
October 28, 2022

Ms. Karen Sherman
Town Planner
Town of Holliston
703 Washington Street
Holliston, MA 01746

**Re: Site Plan, Zoning, & Stormwater Design Engineering Peer Review #2
Master Paving Corp. & Middlesex Asphalt Services, Inc.
157 - 165 Lowland Street Holliston, MA
CMG ID 2022-154**

Dear Karen,

CMG is providing this letter report detailing our second site plan, zoning, and stormwater design engineering peer review of the site improvements for the Master Paving Corp. & Middlesex Asphalt Services, Inc. proposed contractor garage building project. The project is located on an approximately 7.07 +/- Acre parcel identified as 157 – 165 Lowland Street in Holliston, MA (the “Site”).

The project Applicant, *Master Paving Corporation and Middlesex Asphalt Services Inc.* is proposing to construct an approximate 7,200 s.f. contractor garage building, new septic system, and limited pavement areas, and associated access on a portion of the Site. The Site is located within an Industrial District Zone and Groundwater Protection District.

CMG is in receipt of the following documents:

- Five (5) Plan Sheets entitled “Proposed Site Plan of 157-165 Lowland Street in Holliston, MA” prepared by Connorstone Engineering, Inc., date 4/07/22, revise date 10/14/22.
- “Stormwater Report” for 157-165 Lowland Street Holliston, MA prepared by Connorstone Engineering, Inc., date 10/14/22.
- Comment / Response Letter entitled “Peer Review #1 157—165 Lowland Street” prepared by Connorstone Engineering, Inc., date 10/25/22.

Connorstone’s plan and stormwater report revisions listed above address the majority of CMG’s July 8, 2022 civil engineering peer review comments relating to the engineering and stormwater design.

CMG is providing the following remaining comments and recommendations for conditions of approval for the Planning Board’s consideration:

3. Section V-C.2: Plan does not provide a calculation for the required number of parking spaces and does not identify a dedicated ADA / AAB Accessible parking space or accessible route for the new building.

Connorstone Response (10/25/22): The number of spaces would appear to fall under V-C.j- "to be determined by the Planning Board." The updated plans have shown twenty (20) total parking spaces, which would be adequate for the use base upon owner information of the operation needs of the use. One ADA / AAB accessible space has been included on the updated plans located with access to the front of the building.

CMG Comment #2: ADA / AAB parking space does not meet the regulatory requirements for a van accessible space. An 8' wide space with 8' wide striped aisle and appropriate ADA / AAB signage detail must be provided. CMG recommends spot shots be shown on all four corners to determine compliance with slope requirements.

10. Section V-L.4.A.3) c. Groundwater Protection District Zone II Permitted Uses: Portions of the Site constitute redevelopment; however, CMG believes the additional impervious areas beyond existing constitute "new" development in accordance with the MassDEP Stormwater Regulations. Therefore, "new" development areas must recharge roof, parking and drive runoff on-site to the maximum extent practicable with parking and drive runoff discharged to oil/gas trap catch basins with 4 ft. depth sumps prior to recharge as per current MassDEP Stormwater Management Standards.

In addition, 44% TSS Removal pre-treatment and off-line oil/water separator are also required in accordance with the MassDEP Stormwater Management Standards for a land use with higher potential pollutant load prior to recharge to groundwater.

Connorstone Response (10/25/22): The site plans have been revised to include a Stormwater Management System in compliance with MassDEP standards.

CMG Comment #2: MassDEP Stormwater Management Standard 5 requires the use of an oil / grit separator be included in the treatment train designed to treat the water quality volume (i.e. 1 inch of runoff). Proprietary treatment BMPS may not be used as a terminal treatment device for a LUHPPL.

12. Section V-L.4.B.2) i. CMG recommends additional information be provided to verify compliance with state and federal regulations relating to the proposed storage of liquid hazardous materials and/or liquid petroleum products within the proposed garage building. CMG recommends a list of potential products, quantities, storage practices, and spill prevention measures be provided.

Connorstone Response (10/25/22): A locked storage container would be provided within the garage for any minor maintenance items, as approved through DEP by the RCC Permit. Bulk asphalt paving materials would not be storage on-site.

CMG recommends the Planning Board consider this as a Condition of Approval

13. Section V-L.4.B.2) j. Applicant should confirm there will be no on-site storage sodium chloride and /or chemically treated abrasives or other chemical used for the removal of ice and snow from pavement areas. A note relating to this requirement shall be added to the Stormwater O&M Plan.

Connorstone Response (10/25/22): No on-site storage of chemical de-icing materials would be proposed.

CMG recommends the Planning Board consider this as a Condition of Approval

Holliston Planning Board Site Plan Review & Special Permit Regulations

16. 7.3.1 e): "Certificate of Action" block is not provided on the first page of the Site Plan.

Connorstone Response (10/25/22): A "Certificate of Action" block has been added to Sheet 1.

CMG Comment #2: CMG recommends the "Certificate of Action" block should be shown on all sheets in the Proposed Site Plan set or a Plan Index listing all plan sheets be provided on Sheet 1 above the "Certificate of Action" block.

17. 7.3.1 o): Zoning compliance summary table is not provided.

Connorstone Response (10/25/22): The zoning setbacks had been added as requested in comment 1.

CMG Comment #2: Zoning summary should include all relevant requirements including but not limited to: parking requirements, maximum building height, maximum building coverage, and Floor Area Ratio in addition to building setbacks.

19. 7.3.2. h): A lighting plan is not provided and no waiver is requested.

Connorstone Response (10/25/22): A Lighting Plan has been provided to the Board.

CMG Comment #2: Comment Remains. A lighting plan is not included in the revised 10/14/22 Site Plan set.

22. 7.3.4: Landscape Plan signed and sealed by a registered landscape architect must be provided where the Site Plan requires construction of five or more parking spaces.

Connorstone Response (10/25/22): A Landscape Plan has been included (not stamped by a registered Landscape Architect).

CMG Comment #2: CMG recommends the Applicant provide a waiver request for consideration by the Planning Board to not require a Landscape Architect.

27. Section 7.4.2.G.1. – Current plan depicts the schematic layout of the proposed septic system to service the proposed building. CMG recommend the Planning Board require the Applicant provide an approved Septic System Design Plan and proof of Board of Health approval prior to construction.

Connorstone Response (10/25/22): Comment noted related to the septic system.

CMG recommends the Planning Board consider this as a Condition of Approval

28. Section 7.4.2.G.2. – No water services (domestic and/or fire) are shown on the Site Plan. The existing water main and connection locations are also not shown. Applicant's Engineer should provide a water service connection detail, size and type of piping, location and size of the existing water main, and pavement sawcut and patching details if the connection will be within the existing paved roadway.

Connorstone Response (10/25/22): The proposed water service has been added to the plans along with the typical construction details.

CMG Comment #2: The water service details reference the "City of Marlborough". Details should be revised to reflect Town of Holliston water services standards and details.

General Engineering & Stormwater Management Design Comments

41. A Notice of Intent is required to be filed with the Holliston Conservation Commission for all work within the 100 ft. wetlands buffer zone and / or 200 ft. riverfront zone and flood plain.

Connorstone Response (10/25/22): The required permitting will be submitted to the Conservation Commission.

CMG recommends the Planning Board consider this as a Condition of Approval

43. A 10 FT height sound barrier fence is noted on the plans. CMG recommends additional detail be provided to confirm it will comply with snow / wind loads and noise mitigation for the project.

Connorstone Response (10/25/22): Design of any fences would be provided by a Structural Engineer, and could be provided to the Town prior to construction.

CMG recommends the Planning Board consider this as a Condition of Approval

54. Site Plan Narrative notes the Applicant proposed “to house their paving operations fleet in a new building”. Fleet storage is considered a land use with higher potential pollutant load (LUHPPL) and therefore must comply with the pre-treatment requirements of Standard 5.

Connorstone Response (10/25/22): The project has been designed to meet the requirements of Standard 5, including the use of Proprietary Separators for oil/gas separation and a minimum of 44% pretreatment prior to infiltration.

CMG Comment #2: The stormwater treatment train must include an oil/grit separator to comply with Standard 5 (See Comment 10).

61. The Project proposes to alter > 1 Acre therefore an EPA NPDES Construction General Permit (CGP) registration and SWPPP is required to be submitted prior to construction. CMG recommends the Planning Board make this a condition of approval.

Connorstone Response (10/25/22): The proposed site has been designed to fully contain runoff on-site and the NPDES GCP may not apply to the work. However, if requested a SWPPP could be prepared and submitted for review.

CMG Comment #2: If all of the stormwater from the construction activity is captured on-site and allowed to evaporate, soak into the ground on-site, or is used for irrigation (i.e., not discharged to a water of the U.S.), CMG is in agreement the NPDES Construction General Permit may not apply. Under the Clean Water Act (CWA), it is illegal to have a point source discharge of pollutants to a water of the U.S. that is not authorized by the CWA.

Applicant’s Engineer is responsible to determine if there is a potential for a discharge during construction given the Site’s close proximity to Bogastow Brook. If the Applicant’s Engineer believes there is a potential for a discharge it is recommended to apply for NPDES CGP permit coverage before any potential discharge occurs. The controls used to keep the stormwater on-site so it does not reach a water of the U.S. must be effective under any size storm.

65. A revised "Long -term Operation and Maintenance Plan" must be provided based on the updated site stormwater management system design in full compliance with Standard 9.

Connorstone Response (10/25/22): A long term Operation and Maintenance Plan is included I the updated Stormwater Report.

CMG Comment #2: The O&M Plan is missing the following required information:

- **Name of the stormwater management system Owners / Responsible Party;**
- **Party responsible for operation and maintenance;**
- **An inspection and maintenance schedule narrative is contained within the O&M plan. However, CMG recommends a schedule in table format be provided for clarity for implementation of routine and non-routine tasks for each stormwater BMP;**
- **Plan showing the location the location of all stormwater BMPs maintenance access areas need to be included within the O&M Plan;**
- **Description and delineation of public safety features. At a minimum, CMG recommends a statement be provided similar to the following: "All cast iron storm water structure grates and covers shall be kept in good condition and kept closed at all times. Any damaged or broken structures will be replaced immediately upon discovery";**
- **A site-specific "Operation and Maintenance Log Form" is not provided in the O&M plan. CMG recommends a corresponding Stormwater BMP figure also be included depicting the locations of all on-site stormwater piping and structures.**

66. A signed Illicit Discharge Statement is not provided within the O&M Plan.

Connorstone Response (10/25/22): An Illicit Discharge Compliance Statement is attached.

CMG Comment #2: CMG recommends a copy of the Illicit Discharge Compliance Statement be included within the O&M Plan.

If you have any questions or need additional information, please contact me at (508) 864-6802.

Sincerely,
CMG



David T. Faist, PE
Principal Engineer

