



April 07, 2016

Secretary Matthew A Beaton
Executive Office of Environmental Affairs
Leverett Saltonstall Building, Suite 900
100 Cambridge Street
Boston, MA 02114

Attn: MEPA Unit

Re: Ashland Rail Transit Apartments
Environmental Notification Form
MBTA Access Road
Ashland, MA
EEA#15459

Dear Secretary Beaton;

In two separate letters (dated March 23, 2016 and April 4, 2016) to Secretary Beaton, the Ashland Board of Selectmen expressed concern that blasting necessary to construct the Ashland RTD Apartments might adversely impact the stability of the existing Nyanza landfill, a landfill created to permanently be the repository for environmentally hazardous material collected as part of an EPA environmental cleanup of contaminants stemming from the Nyanza and predecessor company chemical operations from 1917 to 1978.

Firstly, we want to assure the Secretary that Campanelli Acquisitions (The Project Proponent) and their partner Thorndike Development fully understand the history of the Nyanza site and share the Town's concerns that the project cannot negatively impact the Nyanza site.

In response to the specific concerns raised by Ashland town officials and the general public, the Proponent will agree to the following Blast Protocol.

1. A comprehensive Draft Blast Plan will be developed and submitted for approval to the Ashland Fire Chief as specified by state statute. In addition this plan shall be forwarded to Mass DEP, the EPA agent in charge of the Nyanza Landfill, and the Ashland Board of Selectmen and comments shall be encouraged.
2. Based on comments a final plan will be submitted for approval to the Ashland Fire Chief.
3. While all of the nearest homes and the Nyanza landfill fall well outside of the proscribed 250 foot area within which a pre-blast survey is mandated, the proponent has agreed to perform a pre-blast survey in homes that abut the RTD district nearest to the planned blasting pursuant to the attached Exhibit 1. Also shown on Exhibit 1 are abutting homes on High Street which will be included in the pre-blast survey.
4. The Proponent has also agreed, at the request of the Selectmen, to install seismographs between the blast area and the Nyanza Landfill and near the adjacent homes as shown on Exhibit 2. These seismographs will be used to insure that vibrations from the blast are consistent with projected allowable vibrations as they will be specified in the approved Blasting Plan.

5. In addition to a representative from the Ashland Fire Department being on-site when blasts occur, Mass DEP has volunteered to have a representative present to monitor the integrity of the landfill. To facilitate this presence the proponent commits to including DEP in its pre-blast conference and notifying them at least 24 hours before scheduled blasts.
6. Prior to any blasting a Baseline Monitoring Program will be implemented to document the existing vibration levels near the Nyanza Landfill.
7. Test blasts will be conducted and seismographic information analyzed at the outset of the program to insure that the blasts are generating acceptable levels of vibration as approved in the blast report.
8. All test information will be shared with DEP, EPA, and the Ashland Fire Department on a weekly basis.

The Board of Selectmen, in their letters to Secretary Beaton, also expressed concern over the potential impacts runoff from the development may have on an existing stormwater culvert that runs under a portion of downtown Ashland and has flooded in the past. Specifically, the Selectmen commented in their letters the following:

“...Mr. Tom Houston, the Town's peer-reviewer determined the single 150 year old culvert is already considered inadequate from a volumetric standpoint and its adequacy from a structural standpoint is circumspect. Even in its current state, the town has experienced flooding during significant rain events. So while we can certainly understand that the proposed development has not *caused* the inadequacy with the culvert there can be no dispute that the development - even after significant mitigation measures - *exacerbates* that inadequacy. The Town is initiating and funding a study to determine the adequacy for both this and future development. “

In response to the concerns raised by Board of Selectmen, the Conservation Commission, residents of Ashland, the Planning Board that issued its approval of the project and Mr. Houston, the Proponent agreed to redesign its stormwater management basin during the permitting process. The redesign reduced the 100 year flow rate by 30% by increasing the total pond volume by 25%. In addition, at the request of the Planning Board, the proponent has agreed to pay to the Town \$111,400 to be used by the Town to fund a comprehensive study of the existing culvert under downtown to determine its adequacy and a plan of action for upgrading the culvert system as necessary. As acknowledged by the Town, this study has been talked about for at least the past fifteen years but lack of funding has thwarted efforts to proceed. This project will enable this study to go forward as the first step towards addressing this pre-existing condition.

In addition, the Selectmen have asked that sufficient insurance be presented prior to work. The Proponent will meet all state mandated insurance requirements in connection with its blasting.

Finally, the Selectmen have asked that as the site is fairly isolated with one road currently in and out, it is important that an evacuation plan be developed and documented prior to work commencing. During blasting, there will be very limited personnel present on site. As we have already stated a representative from the fire department will be present during blasts. We will request that the fire department representative have a key to a gate that closes the emergency access from the MBTA parking lot to the north of the site. In this way, in case of emergency, there will be two means of egress – south along the MBTA access road back to Route 135, and north through the MBTA parking lot and via the gated emergency access road to High street.

If you should have any questions or require additional information, please feel free to call

Sincerely,

KELLY ENGINEERING GROUP, INC.

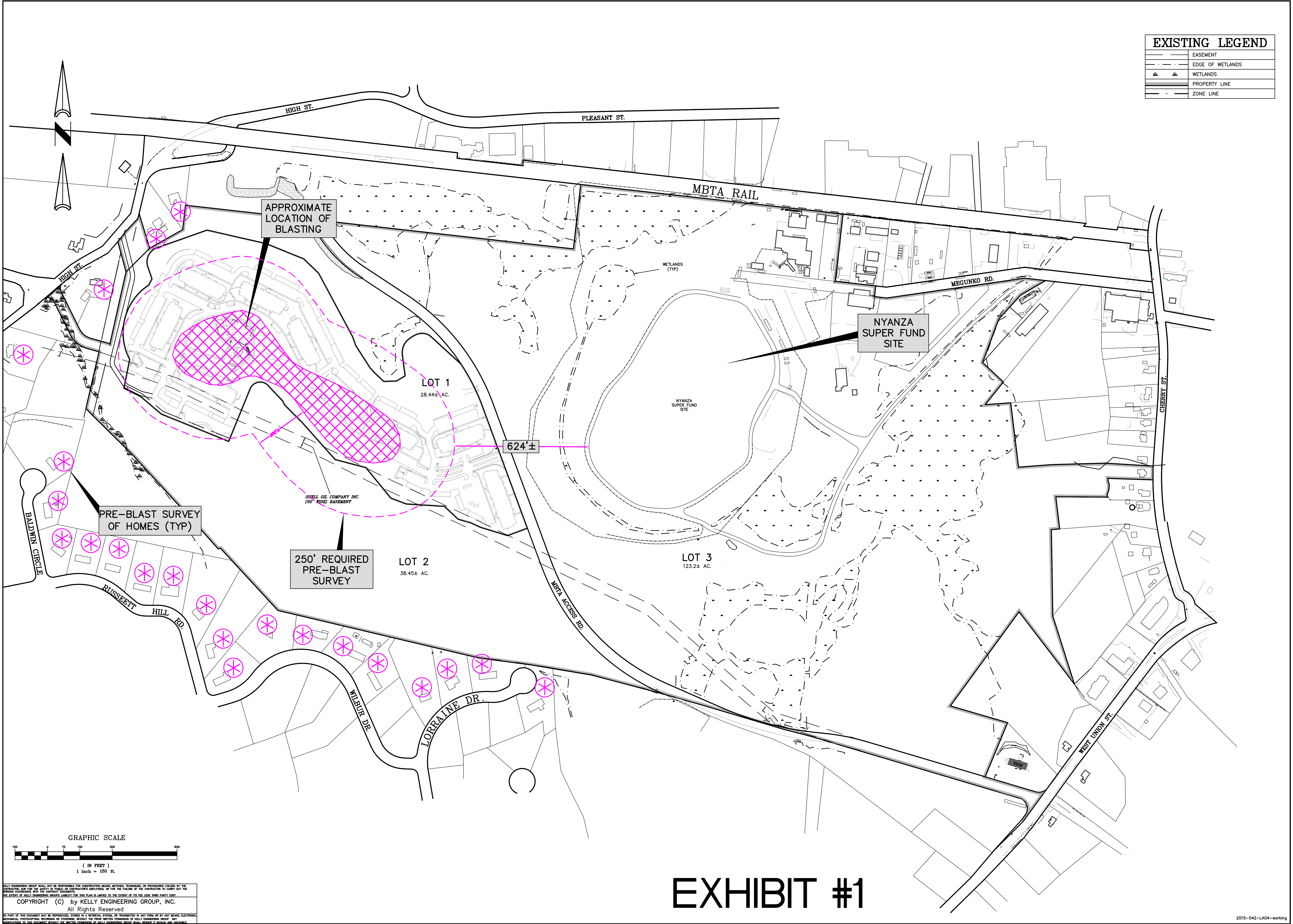


David N. Kelly, P.E.
President

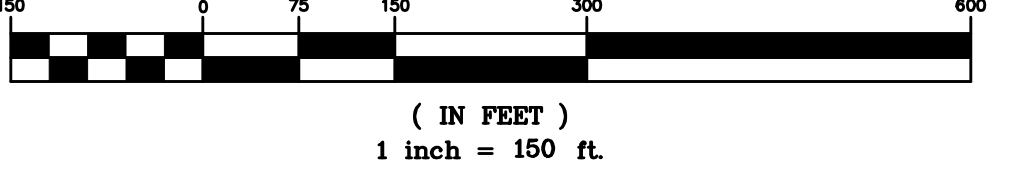
cc: Daniel DeMarco, Campanelli Companies
Katharine Bachman, Wilmer Hale

EXISTING LEGEND

	EASEMENT
	EDGE OF WETLANDS
	WETLANDS
	PROPERTY LINE
	ZONE LINE



GRAPHIC SCALE

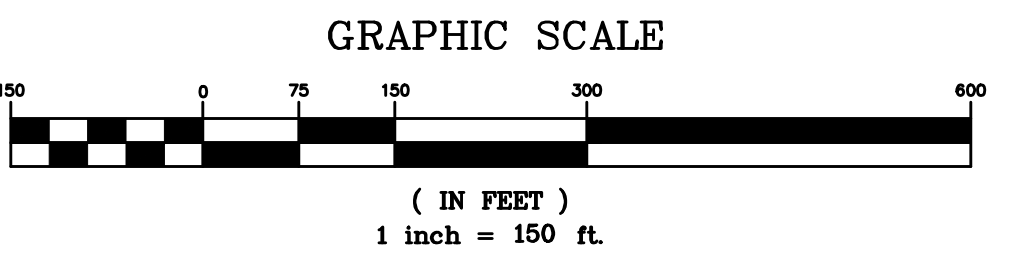
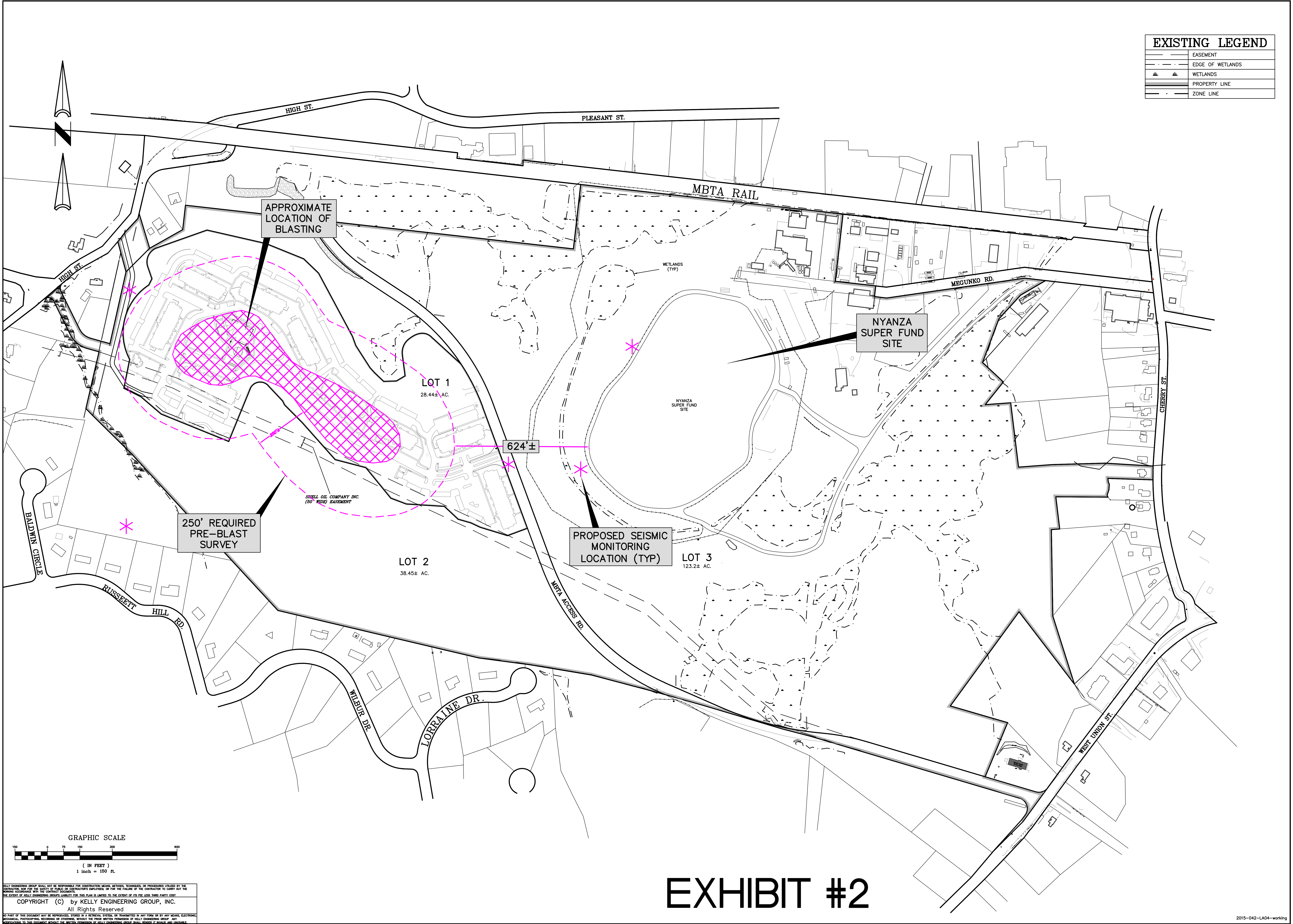


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EXHIBIT #1

EXISTING LEGEND

	EASEMENT
	EDGE OF WETLANDS
	WETLANDS
	PROPERTY LINE
	ZONE LINE



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EXHIBIT #2