

The
Morin-Cameron
GROUP, INC.

July 11, 2025

Mrs. Rebecca Gendreau
MassDEP – Central Regional Office
8 New Bond Street
Worcester, MA 01606

RE: Response to Comments – MassDEP
97 & 99 Mill Road, Battery Energy Storage System – Littleton NOI
Littleton BESS LLC, c/o Citizens Energy Corporation

Dear Mrs. Gendreau:

On behalf of Littleton BESS LLC (Applicant), The Morin-Cameron Group, Inc. (MCG) has provided the following responses to Mass DEP comments issued. The comments are italicized and listed in the order they appear on the DEP data portal and the MCG response follow each comment.

Included with this submission are the following:

- Attachment labelled "97 & 99 Mill Road NOI resubmittal documents_2025.07.11"
- Attachment labelled "97 & 99 Mill Road BESS LLC_Site Redev Plan_Rev2_2025.07.11" dated April 29th, 2025 and revised to July 11th, 2025

We offer the following in response to the Mass DEP comments.

General

1. **DEP Technical Comment:** *The Applicant has provided a narrative stating that the project meets criteria for consideration as Riverfront Area (RA) redevelopment project per 310 CMR 10.58(5). The Applicant states that no new alteration is proposed, therefore, 310 CMR 10.58(5)(e) – (g) does not apply. The project includes work to redevelop previously developed areas and as stated in 310 CMR 10.58(5) all work shall conform to 310 CMR 10.58(5)(a)-(h). The Applicant should demonstrate compliance with 310 CMR 10.58(5)(a)-(h). MassDEP notes that the provisions of 310 CMR 10.58(5) only apply to areas considered degraded (lacking topsoil and vegetation, structures, impervious). MassDEP does not consider lawn or areas with topsoil and vegetation to be degraded. From review of aerial images, some areas appear to contain vegetation, and it is unclear if all areas should be considered degraded per 310 CMR 10.58(5). The Commission should evaluate the existing conditions to determine if all areas are degraded. Work proposed in areas that are not degraded may not be eligible for consideration as redevelopment per 310 CMR 10.58(5) and should be reviewed in compliance with RA performance standards found at 310 CMR 10.58(4). MassDEP notes that dirt, gravel and pavement/roofs have different curve number values which need to be taken into consideration when demonstrating compliance with the MA Stormwater Standards.*

MCG Response: All proposed work is purposefully located within areas that are previously degraded to keep the entirety of the project eligible to be treated as a redevelopment per 310 CMR 10.58(5). A figure showing the limit of work, proposed gravel access path, proposed electrical equipment area and the area of proposed restoration area are shown on the existing conditions plan and additional documentation of the degraded areas on site has been provided in attachment labelled "97 & 99 Mill Road NOI resubmittal documents_2025.07.11" to clearly show that these areas are within previously degraded areas.

2. **DEP Technical Comment:** *The Applicant should provide peak flow calculations reflecting land use conversions using the TR-55 runoff coefficients, to demonstrate compliance with St. 2 of the MA Stormwater Standards. In addition, the building/roof surfaces are increasing as shown on sheet 2 of the plans. As such, the Applicant should demonstrate compliance with St. 3 and 4 in relation to the increase.*

MCG Response: On Sheet 2 (Site Redevelopment Plan) the "Pervious & Impervious Areas (97 & 99 Mill Road)" table shows that there is a reduction of 719 SF of Building/Roof due to the 2 sheds proposed to be removed, not an increase as commented by DEP. Overall the site is decreasing impervious area on site. Additionally, the resurfacing of the existing compacted gravel surface to new pervious gravel on site will maintain existing drainage patterns and have no new impact to the Zone II. Therefore, Mass Stormwater Standards 3 & 4 are to the maximum extent practicable.

Also attached are the proposed pre and post construction HydroCAD analysis showing that within the limit of work on site the peak rates for all storms are decreasing, demonstrating compliance with MA Stormwater Standard 2. Below is a summary of the comparison of Existing and Proposed Peak Rates of Runoff for the 2, 10 and 100 year 24-hour storms based on Southern Middlesex County Rainfall Event storm data (NOAA Atlas 14).

Comparison of Existing and Proposed - Peak Rates of Runoff				
	Event (Frequency in yrs)	Existing Conditions (CFS)	Proposed Conditions (CFS)	Change in Peak (CFS/%)
DP1	2	2.27	2.08	-0.19/-8.4%
	10	3.58	3.41	-0.17 / -4.7%
	100	6.67	6.54	-0.13 / -1.9%

3. **DEP Technical Comment:** *The site is located within the Zone II Wellhead Protection Area. Zone II Wellhead Protection Areas are considered Critical Areas pursuant to the MA Stormwater Standards. The Applicant should revise the Stormwater Checklist and supporting materials to demonstrate compliance with St. 6 for Critical Areas. All updated materials shall be provided to MassDEP and to the Commission. The Commission should refrain from closing the hearing until all updated materials are received.*

MCG Response: The stormwater checklist and Site Redevelopment Plan have been revised. The resurfacing of the existing compacted gravel surface to new pervious gravel on site will maintain existing drainage patterns and have no new impact to the Zone II and meets Standard 6 to the maximum extent practicable.

If you have any questions, please do not hesitate to contact our office at (978) 777-8586.

Very Truly Yours,

THE MORIN-CAMERON GROUP, INC.



Daniel T. Sievers, P.E.
Project Engineer

cc: Littleton BESS LLC
Mass DEP