

March 24, 2023

Planning Board
703 Washington Street
Holliston, Massachusetts 01772

Reference:

555 Hopping Brook Road
Holliston, Massachusetts
EDC Job No.: 3780

Dear Board Members:

This is a response to a peer review provided by CMG, dated January 24, 2023.
Responses are highlighted in red.

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. **The Layout & Materials (100-scale) Plan, Sheet 2 of 36, has been updated with the boundary distance labels and building offset tie distances, along with other requested datapoints. As the Board is aware an Approval Not Required Plan was endorsed by the Board on April 30, 2020 in support of the 555 Hopping Brook Project that was under review during that timeline and this Plan was recorded a few days later at the Middlesex Registry of Deeds as Plan No. 310 of 2020. The current project having been significantly reduced in scale and scope will require a modification of these previously approved lot lines including relocating the westerly boundary further west in order to provide a greater buffer to the residential neighborhood in Medway and requiring a grading easement over land to the south in order to wrap the proposed berm around the east side truck court (both site plan modifications are abutter impact mitigation features). To avoid processing another Plan of Land prior to conditional approval of the site plan we have attached a Draft Approval Not Required Plan dated January 24, 2023. This Plan includes the metes and bounds for the 73.472 Acre Lot, as well as the metes and bounds for the Proposed Grading Easement and Proposed 20-foot Wide Water Line Easement that will extend though the 555 Hopping Brook Site and onto point where the water line was extended from Jackson Drive through land N/F Pulte Homes of New England LLC Site onto land of New Hopping Brook Trust. This Draft Plan of Land can be relied upon as a complete boundary description place holder that can be referenced in documenting a conditional approval of the site 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. **The response outlined in Item 1 above addresses this point as well.**
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. **The response outlined in Item 1 above addresses this point and includes requisite details in order to affirm that the site plan has properly satisfied zoning.**

4. Current property abutter names based on the most recent Town Assessor's listing are not shown on the Existing Conditions or Site Plans. **The Layout & Materials (100-scale) Plan, Sheet 2 of 36, has been updated with the current certified abutters list information.**
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. **The Layout & Materials SWW (40 Scale) Plan, Sheet 3 of 36, has been updated with the centerline stationing details including the terminus and driveway centerline stations. Again, these roadway details provide sufficient information to act as a place holder that can be referenced in documenting a conditional approval of the site plan for the reconstruction of these limits of Hopping Brook Road.**
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. **The basin expansion will afford greater stormwater flow mitigation for the 555 site and Hopping Brook Road additional details and notes have been added to address these concerns.**
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. **Crosswalks have been added to the plans.**
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. **Both driveway separation from the building, bollards have been added to the turnaround limits and bollard details are included on Sheet 4 of 36.**
9. Proposed curbing types are not noted on the Layout and Materials plans. **Most of the project limits are edged with cape cod style bituminous concrete berm, however granite curb is identified at transition limits of driveway at Hopping Brook Entrance and integral concrete curb along sidewalk limits is proposed with each area labelled accordingly.**
10. Driveway striping and pavement painting details are not provided. **Both standard parking space and handicapped space striping details are included on Sheet 5 of 36.**
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. **Overall Water Main Appurtenances are detailed on both the 80 scale Utilities Plan and the 40 scale Grading & Utilities Plan.**
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. **The Isolated Wetland Details have been included on the corresponding sheets that pertain to the terminus of Hopping Brook Road.**
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. **This grading is critical for supporting the earthen berm and has been addressed in more detail in Item 1. This grading is over land also owned by New Hopping Brook Trust and the easement is depicted on the Draft ANR Plan.**

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. Again as outlined in Item 1 we respectfully request the attached Draft Approval Not Required Plan be a condition of approval, otherwise we are forced to issue a sealed Plan of Plan that could easily be misconstrued should the 555 project reboot differently.

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 CRG has agreed to not pursue the greater building height that the Holliston Zoning Board allowed. The site plans and schematic architectural plans illustrate that the building will not exceed 40-feet and the Board's conditional approval would reiterate this point. As part of the building permit process a Sealed Proposed Plot Plan will be provided along with the complete Building Permit Application indicating that the Building does not exceed 40-feet as provided in the bylaw.
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. The sign detail on Sheet 29 of 36 provides sign details and dimensions.
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. A separate standalone "Alternative Maximum Parking" Plan has been prepared illustrating 1,915 parking spaces that would fit within the improved site limits and more than satisfy the 1,833 parking spaces required at 1/300 sf.
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. Parking space dimensions and details are provided on Sheet 5 of 36.
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. The parking lot consists of approximately 72,800 SF of surface area and includes landscaped island areas that is more than twice the minimum 7,280 SF requirement threshold.
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. Lighting Details are illustrated on Sheet 35 of 36 and provide that pole fixtures will not exceed 15-feet as required.
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. A sight distance tie is provided on Sheet 3 of 36.
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. A Licensed Landscape Architect has sealed Sheets 36A & 36B of 36 and outlined the specified plant materials for the project.
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. Bike racks are included at the prescribed ratio.

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. **The cover sheet has been revised.**
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. **The cover sheet has been revised.**
26. Section 7.3.1 f) Zone boundaries within 200-FT should be shown on the Site Layout Plan Sheets 2 through 5. **The zone boundaries are reflected on the plan sheets referenced.**
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) **Addressed in Item 1.**
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. **The cover sheet has been revised.**
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. **Additional contour labels and spot elevations have been added to the plans,**
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. **The Layout & Materials (100-scale) Plan, Sheet 2 of 36, has been updated with the tree clearing limits, while the Pre & Post Development Runoff Maps Sheets 30 & 31 of 36 include the NRCS Soil Mapping Information.**
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. **The plans have been revised to show the dimensions.**
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) **Addressed in Item 1.**
33. Section 7.3.1 p) Acreage of parcel to the nearest tenth of an Acre is not provided. **73.472 Acres as addressed in Item 1.**
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. **O&M Plan is attached to this response package.**
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. **Spot elevations have been added to the plans.**
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. **Sheets 3-6 of 36 include all pertinent building egress points.**
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. **Schematic**

Illustrations of viewsheds from abutting representative properties and from the project site were submitted to the Board prior to the public meeting.

38. Section 7.3.2 e) Dimensions, depiction, and material description of the proposed “Business Sign” are not provided. . The sign detail on Sheet 29 of 36 provides sign details and dimensions.
39. Section 7.3.2 f) Figures and calculations relating to the “building height”, including relationship of existing and proposed grades are not provided. Addressed in Item 15.
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. Existing Utility Information has been added to 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. Existing Utility Information has been added to 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. A standalone SAS Design has been submitted to the Holliston BOH.
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. A Licensed Landscape Architect has sealed Sheets 36A & 36B of 36.

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”. Although larger in area the planned warehouse building will not exceed 40-feet in height and other than total area will be substantially similar to most of the other warehouse buildings located within Hopping Brook Park and the Town of Holliston. The warehouse will be compatible with and will not be out of architectural character or style when compared to similar warehouse facilities in town.
45. Consideration should be given to “harmony in scale, bulk, massing, and density”. At only 17.2% the planned building coverage remains well below half the 40% coverage allowed by zoning keeping the planned warehouse building in harmony with scale, bulk, massing, and density when compared to similar warehouse buildings located in Hopping Brook Park and the Town of Holliston. By isolating a single building on 73+ acres a significant swath of woodland open space can be set aside helping to further protect wetland and water resources that extend onto the subject property.

B. Lighting

46. Building wall mounted fixtures and pole mounted fixtures should be mounted no higher than 15-FT above grade. Building mounted fixtures are set at 20-feet as has been confirmed is allowed under the bylaw.

C. Landscaping and Screening

47. Proposed development shall be integrated into the natural landscape. Where possible perimeter woodlands are preserved, the landscape berm is planned to visually isolate the planned project from the Medway neighborhood and extensive native trees and shrubs are planned to supplement these features.
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. There is approximately 80-feet of grade change from Hopping Brook Road to the highest point on the site and the differential is 132-feet from this same point to the lowest point near the northerly boundary, however with these significant elevation differentials the site plan does blend well into all work limits and the overburden that is cut affords the opportunity to construct the landscape berm along the Medway boundary line. The site earthwork computations are included on Sheet 34 of 36 and attached to this letter is a Graphic Illustration of the Cut Areas (RED) and Fill Areas (GREEN).

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. No response required.

E. Site Development Standards

50. To the extent practicable, the proposed site development shall be located to preserve the natural features of the site. The subject property is industrially zoned and this zoning designation does afford significant building and lot coverages, however when and where possible the site plan does preserve the natural features of the site including bordering vegetated wetland and associated intermittent stream located near the northerly boundary and mature trees along the easterly Medway property boundary.
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. As stated in Item 50 above, where and when possible natural features are preserved, and all parking facilities are adequately screened from abutting properties and Hopping Brook Road. The building is located over 580-feet from Hopping Brook Road and 400-feet from the Medway lot boundary.
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. The building is centrally positioned on the subject lot and the site grading is properly resolved well within the work limits thereby providing a buffer zone to properties that are not similarly zoned.
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. Additional details have been added to the plan set for constructing the Earthen Berm.

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 No comment required.

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. No comment required.

H. Fiscal Analysis

56. CMG defers to the Planning Board for consideration of the need for analysis of fiscal costs from the development No comment required.
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. No Waivers are sought at this time, however if the Board believes that one is needed for not depicting 1-foot contour intervals then this would be the first Project Waiver item as further described below.

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) As addressed in Item 1.
 - b. The location of existing and proposed utilities. (No on-site septic system location is shown in the plans) SAS Design filed with the Holliston BOH.
 - c. The site’s existing and proposed topography with contours at 1-foot intervals. The site does have many existing and proposed contour intervals that must be resolved, and the Site Plan Set has relied on illustrating existing and proposed topography at the customary 2-foot interval in order to avoid making the plans less readable. If necessary, a waiver from the 1-foot contour interval requirement can be sought.
 - j. Estimated seasonal high groundwater elevation in areas to be used for stormwater retention, detention, and infiltration. The soil has been tested throughout the site and particularly within the planned stormwater systems that support the proposed design basin details. Soil tests results have been included within the Plan Set.
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.) The cut/fill computation has been reviewed again and is now properly illustrated.

- f. Topographical features including existing and proposed contours at intervals no greater than one (1) foot with spot elevations provided as needed. **This has been addressed in Item 58.c, a waiver from the 1-foot contour interval requirement can be sought.**
 - 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. **Wash station details are included within the O&M Plan.**
 - 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. **Fuels & related maintenance details are included within the O&M Plan.**
 - 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. **Chemicals & related maintenance details are included within the O&M Plan.**
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. **The O&M Plan has been updated.**
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. **Details & Notes pertaining to Planting have been checked to ensure a compacted depth of 6" of good quality loam and seed with turf grass seed is described.**

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. **2-Foot Contour Intervals are labelled.**
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. **Soil types have been added to the pre and post development plans. Although there is a sliver of Charlton-Hollis Rock Outcrop listed as a "B" soil, all test pits have indicated a "C" soil type is present at the project site.**
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. **EDC does not have complete site as-built information as EDC was not the project engineer for the construction of 465 Hopping Brook Road, however we used both the 12/14/2018 O'Brien Land Surveying As-built Plan on file with the Board and correlated those details with the approved design information that EDC provided for Site Plan Approval of the PharmaCann Project.**
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". **EDC reviewed and discussed with the Holliston Planning Board to Layout Hopping Brook Road to the maximum distance expected and allow site development to dictate the actual extent required. Although the roadway was built to be extended only the PharmaCann project came forward and the only other p[proposal has been the 555 Warehouse. The configuration of the 555 Hopping Brook site would allow the terminus to be established only a short distance from the PharmaCann Site at 465 Hopping Brook Road affording sufficient frontage for whatever may be planned for the remaining 100-acres still available to the west of Hopping Brook Road. EDC recommends that review and approval of reconfiguring the subdivision and terminus of Hopping Brook Road be considered as a condition of approval.**

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 **EDC agrees with this being a condition of approval..**
67. Footing drain and building roof drain tie in locations, details, size, & type for the building are not provided. **The actual building MEP details are not yet developed, however to the maximum extent possible the site plans provide provisions for these MEP connections including internal roof drains. Again, this could be included as a condition of approval, or alternatively these building MEP details are typically reviewed by the Holliston Building Department as part of the building and plumbing permit process.**

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. **The proposed design flows are taken from the 25-year runoff calculations for Manning's pipe flow within the stormwater calculations report, the Rip Rap lined waterway designs have been revised with a label for the outlets they correspond to, some flows were greater based on a previous design and were left as is because it was considered a minimal decrease in design flow.**
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. **The total post-developed area adds up to the total predeveloped area and a summary has been added to the calculations.**

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: **The calculations have been revised using the data below.**
- 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. **Test pits have been added to the corresponding plans and the forebay bottom has been adjusted accordingly.**
72. Rational method design calculations do not match the Rim and Invert elevations as shown in the Grading & Utility Plans. **The calculations and plans have been revised.**

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. **The calculations have been revised.**
- 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. **The calculations have been revised.**
- 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. **The detail has been revised to match the HydroCAD model.**
- 76. The Basin #2 cross-section shown on the Stormwater Details does not appear to match the Grading Plan. **The cross section has been revised.**

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. **The deep sump catch basins, Contech Stormwater units and stormwater forebays take care of the water quality.**
 - 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. **The deep sump catch basins, Contech Stormwater units and stormwater forebays have been sized to treat the required water quality volume.**
 - 79. Forebay sizing calculations do not appear to utilize the correct impervious areas within each drainage subcatchment. **Forebay calculations for the impervious areas have been revised.**
 - 80. Contech water quality unit sizing designs do not appear to be labelled as shown on the Grading and Utility Plans. **The labels on the Contech design sheets have been revised.**
 - 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. **Impervious area were added to the stormwater Runoff Areas plan, the software that is being used for the Manning's charts does not allow for the printing of individual areas related to "c" value.**
 - 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. **The deep sump catch basins, Contech Stormwater units and stormwater forebays take care of the water quality.**
83. **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.*
- 84. 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. **Although there are trailer storage areas the project site is not intended as a "Fleet Storage Area" as defined by this section of the MDEP SMS and therefore LUHPPL are not applicable.**
 - 85. 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. **This section of the checklist was inadvertently checked, and a corrected version is included within the updated Stormwater Report.**

86. 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. **Addressed in Item 85 above.**
87. 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. **Deep sump catch basins and oil-grit separators are both credited with 25% TSS Removal which equates to the required 44% pretreatment for LUHPPL's.**
88. TSS summary should be revised to include LUHPPL best management practices and pre-treatment requirements. **The TSS Calculation Sheets are included in the Stormwater Report and range from providing 91% to 100% total suspended solid removal for the various subcatchment areas which is well in excess of the minimum required.**

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*

89. 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. **EDC agrees with this being a condition of approval.**

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

90. A long-term operation and maintenance plan is not provided in the Stormwater Calculations report. **O&M Plan is attached to this response package.**

Stormwater Standard 10: *Illicit discharges*

91. An illicit discharge statement is not provided in the Stormwater Calculations report. **Illicit Discharge Statement is appended to the O&M Plan.**

Thank you for the opportunity to address these items and your consideration of the revised Site Plan Package and supporting documents.

Very truly yours,

ENGINEERING DESIGN CONSULTANTS, INC.

Walter M. Lewinski

Walter M. Lewinski, P.E.