



12 December 2025
Reference: US-EI-3652230438

Town of Worthington
Conservation Commission
P.O. Box 247
Worthington, MA 01098

Rec'd 12/17/2025
WSP
100 Apollo Drive, Suite 302
Chelmsford, MA 01824
USA
T +1 978-692-9090
wsp.com

Request for Determination of Applicability – BWC Wades Stream, LLC

To the Town of Worthington Conservation Commission:

On behalf of BWC Wades Stream, LLC (BlueWave, the Applicant), WSP USA Inc. (WSP) submits this Request for Determination of Applicability (RDA) to seek confirmation that the activities associated with construction of a Dual Use Large-Scale Ground Mounted Solar Photovoltaic Installation (LSGMSPI) (the Project) at 190 Ridge Road, Worthington, MA (the Site) and an agricultural fence occurring outside the buffer zone are not subject to the Wetlands Protection Act (WPA) and its regulations.

Two wetlands have been delineated on the Site by Fleetwood Environmental Solutions, LLC (Fleetwood) along the western edge and southeast corner of the southern field. These wetlands are connected to Watts Stream via ephemeral streams and other linked wetlands and waterbodies. The Worthington Conservation Commission (Commission) conducted a site walk with Fleetwood on October 28, 2025 to review the resource area boundaries and concurred with the accuracy of the delineation.

This RDA has been filed as a follow up to the Commission's determination that a proposed agricultural fence through a portion of the hayfield is not an exempt agricultural activity for this specific Project and the previously proposed conditions. As such, that formerly proposed fence and the Limit of Work (LOW) has been relocated to the farthest extent of the 100-foot buffer zone. During construction, sediment barriers such as straw wattles, or approved equal, will be placed adjacent to the outside edge of the buffer to protect the downstream resources from impacts such as erosion or sedimentation. Please see Attachment B for annotated plans and specifications showing such practices.

The Project is entirely outside of the delineated wetlands and associated 100-foot buffer zones. Pursuant to the Code of Massachusetts Regulations, Title 310 (310 CMR) § 10.02(2)(d), such activities outside of resource areas and buffer zones are not subject to the WPA and do not require the filing of a Notice of Intent. The Applicant and WSP seek review and confirmation that the Project does not affect protected resource areas, and consequently, no additional actions or submissions involving the conservation commission or WPA are required.

Please find the following materials enclosed for your review:

- WPA Form 1 – Request for Determination of Applicability
- Annotated project plan sheets
- Wetlands Delineation Map provided by Fleetwood
- Site Photographs from June 9 and August 1, 2023 provided by Fleetwood



One copy of all materials is being sent concurrently to the Massachusetts Department of Environmental Protection Western Regional Office.

Sincerely,

WSP USA Inc.

A handwritten signature in black ink, appearing to read 'Olivia Crosby', positioned above a horizontal line.

Olivia Crosby, PE
Lead Consultant, Civil Engineer

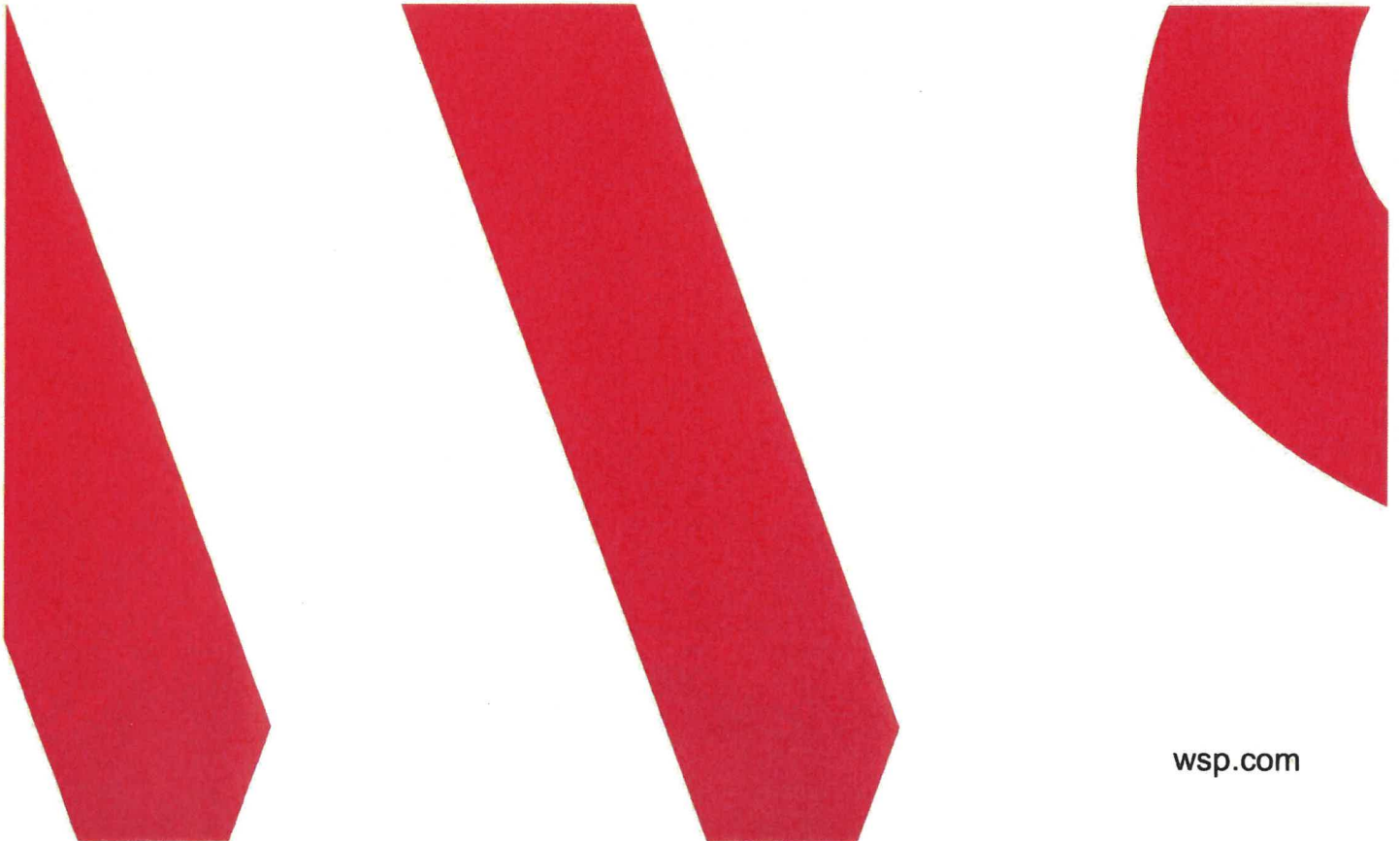
CC: BWC Wades Stream, LLC
Massachusetts Department of Environmental Protection – Western Region

Attachments: A – WPA Form 1
B – Annotated Project Plan Sheets
C – Wetlands Delineation Map provided by Fleetwood
D – Site Photographs from June 9 and August 1, 2023 provided by Fleetwood



ATTACHMENT A

WPA FORM 1





Massachusetts Department of Environmental Protection
Bureau of Water Resources - Wetlands

WPA Form 1- Request for Determination of Applicability Worthington
Municipality
Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

A. General Information

Important:
When filling out
forms on the
computer, use only
the tab key to move
your cursor - do not
use the return key.



1. Applicant:
Michael Zhe
Contact Name
116 Huntington Avenue
Address
Boston
City/Town
(617) 431-8758
Phone Number
BWC Wades Stream, LLC
Company
MA
State
02116
Zip Code
mzhe@bluewave.energy
Email Address
2. Property Owner (if different from Applicant):
Timothy J. Sena & Catherine Rude-Sena
Names
PO Box 132
Address
Worthington
City/Town
MA
State
01098
Zip Code
Phone Number
Email Address (if known)
3. Representative (if any)
Olivia
First Name
Crosby
Last Name
WSP USA Inc.
Company Name
100 Apollo Drive Suite 302
Address
Chelmsford
City/Town
MA
State
01824
Zip Code
+1 (978) 761 7934
Phone Number
olivia.crosby@wsp.com
Email Address (if known)

B. Project Description

1. a. Project Location (use maps and plans to identify the location of the area subject to this request):
190 Ridge Road
Street Address
Worthington MA
City/Town
42.41138
Latitude (Decimal Degrees Format with 5 digits after decimal e.g. XX.XXXXX)
-75.95092
Longitude (Decimal Degrees Format with 5 digits after decimal e.g. -XX.XXXXX)
407
Assessors' Map Number
28
Assessors' Lot/Parcel Number
- b. Area Description (use additional paper, if necessary):

The area of interest is the western edge and southeast corner of the southern field, around the wetlands depicted in Attachment B and C. The wetlands are connected to Watts Stream via a number of ephemeral streams and other linked wetlands and waterbodies. The area is flat with tall grass and small woody saplings throughout. According to the property owner, the land is periodically mowed/hayed.

[How to find Latitude
and Longitude](#)

[and how to convert
to decimal degrees](#)



Massachusetts Department of Environmental Protection
Bureau of Water Resources - Wetlands

WPA Form 1- Request for Determination of Applicability Worthington
Massachusetts Wetlands Protection Act M.G.L. c. 131, §40 Municipality

c. Plan and/or Map Reference(s): (use additional paper if necessary)

Attachment B – Annotated Project Plans

12/01/2025

Title

Date

Attachment C – Wetlands Delineation Map provided by Fleetwood

Prepared 08/02/2023

Title

Date

Attachment D – Site Photographs from 2023 provided by Fleetwood

Prepared 08/02/2023

Title

Date

B. Project Description (cont.)

2. a. Activity/Work Description (use additional paper and/or provide plan(s) of Activity, if necessary):

There is no proposed work associated with the Project within the 100-foot buffer zone of the delineated wetland resource areas on Site. The Limit of Work (LOW) has been set along the edge of the 100-foot buffer zone. During construction, sediment barriers such as straw wattle will be placed adjacent to the outside edge of the buffer to protect the downstream resources from impacts such as erosion or sedimentation. Please see Attachment B for annotated plans and specifications showing such practices.

b. Identify provisions of the Wetlands Protection Act or regulations which may exempt the applicant from having to file a Notice of Intent for all or part of the described work (use additional paper, if necessary).

310 CMR 10.02(2)(d) – Activities Outside the Areas Subject to Protection under M.G.L. c. 131, §40 and the Buffer Zone

3. a. If this application is a Request for Determination of Scope of Alternatives for work in the Riverfront Area, indicate the one classification below that best describes the project.

☐ Single family house on a lot recorded on or before 8/1/96

☐ Single family house on a lot recorded after 8/1/96

☐ Expansion of an existing structure on a lot recorded after 8/1/96

☐ Project, other than a single-family house or public project, where the applicant owned the lot before 8/7/96

☐ New agriculture or aquaculture project

☐ Public project where funds were appropriated prior to 8/7/96

☐ Project on a lot shown on an approved, definitive subdivision plan where there is a recorded deed restriction limiting total alteration of the Riverfront Area for the entire subdivision

☐ Residential subdivision; institutional, industrial, or commercial project

☐ Municipal project

☐ District, county, state, or federal government project

☐ Project required to evaluate off-site alternatives in more than one municipality in an Environmental Impact Report under MEPA or in an alternatives analysis pursuant to an



Massachusetts Department of Environmental Protection
Bureau of Water Resources - Wetlands

WPA Form 1- Request for Determination of Applicability Worthington
Municipality

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

application for a 404 permit from the U.S. Army Corps of Engineers or 401 Water Quality
Certification from the Department of Environmental Protection.

- b. Provide evidence (e.g., record of date subdivision lot was recorded) supporting the classification above (use additional paper and/or attach appropriate documents, if necessary.)

C. Determinations

1. I request the Town of Worthington make the following determination(s). Check any that apply:
Conservation Commission

- ☐ a. whether the **area** depicted on plan(s) and/or map(s) referenced above is an area subject to jurisdiction of the Wetlands Protection Act.
- ☐ b. whether the **boundaries** of resource area(s) depicted on plan(s) and/or map(s) referenced above are accurately delineated.
- ☒ c. whether the **Activities** depicted on plan(s) referenced above is subject to the Wetlands Protection Act and its regulations.
- ☒ d. whether the area and/or Activities depicted on plan(s) referenced above is subject to the jurisdiction of any **municipal wetlands' ordinance or bylaw** of:

Town of Worthington
Name of Municipality

- ☐ e. whether the following **scope of alternatives** is adequate for Activities in the Riverfront Area as depicted on referenced plan(s).

D. Signatures and Submittal Requirements

I hereby certify under the penalties of perjury that the foregoing Request for Determination of Applicability and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge.

I further certify that the property owner, if different from the applicant, and the appropriate DEP Regional Office were sent a complete copy of this Request (including all appropriate documentation) simultaneously with the submittal of this Request to the Conservation Commission.

Failure by the applicant to send copies in a timely manner may result in dismissal of the Request for Determination of Applicability.

Signatures:

I also understand that notification of this Request will be placed in a local newspaper at my expense in accordance with Section 10.05(3)(b)(1) of the Wetlands Protection Act regulations.

Aaron Simms

Signature of Applicant

Dec 15, 2025

Date



Massachusetts Department of Environmental Protection
Bureau of Water Resources - Wetlands

WPA Form 1- Request for Determination of Applicability Worthington
Massachusetts Wetlands Protection Act M.G.L. c. 131, §40 Municipality

Signature of Representative (if any)

Date

BWC WADES STREAM, LLC

2.0 MW AC GROUND-MOUNT SOLAR PV DEVELOPMENT

190 RIDGE ROAD

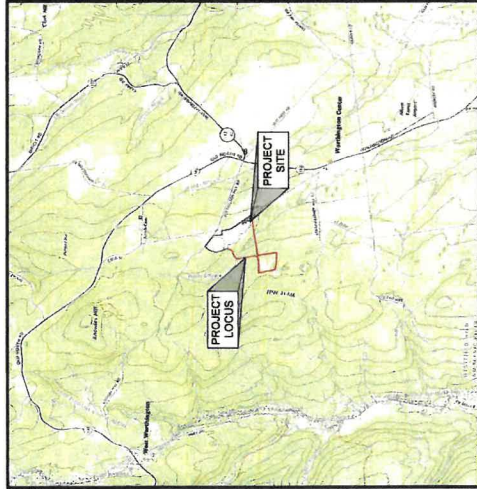
WORTHINGTON, MA 01098

SEPTEMBER 23, 2025

LAST REVISED DECEMBER 03, 2025

ISSUED FOR PERMITTING/NOT FOR CONSTRUCTION

DRAFT



LOCUS MAP
1"=500'



AERIAL IMAGE
1"=100'

DRAWING INDEX

SHEET NUMBER	DRAWING TITLE	DRAWING NUMBER
1	COVER SHEET	C-001
2	CONSTRUCTION, EROSION AND SEDIMENTATION CONTROL, NOTES	C-002
3	EXISTING CONDITIONS	C-003
4	GRADING/GEOTECHNICAL PLAN	C-004
5	PROPOSED CONDITIONS	C-005
6	ACCESS ROAD TOPOGRAPHIC PROFILE ANALYSIS	C-006
7	EQUIPMENT PAD	C-007
8	SHADOW ANALYSIS OF PROPOSED CONDITIONS	C-008
9	DETAILS (SHEET 1 OF 3)	C-009
10	DETAILS (SHEET 2 OF 3)	C-010
11	DETAILS (SHEET 3 OF 3)	C-011

PROPERTY OWNER
**TIMOTHY J. SENA &
CATHERINE RUDE-SENA**
PO BOX 132
WORTHINGTON, MA 01098

PREPARED BY
WSP
WSP USA INC.
100 APOLLO DRIVE SUITE 302
CHELSEA, MA 02158
TEL: 617.229.3122
WWW.WSP.COM
OLIVIA.CROSBY@WSP.COM

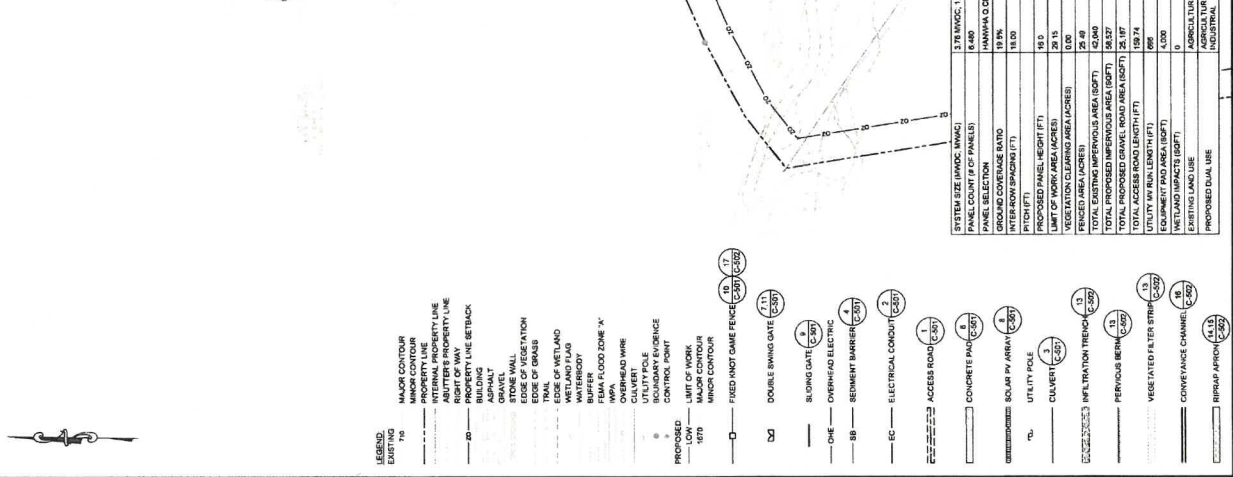
DEVELOPED BY
BWC WADES STREAM, LLC

SITE PLAN REVIEW BY
**TOWN OF WORTHINGTON
PLANNING BOARD**
PO BOX 247, 160 HUNTINGTON ROAD
WORTHINGTON, MA 01098
PLANNING@WORTHINGTONMA.US

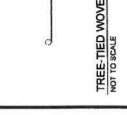
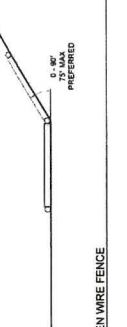
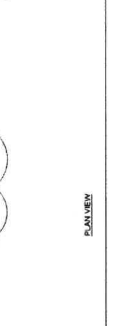
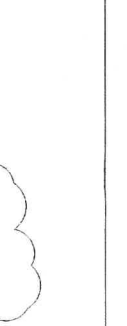
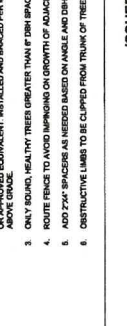
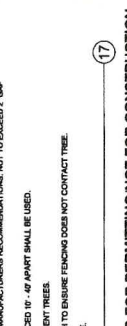
B
115 HUNTINGTON AVE
WORTHINGTON, MA 01098
TEL: 617.229.3122
ASSETMGMT@BLUEWAVE ENERGY

FIBER FENCE

FIBER FENCE

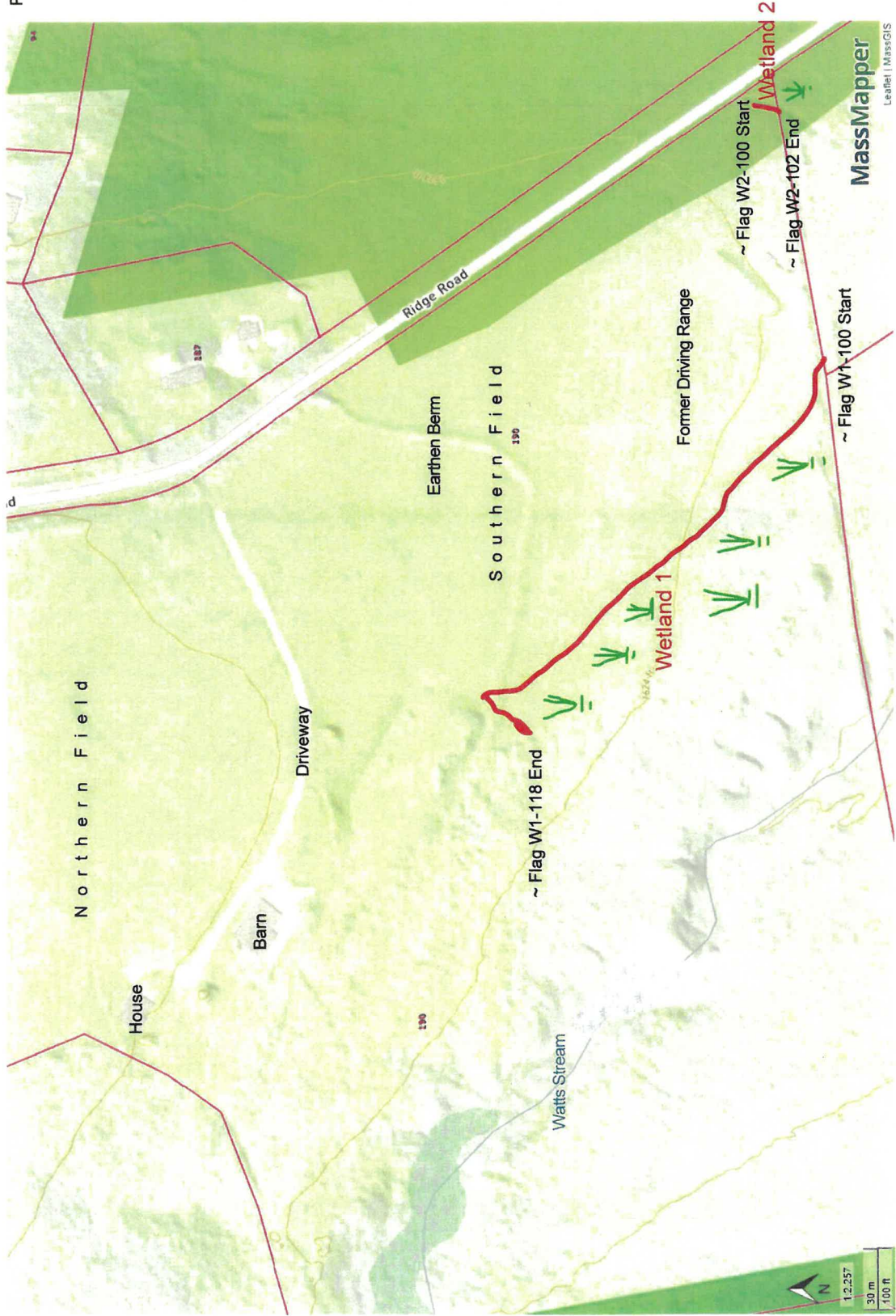


	CONCRETE PAD	6	C-567
	SOLAR PV ARRAY	8	C-567
	UTILITY POLE	3	C-567
	CULVERT	3	C-567
	IMPACTATION TRENCH	13	C-567
	PERFOROUS BERM	13	C-567
	VEGETATED RATED STRIP	13	C-567
	CONVEYANCE CHANNEL	18	C-567
	BRIQAP APRON	18	C-567



Wetlands Delineation Map

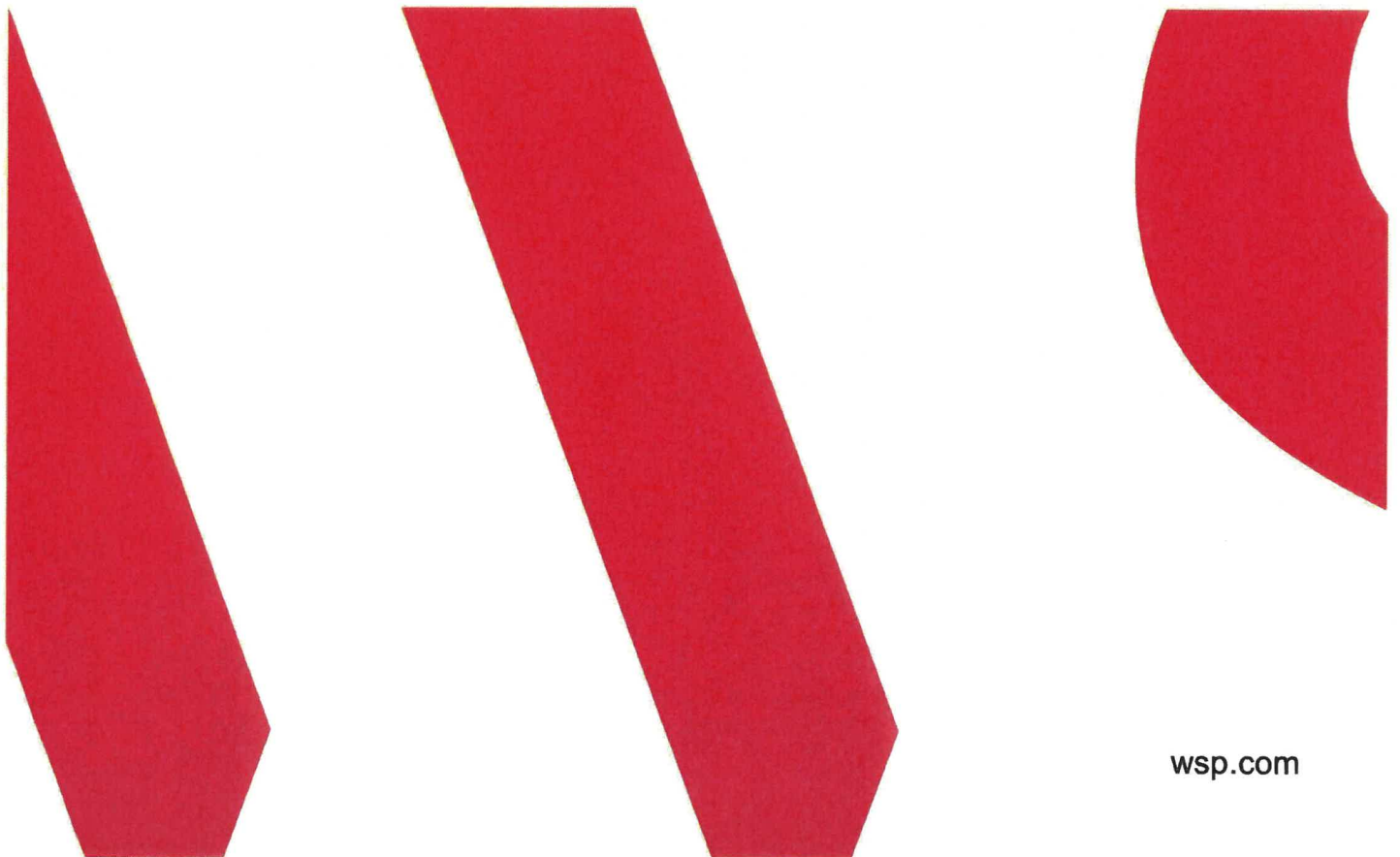
Property Tax Parcels





ATTACHMENT D

**SITE PHOTOGRAPHS FROM
JUNE 9 AND AUGUST 1, 2023
PROVIDED BY FLEETWOOD**





View of Northern Field (facing southeast) from northern edge of property



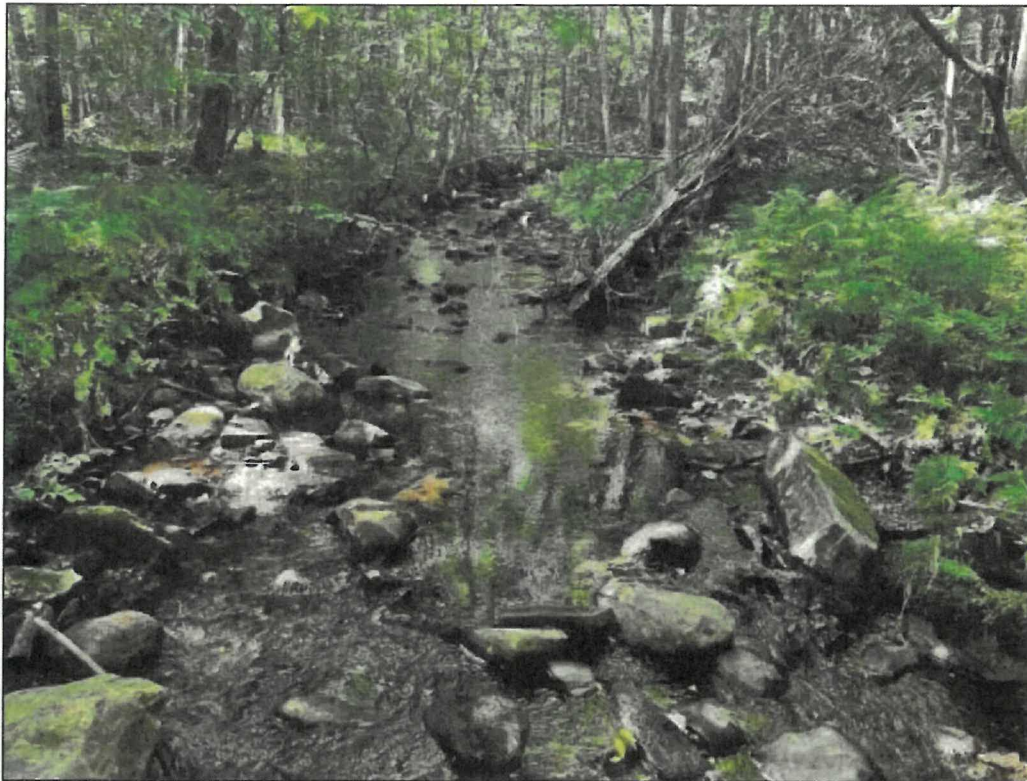
View of Southern Field (facing north) from its southwestern portion



Watts Stream and remnants of beaver dam (facing south) roughly 450 feet west of Southern Field



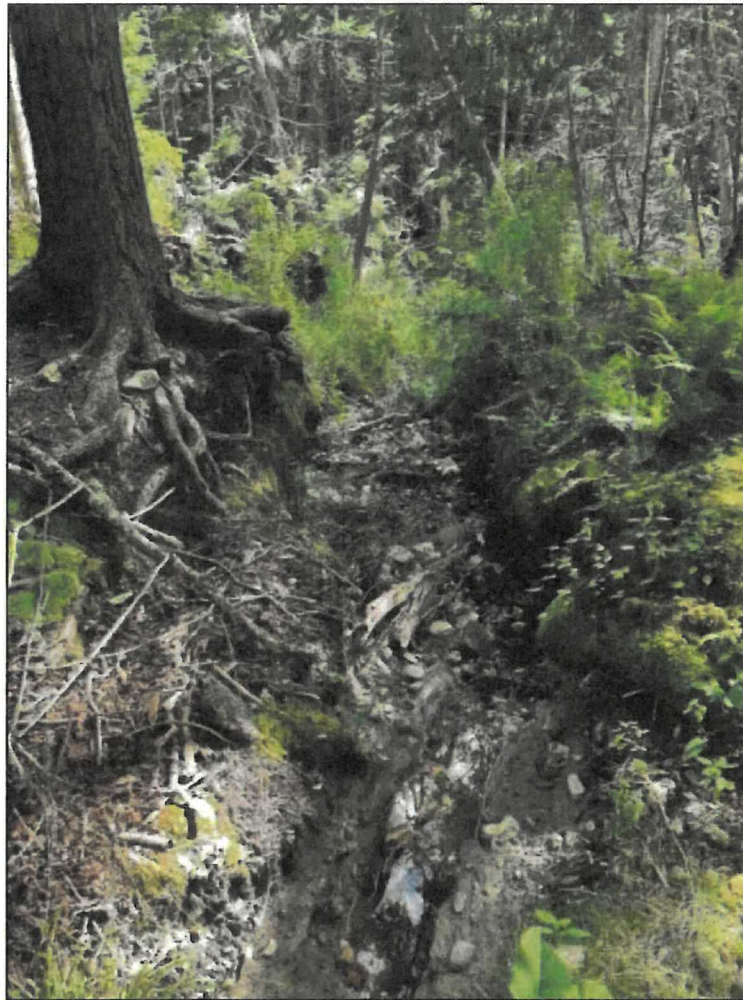
Bordering Vegetated Wetland ("BVW") in former beaver impoundment of Watts Stream; view west



Watts Stream downstream of beaver dam; view northwest



Wetland 1 at western edge of Southern Field; view west



One of the streams connecting Wetland 1 in Southern Field to Watts Stream; view east



Representative view of staking/flagging of Wetland 1 boundary in Southern Field; view east



Damaged culvert at the head of Wetland 2 near southeastern corner of Southern Field



View of Southern Field's eastern edge just north of Wetland 2 and damaged culvert (i.e., no wetlands)

BW Ridge Road RDA Updated 12-12-25 (002)

Final Audit Report

2025-12-15

Created:	2025-12-12
By:	Brie Fortmuller (brie.fortmuller@bluewavesolar.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAJ9i6SA0RbcWpGMAzvWM74hZsVhG0I4Qe

"BW Ridge Road RDA Updated 12-12-25 (002)" History

-  Document created by Brie Fortmuller (brie.fortmuller@bluewavesolar.com)
2025-12-12 - 8:51:47 PM GMT
-  Document emailed to Aaron Simms (asimms@bluewavesolar.com) for signature
2025-12-12 - 8:52:11 PM GMT
-  Email viewed by Aaron Simms (asimms@bluewavesolar.com)
2025-12-15 - 3:30:41 PM GMT
-  Document e-signed by Aaron Simms (asimms@bluewavesolar.com)
Signature Date: 2025-12-15 - 3:31:00 PM GMT - Time Source: server
-  Agreement completed.
2025-12-15 - 3:31:00 PM GMT



Adobe Acrobat Sign