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August 29, 2023

Ms. Karen Sherman  
Town Planner  
Town of Holliston  
703 Washington Street  
Holliston, MA 01746

**Re: Stormwater Management System Design Engineering Peer Review #3  
BWC Bogastow BESS Project - Proposed Battery Energy Storage System  
CMG ID 2022-259: 600 Central Street, Holliston, MA**

Dear Karen,

CMG is in receipt of TRC's August 2023 Site Plan revisions and accompanying August 14, 2023 response letter for the "BWC Bogastow BESS Project" in Holliston, MA. The project is located on the rear portion of the 8.512 +/- Acre parcel currently occupied by the "Christ The King Lutheran Church" at 600 Central Street in Holliston, MA (the "Site").

The project Applicant, *BWC Bogastow Brook LLC c/o Bluewave Solar*, is proposing to construct and operate an approximately 5-megawatt alternating current (MWAC) Battery Energy Storage Facility within an Agricultural – Residential B zoning district and Groundwater Protection District overlay zone.

CMG is in receipt of the following documents:

- "Response to BWC Bogastow Brook, LLC BESS Stormwater Design Peer Review #2 Proposed Battery Energy Storage System – 600 Central Street, Holliston, MA" letter prepared by TRC, date August 14, 2023;
- Site Plans entitled "BWC Bogastow Brook BESS Project Proposed Battery Energy Storage System Central Street Holliston MA" prepared by TRC, date August 14, 2023.

TRC's August 2023 Site Plan and Stormwater Report revisions address the majority of CMG's July 13, 2023 peer review #2 comments.

CMG is providing the following remaining comments and recommendations for conditions of approval for the Planning Board's consideration:

12. All drain pipes should be reinforced concrete pipe (RCP) or a waiver requested for use of HDPE pipe.

*TRC Response (1/19/23): A waiver is requested for the use of HDPE pipe instead of RCP. HDPE pipe has been successfully employed at numerous other projects for similar*

*stormwater management uses and is the favorable alternative to RCP since it is light-weight and easy to install.*

**Waiver Request: Applicant is requesting a waiver to use HDPE drainage pipe for Planning Board Consideration.**

**CMG finds this waiver request acceptable; however, it is subject to final review and approval by the Holliston Planning Board.**

15. Proposed 12" and 24" diameter drain pipe outlets should include reinforced concrete flared end sections (FES) with appropriate trash rack / safety grates.

*TRC Response (1/19/23): A waiver is requested for the use of HDPE pipe instead of RCP. The existing design provides for a trash rack and grate at the outlet structures and a rodent screen at the HDPE outlet pipes.*

**CMG Comment #2:** Rip-rap apron outlet protection should be properly sized based on the 100 -year design flow and apron dimensions shown on the Site Plan.

*TRC Response (8/14/23): Calculations demonstrating that the rip-rap apron outlet protection and plunge pools are properly sized based on 100-year design flows are provided as Attachment #2. The apron schedule, plunge pool schedule, and siteplan, as provided on Sheets G1.02, C4.01, and C2.00, have been updated accordingly. The Design basis for the plunge pool sizing calculations is USDA Natural Resources Conservation Service Design Note 6 (Dated 1/1986). The table below provides a summary of the outlet stabilization parameters.*

**CMG Comment #3:** Plunge pool rip-rap size and apron length and width should be specified on the Site Plan Sheets C2.00 and C4.01 and match the calculations provided.

**CMG recommends the Planning Board consider this plan revision as a Condition of Approval**

33. The Site is > 1 Acre therefore an EPA NPDES 2022 Construction General Permit (CGP) registration and SWPPP is required to be submitted prior to construction. CMG recommends the Planning Board make this a condition of approval.

*TRC Response (1/19/23): TRC agrees with this recommendation and it is the applicant's intent to prepare a SWPPP and submit an NOI for coverage under the NPDES CGP.*

**Condition of Approval Recommendation to complete EPA NPDES 2022 CGP Registration & SWPPP prior to construction.**

**Stormwater Standard 9: Long term operation and maintenance plan**

39. A copy of the plan and easement deed allowing Site access for the legal entity (Responsible Party) to operate and maintain stormwater BMP functions must be provided. The O&M Plan identifies BWC Bogastow Brook, LLC as the Operator (i.e. Responsible Party) of the stormwater system with a separate Property Owner, Christ The King Lutheran Church.

*TRC Response (1/19/23): Bluewave will be submitting the easement deed as a separate document.*

CMG Comment #2: Comment Remains.

*TRC Response (8/14/23): Bluewave will submit the easement deed as a separate document. We request that this be made a Condition of Approval to file prior to construction.*

**CMG recommends the Planning Board consider this as a Condition of Approval**

**Stormwater Standard 10: Illicit discharges**

40. A signed Illicit Discharge Statement is not included in the submitted stormwater report.

*TRC Response (1/19/23): The Stormwater Report will be updated to include a signed Illicit Discharge Statement.*

CMG Comment #2: Comment Remains.

*TRC Response (8/14/23): Provisions for illicit discharge compliance are provided in the Stormwater Management System Long-Term Operation and Maintenance Plan (included as Attachment E of the Stormwater Report). The signed Illicit Discharge Compliance Statement will be filed with the Notice of Intent prior to the start of construction. We request that this be made a Condition of Approval to file prior to construction.*

**CMG recommends the Planning Board consider this as a Condition of Approval**

If you have any questions or need additional information, please contact me at (774) 241-0901.

Sincerely,  
CMG



David T. Faist, PE  
Principal Engineer