

Town of Plymouth **DRAFT**

ENTERGY PROPERTY SITE ANALYSIS

August 2017



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1.0 INTRODUCTION

This site analysis was completed for 1,500-acres of land owned by Entergy Nuclear Generation Company that is located adjacent to the existing Pilgrim Nuclear Energy facility (referred to herein as the “Pilgrim facility”) in Plymouth MA. (please refer to *Map 1: Project Area Locus* in *Attachment 1*). This land area (the “Project Area”) is under evaluation to determine the site’s development potential. The Project Area does not include the actual generation facility; rather, it is comprised of an inland area south of Rocky Hill Road. The Project Area has an irregularly-shaped boundary which generally follows Rocky Hill Road along the northern border (approximately 5,800 linear feet), extends approximately 9,000 linear feet to the south from Rocky Hill Road, and is bisected by Route 3A.

2.0 LAND USE

ON-SITE LAND USE

The Project area is predominantly undeveloped and forested. Minor on-site land uses within the Project Area include roadways, commercial uses, a municipal park, municipal infrastructure, and utility corridors. Each is described below.

The undeveloped land is vegetated with pitch pine and scrub oak typical of the region, which provides a naturalized buffer between the Pilgrim facility and the moderately to densely settled surrounding areas. It is within the area of Plymouth known as Pine Hills. The undeveloped areas contain a network of logging trails used by hikers and mountain bikers. Much of the undeveloped land (approximately 910 acres) is Forest Land Designated under Chapter 61, which is a Massachusetts tax designation created to give preferential tax treatment to those landowners who maintain their property as open space for the purposes of timber production, agriculture or recreation. Taxes for those properties enrolled in Chapter 61 are determined based on the current use of the property (i.e., the productive potential of your land for growing trees), instead of the fair market or development value. To ensure that land under Chapter 61 is managed in a long-term sustainable fashion, there is a penalty for withdrawal from the program and changing it to residential, industrial or commercial use. This penalty consists of payment for the difference between taxes paid and taxes deferred plus interest. The penalty is computed for the previous five years under certification.

The roadways on the Project Area include Route 3A, a two-lane state highway with a north-south course, bisects the center of the Project Area, and Power House Road, a Pilgrim facility access road which extends northward from Route 3A in the eastern portion of the site. In all, roadways comprise approximately 13 acres of the Project Area.

Commercial uses in the Project area seem to be located on a single 7-acre parcel at 265 State Road. The parcel contains three structures and an outdoor boat storage yard. The businesses include Serious Cycles bicycle sales and repair store, Lady Bug Boats (outboard motors), Ron’s Body Works (horse trailer dealer) and the Surf Marine Boat Storage lot. This parcel also contains a cell tower in the southwest corner, although the cell tower access road is located on an adjacent parcel.

The municipal parkland is Cleft Rock Park, an 8.7-acre town facility with nature trails and picnic facilities located at 290 State Road (Route 3A) just across the street from Serious Cycles. The park is notable for a unique rock formation of approximately 25' x 25' and from 12' to 14' tall. There is a cleft through its center 25" to 30" wide and about 25' in length. This passage is approximately 5' high and its "ceiling" is formed by another section of rock that sits on top. It is thought that this rock formation may have been used as a "lookout" spot by the Native Americans. From this vantage point one can see much of Cape Cod Bay and, on a clear day, the monument and shoreline of Provincetown.

Two water tanks, part of Plymouth's municipal water distribution system, are located within the Project Area. One is situated off the northbound lane of State Road near the intersection with Rocky Hill Road, and the other is off the southbound lane further north along State Road past the commercial development.

There is a utility right-of-way (ROW) containing steel structures with overhead transmission lines originating at the Pilgrim facility and extending southward across the Project Area. The ROW runs parallel to, and just west of, Power House Road. The ROW width varies along its 7,800-foot length, but is generally approximately 100 feet wide. In addition, the Project Area contains two cell towers. As noted above, one is in the southwest corner of the commercial property at 265 State Road; the second tower is on an adjacent parcel immediately east of the commercial property.

ADJACENT LAND USE

Adjacent land uses are predominately residential, but also include energy generation, recreation and undeveloped, as follows:

- North: Pilgrim energy generation facility;
- Northeast and East: Densely settled residential areas along the coast associated with White Horse Beach;
- Southeast: Moderate density residential neighborhoods;
- South: A continuation of undeveloped land and utility ROWs;
- Southwest: Agricultural land and lower-density residential;
- West: Medium density residential and the Plymouth Country Club and Golf Course; and
- Northwest: Densely settled residential areas near Rocky Point.

3.0 ENVIRONMENTAL, HISTORIC AND CULTURAL

BSC Wetland Scientists inspected portions of the Project Area on May 25th, 2017 to confirm the location of Historic, Cultural, and Wetland Resource Areas. The Project Area is located on a moraine consisting of glacial erratic's and valley formations with steep topography along the hill face off Rocky Hill Road with a reduced slope from State Road moving south toward Old Sandwich Road. BSC conducted site inspections in three portions of the Project Area (refer to *Map 4: Site Inspection Areas*) to confirm the locations of natural resources, as well as potential historical and cultural resources, as described below.

BSC first inspected the Cleft Rock parcel off State Road. The area walked consisted of following mountain bike trails and cross cutting through forest leading to the transmission lines off Power

House Road, back up the steep rocky moraine-like terrain around to a communication tower, then returning to the trail head at Cleft Rock. There was no indication of wetland resource areas along this route, although BSC did note interesting glacial erratics and valleys throughout the topography. Glacial erratics are large boulders left behind by a glacier following melt. In addition, if you look at the topography of this area one can see how the glacial melt generated water that created valleys moving down slope around the sides of the hills. The hills appear to be a large glacial deposit of sand and stone left behind when the glacier melted.

The second area inspected started off Power House Road along the utility ROW, moving along the overhead transmission lines towards Rocky Hill Road, then followed Rocky Hill Road west along a BVW and continued past uplands and a potential Isolated Land Subject to Flooding (ILSF) before moving south (up slope) from Rock Hill Road. BSC found another ILSF up slope adjacent to an old farm property (potentially an old watering pond for livestock). BSC continued through the wood south until noticing a significant change in vegetation from hardwoods to a Spruce ally that was assumed to have lined the old farm driveway. Following the line of Spruce trees, BSC located one old farm foundation and water well handpump along with what appeared to be a stand of planted Red Cedars. Moving east toward Power House Road (cross cutting the north facing hill side), BSC noted areas of great glacial influence, which consisted of glacial erratic's and steep valleys. Following an old stonewall that appeared to be built for livestock (based on stone size), BSC worked our way back to the ROW and Powers House Road. Additional BVW's were located along Power House Road on east side but were not fully explored during this site visit.

The third area started at State Road and followed at ATV trail south along a ridge up to the highest point in Plymouth, Manomet Hill. From the peak, BSC ventured around the surrounding area following ATV trails and crossing through forest areas but found no wetland resource areas, within the area inspected. BSC noted several additional glacial erratics and valleys leading from the ridge to the east and west.

Using MassGIS, supplemented by the above-described site inspections, BSC identified two types of wetland resource areas along Power House Road and Rocky Hill Road. The resource areas identified include Bordering Vegetated Wetlands (BVW) "Bogs, swamps, marshes, and wet meadows that border on water bodies are defined in the Wetlands Protection Act regulations (310 CMR 10.55) as Bordering Vegetated Wetlands (BVWs)", and Isolated Land Subject to Flooding (ILSF) "isolated depression or a closed basin which serves as a ponding area for runoff or high ground water which has risen above the ground surface". As shown on *Map 2: Environmental Resources*, MassGIS data indicates the presence of several potential vernal pools within the Project Area. BSC did not see any vernal activity within the wetlands field-identified on-site, perhaps because the inspections occurred late in the season when vernal pool activity is less likely to occur.

BSC reached out to the Massachusetts Natural Heritage and Endangered Species Program (NHESP) and was informed that a portion of the Project Area is listed as Eastern Box Turtle habitat. Per NHESP, this designation may be removed when the Program generates new maps (anticipated soon). However, NHESP still considers the site to have habitat for Eastern Box Turtle as well as Eastern Whip-poor-will. NHESP also provided insight into other areas and species that should be reviewed for "potential" habitat. Additional field studies would be necessary for a full assessment (see NHESP email in *Attachment 2*).

BSC submitted letters to the Massachusetts Historical Commission (MHC), Wampanoag Tribe of Gay Head Aquinnah, and the Wampanoag Tribe of Mashpee to obtain historic and cultural information for the property. BSC has received information from MHC regarding the property (see *Attachment 3*). The MHC inventory lists several historically significant sites for the Project Area, including Cleft Rock, owned by the Town of Plymouth, and the “Manomet Site.” MHC noted the use of Rocky Hill Road, Pine Hills, and Manomet Highlands as part of a historic Native American trail system. They consider this area to be “favorable for ancient and historic period land use and occupation.”

During the field inspection, BSC noted that the trees appeared to be approximately the same age, size, and variety (Pitch Pine and Oak). This evidence pointed to the area having been cleared at some point and allowed to return to a natural state all at the same time. BSC research found that a large fire in May of 1957 burned from Myles Standish State Forest over the Pine Hills to the coastline, encompassing the entire Project Area except for a small area along Rocky Hill Road and the area containing the Entergy Plant (also the only area noted with larger more mature trees). (refer to *Map 3: Major Historic Forest Fires*).

On-site Wetland Resource Areas are a significant consideration when proposing land to be built upon. The Massachusetts Wetlands Protection Act (WPA) (301 CMR 10.00) and Town of Plymouth’s Wetland Bylaw (196-4) states “No person shall remove, fill, dredge or alter within 100 feet of resource areas” without first obtaining a permit to do so. Also, the Town of Plymouth Wetlands Rules and Regulations Part 3 stipulate that “The area within 35 feet of a resource area is a no-touch zone. No development, alteration, filling, dredging, or removal is permitted within the 35-foot no-touch zone.”

A National Pollutant Discharge Elimination System (NPDES) Storm Water Pollution Prevention Plan (SWPPP) and Notice of Intent (NOI) would be submitted to the Environmental Protection Agency (EPA) for disturbance of over an acre. “Any construction activity that will, or is part of a “common plan” of development or sale that will, disturb one or more acres and has the potential to have a discharge of storm water to a water of the United States must either have a permit OR have qualified for a waiver.” A Massachusetts Environmental Policy Act (MEPA) filing may also be required depending on the size and scope of development as well as whether the proposed development requires any state permits, involves transfer of state property, or is undertaken by a state agency.

This site provides a forested connection from Myles Standish State Forest, Wildlands Trust-Halfway Pond, Indian Brook Conservation Area, and Little Island Pond, over the Pine Hills, and connecting to Cape Cod Bay, with limited interruption from existing development. The northern face demonstrates the power of the glaciers as they moved through the area depositing a massive boulder field, including Cleft Rock. At the northern base, several wetland resource areas have formed along the roadways. Moving south the glacier produced a massive deposition of sand and more large boulders, along with steep side slopes that are littered with ravines from melt water. The area is home to a variety of animals, BSC identified Coyote, Deer, Rabbits, Skunks, Raccoons, and various birds through direct observation, scat, and/or tracks. Lastly, BSC noted some of the historic features and uses, such as the old farm buildings, pond, fields, and stone walls.

4.0 TOPOGRAPHY

Topography was assessed to identify areas more suited to development. In general, slopes of up to 15% are considered optimal for development, with up to 20% considered suitable for development. Slopes of greater than 20% can present challenges associated with design, access, operation of construction equipment, and stormwater management.

As noted above, the Project Area is within the area known as Pine Hills (not to be confused with “The Pine Hills” development located to the south). As shown on *Map 5: Slope Analysis*, steeply sloped areas of 20% or more are present throughout most of the area, but there are some large swaths with slopes up to 15%. One such area is along Power House Road in the eastern portion of the site, and another is in the northwest and central section south of Rocky Rocky Hill Road. Smaller areas with slopes between 15% and 20% are scattered throughout. In all, approximately 25% of the Project Area is considered “developable” (refer to *Map 6: Developable Areas*). Based on the identification of development options from RKG Associates, the developable areas map will be fine-tuned.

In terms of elevation, the Project Area reaches its peak of up to approximately 400 feet above mean sea level in the center of the southern portion (please refer to *Map 7: Elevation*). This high point in the Pine Hills is called Manomet Hill and is the highest point in Plymouth County. From this ridge, elevation slopes steeply away to the east and west, but more gradually towards the north towards the coast. In the developable area near Power House Road (see above) elevations range from approximately 50 feet to 100 feet above mean sea level. In the developable area behind Rocky Neck Road elevations range from approximately 175 to 200 feet above mean sea level.

5.0 TRANSPORTATION

The Project Area is located on Rocky Hill Road in Plymouth, MA, south of Rocky Point and north of White Horse Beach. Rocky Hill Road runs along the coast of Plymouth in an approximately east-west direction, connecting to State Road (Route 3A) in the west and to White Horse Road in the east. (refer to *Map 8: Transportation Network*)

Currently, and in the future, most trips to/from the site are likely to use State Road (Route 3A) to access Rocky Hill Road; Route 3A is classified as a minor arterial and is a major vehicular connection through Plymouth and southeastern Massachusetts.

Rocky Hill Road is classified as an urban collector roadway and currently accommodates approximately 3,200 vehicles per day (vpd). Near the Project Area, Rocky Hill Road provides one general-use travel lane in each direction with approximately 1 to 2-foot shoulders on both sides of the roadway.

The Greater Attleboro Taunton Regional Transit Authority (GATRA) provides bus service in the area via the Mayflower Link (Plymouth to Manomet). Currently, this service runs via Route 3A and White Horse Road, with a stop at White Horse Beach. This bus route does not pass immediately in front of the Project Area, but the route runs through the intersection of Rocky Hill Road & White Horse Road, located approximately 1 mile away. The Proponent should consider discussing with

GATRA the possibility of extending bus service to the Project Area to increase transit ridership and reduce vehicular traffic.

Consideration is being given to development of the site under a variety of uses. The exact nature of future development is being evaluated, but for comparison purposes, Table 1 outlines traffic generation rates for a variety of potential uses. These rates are taken from the Institute of Transportation Engineers (ITE) Trip Generation manual.

Table 1: Trip Generation Rates				
Use	Unit	Weekday Daily	Weekday Morning Peak Hour	Weekday Afternoon Peak Hour
Single-Family Residential ^a	Dwelling Unit	9.52	0.75	1.00
Office ^b	1,000 SF GFA	11.03	1.56	1.49
Hotel ^c	Rooms	8.17	0.53	0.60
^a based on ITE Land Use Code (LUC) 210 – Single Family Detached Housing				
^b based on ITE Land Use Code (LUC) 710 – General Office Building				
^c based on ITE Land Use Code (LUC) 310 – Hotel				

6.0 ZONING

UNDERLYING ZONING

As shown in *Map 9: Zoning and Aquifer Protection*, most of the site is zoned Rural Residential (RR) (approximately 1,400 acres). The eastern portion of the site (approximately 100 acres) is zoned Medium Lot Residential (R-25). A narrow sliver along the Project Area's southwestern edge (near Doten Road) falls within Large Lot Residential (R-40) zoning. Please refer to *Table 2: Zoning Overview* (at the end of this section) for detailed information about the range of uses and dimension requirements for each of these zones.

The intent of RR Zoning is to:

- Discourage scattering of residential development beyond the fringes to developing village centers and thereby to reduce the needed for uneconomical extension of roads, utilities and other community facilities and services.
- Channel development into zones where public utilities and community facilities and services may be provided efficiently. To utilize the provisions of transfer of development rights as specified in § 205-70 of the Bylaw.
- Discourage development in areas whose soil and slope characteristics are generally less suitable for development than in other zones.
- Preserve the natural, rural character of presently rural areas of the Town.
- Prevent the subdivision of small residential lots along principal Town ways in rural areas.
- Utilize Plymouth's tremendous land resources for uses other than residential development which will help balance the tax base and offer employment to local residents.

The intent of R-25 Zoning is to:

- Retain suburban residential development of adequate spaciousness within close proximity of the several village centers of the Town and thus avoid haphazard scattering of subdivisions in rural areas.

- Encourage the permanent protection of natural and open areas within developed areas and to authorize a variety of types of homes available by means of planned cluster and planned residential development techniques.

This intent of R-40 Zoning is to:

- Reserve areas for large lot single family residential development within the perimeter of the various villages of the Town and within reasonable proximity of community facilities and utilities.
- Utilize Plymouth's tremendous land resources for appropriate uses other than residential development which will help balance the tax base and offer employment to local residents.

In addition to the underlying zoning, the Bylaw (§ 205-39) also regulates how land within wetland areas (WA) may be used to calculate area and yard requirements. The intent of the WA designation is to:

- Protect the streams and other water bodies of the Town;
- Protect the health and safety of persons and property against the hazards of flooding and improper waste disposal;
- Preserve and maintain the water table and water recharge areas within the Town; and
- Assure the continuation of the natural flow patterns of the watercourses providing safe and adequate floodwater and runoff capacity.

Any portion of a lot that lies within the WA may be used to satisfy the area and yard requirements for the district in which the lot is situated, provided that not less than 10,000 square feet or 60% of the lot, whichever is greater, is outside the wetland area. Further, any areas greater than 5 feet in breadth which are covered by water shall not be included in the area requirements, and areas covered by water for part of a normal year shall not comprise more than 15% of the required lot area.

AQUIFER PROTECTION DISTRICT (§ 205-57)

In addition to the underlying zoning, there is an Aquifer Protection District (AA) overlay zone within the Project Area. The following two protection categories are within the AA:

- Area 2 – Planned Future Well Site; and
- Area 3 – Contributing Area to Significant Recreational Water Bodies.

Both Area 2 and Area 3 are regulated in the Town's Zoning Bylaw under the Aquifer Protection District (AA), § 205-57. The Aquifer Protection District is considered as overlying other zoning districts, and any uses permitted in the overlay district are governed by the restrictions of the underlying district. *Table 3: Aquifer Protection Use Table (§ 205-57)* (as excerpted from the Town Zoning Bylaw) lists the uses requiring Special Permits (all of which are subject to Environmental Design Conditions and to specific criteria noted in the Bylaw) and Prohibited uses in these two districts.

The purposes of the AA District are:

- To preserve and protect the groundwater resources of the Town of Plymouth;
- To protect, preserve and maintain the existing and potential groundwater supply and surface water quality for present and future residents of the Town;

- To prevent pollution of ground and surface water and water supplies;
- To assure the continued availability of the potable and recreational water supply of the Town; and
- To promote and protect the public health, safety and general welfare.

The Planned Future Well Site Overlay is defined as the “DEP approved Zones II and IIIs (as defined by DEP in 310 CMR 22.00 as amended) to Public Water Supply Wells and watershed contributing surface runoff” to a DEP-approved Zone I, as defined in the Plymouth Zoning Bylaw and shown in *Map 9*. The Contributing Areas to Significant Recreational Water Bodies overlay is defined as “the area contiguous or noncontiguous to recreational lakes, water bodies or tributaries thereto in which ground or surface water flow is in the direction of and contributory to the lake, water body or tributary as displayed on the Aquifer Protection Map.”

7.0 SWOT ANALYSIS

STRENGTHS

- **Waterfront Location:** The Entergy site is located along Plymouth Bay, with direct access to the Atlantic Ocean. Given the scarcity of developable property along the Atlantic Coast throughout the Eastern Seaboard, the entire site—particularly the current Entergy Plant site—has substantial and broad economic development potential for the Town. While the plant site itself will not be available for development for years, and possibly decades, the conservation easement on the rest of the site expires in 2023.
- **Elevation of the Property:** The Entergy site’s higher elevation is an asset from an economic development perspective. From a base perspective, the higher elevation near the Bay provides some protection from inclement weather. The elevation changes also provide attractive views over the Bay and around the Town of Plymouth. More strategically, the top of the hill location has development potential, and can serve as a destination and/or focal point of any development at the site.
- **Large, Developable Tracts:** The site analysis reveals there are several large developable tracts within the Energy site. The largest contiguous portion of the land that offers the best opportunity for development are located north of Route 3A, with frontage along 3A. (approx. 300 acres). There are two portions of the land south of Route 3A that offer an opportunity for development (approx. 112 acres), one area has frontage along 3A while the other does not. These tracts can accommodate several similar developers, or a variety of development types. Given the size of the entire property, having numerous developable sites enables the Town to encourage a diverse development program for the property.
- **Access to Route 3; Route 3A:** The Entergy property bifurcated by Route 3A, connecting the property to the Town’s downtown area and other tourism destination locations. The site is located approximately 4 miles from Route 3, with a direct connection via Plimoth Plantation Highway. Plimoth Plantation Highway is limited access from Route 3 to the site. This strong transportation connectivity allows a variety of development opportunities for the site. The internal Power House Road access drive from Route 3A to Rocky Hill Road provides additional access into the site, including a relatively larger developable area.
- **Complementary Uses:** In addition to the waterfront location, the Entergy Site is bounded by existing uses that complement some of the opportunities identified for this site (see opportunity section). Most notably, Cleft Rock Park contains interesting cultural features and views. The site also is proximate to Plimoth Plantation and Old Sandwich Golf Club.

- **Single Ownership:** Having the entire site under the control of a single entity is a strength from an economic development perspective, allowing the Town to work with a single entity to define a vision for the site and go through the entitlement process. Large sites like this with multiple owners oftentimes creates challenges in creating a unified vision for the development area.
- **Available Infrastructure:** There is water service available along a portion of Route 3A that can serve the Entergy Site, as well as a water tank on the property.

WEAKNESSES

- **Topography (South Side):** Much of the site has topography exceeding 20% making it challenging for large scale development. The site's varying, and substantial topography creates an economic development challenge for the site. Although the property has several developable sites, some are more challenging to access due to the undulating topography. Additionally, access to those sites further from Rocky Hill Road and Route 3A (particularly on the south side of Route 3A) will require substantial transportation and utility investment to overcome the steep topography.
- **Existing Transmission Lines:** The Pilgrim Nuclear Power Station produces approximately 688 megawatts of dependable capacity. The transmission lines that carries that energy to the grid runs through the Entergy Site along the Edison Access Road. From a physical perspective, the power lines separate a portion of the site that has development potential. The lines also likely will remain active after the plant's decommissioning, as there already is interest from other power companies to connect to the infrastructure. Any development will need to be mindful of their continued use.
- **Distance from Regional Transportation System:** Despite the relative proximity to Route 3, Plymouth remains comparatively far away from the regional transportation system. The Entergy Site is approximately 24 miles from I-495 in Middleborough (via Highway 44) and 34 miles from I-93 in Braintree (via Route 3). Furthermore, the site is more than six miles from the Plymouth train station, which is not served with regular rail service. This creates a competitive challenge for the site for attracting certain types and intensity of uses.
- **Transportation Capacity:** In addition to proximity, the site is challenged by transportation capacity. Simply put, the Plimoth Plantation Highway is the main artery connecting the site to the rest of Plymouth/the Old Colony Region. Both Plimoth Plantation Highway and Route 3A are two-lane roads, limiting the peak capacity to and from the site. This challenge deals more with scale of development than development type. Regardless, a substantial development program will require transportation investments to accommodate the new demand.
- **Existing Infrastructure:** While the site has access to water, it does not have the same access to sewer service. Any development requiring sewer service must bear the cost of installing new lines. The site also has limited access to other utilizes including communication infrastructure.
- **Future Well Siting:** A large portion of the Entergy Site, particularly to the south of Route 3A on the eastern side of the property. Locating a well on the site will impact development in the immediate area. To this point determination of whether a well is appropriate for this site and specifically where it would be located should be done in the short term to help define the overall site development potential.

OPPORTUNITIES

- **Subdivision of the Site:** The Entergy Site's size and development potential (from a physical analysis perspective) lends itself to accommodating a wide range of market

opportunities. More specifically, the unique features in certain parts of the site are more appropriate for certain uses over others. Thus, the Town could encourage a development program that enhances economic diversity rather than focus in on a singular use.

- **'Northside' Economic Development Potential:** The area of the Entergy Site located between Route 3A and the existing power generation facility constitutes most of the potentially developable land. This area is relatively flatter than the rest of the site and is better served with transportation and other infrastructure amenities. From an economic development perspective, this portion of the site is best suited for employment-based development activity.
- **Hilltop Plateau:** The hilltop plateau south of Route 3A has the potential to accommodate a visual and economic focal point for the Entergy Site. Given the superior views and prominent location, the hilltop plateau is ideal for a destination-based activity. This concept could include a cultural/entertainment venue (i.e. concert hall), a business event facility (i.e. conference center), accommodations (i.e. hotel), social gathering venue (i.e. wedding venue), or a combination of these activities.
- **Ecotourism/Recreation Tourism:** A large portion of the Entergy Site is not suitable for physical development, particularly south of Route 3A. However, these areas could accommodate tourism and recreation-based economic development activity. The size of the site can accommodate many tourism and recreation activities. Most notably, the topographic variations are ideal for hiking/biking trails as well as ropes course/zip line facilities. There are areas of the site that are better suited for passive tourism/recreation use as well (i.e. birding).

THREATS

- **Adjacent Uses:** The Entergy site is bounded by existing development. The eastern boundary is the existing power generation facility, which could cause some issues until it is remediated. However, the site also is bounded by a golf course and established residential neighborhoods. Any new development activity on the Entergy Site will need to account for compatibility.
- **Timing of Opportunity/Development:** Access to the Entergy Site and the power generation facility property will not be possible for years. The power generation facility is not going to be fully decommissioned until 2021 and will take approximately 10 years to fully remediate. The Chapter 61A designation on the study site does not expire until 2023. Thus, any economic development investment on either property will not occur for at least six years. Given the property is owned by a private entity, any strategy will need endorsement from the owner.

Table 2: Plymouth Zoning Summary

Zone	Allowed Uses	Special Permit Uses	Special Permit Uses Subject to Environmental Design Criteria	Special Permit Uses Subject to Adequate Facility Conditions	Prohibited Uses	Min Lot Size	Min Lot Dimensions	Min Side Yard	Min Front Yard	Min Rear Yard	Max Lot Coverage/ Max FAR	Max Height
Rural Residential (RR)	<ul style="list-style-type: none">Single-family dwellings.Home occupations.Conservation of soil, water, and plants; outdoor recreation; day camps; fishing and hunting (where legally permitted); proper operation of dams and other water control devices.	<ul style="list-style-type: none">Cemeteries.Nonprofit clubs and lodges.Golf courses, country clubs, tennis courts, swimming pools.Day nurseries and kindergartens.	<ul style="list-style-type: none">Sand and gravel quarries and similar extractive industries subject to Zoning Bylaw § 205-18.High technology planned unit development (PUD), which may include office buildings for administration, engineering and design and data processing uses, laboratories, research facilities , and other campus-type office structures or groups of structures, such as manufacturing and assembly facilities, warehouse space, conference center, and training facilities with overnight accommodations, recreational facilities and other similar uses on well-buffered sites of more than 250 acres in rural service area only and only where access to the PUD from a limited access divided highway such as Route 3 is by a major street where no residential development on lots whose size or front yard (setback) is equal to or smaller than that currently allowed in the zoning district has occurred.Recreational campgrounds.Recreational development, as provided by Zoning Bylaw § 205-59, Rural Density Development per § 205-62, Transfer of Development Rights per § 205-70.Communication towers and antennas per § 205-171.	N/A	<ul style="list-style-type: none">Commercial and industrial uses (except as otherwise provided).Automobile or other junkyards; salvage yards; building materials storage; or scrap yards.Storage of products, materials or vehicles in connection with manufacturing or commercial uses outside the district.High technology PUD on <250 acres, or within a village service area, or which cannot meet access requirements described previously (to be considered a distinctly different use).	120,000 sf density High tech PUD 250 acres RD: 6,000 sf See § 205-59 RDD: 20,000 sf See § 205-62	Width 200' Depth 200' Width 2,000' Depth 2,000'	30' 500' 10 10	70' 500' 20 20	50' 500' 10 25	15% NA 10%/0.2	3 stories 35 feet 3 stories 35 feet
Large Lot Residential (R-40)	<ul style="list-style-type: none">All uses allowed in RR Zones other than village density development.	<ul style="list-style-type: none">Any use authorized by special permit in RR Zones except those requiring environmental design conditions.Colleges, universities, and technical or vocational schools.Two-family dwellings.Village density development.	<ul style="list-style-type: none">High technology PUD, which may only include office buildings for administrative, engineering and design and data processing uses, laboratories, research facilities , and other campus-type office structures or groups of structures and supporting uses which are clearly accessory to the above, such as manufacturing and assembly facilities, warehouse space, conference center, and training facilities with necessary overnight accommodations only, recreational facilities and other similar uses on well-buffered sites of more than 250 acres in rural service area only, and only where access to the PUD from a limited access divided highway such as Route 3 is by a major street where no residential development on lots whose size or front yard (setback) is equal to or smaller than that currently allowed in the zoning district has occurred.Rural density development as provided in § 205-62, including provisions for transfer of development rights..	<ul style="list-style-type: none">Village density development, which is defined as the erection or construction of a dwelling unit or units at a density of greater than one unit per 60,000 square feet in the R-25, R-40, R-20SL, and R-20MD Zoning Districts.	<ul style="list-style-type: none">All uses prohibited in the RR Zone.Land and gravel quarries and other extractive industries.High technology PUD on less than 250 acres, or within a village service area, or which cannot meet the access requirements stated.	40,000 sf Two-family: 55,000 SF High tech PUD 250 acres RD: See § 205-59 RDD: See § 205-62	Width 150' Depth 200' Width 2,000' Depth 2,000'	25' 500'	50' 500'	50' 500'	25% NA	3 stories 35 feet

Zone	Allowed Uses	Special Permit Uses	Special Permit Uses Subject to Environmental Design Criteria	Special Permit Uses Subject to Adequate Facility Conditions	Prohibited Uses	Min Lot Size	Min Lot Dimensions	Min Side Yard	Min Front Yard	Min Rear Yard	Max Lot Coverage/ Max FAR	Max Height
Medium Lot Residential (R-25)	<ul style="list-style-type: none">All uses allowed in R-40 Zones.	<ul style="list-style-type: none">All uses authorized by special permit in R-40 Zones except those subject to environmental design conditions.Funeral homes.Rest homes, halfway houses, convalescent homes, homes for the elderly, orphanages and similar institutions.	<ul style="list-style-type: none">High technology PUD, which may only include office buildings for administrative, engineering and design and data processing uses, laboratories, research facilities , and other campus-type office structures or groups of structures and supporting uses which are clearly accessory to the above, such as manufacturing and assembly facilities, warehouse space, conference center, and training facilities with necessary overnight accommodations only, recreational facilities and other similar uses on well-buffered sites of more than 250 acres in rural service area only, and only where access to the PUD from a limited access divided highway such as Route 3 is by a major street where no residential development on lots whose size or front yard (setback) is equal to or smaller than that currently allowed in the zoning district has occurred.Rural density development as provided in § 205-62, including provisions for transfer of development rights.Hospitals, sanitariums, and similar institutions. "Similar institutions" shall be deemed to include office buildings located on land owned by, and contiguous to land owned by, a hospital affiliate as of April 6, 2002.Retirement mobile home PUDs.	<ul style="list-style-type: none">Village density development.	<ul style="list-style-type: none">All uses prohibited in the R-40 Zone.	25,000 sf Two-family: 35,000 SF VOSD: 6,000 sf see § 205-66 15,000 sf Two-family RD: see § 205-59	Width 110' Depth 175' VOSD – varies see §205-66	15' Single 40' Total 10'	35' 20	40' 10	25% NA	3 stories 35 feet

Table 3: Aquifer Protection Use Table

§ 205-57. Aquifer Protection District (AA) Use Table. [Added Fall ATM by Art.17, October 24, 2011, Amended by Fall ATM by Art. 26, October 20, 2012]		Area 1	Area 2	Area 3
Line Reference	<p>As stated in Paragraph F of Section 205-57, a proposed development project may be subject to more than one use described in the accompanying Aquifer Protection District (AA) Use Table in this Section.</p> <p>A - Allowed Use</p> <p>SP - Special permit Use (all are subject to Environmental Design Conditions, and to those criteria noted in this Section of the Bylaw).</p> <p>P - Prohibited Use</p>			
1	Residential, commercial or industrial use except as expressly prohibited.	P	A	A
2	Single-family or two-family dwelling and accessory uses or additions thereto on any lot of record as of the effective date of the 1981 Aquifer Protection Map.	A	A	A
3	New single- or two-family dwelling, and additions and/or accessory uses thereto, not on a lot of record as of the effective date of the 1981 Aquifer Protection Map discharging all wastewater via a municipal sewerage system or a Title 5 compliant on-site septic system, unless as otherwise specified in this Table.	P	A	A
4	New residential development not on a lot of record as of the effective date of the 1981 Aquifer Protection Map and subject to a special permit must have a gross density of one dwelling unit (four bedrooms) per 40,000 square feet of land; or discharge all wastewater via the municipal sewerage system.	P	A	A
5	(a) All uses allowed in Wetlands Areas and consistent with the Wetlands Protection Act.	A	A	A
	(b) Unless consistent with 310 CMR 22.21(2)(b)(6): ³ the mining of land incidental to the construction of building foundations, roads or utility works, or the installation of Best Management Practices for stormwater management, which involve the removal of soil, loam, sand, gravel or any other mineral substances within five feet of the historical high groundwater, unless the substances removed are re-deposited within 45 days of removal on site to achieve a final grading greater than five feet above the historical high water mark, and except for excavations for the construction of building foundations, the installation of utility works, or wetland restoration work conducted in accordance with a valid Order of Condition issued pursuant to MGL. c. 131, § 40 (the Wetlands Protection Act).	P	P	P
	(c) All uses that as a result of site work have grades of five feet or more above maximum groundwater elevation, unless as otherwise specified in this Table.	P	A	A

³ Note the Town of Plymouth is more restrictive than DEP.

§ 205-57. Aquifer Protection District (AA) Use Table. [Added Fall ATM by Art.17, October 24, 2011, Amended by Fall ATM by Art. 26, October 20, 2012]		Area 1	Area 2	Area 3
Line Reference	As stated in Paragraph F of Section 205-57, a proposed development project may be subject to more than one use described in the accompanying Aquifer Protection District (AA) Use Table in this Section. A - Allowed Use SP - Special permit Use (all are subject to Environmental Design Conditions, and to those criteria noted in this Section of the Bylaw). P - Prohibited Use			
	(d) Permanent removal, or re-grading of the existing soil cover, which results in a finished grade at a level less than five (5) feet above the historical high groundwater, unless as otherwise specified in this Table.	P	SP	SP
6	Passive or active recreation.	P	A	A
7	Normal operation and maintenance of existing water bodies and dams and water control, supply and conservation devices.	A	A	A
8	Minor road repair and overlay, including total reconstruction or expansion, or street improvements when performed by a municipal entity; however, no expansion may take place in an Area 1.	A	A	A
9	All other road repair and overlay, including total reconstruction or expansion, or street improvements.	SP	SP	SP
10	The laying of drinking water, sewer or drainage lines, or repair, replacement or expansion of existing structures and piping.	P ⁴	A	A
11	Dam removal, so long as all other local, state and federal permits that may be required are in place.	A	A	A
12	The replacement or repair of an existing non-sanitary wastewater treatment facility that will not result in a design capacity greater than the design capacity of the existing non-sanitary wastewater treatment facility, or the construction of a non-sanitary wastewater treatment facility, as approved by the DEP, exclusively designed for the treatment of contaminated ground or surface water and operating in compliance with 314 CMR 5.05(3) or 5.05(13).	A	A	A
13	Construction, maintenance, repair or enlargement of drinking water facilities and accessory structures, including underground storage tanks which are not expressly prohibited; the installation of new wells, the laying of water lines, repair and replacement of pipe and appurtenances, and associated grading.	A	A	A

⁴ Except as approved by DEP as required.

§ 205-57. Aquifer Protection District (AA) Use Table. [Added Fall ATM by Art.17, October 24, 2011, Amended by Fall ATM by Art. 26, October 20, 2012]		Area 1	Area 2	Area 3
Line Reference	As stated in Paragraph F of Section 205-57, a proposed development project may be subject to more than one use described in the accompanying Aquifer Protection District (AA) Use Table in this Section. A - Allowed Use SP - Special permit Use (all are subject to Environmental Design Conditions, and to those criteria noted in this Section of the Bylaw). P - Prohibited Use			
14	All uses that have parking for more than 200 vehicles.	P	SP	SP
15	All uses that retain less than 30% of the site's area in its natural state (except as required for a single-family or two-family residence and additions and/or accessory uses thereto), unless as otherwise specified in this Table.	P	SP	SP
16	Uses which render impervious more than 15% or 2,500 square feet of any lot or parcel, whichever is greater.	P	SP	SP
17	Storage of animal manure covered and contained within a structure demonstrated to prevent the generation and escape of contaminated runoff and/or leachate.	P	SP	SP
18	Open storage of animal manure.	P	P	P
19	Animal feedlots exceeding ten animals per acre, except as may be protected under MGL c.40A, s.3.	P	P	P
20	Storage of commercial fertilizers, as defined in MGL c. 128, s. 64 , for non-agricultural uses, unless and only as permitted by special permit within a structure demonstrated to prevent the generation and escape of contaminated runoff and/or leachate.	P	SP	SP
21	The application of pesticides, including herbicides, insecticides, fungicides, and rodenticides, for non-domestic or non-agricultural uses in accordance with state and federal standards. If applicable, the applicant shall provide documentation of compliance with a Yearly Operating Plan (YOP) for vegetation management operations under 333 CMR 11.00 , or a Department of Food and Agriculture approved Pesticide Management Plan or Integrated Pest Management (IPM) program under 333 CMR 12.00.	P	SP	SP
22	The application of fertilizers for non-domestic or non-agricultural uses. Such applications shall be made in a manner so as to minimize adverse impacts on groundwater due to nutrient transport, deposition and sedimentation.	P	SP	SP
23	Service facilities, repair facilities or car washes accessory to other primary uses.	P	SP	SP

§ 205-57. Aquifer Protection District (AA) Use Table. [Added Fall ATM by Art.17, October 24, 2011, Amended by Fall ATM by Art. 26, October 20, 2012]		Area 1	Area 2	Area 3
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24	Boat or motor vehicle service or repair facilities or car washes except those accessory to other primary uses; commercial laboratories; and establishments conducting dry cleaning on the premises.	P	P	P
25	Storage of liquid petroleum products, as an accessory use, in normal Household Quantities including for emergency generators.	A	A	A
26	Storage of liquid petroleum products greater than in normal Household Quantities, unless as otherwise restricted in this Table.	P	A	A
27	Waste oil retention facilities unless approved by the Board of Health or required by MGL c.21, s. 52AA.	P	A	A
28	The storage of more than 5,000 gallons of gasoline, oil or similar petroleum products.	P	P	SP
29	All uses that store fuel or oil in quantities greater than 500 gallons, unless as otherwise specified in this Table.	P	SP	SP
30	Petroleum, fuel oil, and heating oil Bulk Stations and Terminals including, but not limited to, those listed under SIC codes 5983 and 5171, not including liquefied petroleum gas. SIC Codes are established by the U.S. Office of Management and Budget and may be determined by referring to the publication "Standard Industrial Classification Manual".	P	P	P
31	Storage and/or transmission of petroleum or refined petroleum products, except normal household use, outdoor maintenance, and heating of a structure; waste oil retention facilities required by statute, rule, or regulation; emergency generators required by statute, rule, or regulation; and treatment works approved under 314 CMR 5.00 for treatment of ground or surface waters, provided that storage listed above is in freestanding containers within buildings or above ground with secondary containment adequate to contain a spill the size of the container's total storage capacity. Storage tanks may be located within a building or other special enclosure which is sealed so that any leakage is trapped and may be removed without entering into the ground.	P	SP	SP

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Line Reference	As stated in Paragraph F of Section 205-57, a proposed development project may be subject to more than one use described in the accompanying Aquifer Protection District (AA) Use Table in this Section. A - Allowed Use SP - Special permit Use (all are subject to Environmental Design Conditions, and to those criteria noted in this Section of the Bylaw). P - Prohibited Use			
32	Storage of liquid Hazardous or Toxic materials and/or liquid petroleum products in quantities greater than normal household use, unless as otherwise specified in this Table.	P	SP	SP
33	Replacement of existing tanks or existing systems for the keeping, dispensing or storing of gasoline, if in compliance with all applicable laws.	A	A	A
34	Facilities that generate, treat, store, or dispose of Hazardous waste unless as otherwise specified in this Table.	P	P	P
35	Facilities that generate, treat, store, or dispose of Hazardous waste that are Very Small Quantity Generators, or Household hazardous waste collection centers or events operated pursuant to 310 CMR 30.390 , or Waste oil retention facilities required by MGL c. 21, s. 52A , or Treatment works approved by the DEP designed in accordance with 314 CMR 5.00 for the treatment of contaminated ground or surface waters, or Storage of sludge and septage, which is in compliance with 310 CMR 32.30 and 310 CMR 32.31.	P	SP	SP
36	The treatment or disposal works that are subject to 314 CMR 5.00 for wastewater other than sanitary sewage, inclusive of treatment or disposal works related to activities under the Standard Industrial Classification (SIC) Codes set forth in 310 CMR 15.004(6) (Title 5) , except the following: 1. The replacement or repair of an existing system(s) that will not result in a design capacity greater than the design capacity of the existing system(s); 2. The replacement of existing subsurface sewage disposal system(s) with wastewater system(s) that will not result in a design capacity greater than the design capacity of the existing system(s); 3. Treatment works approved by the Massachusetts DEP designed for the treatment of contaminated groundwater or surface waters and operated in compliance with 314 CMR 5.05(3) or 5.05 (13) ; and 4. Publicly owned treatment works (POTWs) that meet the wastewater management criteria for siting, design and water quality set forth in the latest version of the Massachusetts DEP's (Interim) Guidelines on Reclaimed	P	SP	SP

§ 205-57. Aquifer Protection District (AA) Use Table. [Added Fall ATM by Art.17, October 24, 2011, Amended by Fall ATM by Art. 26, October 20, 2012]		Area 1	Area 2	Area 3
Line Reference	<p>As stated in Paragraph F of Section 205-57, a proposed development project may be subject to more than one use described in the accompanying Aquifer Protection District (AA) Use Table in this Section.</p> <p>A - Allowed Use SP - Special permit Use (all are subject to Environmental Design Conditions, and to those criteria noted in this Section of the Bylaw). P - Prohibited Use</p>			
	Water, and any subsequent Guidelines.			
37	Landfills, open dumps, and solid waste disposal facilities, including without limitation, authorized or unauthorized landfills as defined in this bylaw.	P	P	P
38	The use of sodium chloride for ice control.	P	P	P
39	Storage of sodium chloride, chemically treated abrasives or other chemicals used for the removal of ice and snow on roads in quantities greater than for normal individual household use, unless and only through special permit provided such storage is within a structure designed to prevent the generation and escape of contaminated runoff and/or leachate.	P	SP	SP
40	Disposal or stockpiling of snow or ice brought in from outside the Aquifer Protection District.	P	P	P
41	Disposal or stockpiling of snow or ice.	P	SP	SP
42	Automobile graveyards and junkyards as defined in MGL c.140B, s.1.	P	P	P
43	Commercial establishments for manufacturing electronics or those for plating, finishing, etching or polishing electronics or metals.	P	P	P
44	Industrial and commercial uses which discharge process wastewater or which discharge process liquids on site.	P	P	P
45	The use of septic system cleaners which contain Toxic or Hazardous materials.	P	P	P
46	Disposal of brush and stumps.	P	P	P

§ 205-57. Aquifer Protection District (AA) Use Table. [Added Fall ATM by Art.17, October 24, 2011, Amended by Fall ATM by Art. 26, October 20, 2012]		Area 1	Area 2	Area 3
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47	Storage of Hazardous or Toxic materials in quantities greater than household use.	P	SP	SP
48	Manufacturing of Hazardous or Toxic materials.	P	P	P
49	Facilities that generate, treat, store or dispose of Toxic or Hazardous waste.	P	SP	SP
50	The disposal of liquid or leachable wastes, except by individual on-site domestic sewage disposal systems serving single or multi-family residences or serving business, industrial or institutional uses discharging not more than 1,000 gallons per day per 40,000 square feet of lot area in compliance with Title V of the State Environmental Code.	P	P	P
51	The landfilling or disposal of solid or liquid or leachable wastes, including the landfills receiving only wastewater and/or septage residuals including those approved by the DEP pursuant to MGL c. 21 s. 26 through s. 53; MGL c. 111 s. 17; MGL c.83 s.6 and s.7 , and regulations promulgated thereunder.	P	P	P

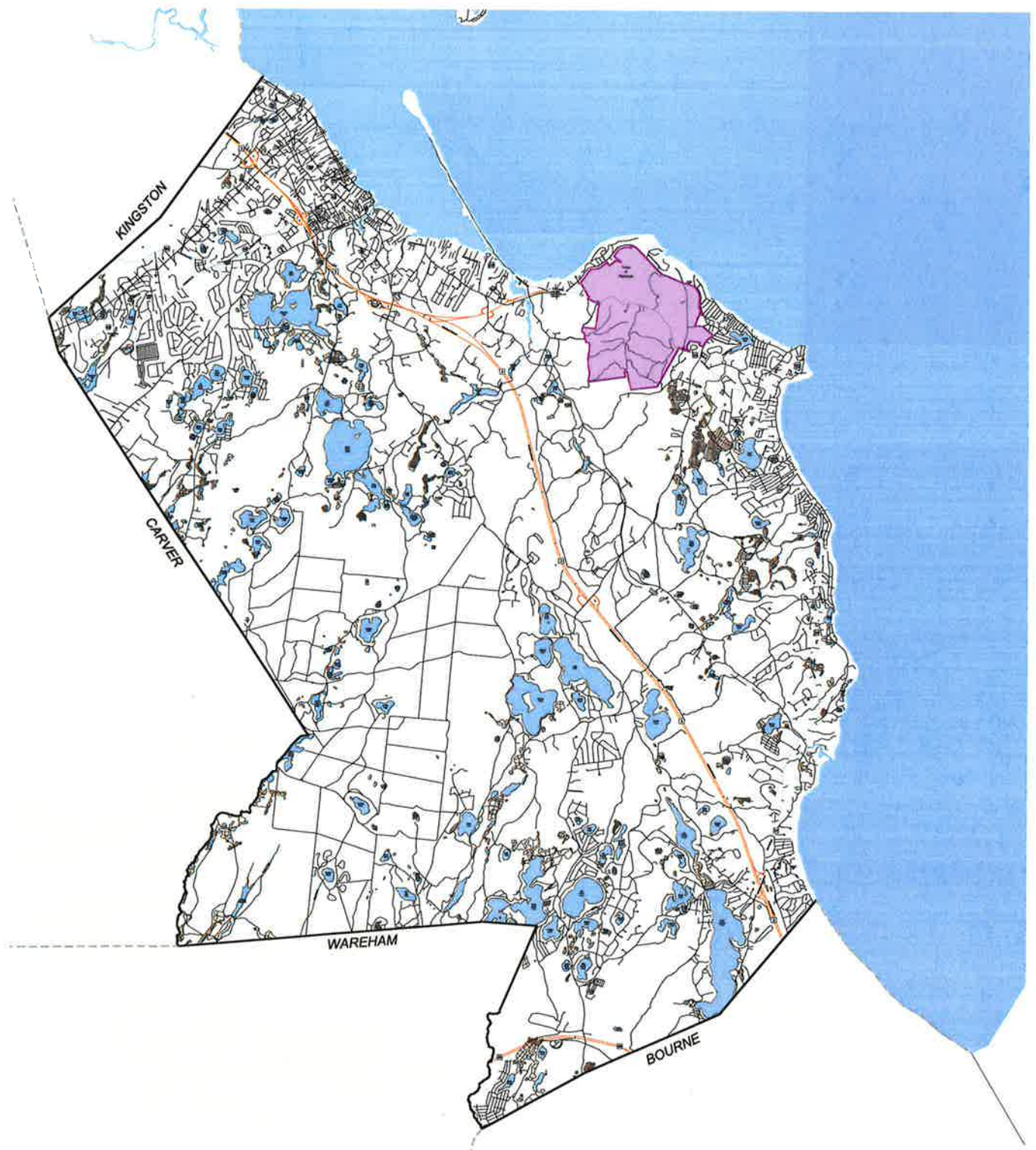
Town of Plymouth

ENTERGY PROPERTY SITE ANALYSIS

June 2017

ATTACHMENT 1

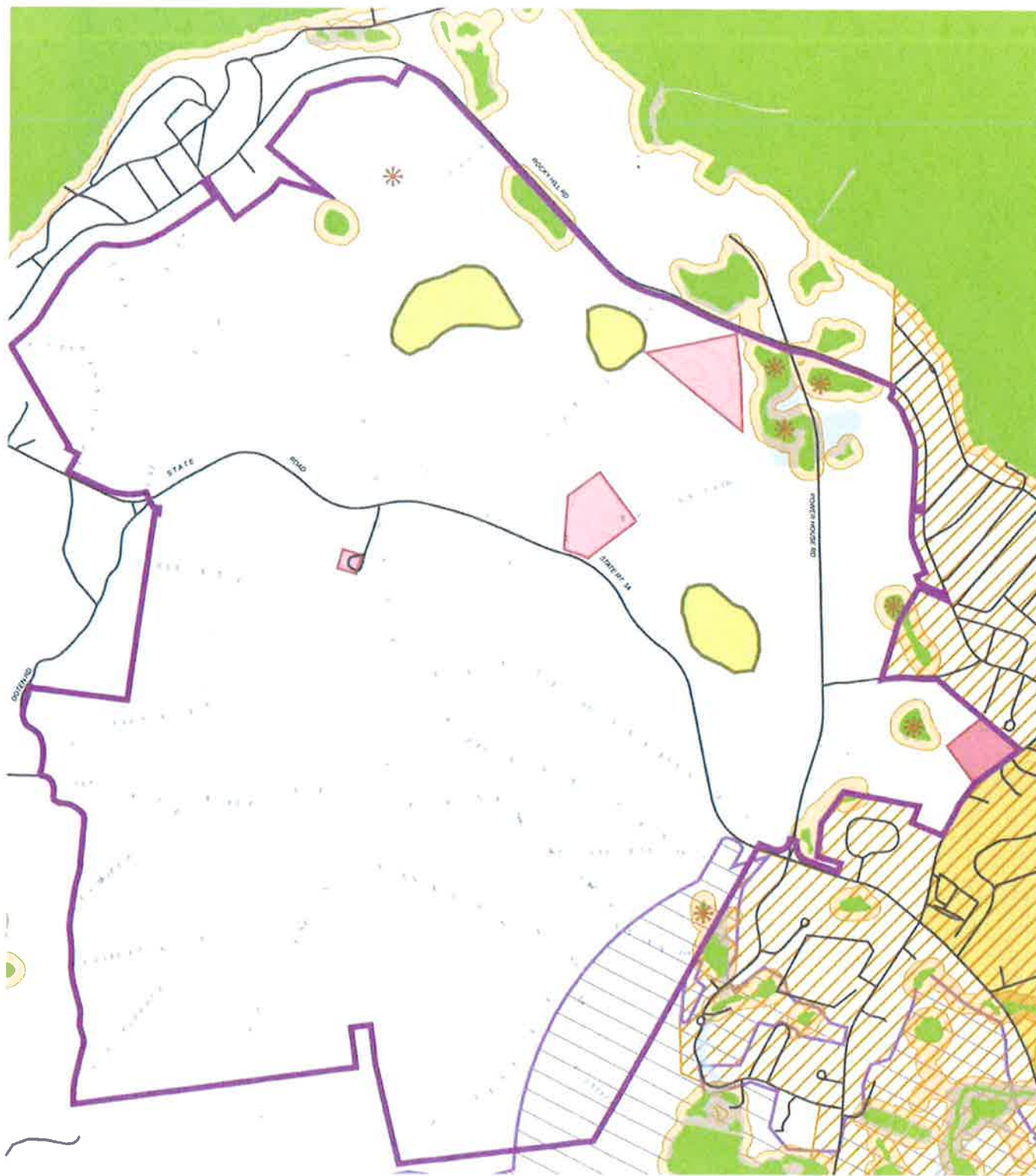
MAPS



LEGEND

- TOWN OF PLYMOUTH BOUNDARY
- TOWN BOUNDARY
- ENTERGY NUCLEAR GENERATION CO. PARCEL
- LIMITED ACCESS ROADWAY
- MAJOR STREET
- LOCAL STREET
- WATER

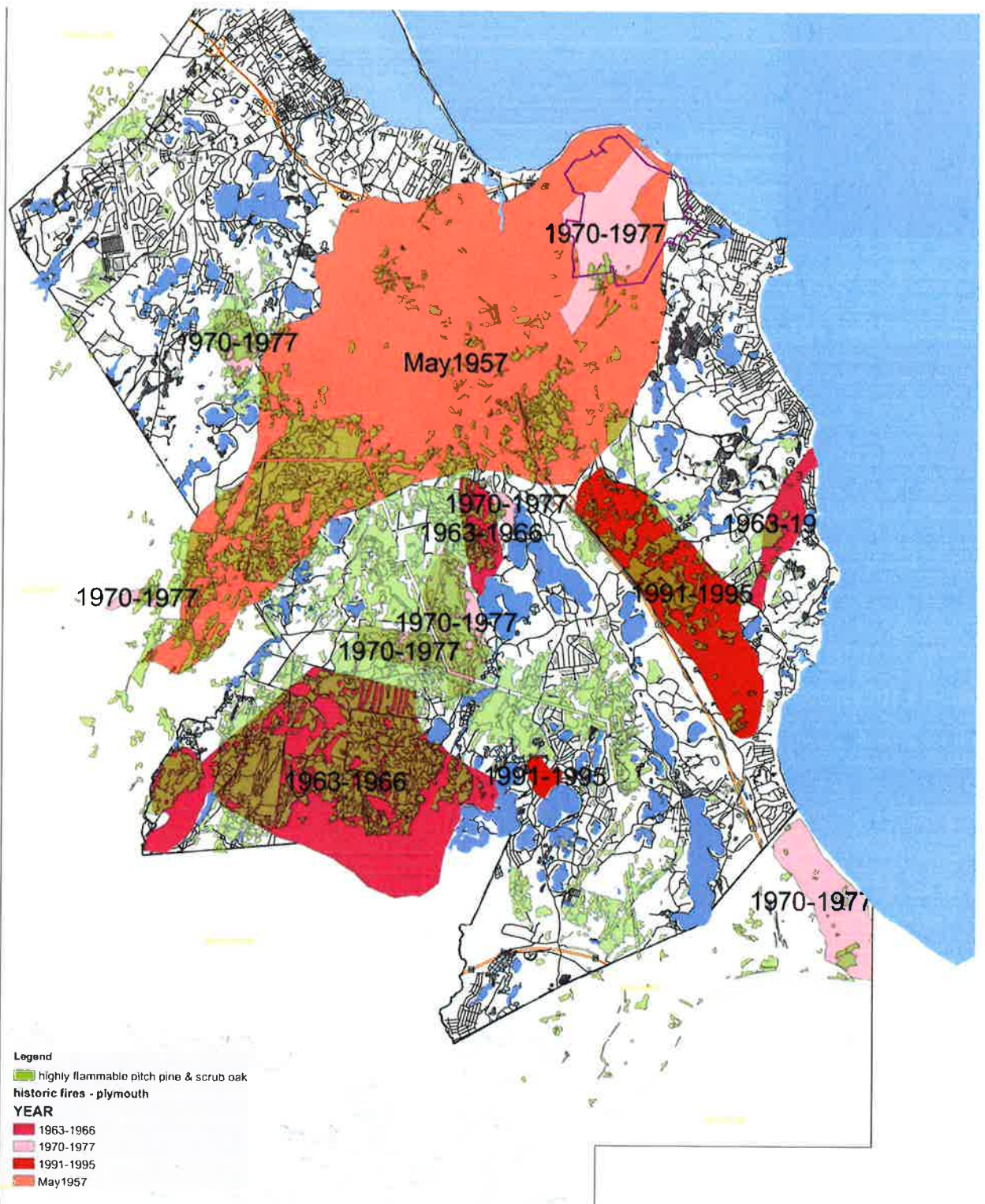




LEGEND

- | | |
|---|---|
|  ENTERGY NUCLEAR GENERATION CO. PARCEL |  MADEP WETLANDS |
|  POTENTIAL VERNAL POOL |  100FT. WETLAND BUFFER |
|  25' CONTOURS |  NHEP PRIORITY & ESTIMATED HABITAT |
|  ROADS |  FEMA FLOODPLAIN |
| |  TOWN PROPERTY |
| |  GLACIAL ERRATIC/VALLEY |





LEGEND

- ENTERMY NUCLEAR GENERATION CO. PARCEL
- ROADS

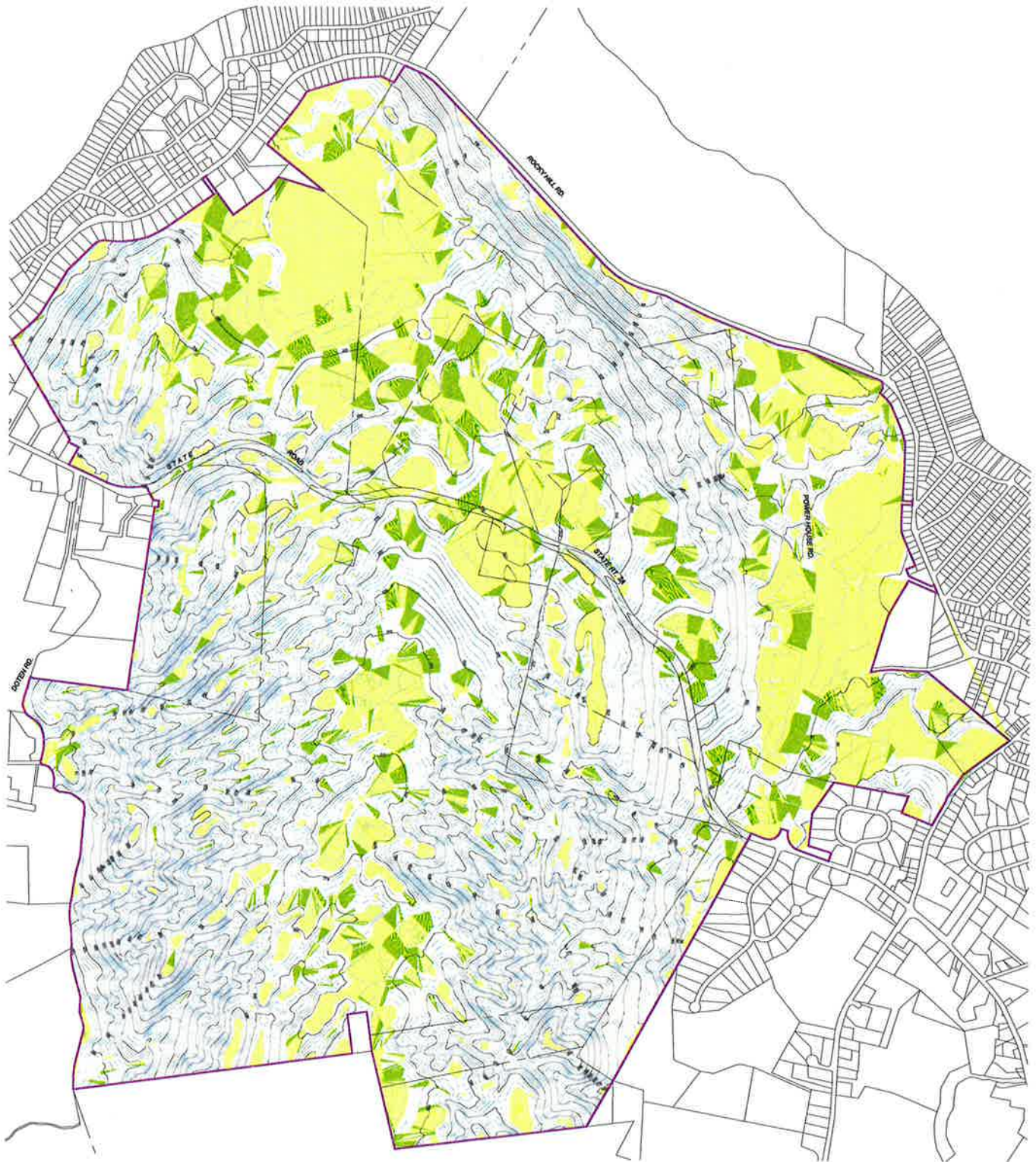




LEGEND

- ENTERGY NUCLEAR GENERATION CO. PARCEL
- ROADS





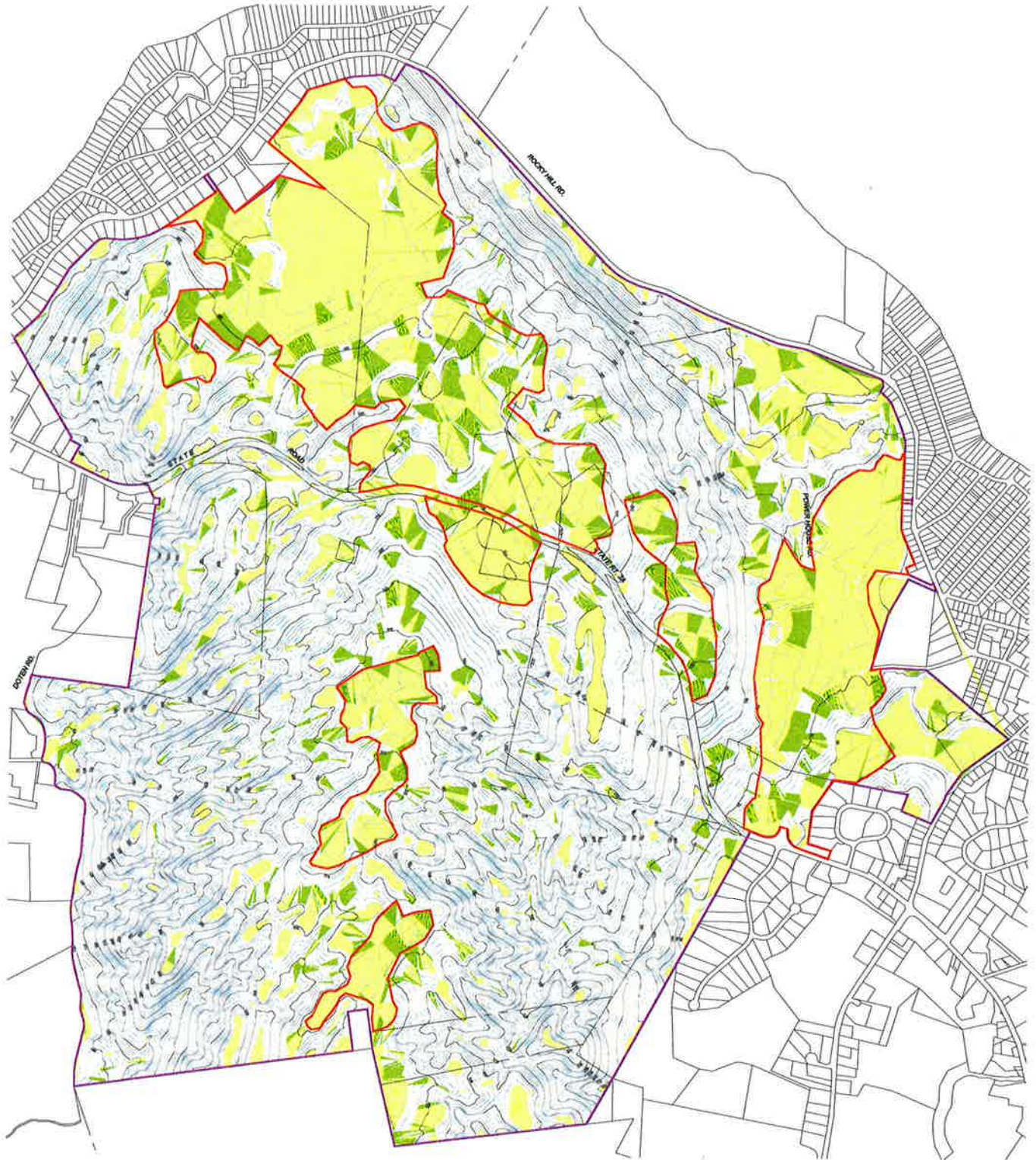
LEGEND

- ENTERGY NUCLEAR GENERATION CO. PARCEL
- 5' CONTOURS
- 25' CONTOURS
- POTENTIAL DEVELOPABLE AREA

SLOPE TABLE

COLOR	MINIMUM SLOPE	MAXIMUM SLOPE
■	0.00%	15.00%
■	15.00%	20.00%
	20.00%	80040.24%





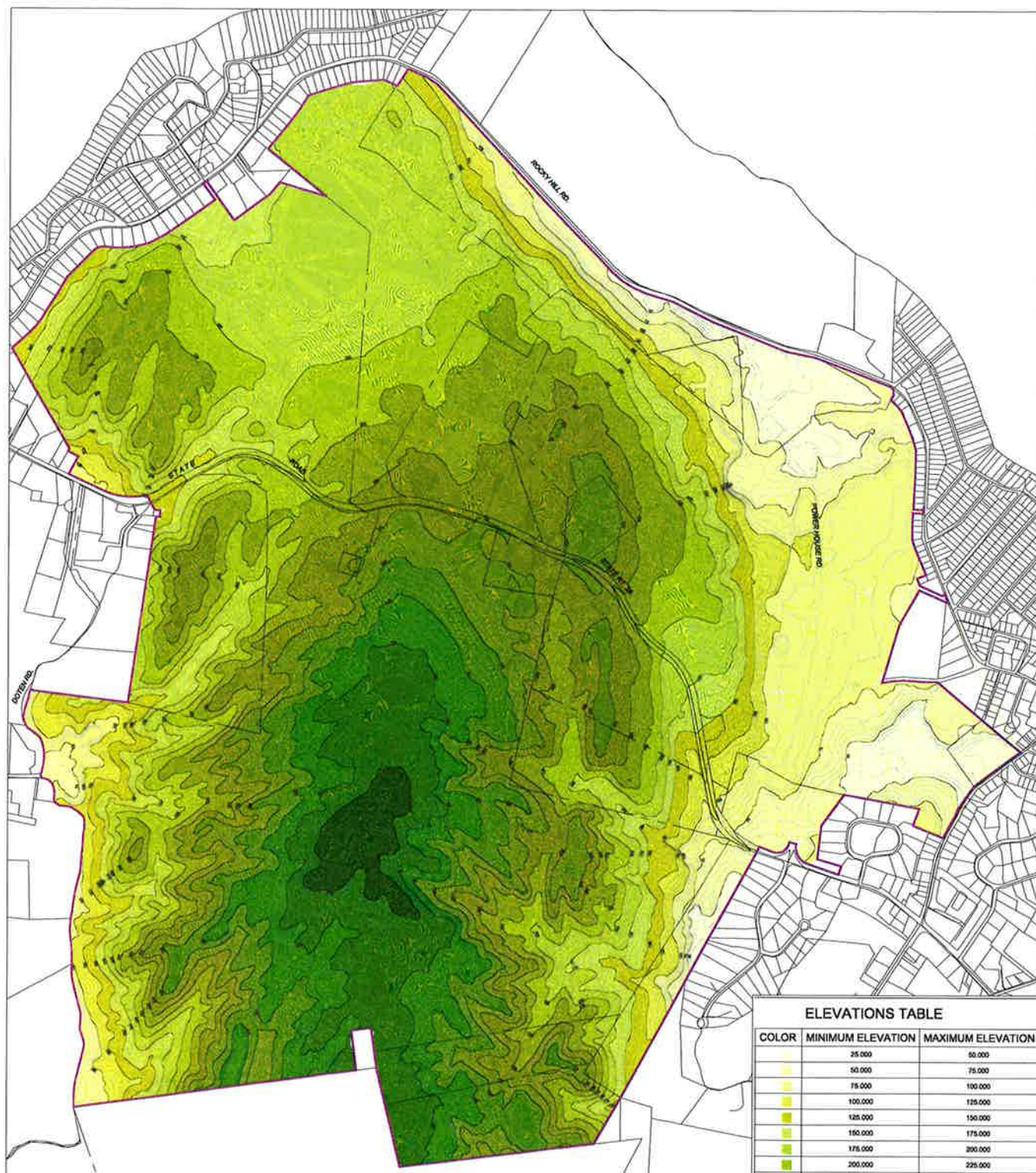
LEGEND

- ENTERGY NUCLEAR GENERATION CO. PARCEL
- 5' CONTOURS
- 25' CONTOURS
- POTENTIAL DEVELOPABLE AREA

SLOPE TABLE

COLOR	MINIMUM SLOPE	MAXIMUM SLOPE
■	0.00%	15.00%
■	15.00%	20.00%
	20.00%	89948.24%





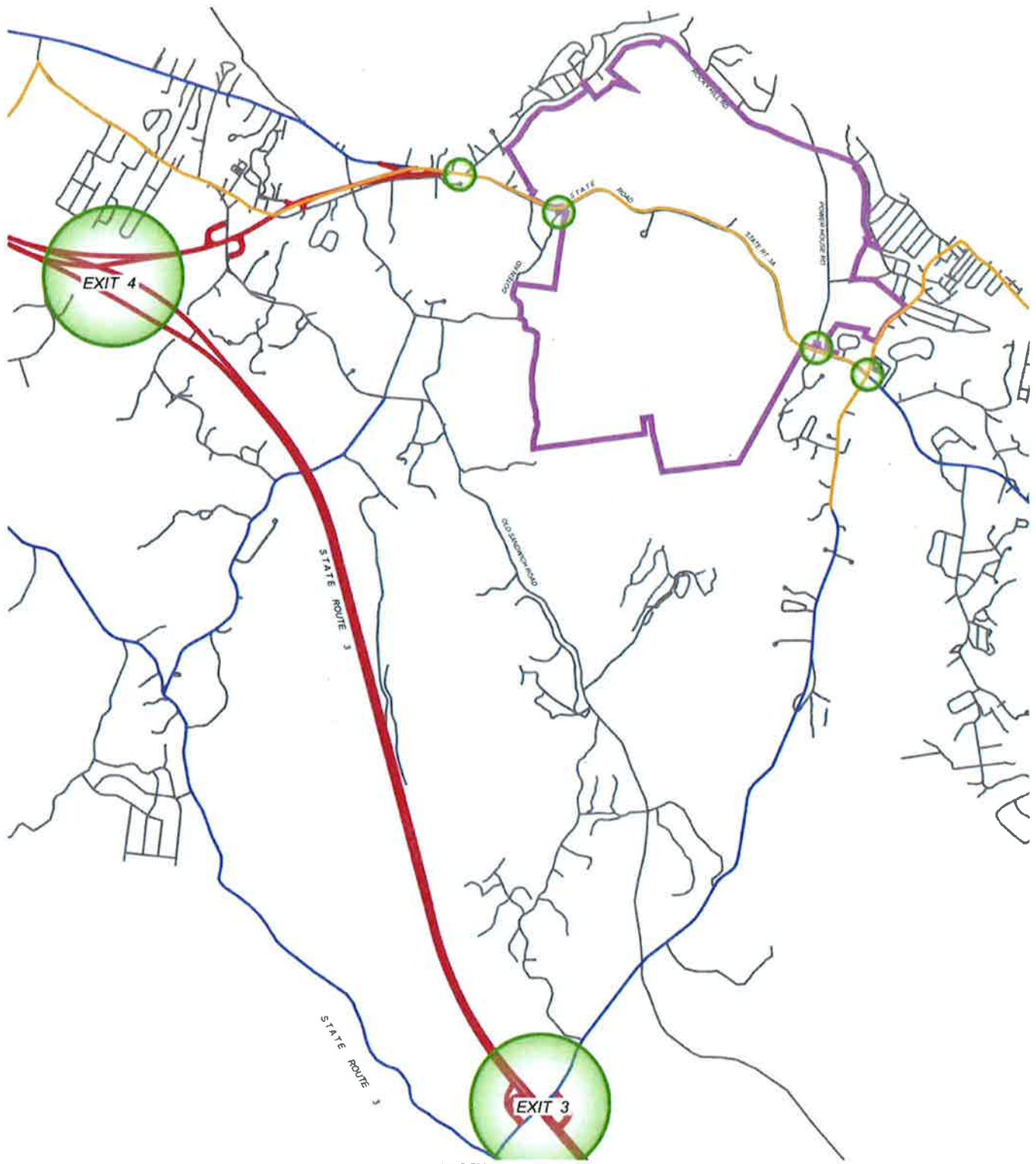
LEGEND

- ENTERGY NUCLEAR GENERATION CO. PARCEL
- 5' CONTOURS
- 25' CONTOURS

ELEVATIONS TABLE

COLOR	MINIMUM ELEVATION	MAXIMUM ELEVATION
	25.000	50.000
	50.000	75.000
	75.000	100.000
	100.000	125.000
	125.000	150.000
	150.000	175.000
	175.000	200.000
	200.000	225.000
	225.000	250.000
	250.000	275.000
	275.000	300.000
	300.000	325.000
	325.000	350.000
	350.000	375.000
	375.000	400.000

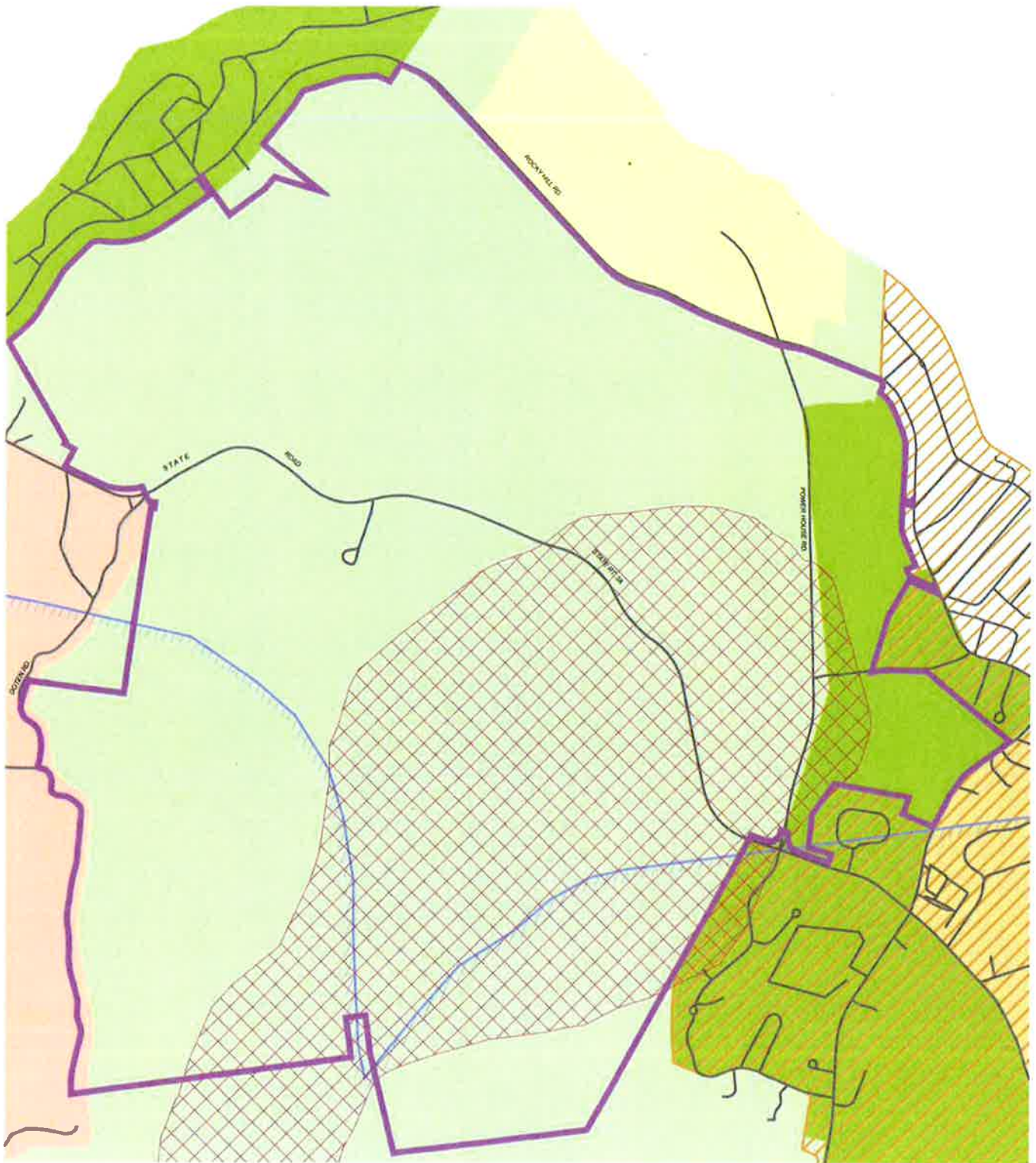




LEGEND

- ENTERGY NUCLEAR GENERATION CO. PARCEL
- LIMITED ACCESS ROADWAY
- MAJOR STREET
- LOCAL STREET
- GATRA MAYFLOWER LINK
- MAJOR INTERSECTION





LEGEND

- ENTERGY NUCLEAR GENERATION CO. PARCEL
- (LI) LIGHT INDUSTRIAL
- (R-20MD) MIXED DENSITY RESIDENTIAL
- (R-25) MEDIUM LOT RESIDENTIAL
- (R-40) LARGE LOT RESIDENTIAL
- (RR) RURAL RESIDENTIAL
- CPSGD ZONING OVERLAY
- AREA 2 - PLANNED FUTURE WELL SITE
- AREA 3 - CONTRIBUTING AREA TO SIGNIFICANT RECREATIONAL WATER BODIES



Town of Plymouth

ENTERGY PROPERTY SITE ANALYSIS

June 2017

ATTACHMENT 2 NHESP CORRESPONDENCE

On May 30, 2017, at 9:30 AM, Harper, Lynn (FWE) <lynn.harper@state.ma.us> wrote:

Hi, Matt,

That area was mapped in the 2008 version of the Priority Habitat of Rare Species maps for Eastern Box Turtle (Special Concern). In the draft map of Priority Habitat that is out for public comment through June 3rd, we have chosen not to regulate that site, because for many Special Concern species, we don't regulate populations we don't consider to be truly viable.

That's a long way of saying none of the Entergy property will be mapped as Priority Habitat and therefore regulated under MESA in the up-to-date version of the Priority Habitat map we expect to put out later this year (with the caveat that the Priority Habitat map may change as a result of public comment, and that publication of the updated map may be delayed for reasons beyond our control).

That's only the regulatory end of things, however. In terms of the overall biodiversity picture, however, we do still consider the Entergy property to have habitat for Eastern Box Turtle, as well as for Eastern Whip-poor-will (Special Concern; it wasn't even listed under MESA at the time of the 2008 Priority Habitat map). So, for example, if the Town applied for a LAND grant for the property, we would provide a comment letter saying the property has habitat for Eastern Box Turtle and Eastern Whip-poor-will (depending on what part of the property would be conserved). On the other hand, if someone were to propose developing subdivisions on the property, Natural Heritage would not regulate such development under MESA, at least at this moment.

As for what else you could survey for on the site, obviously you can look for more Eastern Box Turtles or Eastern Whip-poor-wills. The property is not likely to have the sort of rare species richness the pitch pine-scrub oak barrens of Myles Standish State Forest have, nor does it have any ponds that might be coastal plain ponds, with all their rare plants and damselflies. There is a little pond west of the ballfield on White Horse Road; it would be worth looking there for plants and damselflies. It would also be worth walking the north-south powerline to look for rare plants (*Liatris*? *Aristida purpurascens*? *Panicum rigidulum* ssp. *pubescens*? *Lycopodiella alopecuroides*? There could be others). The closed-canopy forest that covers most of the property probably doesn't have anything in the way of rare plants, but feel free to prove me wrong!

Lynn

Lynn Harper

Habitat Protection Specialist
Natural Heritage & Endangered Species Program
Massachusetts Division of Fisheries & Wildlife
1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6351 | f: (508) 389-7890
mass.gov/masswildlife | facebook.com/masswildlife

From: Creighton, Matthew T. [<mailto:mcreighton@bscgroup.com>]
Sent: Friday, May 26, 2017 1:51 PM
To: Harper, Lynn (FWE); DGould@townhall.plymouth.ma.us
Cc: Fasser, Jef
Subject: Town of Plymouth

Hi Lynn,

BSC recently had a meeting regarding the Entergy Land with the Town of Plymouth to discuss protection of various resource areas and potential economic strategies for the property. The Town's Marine and Environmental Affairs Director, David Gould was at the meeting (CCed on this email) and said he had spoken with you recently about updating maps for this property. We were hoping you would be able to provide information on what species is mapped on the southeastern portion of the property? I am conducting field evaluations of the site from an ecological/habitat/historic standpoint and any information you provide would help me look for potential habitat or species, while in the field. This information would be used by the Town when considering purchasing/developing/protecting the area. I have attached a map showing the area of mapped habitat within the property boundary.

I know in the past Heritage has provided this type of information free of charge to other Town's we have worked with and ask if you would be able to do the same here. Please let me know if you have any questions or need additional information.

Sincerely,

Matt Creighton

Matthew Creighton, PWS | Associate / Wetland Scientist

BSC Group

349 Route 28, Unit D | West Yarmouth | MA 02673
direct | 617-896-4591
main | 508-778-8919
cell | 401-480-9179

Town of Plymouth

ENTERGY PROPERTY SITE ANALYSIS

June 2017

ATTACHMENT 3 MHC CORRESPONDENCE



June 19, 2017

The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

Robin Carver
Town Planner
Plymouth Planning & Development Department
Town of Plymouth
11 Lincoln Street
Plymouth, MA 02360

RE: Town of Plymouth Entergy Site, State Road, Powerhouse Road, Rocky Hill Road, Plymouth, MA.
MHC #RC.62532.

Dear Ms. Carver:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Project Notification Form (PNF) submitted by BSC Group, Inc., for the property referenced above.

The PNF indicates that no new construction is proposed within the property at this time. If new construction requires state and/or federal funding, licensing, permits or approvals, then separate PNFs should be submitted to the MHC for each project. The MHC encourages consultation with this office as project planning proceeds to assist to avoid, minimize or mitigate adverse effects to significant historic and archaeological resources.

Review of the Inventory of Historic and Archaeological Assets of the Commonwealth indicates that the property includes several recorded resources, including the Cleft Rock (MHC # PLY. 936) and the Manomet Site (19-PL-68; PLY.HA.59). Rocky Hill Road is noted in historical documents as following the route of a colonial period Native American trail through the Pine Hills/Manomet Highlands. The MHC would appreciate receiving additional information on the old farmhouse foundation referenced in the PNF.

These sites were identified during the 1974 archaeological survey for the Pilgrim Nuclear Power Station and have been more recently referenced in the 2007 Pilgrim Environmental Impact Statement. Information included in the MHC's files for these sites and the 1974 archaeological survey is incomplete. The 1974 archaeological survey appears to have been conducted for only a portion of the property referenced in the PNF.

Undisturbed portions of the property are archaeologically sensitive. This archaeological sensitivity is primarily due to environmental setting, with areas of level, well-drained soils in proximity to the wetlands and water resources of Cape Cod Bay, as well as upland areas in proximity to transportation corridors, favorable for ancient and historic period land use and occupation. Evidence of ancient and historic period Native American activities, and colonial period agricultural, industrial and residential activities, may be present within undisturbed portions of the property.

These comments are offered to assist in compliance with Massachusetts General Law, Chapter 9, Sections 26-27C (950 CMR 71). Please contact me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jonathan K. Patton", written over a horizontal line.

Jonathan K. Patton
Staff Archaeologist/Preservation Planner
Massachusetts Historical Commission

xc: Matthew Creighton, BSC Group, Inc.
Plymouth Historical Commission