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January 24, 2023

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

**Re: Site Plan, Zoning, & Stormwater Design Engineering Peer Review #1  
CRG Acquisition, LLC - Proposed 550,000 S.F. Warehouse  
555 Hopping Brook Road, Holliston, MA  
CMG ID 2023-025**

Dear Karen,

CMG is providing this letter report detailing our site plan, zoning, and stormwater design engineering peer review relating to the proposed Site Plan & Special Permit Application submittal by CRG Acquisition, LLC (Applicant) dated November 7, 2022. The project Applicant is proposing to construct a 550,000 S.F. Storage – Distribution Warehouse with associated parking, access driveways, stormwater management system, Title V septic system, and associated utilities. The project is located on an approximately 73.5 +/- Acre parcel identified as 555 Hopping Brook Road in Holliston, MA (the “Site”). Site is located within an Industrial (IND) Zoning District.

CMG is in receipt of the following documents:

- Application for Grant of Site Plan Review and Special Permit, Applicant CRG Acquisition, LLC for 555 Hopping Brook Road “Storage – Distribution Facility of 550,000 GSF”, date 11/07/22;
- Application for Stormwater and Land Disturbance Permit, Applicant CRG Acquisition, LLC for 555 Hopping Brook Road, Major Land Disturbance Permit Requirements, date 11/07/22;
- Letter RE: “CRG Integrated Real Estate Solutions, 555 Hopping Brook Road, Holliston, MA” prepared by Lynch, Desimone & Nylen, LLP, date 11/07/22;
- “555 Hopping Brook Road A Modification of the Definitive Site Plan”, prepared by Engineering Design Consultants, Inc. date 09/01/22; and
- “Stormwater Calculations” 555 Hopping Brook Road, Holliston, Massachusetts” prepared by Engineering Design Consultants, Inc., date 09/01/22

CMG is providing this letter summarizing our review comments for the above documents to evaluate the project’s compliance with the following regulations for Planning Board consideration:

- Town of Holliston Zoning By-Laws date May 09, 2022, Amendments approved by the Attorney General’s office on September 02, 2022.
- Town of Holliston Planning Board Rules and Regulations amended through January 5, 2012, revised through May 20, 2021.
- Town of Holliston Stormwater Management and Land Disturbance Regulations, date May 20, 2021 and the 2008 Massachusetts Stormwater Management Standards.

CMG provides the following technical comments for the Planning Board's consideration:

**General Site Plan Comments**

1. Property lines for proposed development don't match Existing Conditions plan and are not labeled. Proposed development extends beyond property lines shown on existing conditions plan.
2. Proposed lot area is listed as 3,200,443 SF (7.35 Acres), Existing Conditions plan shows 3,392,980 SF (77.89 Acres). Applicant should document any proposed property line changes.
3. The "Layout and Materials Plan (80 Scale) should show the entire property to include the proposed site layout, building setback lines, zone line, current property abutters, and limited existing conditions to verify compliance with zoning and clearly depict the proposed property lines.
4. Current property abutter names based on the most recent Town Assessor's listing are not shown on the Existing Conditions or Site Plans.
5. It is not clear from the plan how the alignment of the proposed cul-de-sac connects to Hopping Brook Road. The proposed cul-de-sac location and alignment does not agree with the Hopping Brook Road roadway layout shown on the Existing Conditions Plan. More detail is required.
6. Expansion of the off-site stormwater basin associated with Hopping Brook Road is proposed. Existing conditions mapping, roadway layout, and property lines and easement information relating to this basin should be provided in the plan set.
7. No crosswalk markings are provided on the Site driveway between the five (5) foot width sidewalk which runs along the northern edge of the main Site driveway and the building entrance.
8. The limits of pavement for the proposed circular turnaround area directly abut the southwest corner of the building with no landscape strip, curbing, and / or bollard protection shown to prevent building damage from vehicles.
9. Proposed curbing types are not noted on the Layout and Materials plans.
10. Driveway striping and pavement painting details are not provided.
11. Existing and proposed fire hydrants, water service size, type, and connection details are not provided. Plans depict an on-site schematic location only for the proposed water service.
12. Limits of the "isolated wetlands" flagging and associated wetlands buffer zone located at the proposed Hopping Brook Road cul-de-sac are not shown on all appropriate plan sheets.
13. Proposed grading and earthen berm extend beyond what appears to be the Site's proposed property lines. Property line should be adjusted to include these areas or a slope easement provided.

**Town of Holliston Zoning By-Law Comments**

14. Section IV-B Frontage minimum in an Industrial district is 100 ft. Plans list 150 ft. is provided however there is no proposed property line plan stamped by a Licensed Land Surveyor showing this dimension to confirm the plan is in compliance.
15. Section IV-B Maximum Building Height in an Industrial district is 40 ft. A calculation is not provided to confirm the proposed "Building Height" as defined in Zoning By-law section I-E Definitions.

16. Section V-B: Exterior Signs; No dimensions or details are provided for proposed “Business Sign” to be located at the Site entrance to verify compliance with this section.
17. Section V-C g. industrial establishments require one parking space per 1.3 employees on largest shift. Section V-C g also states parking for “industrial establishments” should be expandable to not less than one space per 300-SF of gross floor area. Neither of these calculations are provided. CMG recommends the Applicant demonstrate compliance with Section V-C g or provide supporting evidence to justify alternative Site parking standards in accordance with Section V-C j.
18. Section V-C b. dimensions for both employee parking and ADA/AAB accessible spaces are not provided on the plan as necessary to verify compliance.
19. Section V-C b. requires that 10% of the interior of parking lot over 40 spaces be landscaped, including trees. Applicant should provide calculations to support compliance.
20. Section V-C d. limits parking lot luminaire mounting height to 15-FT. Lighting plan Sheet 35 notes a 20-FT mounting height and Applicant is not requesting a waiver. No light pole and/or light pole base details are provided.
21. Section V-C f. requires a minimum of 150-FT of visibility in each travel lane. Applicant should note sight line on Sheet 3 for Hopping Brook Road at the Site driveway.
22. Section V-C g. requires all plantings shall be of a species characterized by suitability and hardiness for location in a parking lot. A planting schedule identifying the number and type of plantings for the parking area is not provided in the plan set.
23. Section V-C h. requires bike racks to accommodate 1 bike per 20 parking spaces. A calculation noting the required bicycle rack capacity is not provided on the zoning table.

#### **Holliston Planning Board Special Permit and Site Plan Regulations (Article VII)**

24. Section 7.3.1 c) The 11/7/22 Site Plan / Special Permit Application identifies a different Property Owner (New Hopping Brook Realty Trust) than the Applicant (CRG Acquisition, LLC). Cover Sheet #1 should reflect the correct Property Owner and Applicant information.
25. Section 7.3.1 c) Assessor’s Parcel Map, Lot, and Block number for the subject 555 Hopping Brook Road parcel should be noted on the Cover Sheet.
26. Section 7.3.1 f) Zone boundaries within 200-FT should be shown on the Site Layout Plan Sheets 2 through 5.
27. Section 7.3.1 g) Boundaries of the property line and lines of existing streets are required. There are discrepancies between the Existing Conditions plan and the proposed development. (Also See Comments 1 & 2)
28. 7.31. h) CMG recommends the Locus Map shown on the Cover Sheet should also depict the adjacent zone line and residential streets in Medway to accurately show the parcel with reference to surrounding areas.
29. Section 7.3.1 j) Several of the proposed contour lines are not labeled and the grading plans do not provide spot elevations and structure rim grades necessary to evaluate compliance.

30. Section 7.3.1 k) Existing wetlands, wetland buffer zones, NRCS soil mapping, existing wooded areas, and other significant features including past limits of tree clearing are not provided as needed on the appropriate plan sheets.
31. Section 7.3.1 n) Dimensions for pavement curbing radii, employee parking aisle widths, ADA/AAB accessible parking, circular paved turnaround area, and several ramps are not provided.
32. Section 7.3.1 o) All calculations necessary to determine conformance to Zoning By-laws and Planning Board rules and regulations are not provided (See Zoning By-Law Comment Section)
33. Section 7.3.1 p) Acreage of parcel to the nearest tenth of an Acre is not provided.
34. Section 7.3.1 q) An Operation and Maintenance Plan that meets the requirements of the Holliston Stormwater Management and Land Disturbance Regulations is not provided.
35. Section 7.3.2 a) Proposed spot elevations adjacent to the building are required to determine both compliance with the Building Height requirement and proposed drainage design.
36. Section 7.3.2 c) Layout locations of all building exterior exits, garage doors, and individual loading docks are not shown on the plans.
37. Section 7.3.2 d) Sketches to indicate the visual impact on adjacent properties and the surrounding neighborhood are not included with the submitted materials.
38. Section 7.3.2 e) Dimensions, depiction, and material description of the proposed “Business Sign” are not provided.
39. Section 7.3.2 f) Figures and calculations relating to the “building height”, including relationship of existing and proposed grades are not provided.
40. Section 7.3.3 a) Location and sizes of all existing utilities (i.e. water, gas, electric/cable/telephone) within Hopping Brook Road are not shown on the plan set.
41. Section 7.3.3 b) Location and sizes of all proposed utility structures (i.e. water, gas, electric/cable/telephone) and any proposed Title V sewage disposal facility are not shown on the plan set.
42. Section 7.3.3 c) The proposed plans do not depict the location of the soil test pit locations or groundwater table relative to a proposed Title V sewage disposal system or the proposed stormwater basins.
43. Section 7.3.4 requires a Landscape Plan be provided which is prepared, signed and sealed by a registered Landscape Architect. The Landscape Plan (Sheet 36) provided is signed and sealed by an engineer and does not meet the requirements of Section 7.3.4.

### **Section 7.4 Performance Standards for Non-Residential Developments**

CMG offers the following comments for the Planning Board's consideration as to whether the project is in keeping with the standards set forth in Section 7.4. The comments below are not meant to comprehensively account for all items in the performance standards, simply to highlight some key items relating to this project.

#### **Section 7.4.2 Standards**

##### **A. Aesthetics**

- 44. Architectural details should be "compatible with New England architectural style".
- 45. Consideration should be given to "harmony in scale, bulk, massing, and density".

##### **B. Lighting**

- 46. Building wall mounted fixtures and pole mounted fixtures should be mounted no higher than 15-FT above grade.

##### **C. Landscaping and Screening**

- 47. Proposed development shall be integrated into the natural landscape.
- 48. Grade changes shall be in keeping with the general appearance of the neighboring developed areas. No supporting cut and fill calculations or figures are provided.

##### **D. Stormwater Management**

- 49. Applicant has submitted a Stormwater Management Report, date September 1, 2022. CMG is providing a separate section of stormwater related comments within this letter.

##### **E. Site Development Standards**

- 50. To the extent practicable, the proposed site development shall be located to preserve the natural features of the site.
- 51. Section 7.4.2 E. 4. (A) Placement of buildings, structures, or parking facilities shall not detract from the site's scenic qualities and shall blend in with the natural landscape.
- 52. Section 7.4.2 E. 4. (B) Building sites shall be directed away from the crest of hills, and foundations shall be constructed to reflect the natural terrain.
- 53. Section 7.4.2 E. 8. Finished grades should be limited to no greater than a 3:1 slope. The proposed project's sloped grading areas range between 2:1 ~ 3:1 slopes. The "Earth Berm Section" detail shown on Sheet 25 notes use of 6" loam treated with jute and hydroseed for areas with 2:1 slopes. CMG recommends the Applicant provide more details relating to the proposed slope stabilization design, construction methods, and materials for Site slopes equal to or greater than 2:1 for the proposed berm area given its close proximity to the abutting residential properties.

##### **F. Pedestrian and Vehicular Access; Traffic Management**

- 54. CMG understands the Traffic Management aspects of the projects are being reviewed separately by MDM Transportation Consultants, Inc.

### **G. Utilities, Security and Emergency Systems**

55. Site will be serviced by Town Water and an on-site septic system to be permitted and installed under the supervision of the Holliston Water Department and Board of Health, respectively.

### **H. Fiscal Analysis**

56. CMG defers to the Planning Board for consideration of the need for analysis of fiscal costs from the development
57. Section 7.4.4 Waiver of Standards: The Planning Board in the course of granting a Special Permit may waive any the performance standards where such waiver “is not inconsistent with public health and safety, and where such waiver does not derogate from the purpose of this section”. CMG recommends the Applicant provide a detailed waiver list for any performance standards not met by the proposed project for consideration by the Planning Board.

### **Regulations for Stormwater Management and Land Disturbance (Article XI):**

58. Section 11.4.3, the Stormwater Management Plan shall include the following items:
- a. The location(s) of existing and proposed easements. (Proposed site improvements appear to require grading easements on abutting properties)
  - b. The location of existing and proposed utilities. (No on-site septic system location is shown in the plans)
  - c. The site’s existing and proposed typography with contours at 1-foot intervals.
  - j. Estimated seasonal high groundwater elevation in areas to be used for stormwater retention, detention, and infiltration.
59. Section 11.4.4, the Erosion Control Plan (ECP) shall include the following:
- e. Volume and nature of existing and proposed soil material. (Site earthwork schedule shown on Sheet 33 appears to have numbers crossed out.)
  - f. Topographical features including existing and proposed contours at intervals no greater than one (1) foot with spot elevations provided as needed.
  - o. A description of where and how construction vehicles and equipment will be cleaned within the site or at designated entry/ egress stations at the site boundary.
  - p. A description of how fueling of vehicles and equipment will be conducted, including how fuels and other vehicle maintenance substances will be stored and handled during construction.
  - q. A description of how chemicals and any other materials that constitute a potential source of stormwater contamination will be stored and handled during construction.
60. Section 11.5.2; The submission did not include Long-Term O &M Plan for the proposed stormwater management system. The O & M Plan should include all the requirements described in §11.5.2.
61. Section 11.10.1; Areas to be planted shall be loamed with not less than 6” compacted depth of good quality loam and seed with turf grass seed or other appropriate ground cover in accordance with good planting practice.

### General Stormwater Engineering Design Comments

62. Proposed Grading & Utility Plans show 10-foot contour labels on multiple sheets. Plans should be revised to include labels on all proposed contours, especially within all basins and forebays.
63. Soil Types classifications and boundaries, existing soil test pits, existing wetlands and buffers zones, are not shown. Soil type and boundaries should be shown on the pre and post development drainage maps.
64. Off-site stormwater detention basin 10P, culvert 12P, & underground recharge system 22P located at 465 Hopping Brook Road are included in the calculations however, no as-built details or supporting reference information is provided.
65. Existing conditions and Site Plan should define existing vs. proposed layout / grading for Hopping Brook Road cul-de-sac as it differs from March 16, 2017 Certificate of Action for “Hopping Brook Business Park”.
66. CMG recommends the Planning Board make it a condition of approval that the “Hopping Brook Road” project revisions be submitted to the Planning Board for review and approval prior to issuance of a building permit to insure there are no discrepancies from the 555 Hopping Brook Site Plans and stormwater design
67. Footing drain and building roof drain tie in locations, details, size, & type for the building are not provided.

### MassDEP Stormwater Management Standards Comments

**Stormwater Standard 1:** *No new stormwater conveyances (e.g. outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or water of the Commonwealth.*

68. Rip-rap lined waterway designs are provided on the Site Plans and Stormwater Report. The report doesn't make it clear where the proposed design flow (Q) values used for each swale correspond with the HydroCAD calculations. In addition, calculations in the Stormwater Report should be labelled as to which riprap outfall is being referenced.
69. There is no table showing pre-development and post development areas for each subcatchment. The post-development drainage areas modelled in the HydroCAD model do not equal the pre-development drainage area.

**Stormwater Standard 2:** *Stormwater management systems shall be designed so that post development peak discharge rates do not exceed pre-development peak discharge rates.*

70. The storm events modelled do not appear to use the most current NOAA Atlas 14 precipitation data as stated in The Holliston Planning Board Stormwater Management and Land Disturbance Regulations (§11.11.2.a). The HydroCAD model should be revised to include the NOAA Atlas 14 reference table including the following precipitation data:
  - a. 2-year = 3.38”
  - b. 10-year = 5.27”
  - c. 25-year = 6.45”
  - d. 100-year = 8.26”
71. Soil test pit locations should be included on all Grading and Utility Plans. In addition, the western forebay associated with Pond 30P does not appear to achieve 2' separation to groundwater based on the submitted soil logs.
72. Rational method design calculations do not match the Rim and Invert elevations as shown in the Grading & Utility Plans.

**Stormwater Standard 3:** *Loss of annual recharge of groundwater shall be eliminated or minimized.*

73. Proposed Pond 30P HydroCAD calculations do not match the design plans. The proposed basin design appears to be approximately 4' higher than the HydroCAD calculations.
74. Engineer should provide additional information to verify required recharge volume for impervious flows to the west. The 503,704 s.f. of impervious area does not appear to match the HydroCAD calculations.
75. Outlet Control Structure (OCS-2) does not appear to match the Grading Plans. The outlet control structure also appears to be modelled incorrectly in the HydroCAD model.
76. The Basin #2 cross-section shown on the Stormwater Details does not appear to match the Grading Plan.

**Stormwater Standard 4:** *Stormwater management systems shall be designed to remove 80% of the average annual post construction load of Total Suspended Solids (TSS).*

77. No Water Quality Volume calculations are included in the Stormwater Report.
78. Per §11.10.1.8.a.ii.1. of the Holliston Stormwater Management and Land Disturbance Regulations, to meet the TSS and Total Phosphorous (TP) treatment requirements. Treatment BMPs for new developments shall retain one (1) inch multiplied by the total post-construction impervious surface area.
79. Forebay sizing calculations do not appear to utilize the correct impervious areas within each drainage subcatchment.
80. Contech water quality unit sizing designs do not appear to be labelled as shown on the Grading and Utility Plans.
81. The water quality flow as shown in the Contech design submittal cannot be confirmed due to impervious areas to each drainage structure not being included in the stormwater report. CMG recommends the engineer include impervious drainage areas to each structure be included in the Rational Method table.
82. Stage-storage-volume tables for each stormwater basin and forebays should be provided along with supporting calculations to illustrate the actual WQV provided for each basin.

**Stormwater Standard 5:** *Land uses with higher potential pollutant loads (LUHPPL), source control and pollution prevention shall be implemented in accordance with the Massachusetts Stormwater Handbook to eliminate or reduce the discharge of stormwater runoff from such land uses to the maximum extent practicable.*

83. The project will provide outdoor vehicle fleet storage and is therefore considered a land use with higher potential pollutant load (LUHPPL). The Stormwater Report must provide supporting information to verify compliance with Standard 5.
84. Stormwater checklist notes the proposed use is covered under the EPA NPDES Multi-sector Industrial Stormwater permit, also identified as a LUHPPL. CMG recommends additional information be provided regarding the type of multi-sector use and any additional BMP requirements for this use.
85. CMG recommends proof of EPA Multi-Sector Permit authorization and a copy of the project's SWPPP be submitted to the Planning Board prior to discharge of the Site's stormwater runoff to the post-construction BMPs.
86. Engineer must document how all of the LUHPPL requirements are being met including but not limited to the addition of oil / grit separators to the BMP treatment train.
87. TSS summary should be revised to include LUHPPL best management practices and pre-treatment requirements.



**Stormwater Standard 6:** *Stormwater discharges within a Zone II or Interim Wellhead Protection Area of a public water supply, and stormwater discharges near or to any other critical area.*

Not applicable – Site does not discharge stormwater to or near a critical area.

**Stormwater Standard 7:** *Redevelopment Projects*

Not Applicable – Site is not a redevelopment project.

**Stormwater Standard 8:** *Construction period erosion and sedimentation control*

88. The Site is > 1 Acre therefore an NPDES Stormwater Pollution Prevention Plan (SWPPP) in accordance with the 2022 EPA Construction General Permit (CGP) is required to be submitted prior to construction. CMG recommends the Planning Board require the Applicant to provide the NPDES SWPPP and copy of the EPA ENOI authorization email prior to the commencement of construction.

**Stormwater Standard 9:** *Long term operation and maintenance plan*

89. A long-term operation and maintenance plan is not provided in the Stormwater Calculations report.

**Stormwater Standard 10:** *Illicit discharges*

90. An illicit discharge statement is not provided in the Stormwater Calculations report.

If you have any questions or need additional information, please contact CMG at (774) 241-0901.

Sincerely,

CMG



David T. Faist, PE  
Principal Engineer



Robert Lussier, EIT  
Project Engineer II