



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WESTERN REGIONAL OFFICE
436 DWIGHT STREET, SPRINGFIELD, MA 01103 413-784-1100

MAURA T. HEALEY
Governor

KIMBERLEY DRISCOLL
Lieutenant Governor

REBECCA L. TEPPER
Secretary

BONNIE HEIPLE
Commissioner

DATE: September 2, 2026

Municipality MONTAGUE
(city/town)

RE: NOTIFICATION OF WETLANDS PROTECTION ACT FILE NUMBER

The Department of Environmental Protection has received a Notice of Intent filed in accordance with the Wetlands Protection Act (M.G.L. c. 131, §40):

Applicant: LAURIE-JEAN AND BLAKE PHILLIPS

Owner:

Address: 9 RANDALL ROAD
MONTAGUE, MA 01351

Address:

LOCUS: 9 RANDALL ROAD

This project has been assigned the following file # : WE 229-0274

A FILE NUMBER ONLY INDICATES THAT THE APPLICATION CONTAINS THE MINIMAL SUBMITTAL REQUIREMENTS AND IS ADMINISTRATIVELY COMPLETE - NOT THAT THE INFORMATION IN THE APPLICATION IS ADEQUATE FOR ISSUANCE OF AN ORDER OF CONDITIONS.

Although a file # is being issued, please note the following:

[1] The Alternatives Analysis failed to detail the alternatives that were explored. The purpose of evaluating project alternatives is to locate activities so that impacts to the riverfront area are avoided to the extent practicable, the commission cannot evaluate the project alternatives if none are provided. The commission should seek clarification on which alternatives were explored and why they were deemed infeasible.

[2] The work proposed in related to a single-family house, but the Notice of Intent mentions that it constitutes redevelopment project as defined in the Massachusetts Stormwater Standards. In accordance with 310 CMR 10.05 (l)1. Stormwater Management Standards do not apply to a single-family house.

[3] Please reach out to Tom Gruszkos via phone at (617) 352-2604 with any questions. Thanks.

If you have any questions regarding this letter, please contact: THOMAS GRUSZKOS @ (413)-755-2260

Cc: Montague Conservation Commission, ONE AVENUE A TURNERS FALLS, Montague, MA, 01376
Representative: BSC GROUP, 180 GLASTONBURY BOULEVARD, GLASTONBURY, CT, 06033

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD# 1-866-539-7622 or 1-617-574-6868.



Printed on Recycled Paper

LAURIE-JEAN AND BLAKE PHILLIPS
9 RANDALL ROAD
MONTAGUE, MA 01351

September 4, 2026

Town of Montague Conservation Commission
One Avenue A
Turner Falls, MA 01376

**RE: Notification of Wetlands Protection Act File No. WE 229-0274
Accessory Dwelling Unit
9 Randall Road, Montague MA**

To the Montague Conservation Commission:

On behalf of Laurie-Jean and Blake Phillips (the Applicant), BSC Group, LLC (BSC) submits this letter in response to the September 2, 2026 file number comment by MassDEP reviewer Thomas Gruszkos for the Notice of Intent (NOI) submitted for property improvements at 9 Randal Road in Montague (DEP File No. WE 229-0274). Please find the questions asked with responses below.

1. **Question:** The Alternative Analysis failed to detail the alternatives that were explored. The purpose of evaluating the project alternatives is to locate activities so that impacts to the riverfront area are avoided to the extent practicable, the commission cannot evaluate the project alternatives if none are provided. The commission should seek clarification on which alternatives were explored and why they were deemed infeasible.
 - a. **Response:** The proposed project consists of construction of an approximately 600 square foot addition to an existing single family residence to provide a safe, accessible living space for an aging parent of the property owner who will be relocating to the residence and who has mobility limitations. Because the existing first floor finished floor elevation sits above the surrounding grade, the proposed addition also requires construction of an accessible entry ramp to provide compliant access into the addition and a connected route to the existing residence. The proposed project also includes replacement of the existing septic system to support the additional residential living space, construction of an accessible concrete walkway connecting the driveway to the addition and ramp, and limited regrading of a portion of the existing driveway to support the concrete walkway.

The proposed work is located within areas regulated by the Massachusetts Wetland Protection Act, including the 100-foot Buffer Zone to Bordering Vegetated Wetlands, and the 200-foot Riverfront Area. In fact, the entire parcel is located within Riverfront Area. In accordance with 310 CMR 10.58(4), alternatives were evaluated to determine whether the project purpose, providing a safe and accessible living space that allows an aging family member to reside with and receive support from the property owner, could be achieved through a practicable and equivalent alternative having less adverse effects on the environment. The alternatives considered are detailed below:

No-Build Alternative: Under the No-Build Alternative, the proposed addition, accessible entry ramp, septic system replacement, and associated site improvements would not be constructed. This alternative would avoid the proposed construction-related disturbances

within the Buffer Zone and Riverfront Area, and would result in no new clearing, grading, excavation or impervious surface associated with the proposed project. However, the No Build Alternative would not meet the purpose and need of the project. The property owner's parent requires a safe, accessible living space due to her mobility limitations, and the existing residence does not currently provide an accessible bedroom, bathroom, or living area, nor an accessible means of entry given the elevation of the first floor above surrounding grade. Without the proposed addition and ramp, the parent would be unable to safely and independently access or occupy the residence, and the owner would be unable to provide the level of day-to-day support that prompted the family's decision to have her live with them. This alternative was therefore rejected.

Alternative 1 - Addition Relocation, Resizing and Vertical Expansion: Under this alternative, the residential addition would be relocated to another portion of the property, reduced or significantly reconfigured, or constructed vertically as a second-story addition to reduce or avoid additional development within regulated areas.

- The property is located within the Residential-2 (RS-2) Zoning District designation within the Town of Montague, which requires minimum setbacks of 25 feet from the front lot line, 15 feet from the side lot lines, and 30 feet from the rear lot line.
- As the Project involves an addition to an existing residence rather than the construction of a new, freestanding residence, the addition must physically and functionally connect to the existing residence to fulfill the purpose and need of the project. The addition must be American Disability Association (ADA) compliant, and a single story addition will be more beneficial than a second story addition.
- The project must also accommodate an accessible route between the driveway and the proposed addition, including an entry ramp meeting applicable slope and landing requirements for ADA compliance.
- The approximately 600 square foot addition footprint reflects the minimum area needed to provide a Massachusetts Architectural Access Board (521 CMR) and ADA compliant bedroom, bathroom, and living area, including required clear floor space, turning radius, and door clearances, as well as the connecting corridor to the existing residence.

Relocating the addition to another portion of the residence would shift development towards the adjacent onsite watercourse and BVW and would result in additional disturbance within the 100-foot Buffer Zone to the BVW. Reducing or reconfiguring the addition would compromise the ability to provide a fully accessible living area consistent with 521 CMR and would not adequately meet the purpose and functional needs of the addition.

Vertical expansion through construction of a second story was also evaluated. While this alternative would avoid expansion of the residence footprint, it is not economically feasible and would not meet the goal of the project to increase accessibility and mobility for an aging resident. The existing one-story residence was not designed to support a second story and would require significant structural improvements to the existing foundation and building framing to support a second story, increasing project costs. Vertical expansion would also present significant accessibility challenges, as locating the proposed living space on a second story would require additional accessibility improvements, such as a residential elevator or lift, to provide an accessible route to the new space. This would further increase project costs

and would be less practical than constructing the addition at grade with a direct, accessible connection from the driveway and proposed concrete path.

Alternative 2 - Alternative Septic System Location: Under this alternative, the replacement of the existing septic system was evaluated to determine whether disturbance within the inner 100 feet of the Riverfront Area would be avoided. Massachusetts Title 5 (310 CMR 15) establishes the state requirements for the siting, design, construction and operation of on-site sewage disposal systems. The location for the installation of the upgraded septic system is constrained by the existing and proposed residence, property boundaries, BVW, existing septic infrastructure and applicable Title 5 setback requirements, including minimum setbacks of 10 feet from property lines, 25 feet from BVW for the septic tank, 50 feet from BVW for the soil absorption system, and applicable setbacks from building foundations. Relocating the new septic system would intersect these constraints and/or require a less efficient system configuration with new septic infrastructure, resulting in additional excavation and grading within the BVW and Riverfront Area. The proposed septic system replacement is sited within the existing, previously disturbed and maintained lawn area currently occupied by the septic system. Because this location limits any new clearing or expansion of the disturbed area within the Buffer Zone or Riverfront Area, it represents the alternative that avoids and minimizes impacts to the maximum extent practicable, consistent with 310 CMR 10.58(4).

Alternative 3 (Accessible Entry Ramp Location and Configuration): Under this alternative, various locations and configurations for the accessible entry ramp were evaluated. Because the first floor finished floor elevation is above the surrounding grade, an accessible ramp is required to provide a safe, compliant means of entry for the property owner's parent. Applicable accessibility standards under 521 CMR and the ADA limit ramps to a maximum running slope of 1:12 and require level landings of at least 5 feet by 5 feet at the top and bottom of the ramp, intermediate landings at defined rise intervals, and continuous handrails. These requirements establish a minimum ramp length and footprint based on the elevation differential between the first floor and surrounding grade and cannot be reduced without rendering the ramp unsafe or noncompliant.

Alternative ramp locations along the side and rear of the residence were considered. These locations were found to bring the ramp and associated grading into closer proximity to the BVW and watercourse onsite, resulting in greater disturbance within the Buffer Zone and Riverfront Area than the proposed configuration. Locating the ramp along the driveway frontage, as proposed, allows the required ramp length and landings to be accommodated using previously disturbed, developed portions of the property, and represents the practicable configuration that avoids and minimizes disturbance to the Riverfront Area to the greatest extent practicable while still providing safe, compliant access for the property owner's parent.

Since the entire parcel is located within the 200-foot Riverfront Area, there is no way to avoid impacts to Riverfront Area for the proposed improvements. However, taken together, the No Build, addition relocation and resizing, vertical expansion, alternative septic location, and alternative ramp configuration alternatives were each evaluated and rejected because they either failed to meet the purpose and need of the project or resulted in equal or greater impact to the Buffer Zone and Riverfront Area than the proposed project. The proposed project therefore represents an alternative that avoids and minimizes impacts to the Riverfront Area to the maximum extent practicable while achieving the project purpose, in accordance with 310 CMR 10.58(4).

2. **Question:** The work proposed is related to a single-family house, but the Notice of Intent mentions that it constitutes redevelopment project defined in the Massachusetts Standards. In accordance with 310 CMR 10.05 (I) Stormwater Management Standards do not apply to a single-family house.

a. **Response:** Acknowledged.

Should you need additional information please do not hesitate to reach out to me at JHarris@BSCGroup.com or 860.852.8227.

Sincerely,
BSC Group, Inc.



Jesse A. Harris, PLA

Landscape Architect, Senior Associate

CC: MADEP Thomas Gruszkos

From: [Jesse A. Harris](#)
To: [Maureen Pollock](#)
Cc: [Melissa Kaplan](#)
Subject: 9 Randall Road - Updated Plans
Date: Wednesday, September 9, 2026 9:52:34 AM
Attachments: [2026-09-09 Revised Site Preparation Plan SHT 3 OF 6.pdf](#)
[2026-09-09 Revised Details SHT 6 OF 6.pdf](#)

Good morning, Maureen,

Please find attached the revised site preparation plan, which includes silt fence in addition to straw wattle, as well as a possible stockpile location with E&S controls, as discussed during yesterday's ConnComm site walk. Also attached is the revised detail sheet incorporating the silt fence.

Please let me know if you have any questions or if anything else is required ahead of tomorrow's public hearing.

Best,

Jesse A. Harris, PLA

Landscape Architect | Senior Associate

180 Glastonbury Boulevard, Suite 305 / Glastonbury, CT 06033

O: 860-652-8227 / D: 617-896-4550 / C: 413-522-4454

jharris@bscgroup.com

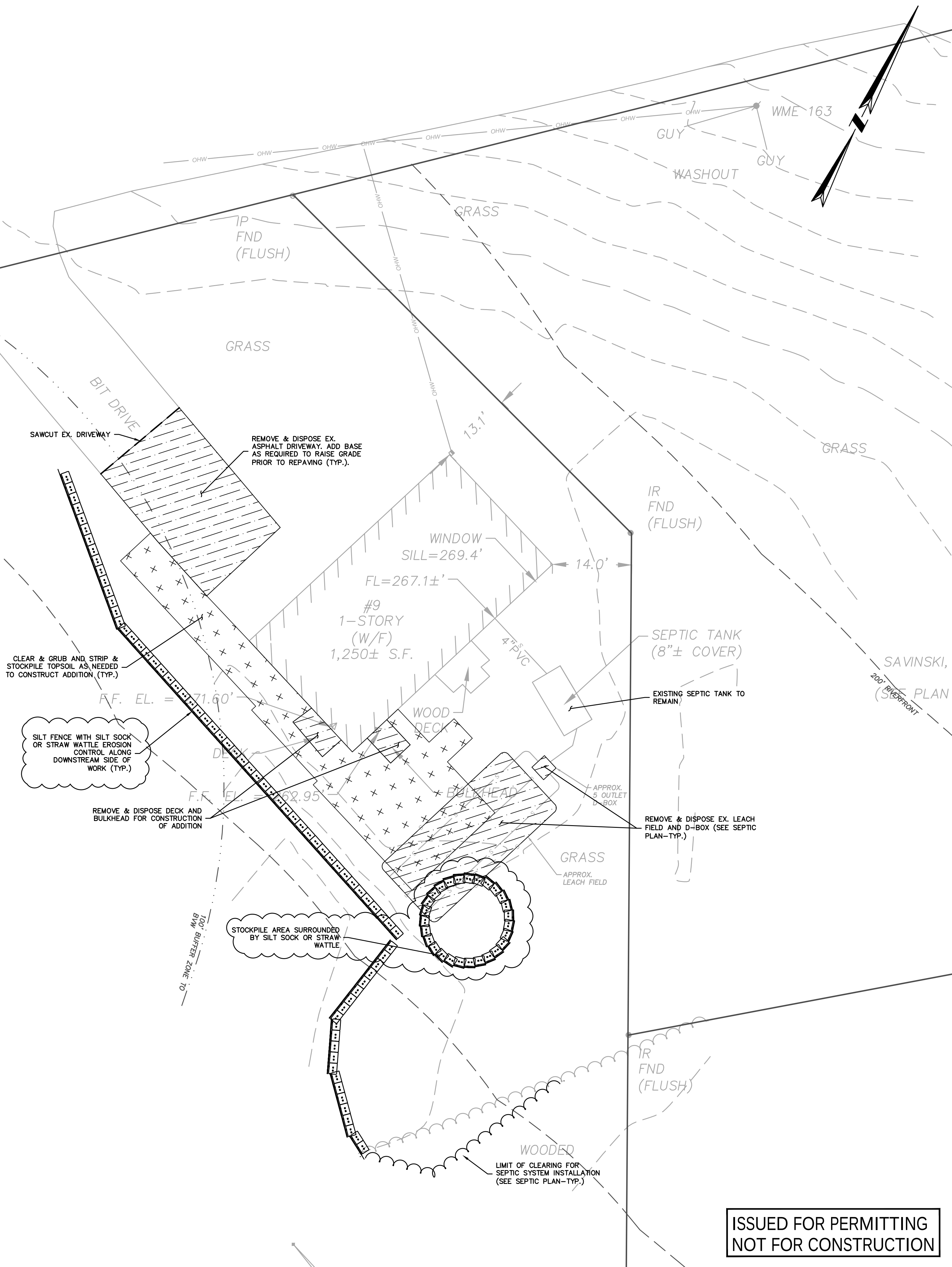
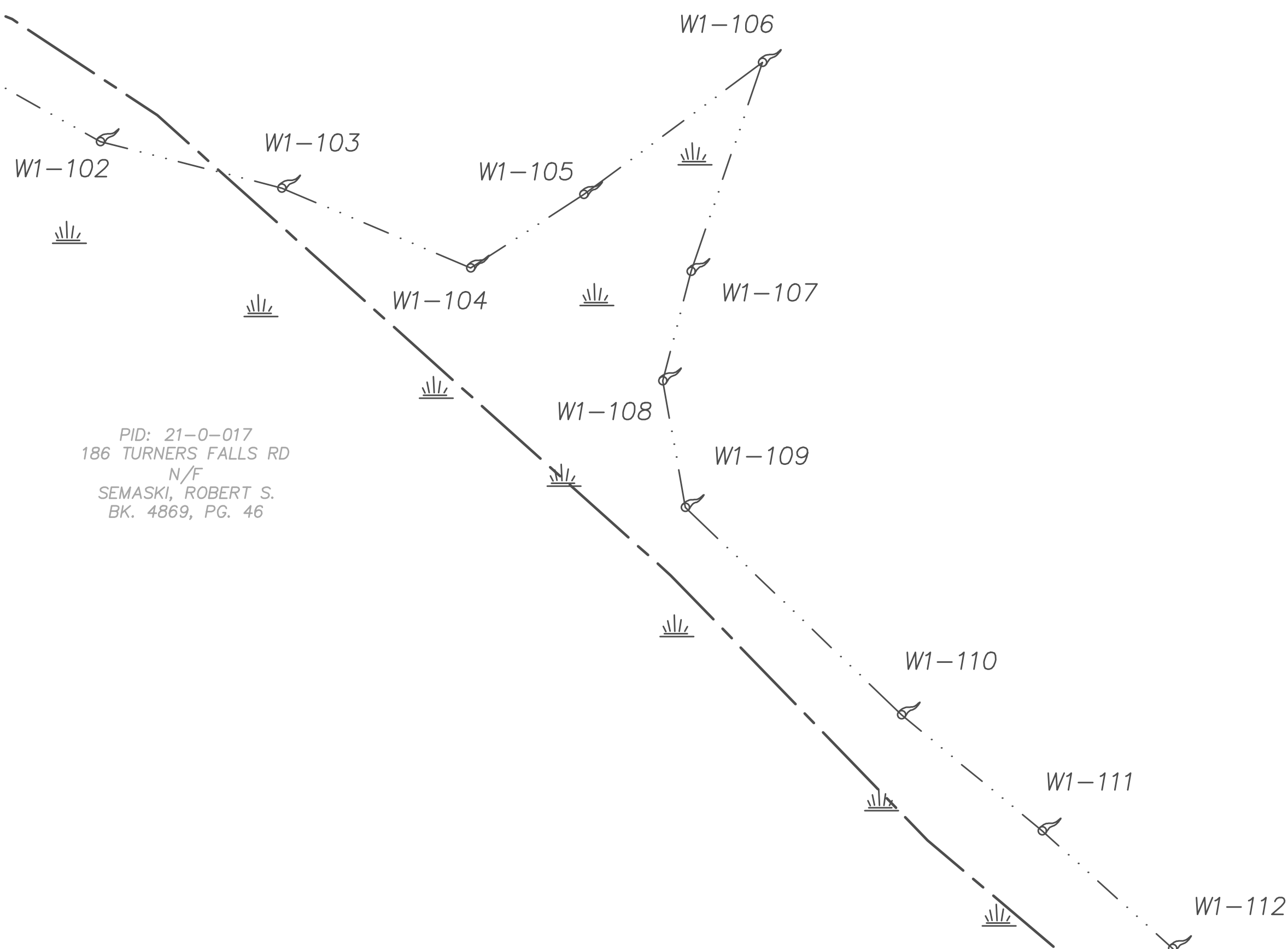
www.bscgroup.com

- GENERAL NOTES:**
- EXISTING CONDITIONS SHOWN BASED UPON FIELD SURVEY PERFORMED BY BSC GROUP, INC. (BSC) IN JUNE 2026.
 - HORIZONTAL DATUM IS BASED UPON NORTH AMERICAN DATUM OF 1983 AS DERIVED VIA GPS OBSERVATIONS PERFORMED BY BSC ON JUNE 18, 2026.
 - VERTICAL DATUM IS BASED UPON NORTH AMERICAN VERTICAL DATUM OF 1988 AS DERIVED VIA GPS OBSERVATIONS PERFORMED BY BSC ON JUNE 18, 2026.
 - LOCUS IS LOCATED WITHIN ZONE C AS GRAPHICALLY DEPICTED ON FLOOD INSURANCE RATE MAP NUMBER 250122 0003 C, EFFECTIVE DATE FEBRUARY 12, 1982.
 - NO GUARANTEE IS IMPLIED OR INTENDED AS TO THE ACCURACY, LOCATION, OR THAT ALL UTILITIES AND/OR SUBSURFACE STRUCTURES ARE SHOWN. THE CONTRACTOR SHALL FIELD VERIFY THE LOCATION, SIZE, INVERTS AND TYPES OF EXISTING PIPES AT ALL PROPOSED POINTS OF CONNECTION PRIOR TO ORDERING MATERIALS. WHERE AN EXISTING UTILITY IS FOUND TO CONFLICT WITH THE PROPOSED WORK, THE LOCATION, ELEVATIONS AND SIZE OF THE UTILITY SHALL BE ACCURATELY DETERMINED WITHOUT DELAY BY THE CONTRACTOR, AND THE INFORMATION FURNISHED IN WRITING TO THE OWNER'S REPRESENTATIVE FOR THE RESOLUTION OF THE CONFLICT.
 - ALL MATERIALS AND CONSTRUCTION METHODS SHALL CONFORM TO REQUIREMENTS OF THE TOWN OF MONTAGUE AND "CONSTRUCTION STANDARDS" OF THE MASSACHUSETTS DEPARTMENT OF TRANSPORTATION (MASS DOT) HIGHWAY DIVISION, LATEST EDITION, AND THESE CONTRACT DOCUMENTS.
 - ALL EXCAVATIONS SHALL BE THOROUGHLY SECURED ON A DAILY BASIS BY THE CONTRACTOR AT THE COMPLETION OF CONSTRUCTION OPERATIONS.
 - AREAS OUTSIDE THE LIMIT OF WORK DISTURBED BY THE CONTRACTOR'S OPERATIONS SHALL BE RESTORED BY THE CONTRACTOR TO THEIR ORIGINAL CONDITION AT THE CONTRACTOR'S EXPENSE, TO THE SATISFACTION OF THE ENGINEER. ALL AREAS DISTURBED DURING CONSTRUCTION NOT COVERED WITH BUILDINGS, STRUCTURES, OR PAVEMENTS SHALL RECEIVE SIX INCHES OF LOAM AND SEED, UNLESS DIRECTED OTHERWISE BY THE ENGINEER.
 - CONTRACTOR SHALL BE SOLELY RESPONSIBLE FOR SITE SECURITY AND JOB SAFETY. ALL CONSTRUCTION ACTIVITY SHALL BE IN ACCORDANCE WITH OSHA REGULATIONS AND LOCAL & STATE REQUIREMENTS.
 - ALL MATERIALS ARE TO BE DISPOSED OF PER APPLICABLE LAWS AND REGULATIONS.
 - WHERE EXISTING PAVEMENT TO BE REMOVED MEETS EXISTING PAVEMENTS TO REMAIN, CONTRACTOR IS TO SAWCUT A STRAIGHT LINE UNLESS INDICATED OTHERWISE.
 - ALL EXISTING REMAINING UTILITIES SHALL BE PROTECTED, UNLESS NOTED OTHERWISE.
 - ALL EXISTING UTILITY STRUCTURES, CONDUITS, AND APPURTENANCES OF ANY KIND SHALL BE COMPLETELY REMOVED WITHIN THE LIMITS OF EXCAVATION FOR NEW BUILDINGS, UNLESS NOTED OTHERWISE ON THE DRAWINGS.

- EROSION CONTROL NOTES:**
- THE SITE CONTRACTOR IS RESPONSIBLE FOR ESTABLISHING AND MAINTAINING SUITABLE EROSION AND SEDIMENTATION CONTROL DEVICES ON SITE DURING CONSTRUCTION AS REQUIRED TO PREVENT SILT FROM LEAVING THE SITE INCLUDING CONSTRUCTING ENTRANCES AND PERIMETER SEDIMENT CONTROLS. SILT WILL NOT BE ALLOWED BEYOND CONSTRUCTION LIMITS.
 - EROSION CONTROL SHALL, AT MINIMUM, BE INSTALLED IN THE LOCATIONS SHOWN ON THE PLANS. IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO INSTALL ADDITIONAL EROSION CONTROLS AS NECESSARY.
 - THE CONTRACTOR IS RESPONSIBLE FOR THE CLEANUP AND REMOVAL OF ANY BUILDUP OF SEDIMENT WHICH ESCAPES FROM THE SITE AT NO ADDITIONAL COST TO THE OWNER.
 - THE CONTRACTOR IS RESPONSIBLE FOR REMOVING ALL TEMPORARY EROSION CONTROL MEASURES AFTER CONSTRUCTION IS COMPLETE AND ALL DISTURBED AREAS HAVE BEEN STABILIZED.
 - THE CONTRACTOR IS RESPONSIBLE FOR ALL COSTS ASSOCIATED WITH ANY FINES LEVIED AGAINST THE SITE FOR VIOLATIONS OF EROSION CONTROL REGULATIONS.
 - SEDIMENT BEHIND PERIMETER SEDIMENT CONTROLS MUST BE REMOVED ONCE SEDIMENT REACHES A LEVEL OF DEPOSITION EQUAL TO HALF THE HEIGHT OF THE BARRIER OR AS RECOMMENDED BY MANUFACTURER.

- SITE PREPARATION AND DEMOLITION:**
- AREAS OUTSIDE THE LIMIT OF WORK DISTURBED BY THE CONTRACTOR'S OPERATIONS SHALL BE RESTORED BY THE CONTRACTOR TO THEIR ORIGINAL CONDITION AT THE CONTRACTOR'S EXPENSE, TO THE SATISFACTION OF THE ENGINEER. ALL AREAS DISTURBED DURING CONSTRUCTION NOT COVERED WITH BUILDINGS, STRUCTURES, OR PAVEMENTS SHALL RECEIVE SIX INCHES OF LOAM AND SEED, UNLESS DIRECTED OTHERWISE BY THE ENGINEER.
 - ALL MATERIALS ARE TO BE DISPOSED OF PER APPLICABLE LAWS AND REGULATIONS.
 - ALL EXISTING REMAINING UTILITIES SHALL BE PROTECTED, UNLESS NOTED OTHERWISE.
 - ALL EXISTING UTILITY STRUCTURES, CONDUITS, AND APPURTENANCES OF ANY KIND SHALL BE COMPLETELY REMOVED WITHIN THE LIMITS OF EXCAVATION FOR NEW BUILDINGS, UNLESS NOTED OTHERWISE ON THE DRAWINGS.

PID: 21-0-140
9 RANDALL RD
N/F
PHILLIPS, LAURIE-JEAN & BLAKE
BK. 8181, PG. 302
(SEE ALSO PLAN BOOK 88 PAGE 41 LOT 4)



ISSUED FOR PERMITTING
NOT FOR CONSTRUCTION

9 RANDALL ROAD ACCESSORY DWELLING UNIT

9 RANDALL ROAD

IN

MONTAGUE
MASSACHUSETTS
(FRANKLIN COUNTY)

SITE PREPARATION PLAN

AUGUST 26, 2026

REVISIONS:

NO.	DATE	DESC.
1	09/09/26	ADDED E&S CONTROLS

PREPARED FOR:

LAURIE JEAN PHILLIPS
9 RANDALL ROAD
MONTAGUE, MASSACHUSETTS
01351

BSC GROUP

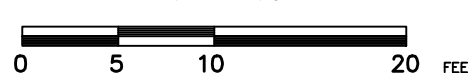
BUILD | SUPPORT | CONNECT

803 Summer Street
Boston, Massachusetts
02127

617 896 4300

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SCALE: 1" = 10'

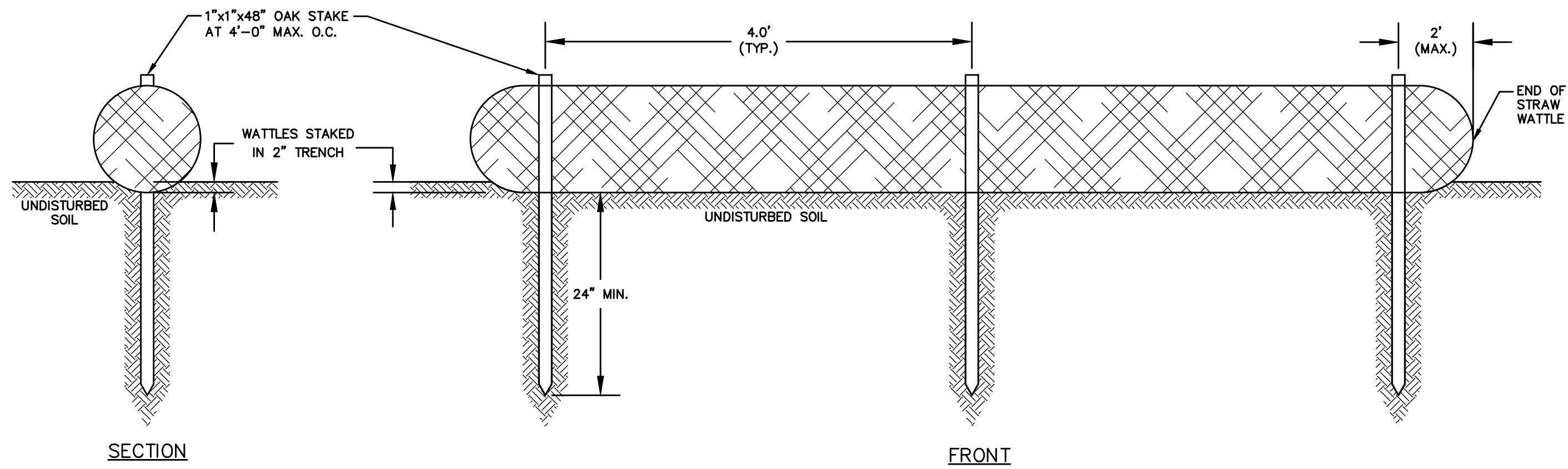


FILE: \Civil\Drawings\010292200-PREP

DWG.:

JOB. NO: 0102922.00

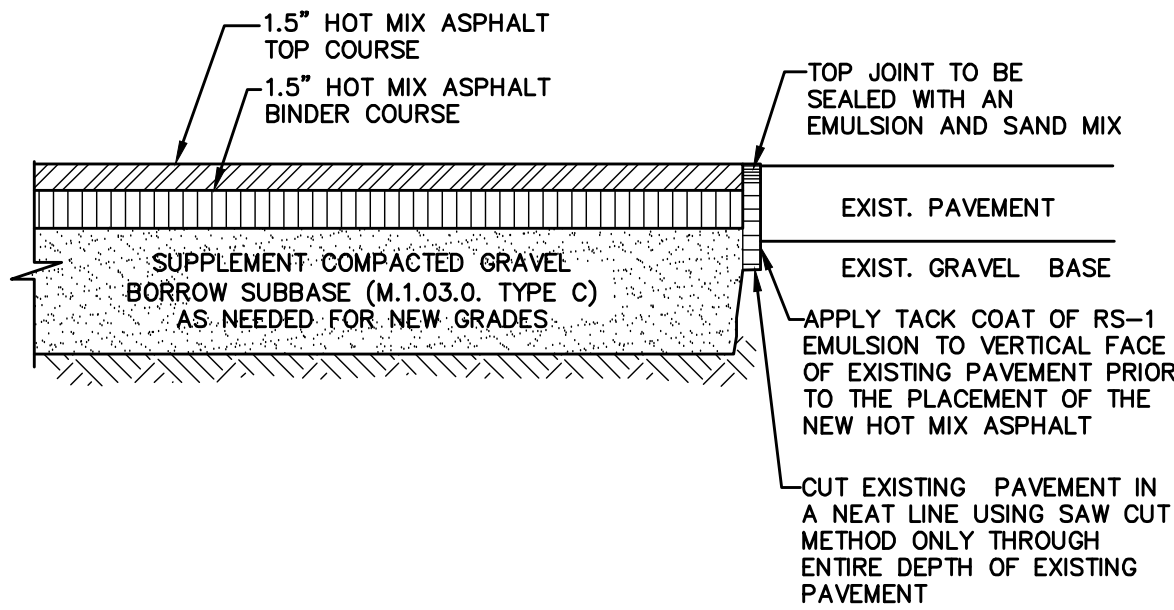
SHEET 3 OF 6



- NOTES:
1. STRAW WATTLES SHALL BE INSTALLED PER MANUFACTURER'S RECOMMENDATIONS.
 2. ENDS OF WATTLES SHALL BE TURNED SLIGHTLY UPSLOPE.
 3. STAKES SHALL NOT EXTEND ABOVE THE STRAW WATTLES MORE THAN 2".
 4. SEDIMENT DEPOSITS SHOULD BE REMOVED WHEN THEY REACH HALF THE HEIGHT OF THE STRAW WATTLE.

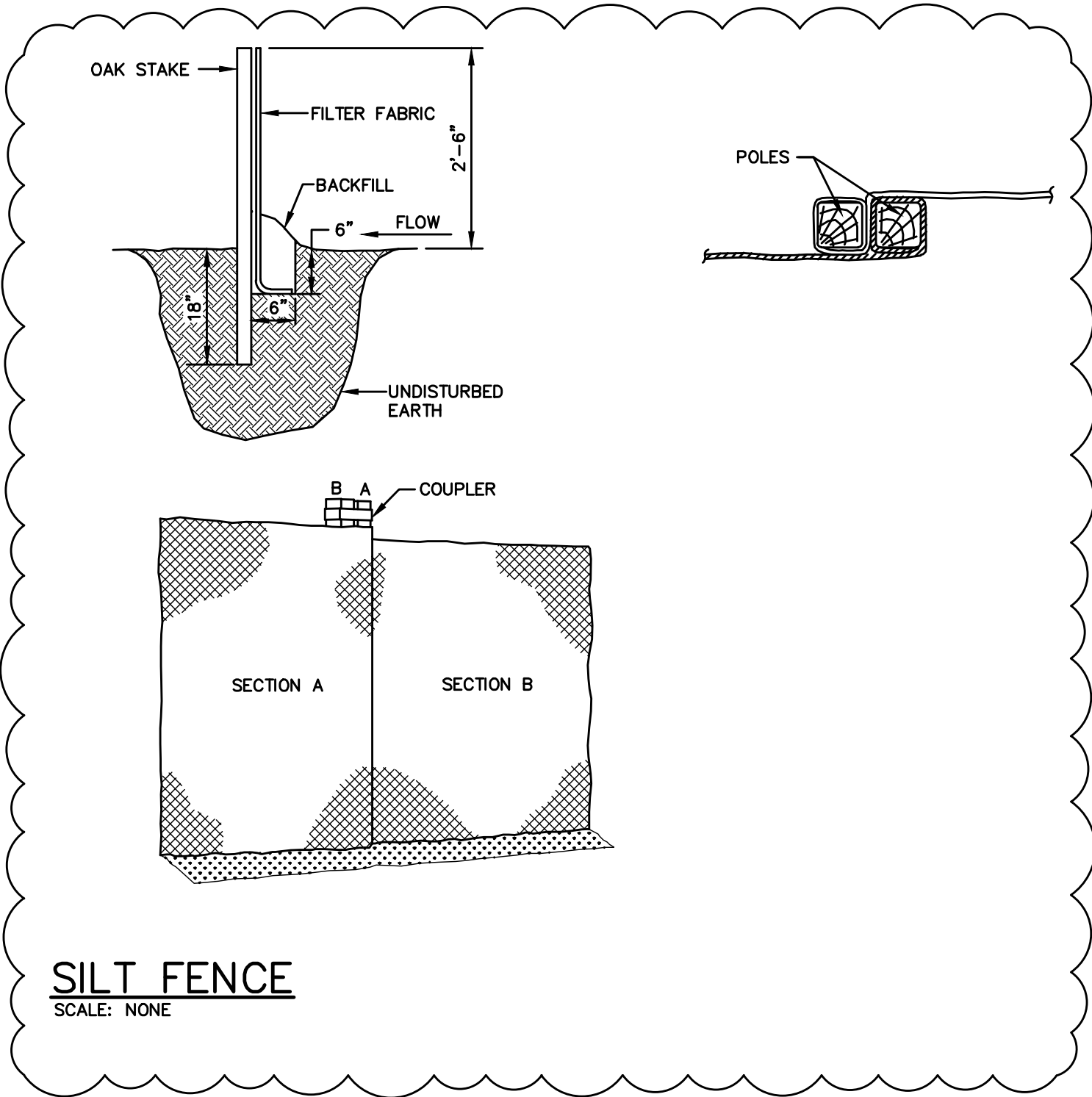
STRAW WATTLE (OR APPROVED EQUAL) FOR PERIMETER SEDIMENT CONTROL

SCALE: NONE



HOT MIX ASPHALT PAVEMENT

SCALE: NONE



SILT FENCE

SCALE: NONE

9 RANDALL ROAD
ACCESSORY
DWELLING UNIT

9 RANDALL ROAD
IN
MONTAGUE
MASSACHUSETTS
(FRANKLIN COUNTY)

DETAILS

AUGUST 26, 2026

REVISIONS:

NO.	DATE	DESC.
1	09/09/26	ADDED E&S CONTROLS

PREPARED FOR:
LAURIE JEAN PHILLIPS
9 RANDALL ROAD
MONTAGUE, MASSACHUSETTS
01351

BSC GROUP
BUILD | SUPPORT | CONNECT
803 Summer Street
Boston, Massachusetts
02127
617 896 4300

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SCALE: AS SHOWN

ISSUED FOR PERMITTING
NOT FOR CONSTRUCTION

FILE: \\Civil\\Drawings\\010292200-DET
DWG: SHEET 6 OF 6
JOB. NO: 0102922.00

NOI #2026-08 – Notice of Intent (DEP file #229-0274)

9 Randall Road

Site Visit Photographs Taken on September 8, 2026 by Town of Montague Staff

















