Project Narrative and Statement in Support for New England Power Company Application to Town of Leicester Planning Board for Site Plan Review and Stormwater Permit for Electric Switching Station Improvement Project at 408 Stafford Street, Leicester, Massachusetts

New England Power Company ("NEPCo") seeks site plan review approval from the Town of Leicester Planning Board (the "Board") in connection with its proposed construction and installation of a new 115kV electric switching station (the "Project") to be known as Stafford Street Switching Station #2236 (the "Switching Station") to be located at 408 Stafford Street in Leicester, Massachusetts.

I. Background, Existing Conditions and Need.

NEPCo owns an approximately 45-acre lot of land, which is known and numbered as 408 Stafford Street, Leicester, Massachusetts (the "Property").[1] The Property lot is surrounded by woodlands, except for Stafford Street and the residences to south and southeast, and is comprised of a 250-foot wide public utility right-of-way corridor (the "ROW") that has been in operation for public utility purposes for over 90 years, and contains related transmission and distribution lines, equipment and infrastructure. The Property lot also contains a large-scale ground-mounted solar energy system to the south of the ROW and woodlands to the north of the ROW. The Switching Station will be located entirely within the ROW and within the Business Industrial-A zoning district and no overlay districts. The Switching Station will be setback over 651 feet from Stafford Street over 497 feet from the nearest residential property. Construction and installation of the Switching Station and switching station-related equipment and facilities is necessary to increase the capacity and improve the overall reliability of electric service in the Town and surrounding communities in the region.

II. Project Scope.

The Project includes the installation and construction of the following primary components: (i) an approximately 9,100 square foot, 35-foot tall pre-fabricated building consisting of a gas insulated switchgear (GIS) equipment room and a control room; (ii) various switching station equipment and associated foundations; (iii) a new pervious-paved access driveway; (iv) an 8-foot tall perimeter fence plus 1-foot of barbed wire with a security gate; (v) underground duct banks; (vi) crushed stone throughout the Switching Station; (vii) re-grading and tree clearing; (viii) reconfiguration of existing transmission lines and supports within and outside of the new fence to loop in and out of the Switching Station, including transmission line structures outside of the new fence.

III. Applicability of Site Plan Review and Stormwater Permit.

Section 5.2.02 of the Leicester Zoning Bylaw provides that any expansion of an existing use, that results in the addition or creation of 10,000 square feet of new land area devoted to a use requires site plan review. Based on the Project scope, NEPCo seeks from the Board site plan review approval, a stormwater permit and such other relief, approvals and waivers as may be

[1] The Property is identified by Leicester assessing records as Parcel IDs 34.A3.0 and 34A1.1.0.

deemed necessary by the Board. The Building Commissioner and Town Planner have confirmed that no other zoning-related permits or approvals will be required for the Project, including, but not limited to, an earth disturbance permit.[2] All rights are reserved with respect to the applicability of the permits and approvals being sought herein.

IV. Reasons for Granting Site Plan Review Approval and Stormwater Permit.

The Board should grant the requested site plan review approval and stormwater permit for the reasons set forth below.

A. The use complies with all the provisions of the Leicester Zoning Bylaw.

The Project use complies with all provisions of the Zoning Bylaw, and is consistent with the general purpose and intent thereof. Public utility use is permitted by right in the Business Industrial-A zoning district, and such public utility use has existed at the site for over 90 years and also predates the first adoption of zoning in the Town. The Project will comply with all dimensional requirements of the Zoning Bylaw. Except for the site plan review approval and waivers requested herein, no other zoning-related permits or approvals are required for the Project.

Granting the requested site plan review approval and waivers will promote the highest and best use of the Property, and, in particular, the ROW land, which has been used for public utility purposes for decades, and the Project facilities are consistent and compatible with the character, materials and scale of structures, equipment and site features throughout the Property, including the existing transmission and distribution lines that currently run through the ROW and nearby properties and the large-scale photovoltaic system.

Consistent with the Zoning Bylaw, the Project will encourage the most appropriate use of the land and will support, enhance and promote the health, welfare, safety, economic vitality and growth of the Town and surrounding communities by providing necessary and critical electric infrastructure to ensure reliable electric service to its residents, businesses and institutions. The nature and purpose of the switching station use under the Project is directly for the public good and benefit, and the Project will generate significant real estate tax revenues for the Town. NEPCo has no reasonable alternative to accomplish this purpose in a manner more compatible with the character of the Property's existing public utility uses. Given the high voltage transmission and distribution lines, no other development could be constructed where the Switching Station is proposed.

The kind, size, height and nature of the Project improvements will have minimal impacts on, and will not be detrimental to or adversely affect, adjoining properties or the neighborhood. The location of the proposed Switching Station will be located a safe and significant distance from adjoining streets and property lines, and will not be visible from any residential properties. The Switching Station will be minor in size in relation to the overall site, will be setback from the street well beyond minimum setback requirements and partially screened by the existing

[2] Public utility use is permitted by right in the Business Industrial-A zoning district. Moreover, the public utility use within the ROW pre-dates the first adoption of zoning in the Town.

large-scale photovoltaic system, higher topography, security fencing and the existing robust woodland buffer along Stafford Street and between residences. Unlike residential, commercial and other types of developments, because that the Switching Station will be an unmanned facility there will be no increase in traffic congestion, strains on parking or undue concentrations of the population. The Project is designed so as to not overcrowd the land as the Switching Station footprint will result in a lot coverage of less than 4%.

B. <u>The use will not materially endanger or constitute a hazard to the public health and safety.</u>

The proposed Switching Station will not create a nuisance, hazard, congestion or concerns pertaining to health, safety or general welfare, including residential properties in the area. Because substantial public utility infrastructure currently exists at the Property, there will not be substantial harm to the neighborhood, including residences, or derogation from the purpose and intent of the Zoning Bylaw. The proposed Switching Station and facilities will be located a safe distance from adjoining streets and property lines.

No sensitive environmental resources will be impacted. Moreover, no hazardous wastes will be generated or disposed of on site. The Project is not located in a floodplain, aquifer protection zone or other environmentally sensitive area.

There are no notable natural terrain features or scenic views or landscapes at the Property, and the Project will not obstruct any views of same from publicly accessible locations or otherwise. The Property is not within an historic district, contains no historic or cultural features, landmarks or designations and is not listed in the Massachusetts Cultural Resource Information System (MACRIS), the Inventory of Historic Assets of the Commonwealth, the National Register of Historic Places or the State Register of Historic Places.

C. <u>The use will not create undue traffic congestion or unduly impair pedestrian safety</u>.

Because the Switching Station will be an unmanned facility and closed to the public, the Project will not result in undue concentration of population, increases in traffic volumes or negative impacts on adjacent streets and ways. Once operational, traffic generated by the Switching Station will be limited to service vehicles visiting the site to perform routine inspections and equipment maintenance, as necessary.

The Project will not result in a nuisance or hazard to vehicles or pedestrians within or off the Property. The new driveway and curb cut will allow for safe and efficient vehicular traffic flow to and from the Switching Station and the Property. The Project will not create any line of sight hazards along streets. The driveway layout will allow for safe and efficient traffic flow within the site for vehicles and pedestrians. Convenient, safe and adequate access for fire-fighting and emergency vehicles will be provided to the Switching Station. Access to and from the Property will continue to be from Stafford Street which serves as a secondary arterial roadway in Leicester, and, therefore, there will be no impacts on minor residential streets.

D. Sufficient off-street parking exists or will be provided to serve the use.

Traffic generated by the Switching Station will be limited to service vehicles performing routine inspections, testing and equipment maintenance, as necessary, and, therefore, no parking or loading spaces are required. However, there will continue to be adequate areas for parking, loading and unloading, when necessary. The Building Commissioner confirmed that because the Switching Station will be an unmanned facility, no parking or loading spaces are required.

E. The use can be adequately served by water, sewer, and other necessary utilities, or if these are unavailable, that they will be brought to the site at the owner's expense; or, the Planning Board is satisfied that the proposed alternatives will comply with all applicable regulations.

No water supply, sewer, wastewater or gas infrastructure are necessary or contemplated for the Project. The Project will not burden town services or infrastructure, including, but not limited to, water supply, sewer and wastewater systems, solid waste disposal, stormwater systems or other necessary utilities. The Project will generate minimal levels of refuse and waste at the Switching Station and will not be visible from residential properties.

F. The use will not result in a substantial increase of rate of surface water runoff to neighboring properties and streets, nor will result in pollution or degradation to surface water or groundwater.

The proposed stormwater management system has been designed in accordance with the Massachusetts Department of Environmental Protection's Stormwater Management Standards. The design, incorporates Best Management Practices (BMPs) to attenuate post-development peak discharge rates to pre-development levels for the 2-year, 10-year, and 100-year 24-hour storm events. Additionally, the design provides the requisite water quality treatment and groundwater recharge volumes and satisfies the requirements of the Town of Leicester stormwater regulations.

The BMPs proposed for this project include porous pavement, infiltration basins, and the crushed stone surfacing of the substation yard. The proposed BMPs promote the infiltration of stormwater, enhance water quality, and diminish overland flow velocities while dissipating concentrated flows. The BMPs will achieve the required infiltration and water quality volumes with minimal change in drainage characteristics and patterns from the existing to the proposed conditions. The project will not result in an increase of surface water runoff from the property to neighboring properties and streets and is not anticipated to significantly alter groundwater levels. The proposed design attempts to unalter or reduce:

- pollution of and degradation to surface water and groundwater,
- erosion and sedimentation, and
- the potential for flooding.

For details and calculations, see the submitted Stormwater Management Report.

Appropriate site erosion and sedimentation controls will be implemented and maintained during construction. The site will remain stabilized during and after the construction phase, including during excavation and grading work. Construction of the proposed Project is scheduled to begin as soon as possible and continue over an approximately 18-month to 2-year period. NEPCo intends to address construction period impacts to the extent practicable using standard construction mitigation.

G. <u>The use will not result in any undue disturbance to adjoining property owners or the Town caused by excessive or unreasonable noise, smoke, vapors, fumes, dust, glare, etc.</u>

The switching station operations will produce low levels of noise that will not be noticeable at any residential properties due to limited sound sources at the Switching Station, the significant distance of such sound sources from property lines, mitigation of existing woodland buffers, ambient noise levels (including vehicles traversing Stafford Street) and limited number of visitors to the site.

There will be no deleterious effect on neighboring properties as a result of the proposed lighting for the Project. The proposed lighting will not result in any increase in impacts with respect to light or glare that would be noticeable by any abutting properties. This outdoor lighting will be mounted at heights that are sufficient and adequate for security and safety purposes and will be installed and directed in a downwards angle towards the switching station equipment and facilities, and away from neighboring properties, and, therefore, compatible, and in harmony with, the surrounding properties. All proposed lighting will be located over 650 feet from the nearest public way, and based on the photometric plan, will comply with the Town's standards. Minimal lighting may be left on overnight for safety and to deter trespassing.

The Project use is not noxious, harmful or hazardous, will not involve the storage or generation of hazardous materials and will not result in any undue disturbance to adjoining property owners or the Town caused by excessive or unreasonable smoke, vapors, fumes or dust.