the engineering computations and supporting information set forth in Volume 3 of the Massachusetts Stormwater Handbook. The Stormwater Report must be prepared and certified by a Registered Professional Engineer (RPE) licensed in the Commonwealth.

The Stormwater Report must include:

- The Stormwater Checklist completed and stamped by a Registered Professional Engineer (see page 2) that certifies that the Stormwater Report contains all required submittals.[1] This Checklist is to be used as the cover for the completed Stormwater Report.
- Applicant/Project Name
- Project Address
- Name of Firm and Registered Professional Engineer that prepared the Report
- Long-Term Pollution Prevention Plan required by Standards 4-6
- Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan required by Standard 8[2]
- Operation and Maintenance Plan required by Standard 9

In addition to all plans and supporting information, the Stormwater Report must include a brief narrative describing stormwater management practices, including environmentally sensitive site design and LID techniques, along with a diagram depicting runoff through the proposed BMP treatment train. Plans are required to show existing and proposed conditions, identify all wetland resource areas, NRCS soil types, critical areas, Land Uses with Higher Potential Pollutant Loads (LUHPPL), and any areas on the site where infiltration rate is greater than 2.4 inches per hour. The Plans shall identify the drainage areas for both existing and proposed conditions at a scale that enables verification of supporting calculations.

As noted in the Checklist, the Stormwater Management Report shall document compliance with each of the Stormwater Management Standards as provided in the Massachusetts Stormwater Handbook. The soils evaluation and calculations shall be done using the methodologies set forth in Volume 3 of the Massachusetts Stormwater Handbook.

To ensure that the Stormwater Report is complete, applicants are required to fill in the Stormwater Report Checklist by checking the box to indicate that the specified information has been included in the Stormwater Report. If any of the information specified in the checklist has not been submitted, the applicant must provide an explanation. The completed Stormwater Report Checklist and Certification must be submitted with the Stormwater Report.

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[1] The Stormwater Report may also include the Illicit Discharge Compliance Statement required by Standard 10. If not included in the Stormwater Report, the Illicit Discharge Compliance Statement must be submitted prior to the discharge of stormwater runoff to the post-construction best management practices.

[2] For some complex projects, it may not be possible to include the Construction Period Erosion and Sedimentation Control Plan in the Stormwater Report. In that event, the issuing authority has the discretion to issue an Order of Conditions that approves the project and includes a condition requiring the proponent to submit the Construction Period Erosion and Sedimentation Control Plan before commencing any land disturbance activity on the site.

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

B. Stormwater Checklist and Certification

The following checklist is intended to serve as a guide for applicants as to the elements that ordinarily need to be addressed in a complete Stormwater Report. The checklist is also intended to provide conservation commissions and other reviewing authorities with a summary of the components necessary for a comprehensive Stormwater Report that addresses the ten Stormwater Standards.

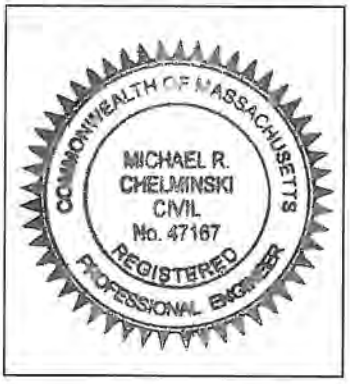
Note: Because stormwater requirements vary from project to project, it is possible that a complete Stormwater Report may not include information on some of the subjects specified in the Checklist. If it is determined that a specific item does not apply to the project under review, please note that the item is not applicable (N.A.) and provide the reasons for that determination.

A complete checklist must include the Certification set forth below signed by the Registered Professional Engineer who prepared the Stormwater Report.

Registered Professional Engineer's Certification

I have reviewed the Stormwater Report, including the soil evaluation, computations, Long-term Pollution Prevention Plan, the Construction Period Erosion and Sedimentation Control Plan (if included), the Long-term Post-Construction Operation and Maintenance Plan, the Illicit Discharge Compliance Statement (if included) and the plans showing the stormwater management system, and have determined that they have been prepared in accordance with the requirements of the Stormwater Management Standards as further elaborated by the Massachusetts Stormwater Handbook. I have also determined that the information presented in the Stormwater Checklist is accurate and that the information presented in the Stormwater Report accurately reflects conditions at the site as of the date of this permit application.

Registered Professional Engineer Block and Signature



mrc October 25, 2018
Signature and Date

Checklist

Project Type: Is the application for new development, redevelopment, or a mix of new and redevelopment?

N/A, the Project does not require stormwater management.
mrc 10/25/2018

☐ New development

☐ Redevelopment

☐ Mix of New Development and Redevelopment

Checklist for Stormwater Report

Checklist (continued)

N/A, the Project does not require LID measures. MRC 10/25/2018

LID Measures: Stormwater Standards require LID measures to be considered. Document what environmentally sensitive design and LID Techniques were considered during the planning and design of the project:

- ☐ No disturbance to any Wetland Resource Areas
- ☐ Site Design Practices (e.g. clustered development, reduced frontage setbacks)
- ☐ Reduced Impervious Area (Redevelopment Only)
- ☐ Minimizing disturbance to existing trees and shrubs
- ☐ LID Site Design Credit Requested:
  - ☐ Credit 1
  - ☐ Credit 2
  - ☐ Credit 3
- ☐ Use of "country drainage" versus curb and gutter conveyance and pipe
- ☐ Bioretention Cells (includes Rain Gardens)
- ☐ Constructed Stormwater Wetlands (includes Gravel Wetlands designs)
- ☐ Treebox Filter
- ☐ Water Quality Swale
- ☐ Grass Channel
- ☐ Green Roof
- ☐ Other (describe): _____

Standard 1: No New Untreated Discharges

- ☐ No new untreated discharges — N/A, the Project does have any new untreated discharges MRC 10/25/2018
- ☐ Outlets have been designed so there is no erosion or scour to wetlands and waters of the Commonwealth
- ☐ Supporting calculations specified in Volume 3 of the Massachusetts Stormwater Handbook included.

Checklist for Stormwater Report

Checklist (continued)

Standard 2: Peak Rate Attenuation N/A, The Project does not include any discharges. MRC 10/25/2018

☐ Standard 2 waiver requested because the project is located in land subject to coastal storm flowage and stormwater discharge is to a wetland subject to coastal flooding.

☐ Evaluation provided to determine whether off-site flooding increases during the 100-year 24-hour storm.

☐ Calculations provided to show that post-development peak discharge rates do not exceed pre-development rates for the 2-year and 10-year 24-hour storms. If evaluation shows that off-site flooding increases during the 100-year 24-hour storm, calculations are also provided to show that post-development peak discharge rates do not exceed pre-development rates for the 100-year 24-hour storm.

Standard 3: Recharge N/A, The Project does not include any discharges. OR Recharges. MRC 10/25/2018

☐ Soil Analysis provided.

☐ Required Recharge Volume calculation provided.

☐ Required Recharge volume reduced through use of the LID site Design Credits.

☐ Sizing the infiltration, BMPs is based on the following method: Check the method used.

☐ Static ☐ Simple Dynamic ☐ Dynamic Field[1]

☐ Runoff from all impervious areas at the site discharging to the infiltration BMP.

☐ Runoff from all impervious areas at the site is *not* discharging to the infiltration BMP and calculations are provided showing that the drainage area contributing runoff to the infiltration BMPs is sufficient to generate the required recharge volume.

☐ Recharge BMPs have been sized to infiltrate the Required Recharge Volume.

☐ Recharge BMPs have been sized to infiltrate the Required Recharge Volume *only* to the maximum extent practicable for the following reason:

- ☐ Site is comprised solely of C and D soils and/or bedrock at the land surface
- ☐ M.G.L. c. 21E sites pursuant to 310 CMR 40.0000
- ☐ Solid Waste Landfill pursuant to 310 CMR 19.000
- ☐ Project is otherwise subject to Stormwater Management Standards only to the maximum extent practicable.

☐ Calculations showing that the infiltration BMPs will drain in 72 hours are provided.

☐ Property includes a M.G.L. c. 21E site or a solid waste landfill and a mounding analysis is included.

[1] 80% TSS removal is required prior to discharge to infiltration BMP if Dynamic Field method is used.

Checklist for Stormwater Report

Checklist (continued)

Standard 3: Recharge (continued)

☐ The infiltration BMP is used to attenuate peak flows during storms greater than or equal to the 10-year 24-hour storm and separation to seasonal high groundwater is less than 4 feet and a mounding analysis is provided.

☐ Documentation is provided showing that infiltration BMPs do not adversely impact nearby wetland resource areas.

Standard 4: Water Quality N/A, the Project does not include any discharges. MRC 10/25/2018

The Long-Term Pollution Prevention Plan typically includes the following:

- Good housekeeping practices;
- Provisions for storing materials and waste products inside or under cover;
- Vehicle washing controls;
- Requirements for routine inspections and maintenance of stormwater BMPs;
- Spill prevention and response plans;
- Provisions for maintenance of lawns, gardens, and other landscaped areas;
- Requirements for storage and use of fertilizers, herbicides, and pesticides;
- Pet waste management provisions;
- Provisions for operation and management of septic systems;
- Provisions for solid waste management;
- Snow disposal and plowing plans relative to Wetland Resource Areas;
- Winter Road Salt and/or Sand Use and Storage restrictions;
- Street sweeping schedules;
- Provisions for prevention of illicit discharges to the stormwater management system;
- Documentation that Stormwater BMPs are designed to provide for shutdown and containment in the event of a spill or discharges to or near critical areas or from LUHPPL;
- Training for staff or personnel involved with implementing Long-Term Pollution Prevention Plan;
- List of Emergency contacts for implementing Long-Term Pollution Prevention Plan.

☐ A Long-Term Pollution Prevention Plan is attached to Stormwater Report and is included as an attachment to the Wetlands Notice of Intent.

☐ Treatment BMPs subject to the 44% TSS removal pretreatment requirement and the one inch rule for calculating the water quality volume are included, and discharge:

- ☐ is within the Zone II or Interim Wellhead Protection Area
- ☐ is near or to other critical areas
- ☐ is within soils with a rapid infiltration rate (greater than 2.4 inches per hour)
- ☐ involves runoff from land uses with higher potential pollutant loads.

☐ The Required Water Quality Volume is reduced through use of the LID site Design Credits.

☐ Calculations documenting that the treatment train meets the 80% TSS removal requirement and, if applicable, the 44% TSS removal pretreatment requirement, are provided.

Checklist for Stormwater Report

Checklist (continued)

Standard 4: Water Quality (continued)

☐ The BMP is sized (and calculations provided) based on:

- ☐ The ½" or 1" Water Quality Volume or
- ☐ The equivalent flow rate associated with the Water Quality Volume and documentation is provided showing that the BMP treats the required water quality volume.

☐ The applicant proposes to use proprietary BMPs, and documentation supporting use of proprietary BMP and proposed TSS removal rate is provided. This documentation may be in the form of the propriety BMP checklist found in Volume 2, Chapter 4 of the Massachusetts Stormwater Handbook and submitting copies of the TARP Report, STEP Report, and/or other third party studies verifying performance of the proprietary BMPs.

☐ A TMDL exists that indicates a need to reduce pollutants other than TSS and documentation showing that the BMPs selected are consistent with the TMDL is provided.

Standard 5: Land Uses With Higher Potential Pollutant Loads (LUHPPLs) N/A MRC 10/25/2018

☐ The NPDES Multi-Sector General Permit covers the land use and the Stormwater Pollution Prevention Plan (SWPPP) has been included with the Stormwater Report.

☐ The NPDES Multi-Sector General Permit covers the land use and the SWPPP will be submitted ***prior to*** the discharge of stormwater to the post-construction stormwater BMPs.

☐ The NPDES Multi-Sector General Permit does ***not*** cover the land use.

☐ LUHPPLs are located at the site and industry specific source control and pollution prevention measures have been proposed to reduce or eliminate the exposure of LUHPPLs to rain, snow, snow melt and runoff, and been included in the long term Pollution Prevention Plan.

☐ All exposure has been eliminated.

☐ All exposure has ***not*** been eliminated and all BMPs selected are on MassDEP LUHPPL list.

☐ The LUHPPL has the potential to generate runoff with moderate to higher concentrations of oil and grease (e.g. all parking lots with >1000 vehicle trips per day) and the treatment train includes an oil grit separator, a filtering bioretention area, a sand filter or equivalent.

Standard 6: Critical Areas N/A, the Project does not include any discharges. MRC 10/25/2018

☐ The discharge is near or to a critical area and the treatment train includes only BMPs that MassDEP has approved for stormwater discharges to or near that particular class of critical area.

☐ Critical areas and BMPs are identified in the Stormwater Report.

Checklist for Stormwater Report

Checklist (continued)

Standard 7: Redevelopments and Other Projects Subject to the Standards only to the maximum extent practicable

☐ The project is subject to the Stormwater Management Standards only to the maximum Extent Practicable as a: NA, the Project does not require stormwater management. MRC 10/25/2018

- ☐ Limited Project
- ☐ Small Residential Projects: 5-9 single family houses or 5-9 units in a multi-family development provided there is no discharge that may potentially affect a critical area.
- ☐ Small Residential Projects: 2-4 single family houses or 2-4 units in a multi-family development with a discharge to a critical area
- ☐ Marina and/or boatyard provided the hull painting, service and maintenance areas are protected from exposure to rain, snow, snow melt and runoff
- ☐ Bike Path and/or Foot Path
- ☐ Redevelopment Project
- ☐ Redevelopment portion of mix of new and redevelopment.

☐ Certain standards are not fully met (Standard No. 1, 8, 9, and 10 must always be fully met) and an explanation of why these standards are not met is contained in the Stormwater Report.

☐ The project involves redevelopment and a description of all measures that have been taken to improve existing conditions is provided in the Stormwater Report. The redevelopment checklist found in Volume 2 Chapter 3 of the Massachusetts Stormwater Handbook may be used to document that the proposed stormwater management system (a) complies with Standards 2, 3 and the pretreatment and structural BMP requirements of Standards 4-6 to the maximum extent practicable and (b) improves existing conditions.

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control

A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan must include the following information:

N/A Project does not result in land disturbance MRC 10/25/2018

- Narrative;
- Construction Period Operation and Maintenance Plan;
- Names of Persons or Entity Responsible for Plan Compliance;
- Construction Period Pollution Prevention Measures;
- Erosion and Sedimentation Control Plan Drawings;
- Detail drawings and specifications for erosion control BMPs, including sizing calculations;
- Vegetation Planning;
- Site Development Plan;
- Construction Sequencing Plan;
- Sequencing of Erosion and Sedimentation Controls;
- Operation and Maintenance of Erosion and Sedimentation Controls;
- Inspection Schedule;
- Maintenance Schedule;
- Inspection and Maintenance Log Form.

☐ A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan containing the information set forth above has been included in the Stormwater Report.

Checklist for Stormwater Report

Checklist (continued)

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control (continued)

☐ The project is highly complex and information is included in the Stormwater Report that explains why it is not possible to submit the Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan with the application. A Construction Period Pollution Prevention and Erosion and Sedimentation Control has ***not*** been included in the Stormwater Report but will be submitted ***before*** land disturbance begins.

☒ The project is ***not*** covered by a NPDES Construction General Permit.

☐ The project is covered by a NPDES Construction General Permit and a copy of the SWPPP is in the Stormwater Report.

☐ The project is covered by a NPDES Construction General Permit but no SWPPP been submitted. The SWPPP will be submitted BEFORE land disturbance begins.

Standard 9: Operation and Maintenance Plan N/A no new infrastructure is proposed. MRC 10/25/2018

☐ The Post Construction Operation and Maintenance Plan is included in the Stormwater Report and includes the following information:

- ☐ Name of the stormwater management system owners;
- ☐ Party responsible for operation and maintenance;
- ☐ Schedule for implementation of routine and non-routine maintenance tasks;
- ☐ Plan showing the location of all stormwater BMPs maintenance access areas;
- ☐ Description and delineation of public safety features;
- ☐ Estimated operation and maintenance budget; and
- ☐ Operation and Maintenance Log Form.

☐ The responsible party is ***not*** the owner of the parcel where the BMP is located and the Stormwater Report includes the following submissions:

- ☐ A copy of the legal instrument (deed, homeowner's association, utility trust or other legal entity) that establishes the terms of and legal responsibility for the operation and maintenance of the project site stormwater BMPs;
- ☐ A plan and easement deed that allows site access for the legal entity to operate and maintain BMP functions.

Standard 10: Prohibition of Illicit Discharges N/A, the Project does not have any illicit discharges. MRC 10/25/2018

☐ The Long-Term Pollution Prevention Plan includes measures to prevent illicit discharges;

☐ An Illicit Discharge Compliance Statement is attached;

☐ NO Illicit Discharge Compliance Statement is attached but will be submitted ***prior to*** the discharge of any stormwater to post-construction BMPs.