

Minor Buffer Zone Activity Application:
National Grid Elm Street Pole
Installation

Franklin, Massachusetts

FEBRUARY 2026

PREPARED FOR
National Grid

PREPARED BY
SWCA Environmental Consultants

**MINOR BUFFER ZONE ACTIVITY APPLICATION: NATIONAL
GRID ELM STREET POLE INSTALLATION**

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CONTENTS

| | | |
|----------|--|----------|
| 1 | Introduction | 1 |
| 2 | Existing Conditions | 1 |
| 2.1 | Regulated Resource Areas..... | 1 |
| 2.1.1 | Freshwater Vegetated Wetlands | 2 |
| 2.1.2 | Inland Bank..... | 2 |
| 2.1.3 | 100-foot Buffer Zone | 2 |
| 2.1.4 | Locally Regulated Buffer Zone | 2 |
| 2.2 | Other Environmental Constraints | 3 |
| 2.2.1 | Priority and Estimated Habitats of Rare Species | 3 |
| 2.2.2 | Vernal Pools..... | 3 |
| 2.2.3 | Outstanding Resource Areas..... | 3 |
| 2.2.4 | Areas of Critical Environmental Concern..... | 3 |
| 3 | Proposed Work..... | 4 |
| 3.1 | Project Description..... | 4 |
| 3.2 | Erosion and Sediment Control and Best Management Practices | 4 |
| 4 | Performance standards..... | 5 |
| 4.1 | MBZA Performance Standards | 5 |
| 5 | Summary | 6 |
| 6 | References Cited/Literature Cited..... | 6 |

Appendices

- Appendix A. Minor Buffer Zone Activity Application
- Appendix B. Figures
- Appendix C. Site Photographs

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1 INTRODUCTION

On behalf of National Grid, SWCA Environmental Consultants (SWCA) has prepared this Minor Buffer Zone Activity (MBZA) application for the Elm Street Pole Installation project in Franklin, Massachusetts (The Project). A completed “MBZA Application Form” is included in Appendix A. Figure 1 (see Appendix B) depicts the extent of the Project on an U.S. Geological Survey (USGS) topographic map.

The Project consists of installing a new mid-span pole, Pole P2-50, recloser bypass switch, and communication unit between Poles P2 and P3 within the shoulder of the existing right-of-way (ROW) of Elm Street. The Project will have temporary impacts to areas subject to protection, as regulated under the Massachusetts Wetlands Protection Act (WPA) M.G.L. c. 131 § 40 and the Town of Franklin Wetlands Protection Bylaw Chapters 181 and 271 (Bylaw).

The Project is proposed within the 100-foot Buffer Zone of Bordering Vegetated Wetlands (BVW) and Inland Bank. Additionally, the Project is located within the Franklin 25-foot No Disturb Zone. The proposed work does not alter or fill any of the adjacent wetlands as the Project activities within the Buffer Zones are located entirely within the existing maintained shoulders of the Elm Street ROW. All temporarily disturbed areas will be restored to their pre-construction conditions following construction, and appropriate best management practices will be implemented to avoid impacts to resource areas throughout construction.

This MBZA application has been developed in accordance with the WPA and its implementing regulations (310 CMR 10.00 *et seq.*) and the Town of Franklin Bylaw. National Grid is requesting approval of this Minor Buffer Zone Activity Application given that the Project, as described in this application, meets the requirements for the WPA exemption under 310 CMR 10.02(2)(b)(2)(h), and will not alter resource areas.

Two hard copies of this MBZA application and associated documents have been submitted to the Franklin Town Hall and Conservation Commission (Commission).

2 EXISTING CONDITIONS

The proposed pole installation activities are located within the existing roadway shoulder within a residential part of Elm Street (Figure 2 in Appendix B). The Elm Street ROW is approximately 26 feet wide and consists of two paved travel lanes and pervious shoulders with a mix of narrow grass. One wetland and one channelized stream feature exist within the Project site and are further described in Section 2.1. Representative photographs of the Site and vegetative communities are included in Appendix C.

According to the Web Soil Survey (Natural Resources Conservation Service [NRCS] 2023), the Project site is within two different soil types: Charlton-Hollis-Rock outcrop complex and Ridgebury fine sandy loam. According to the Federal Emergency Management Agency (FEMA) Floodplain Insurance Rate Maps (FIRMs) (Map No. 25021C0144F) (FEMA 2025), the Site is within an area of minimal flood hazard (Zone X). FEMA Floodplain Maps are included in Appendix B.

2.1 Regulated Resource Areas

Prior to completing the field delineation, SWCA conducted a desktop analysis using Massachusetts Geographic Information System (MassGIS) data layers, including, but not limited to: MassDEP mapped wetlands and hydrologic connections, potential and certified vernal pools, Natural Heritage and Endangered Species Program (NHESP) Priority and Estimated Habitats for Rare Species, and Outstanding Resource

Waters (ORW). In addition, SWCA reviewed Natural Resource Conservation Service (NRCS) soils, United States Geological Survey (USGS) StreamStats, aerial imagery, FEMA FIRMs, USGS topographic quadrangles, and other publicly available data. SWCA performed a delineation using a multiple parameter method approach following the WPA and its implementing regulations, the methodology described in *Massachusetts Handbook for Delineation of Bordering Vegetated Wetlands* (MassDEP 2022), and the Corps of Engineers *Wetland Delineation Manual* (Environmental Laboratory 1987) and its supplement, *the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region, Version 2.0* (U.S. Army Corps of Engineers [USACE] 2011).

SWCA completed a site visit and delineation on December 17, 2025. One bordering vegetated wetland and one channelized intermittent stream were delineated and documented. The Environmental Resources Map in Appendix B depicts the locations of regulated resource areas within and in proximity to the Site on an aerial photograph. Representative photographs are included in Appendix C. The following sections describe the regulated resource areas and associated buffer zones.

2.1.1 Freshwater Vegetated Wetlands

One BVW, labeled as FR-W1 (Wetland 1) is located both to the north and south of Elm Street, connected through a 12-inch corrugated metal pipe. This wetland is a mosaic mix of palustrine forested wetland (PFO) extending northwards and palustrine emergent wetland (PEM) extending southwards. Wetland 1 is bound by residential properties to the east and west. Dominant wetland vegetation consists of Joe Pye weed (*Eutrochium maculatum*), giant golden rod (*Solidago gigantea*), sensitive fern (*Onoclea sensibilis*), creeping jenny (*Lysimachia nummularia*), and fringed willowherb (*Epilobium ciliatum*). Primary and secondary indicators of hydrology observed include saturation, surface water, a high-water table, drainage patterns, geomorphic position, and microtopographic relief. Soil consisted of silt loam exhibiting a redox dark surface. This wetland was delineated from flag FR-W1-100 to 112 to the north of Elm Street and FR-W1-100 to 109 to the south of Elm Street. Stream FR-S1 (Stream 1), flows southwest through the wetland channelizing into the culvert crossing. No work is proposed within the wetland.

2.1.2 Inland Bank

One intermittent stream feature, labeled FR-S1 (Stream 1) was identified within Wetland 1. The stream is between approximately 1 to 2-feet wide and approximately 3-inches deep flowing south under Elm Street at the time of the delineation. Stream 1 begins within Wetland 1 where it channelizes as it flows towards a 12-inch corrugated metal culvert, under Elm Street. To the south, the stream diffuses into Wetland 1 where it eventually channelized further off Site to the south. No work is proposed within the stream.

2.1.3 100-foot Buffer Zone

Both the WPA and the Franklin Bylaw include a 100-foot Buffer Zone associated with BVW and Inland Bank. The entire Project site is located within the 100-foot Buffer Zone to BVW and Inland Bank. It consists of upland immature forest surrounding Wetland 1 and Stream 1, residential properties, and the existing paved ROW of Elm Street and its associated shoulders. All activities within the buffer zone will occur within the existing maintained roadway shoulders within the Elm Street ROW.

2.1.4 Locally Regulated Buffer Zone

The Franklin Bylaw includes three locally regulated buffer zones: the 25-foot No Disturbance Buffer Zone, the 25–50-foot Buffer Zone, and the 50–100-foot Buffer Zone.

The 25-foot No Disturbance Buffer Zone to resources shall begin at the resource boundary and extend 25 feet horizontally from this edge. No work or disturbance, including grading activities and vegetation removal, shall take place within this buffer zone. Work within the 25-foot Buffer Zone will consist of the installation of the new mid-span pole. No grading activities or vegetation removal are proposed within this buffer zone.

The 25–50-foot Buffer Zone to resources shall begin 25-feet from the resource boundary and extend to 50-feet horizontally from the resource edge. No impervious structures, including but not limited to concrete and stone foundations or slabs, that would significantly increase runoff are permitted within this buffer zone. Alteration with this buffer zone is limited to grading, tree clearing, stormwater management system components, lawns, gardens, and other low impact uses. No work is proposed within the 25–50-foot Buffer Zone.

The 50–100-foot Buffer Zone to resources shall begin 50-feet from the resource boundary and extend to 100-feet horizontally from the resource edge. Alterations including structures are allowed within this buffer zone. No work is proposed within the 50-100-foot Buffer Zone.

2.2 Other Environmental Constraints

2.2.1 Priority and Estimated Habitats of Rare Species

SWCA reviewed available MassGIS NHESP datasets to determine if the Project is located within or near areas designated as Priority Habitats of Rare Species (MassGIS 2021a) or Estimated Habitats of Rare Wildlife (MassGIS 2021b). The NHESP mapping shows there are no mapped habitats in or near the Project area.

2.2.2 Vernal Pools

SWCA reviewed MassGIS data layers to determine if the Project is located within or near Certified or Potential Vernal Pools. MassGIS (2025 and 2013) does not identify any vernal pools in or near the Project area.

2.2.3 Outstanding Resource Areas

SWCA reviewed MassGIS data layers to determine if the Project is located within any Outstanding Resource Waters (ORWs) (MassGIS 2010). ORWs are watershed areas that have been classified as an outstanding resource under the Massachusetts Surface Water Quality Standards as determined by their important socioeconomic, recreational, ecological, and/or aesthetic values. ORWs are identified so that they may be protected and maintained. There are no ORWs in or near the Project area.

2.2.4 Areas of Critical Environmental Concern

SWCA reviewed MassGIS data layers to determine if the Project is located within any Areas of Critical Environmental Concern (ACEC) (MassGIS 2009). An ACEC is a designated area in Massachusetts that receives special recognition because of the quality, uniqueness, and significance of its natural and/or cultural resources. ACECs are identified so that they may be protected and maintained. SWCA determined that there are no ACECs in or near the Project area.

3 PROPOSED WORK

3.1 Project Description

National Grid is responsible for delivering safe and reliable energy through its transmission and distribution of utilities. A mid-span pole is crucial for supporting overhead cables to prevent sagging of the existing line and ensure safety of the residential community.

The new pole installation will consist of the installation of the following:

- Mid-span pole P2-50;
- Recloser bypass switch; and
- Communication unit.

The proposed work will be along the northern roadway shoulder of Elm Street west of the 5 Elm Street property between existing poles P2 and P3. A new mid-span pole will be installed approximately 95 feet equidistant between the two existing poles. Installed on the proposed pole will be a recloser bypass switch and communication unit. The recloser bypass switch is a device used to be able to bypass and isolate circuit reclosers for repairs and maintenance. The communication unit is used to ensure that the available supply of electricity is equal to the demand. This helps ensure the reliability and safety of the electrical grid.

The Project does not propose any fill or discharges into wetlands or other regulated resource areas. The entirety of the Project is proposed within the locally regulated 0-25-foot No Disturb Zone to BVW. There is approximately 7 square feet of permanent impacts to the Buffer Zone consisting of the installed mid-span pole. Vegetation removal, including potential tree clearing, large shrub removal, or extensive trimming, will not be required for this project; however, minor tree trimming of extended limbs will be required as part of line maintenance. All temporarily disturbed areas will be restored to their pre-construction conditions following construction.

The proposed work within the Buffer Zone is not subject to the Massachusetts Stormwater Standards as no changes in topography or impervious surface area from existing conditions will result from the Project. More specifically, the Project will not result in an increase in volume or velocity of stormwater flows and will not result in an increase in any grade changes.

3.2 Erosion and Sediment Control and Best Management Practices

Sedimentation barriers consisting of straw wattles are proposed for installation between aquatic resource areas (i.e., wetlands and stormwater feature) and the Project. The Franklin Policy under the Best Development Practices Guidebook only allows the use of straw wattles and filter mitts as erosion control barriers, haybales and filter fabric are not allowed under any circumstances. All work will be conducted in conformance with National Grid's environmental guidance manual, EG-303NE, which describes minimum standard operating procedures and best management practices (BMPs) to minimize impacts to sensitive environmental resources during electric line construction and maintenance activities. These BMPs include various mitigative measures that can be implemented on an as-needed basis according to various site conditions and construction methods. A copy of the EG-303NE manual is available upon request. The Environmental Resources Map in Appendix B depicts the locations of the sediment controls.

The sediment controls will be placed along the Site adjacent to construction areas to limit disturbance and prevent sediment from entering the resource areas during construction. All erosion control barriers will be installed prior to any site work and shall remain in place until all surfaces are stable, and any disturbed soils are sufficiently vegetated. Construction debris and sediment will be kept on-site and will not be permitted to migrate beyond the project boundaries. On-site controls will be inspected, and any necessary maintenance and/or repairs will be promptly completed. There are no storm water catch basins along the Site boundary.

The proposed Project does not require a Stormwater Pollution Prevention Plan (SWPPP) under the NPDES Construction General Permit, as the Project does not exceed one acre of ground disturbance.

4 PERFORMANCE STANDARDS

4.1 MBZA Performance Standards

The Town of Franklin Wetlands Protection Bylaw Regulations outlines specific performance standards for a project to meet the requirements of a Minor Buffer Zone Activity. The Commission shall presume that activity proposed to occur:

- (1) *Exclusively within a previously disturbed or clearly delineated buffer zone;*

All proposed work will occur within the existing roadway layout of Elm Street along the north roadway shoulder.

- (2) *The alternation is less than 1,000 square feet or 5% of the buffer zone on the lot, whichever is less;*

Proposed alteration from this Project is less than 1,000 square feet. Total proposed alteration for the project is approximately 7 square feet.

- (3) *At a minimum, a 25-foot-wide area is preserved between the activity and the resource area boundary;*

All proposed work is to occur within the existing, maintained Elm Street ROW. While the proposed pole location exists within the 25-foot No Disturbance Zone, it is sited within an area that has been previously disturbed by roadway construction, roadway maintenance, and culvert maintenance activities. The roadway shoulder, in its current condition, consists of a mix of disturbed soils and gravel which support the roadbed.

- (4) *The buffer zone does not contain estimated wildlife habitat which is indicated on the most recent Estimated Habitat Map or State listed Rare Wetlands Wildlife;*

The most recent NHESP mapping shows there are no mapped estimated wildlife habitats in or near the Project area.

- (5) *Erosion and sedimentation controls, if required, are provided at the limit of work to protect the resource areas;*

Erosion and sediment controls consisting of straw wattles are proposed for installation between aquatic resource areas and the work area. Erosion controls shall act as the limit of disturbance for this Project.

(6) *Shall constitute activities within the buffer zone that would be eligible for a negative Determination of Applicability with conditions.*

All proposed activities outlined within this MBZA Application are activities which would be eligible for a negative Determination of Applicability from the Town of Franklin Conservation Commission.

5 SUMMARY

All activities will be performed in such a manner to reduce the potential for any adverse impacts to the resource areas during construction, and with post-construction measures implemented to stabilize any disturbed areas. All work located within the WPA and Franklin Bylaw locally regulated Buffer Zones shall occur within the existing roadway shoulder ROW. The Applicant is therefore seeking approval of this Minor Buffer Zone Activity Application from the Town of Franklin Conservation Commission for this Project.

6 REFERENCES CITED/LITERATURE CITED

Federal Emergency Management Agency (FEMA). 2025. Flood Insurance Rate Map (FIRM), Norfolk County, Massachusetts, Map No. 25021C0144F.

Massachusetts Department of Environmental Protection (MassDEP). 2022. Massachusetts Handbook for Delineation of Bordering Vegetated Wetlands, Second Edition, September 2022.

MassDEP. 2006. Massachusetts Wildlife Habitat Protection Guidance for Inland Wetlands. MassDEP, Bureau of Resource Protection, Wetlands and Waterways Program, Boston, MA. 19 pp.

Massachusetts Geographic Information System (MassGIS). 2009. Areas of Critical Environmental Concern. Available at <https://www.mass.gov/info-details/massgis-data-areas-of-critical-environmental-concern>. Accessed January 2026.

MassGIS. 2010. Outstanding Resource Waters. Available at: <https://www.mass.gov/info-details/massgis-data-outstanding-resource-waters>. Accessed January 2026.

MassGIS 2013. NHESP Potential Vernal Pools. Available online at <https://www.mass.gov/info-details/massgis-data-nhosp-potential-vernal-pools> . Accessed January 2026.

MassGIS. 2021a. NHESP Priority Habitats of Rare Wildlife. Available online at <https://docs.digital.mass.gov/dataset/massgis-data-nhosp-priority-habitats-rare-species>. Accessed January 2026.

MassGIS. 2021b. NHESP Estimated Habitats of Rare Wildlife. Available online at <https://www.mass.gov/info-details/massgis-data-nhosp-estimated-habitats-of-rare-wildlife>. Accessed January 2026.

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Natural Resources Conservation Services. 2023. Web Soil Survey. Available online at <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>. Accessed January 2026.

U.S. Army Corps of Engineers. 2011. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region (Version 2.0), ed. J. S. Wakeley, R. W. Lichvar, C. V. Noble, and J. F. Berkowitz. ERDC/EL TR-12. Vicksburg, MS: U.S. Army Engineer Research and Development Center.

APPENDIX A
MBZA Application

TOWN OF FRANKLIN CONSERVATION COMMISSION

MINOR BUFFER ZONE ACTIVITY APPLICATION AS PER FRANKLIN BY-LAW CHAPTER 181

In order to be considered complete, all information, requirements and conditions must be completed and the \$50.00 filing fee submitted with the application.

Applicant: (Please Print the following information)

National Grid - Matthew Todd

Applicant's Name

170 Data Drive

Mailing Address

Waltham

MA

02451

City/Town

State

Zip Code

207-317-3731 matthew.todd@nationalgrid.com

Telephone Number and e-mail address of primary contact for this application.

Property & Plan Information:

N/A Public Roadway

Land Owner's Name (If Different from Applicant)

Elm Street, Franklin, MA

Project Location (Street Address)

Assessor's Map & Parcel Number

Environmental Resources Map, 2/2/2026

Plan Name and date

All plans and information submitted for an MBZA must contain information to adequately depict the following: (NOTE: 2 hard copies of all material must be submitted to the Town Hall and an electronic copy of the entire application to the Conservation Agent's email.)

1. Plans:

- 1.1. Existing conditions of the property showing all existing structures;
- 1.2. Area of proposed work including total area of disturbance and whether the disturbances are permanent or temporary;
- 1.3. Location of all wetlands and buffer zones, including the 25', 50' and 100' buffers;
- 1.4. Location, type and size of any vegetation being removed and any vegetation to be planted as a mitigation measure;
- 1.5. Existing slopes and direction of drainage; and
- 1.6. Location of any required erosion control.

2. Narrative:

- 2.1. Detailed description of the activity to take place; and
- 2.2. Detailed description of how and when the work will be performed.

3. Other:

- 3.1. A photograph of the area where the activity is to take place.
- 3.2. A filing fee of \$50.00.

Authorization:

I hereby request that the Franklin Conservation Commission review this Application for a Minor Buffer Zone Activity. I (we) affirm that the project will comply with all criteria as stated in Section 14 of the Franklin Wetlands Protection Regulations as well as all information submitted. I (we) also grant authority to the Franklin Conservation Commission members and agent to go onto my (our) property solely for purposes directly related to the inspection and approval of this application

Matthew Todd

2/3/2026

Property owner's Signature

Date

2. PERFORMANCE STANDARDS

2.1. These are the requirements for a Minor Buffer Zone Activity (MBZA)

2.1.1. The Conservation Commission (The Commission) shall presume that activity proposed to occur:

- Exclusively within a previously disturbed or clearly delineated buffer zone; and
- The alteration is less than 1,000 Square Feet or 5% of the buffer zone on the lot, whichever is less; and
- At a minimum, a 25 foot wide area is preserved between the activity and the resource area boundary; and
- The buffer zone does not contain estimated wildlife habitat which is indicated on the most recent Estimated Habitat Map of State listed Rare Wetlands Wildlife; and
- Erosion and sedimentation controls, if required, are provided at the limit of work to protect the resource areas, and
- Shall constitute activities within the buffer zone that would be eligible for a Negative Determination of Applicability with conditions.

2.2. The Commission may determine that this presumption should not apply based on unusual circumstances such as steep slopes, the potential for negative impacts over time or because the proposed project would require oversight through continuing conditions. The Commission may waive any or all of the above requirements if they find that there is an emergency situation. In order for the site to be declared an emergency, a vote of the Commission shall be required.

2.3. In order for a property owner to apply for an MBZA they must meet all of the above requirements and provide a plan of the activity, a detailed project narrative and photographs of the project area. The distance between the proposed project and the wetlands must be noted on the plan and may require delineation if requested by the Commission or Agent. Additional items detailed on the MBZA form or requested by the Commission, or its Agent, may be required. The applicant is required to prove by a preponderance of the evidence that their proposed MBZA will not result in a negative impact to the wetlands.

2.4. The minor nature of these projects will not require the Commission to hold an advertised public hearing on the matter. The Agent shall review the application and may perform a site visit to confirm information provided in the plan, project narrative and photographs. The Agent may request additional information if s/he deems necessary. Upon review of the MBZA application, the commission may issue an approval, with or without conditions, a denial, or require the applicant to provide further information. If the commission issues a denial, the applicant shall be required to file a Notice of Intent if they wish to pursue the activity.

2.5. The work must conform to the plans submitted in the Minor Buffer Zone Activity application and all applicable conditions or modifications imposed by the Commission in the approval. If the applicant fails to perform the work according to the approved plan or in conformance with the applicable conditions of the approval, the permit will be revoked. Failure to conform to the plans and specifications shall constitute grounds for requiring a Notice of Intent and/or an Enforcement Action, including fines, by the Commission.

2.6. Upon completion of the project the applicant shall notify the Agent. The Agent shall inspect the work for and inform the Commission of the results.

2.7 Minor activities within Riverfront Zone, the 100' buffer zone, but not within the 25' "no touch" zone, and not within 25' of a perennial stream, may be authorized by the Conservation Agent under the following conditions:

2.7.1. The proposed activity will not run counter to the interests of the Wetlands Protection Act;

2.7.2. The proposed activity shall collectively not encompass more than 150 ft² of land area;

2.7.3. The proposed activity shall be only those activities permitted under 310 CMR 10.02 (2) (b) as well as the removal of vegetative debris and trees;

2.7.4. These activities shall be outlined on a MBZA application providing all required information and accompanied by the required filing fee;

2.7.5. All decisions of the Conservation Agent may be appealed to the Conservation Commission following the procedures outlined in section 8 of these regulations;

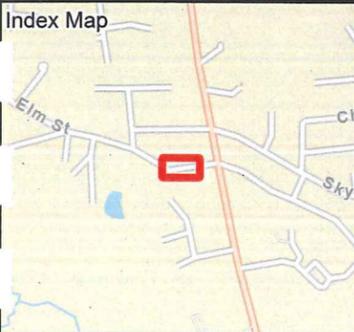
2.7.6. The agent shall prepare and submit a report, at least monthly, to the Commission on all permits approved under this section.

APPENDIX B

Figures



Resource Areas Reviewed:
 Areas of Critical Environmental Concern; Census 2000 Streams; Ch. 91 Tidelands Jurisdiction;
 Environmental Justice Populations & Language Overlay; FEMA 100yr Floodplain; Hiking Trails;
 Interim Wetland Protection Area; Landfills (NotCapped, [Un]Lined, [In]Active, Closed);
 MADEP Hydrologic Connections; MADEP Oil and/or Hazardous Material Sites with Activity and
 Use Limitations; MADEP Tier Classified Oil and/or Hazardous Material Sites (21E); MADEP
 Wetlands; MADFW Coldwater Fisheries Resources; MHC Inventory; NHD Hydrography;
 NHESP Certified & Potential Vernal Pools; NHESP Priority & Estimated Habitats; NRCS Hydric
 Soils; Open Space Article 97 Land; Outstanding Resource Water; Public Water Supply;
 Surface Water Protection Zone; USGS Wild & Scenic Rivers; Watershed Protection Act Zones;
 Wetland PA Affected Parcels; Zone II Wetland Protection Area; World Street Map; Sources: Esri,



- | | | |
|--------------------------------|----------------------------------|----------------------------|
| ⊗ Culvert | — 25-foot No Disturb Zone | — Erosion Controls |
| ● Existing Structure | — 50-foot Buffer Zone | — Road |
| ● Proposed Structure (approx.) | — 100-foot Buffer Zone | ■ Delineated Wetland Area* |
| ● Stream Flag | — Delineated Intermittent Stream | ■ Permanent Impacts |
| ● Wetland Flag | — Delineated Wetland Boundary | |

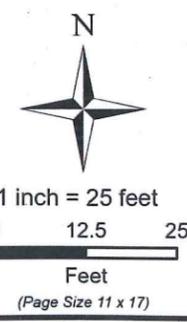
*Indicates Layers Set to Transparency

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nationalgrid

**ELM STREET POLE
 INSTALLATION**
 Environmental Resources Map

Franklin, MA
 Page 1 of 1

Created by:



APPENDIX C
Site Photographs



Figure C-1. View of Wetland FR-W2. Proposed work to occur east of W2. Facing north.



Figure C-2. A close-up view of Wetland W2. Facing north.



Figure C-5. View of Stream FR-S1 culvert inlet. *Facing south.*



Figure C-6. View of Elm Street northern roadway shoulder west of Stream FR-S1. *Facing west.*



Figure C-3. View of Elm Street roadway shoulder where work is proposed to occur. Facing east.



Figure C-4. View of Stream FR-S1 within Wetland FR-W2. Facing northeast.



Figure C-9. View of Stream FR-S1 outlet flowing into Wetland FR-W1. Facing northwest.



Figure C-10. View of Wetland FR-W1. Facing south.



Figure C-7. View along Elm Street northern shoulder east of Stream FR-S1, where work is proposed. *Facing east.*



Figure C-8. View of Wetland FR-W1 from the roadway shoulder. *Facing south.*