

December 11, 2020

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

Reference:

555 hopping Brook Road
Holliston, Massachusetts
EDC Job No.: 3663

Dear Ms. Sherman:

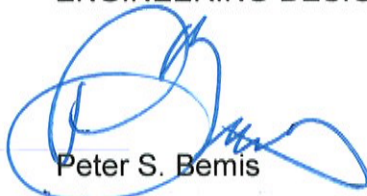
In regard to the above referenced project, we have attached a response to comments from a peer review letter dated, December 10, 2020, from CMG Environmental Services.

For ease of review our responses to the CMG comments are highlighted in red.

If you have any question, please contact us.

Very truly yours,

ENGINEERING DESIGN CONSULTANTS, INC.



Peter S. Bemis

General Engineering SWPPP Comments:

1. SWPPP does not reference the current EPA NPDES 2017 Construction General Permit or include a copy or reference to these regulations as required. **A copy of the preamble to the EPA NPDES 2017 CGP has been included at the end of the Table of Contents along with the hyperlink to the full document.**
2. The EPA CGP Notice of Intent form and/or EPA Authorization email with NPDES Tracking number is not included in the SWPPP Appendices. **A copy of the NOI and Tracking Number is appended at the end of the SWPPP document.**
3. The “General Description of Project” appears to be describing a different project involving multi-family residential units? Project description should be revised to include the relevant project information. **This is corrected in the December 10, 2020 SWPPP and was corrected in the October 29, 2020 SWPPP as well.**
4. “Maximum Area of Earth Disturbance at Any One Time” shall be revised to less than 5 Acres. **This is corrected in the December 10, 2020 SWPPP and was corrected in the October 29, 2020 SWPPP as well.**
5. In the project schedule, “Phase III: Tree Clearing, Grub and Stump Wooded Areas”, is too broad. The number of 5-acre sections to be cleared and grubbed should be clearly labelled as well as the order at which they will be cleared. **The work limit details have been redefined and tasks are now detailed across 3 Phases during the upcoming winter construction season.**
6. Prior to clearing and grubbing a 5-acre section, the previous 5-acre section needs to be stabilized. The stabilization method needs to be clearly described in the project schedule and on the plans. **The work limit details have been redefined and the stabilization task better defined as well.**
7. Phases 6 through 9 appear to be missing in the project schedule. **The missing details have been reinserted into the SWPPP.**
8. Building construction, stormwater management installation, septic installation, and general utility information appears to be missing in the project schedule. **The missing details have been reinserted into the SWPPP.**
9. On page 9 of the SWPPP, the site plans referenced are dated November 16, 2019. The most recent revision date for the plan set should be indicated on this sheet. **All the dates have been adjusted with an anticipated construction start of December 21, 2020.**
10. On page 11 of the SWPPP, the description for “Width of Natural Buffer” includes a waiver request for razing a barn within the 50-foot buffer zone? It is CMG’s understanding that there will be no disturbance within the 50-foot buffer zone. Engineer shall review and revise as needed. **This was not correct and has been properly redefined with no work located within any protected wetland buffer zone.**
11. On page 13 of the SWPPP, the general description for the “Sediment Track-Out” includes information regarding Trotter Drive. This appears to be describing a different project and should be revised. **This was not correct and has been properly redefined referencing Hopping Brook Road.**

12. On page 13 of the SWPPP, the “Specific Track-Out Controls” appears to be describing the same project on Trotter Drive. Engineer shall review and revise as needed. **This was not correct and has been properly redefined referencing Hopping Brook Road.**
13. On page 13 of the SWPPP, the general description for “Stockpiled Sediment or Soil” states there will be a loam stockpile on the central portion of the project. According to the Erosion Control Plan, there appears to be three (3) stockpile areas located along the outside perimeter of the project area. Engineer shall review and revise as needed. **This was not correct and has been properly redefined referencing the stockpile location as depicted on the project plans.**
14. On page 14 of the SWPPP, the specific dust controls for Stockpile Control #1 should include cover/ stabilization by the end of each work day per the Town of Holliston’s Stormwater and Land Disturbance Permit, Condition #19. **The dust control statement was corrected as CMG recommended.**
15. On Page 14 of the SWPPP, the general description for “Minimize the Disturbance of Steep Slopes” indicates no slopes are proposed steeper than 3:1 requiring specialized treatment. Based on the most current Plan Set, there appears to be 1.5:1 slope along the site entrance. Engineer shall review and revise as needed. **This was not correct and has been properly redefined with all slopes exceeding 3:1 requiring special treatment as detailed on the project plans.**
16. An erosion control blanket or approved equal stabilization method should be included in “Steep Slope Control #1”. Currently, loam and seed are proposed which is not adequate for stabilizing a 1.5:1 slope. **This was not correct and has been properly redefined with all slopes exceeding 3:1 requiring special treatment as detailed on the project plans.**
17. No erosion controls are proposed for the “Constructed Stormwater Conveyance Channels”. According to the Construction Sequence for Sediment Control on the Erosion Control Plan, temporary swales will be constructed along the edges of the proposed driveway. This portion of the SWPPP should not be left blank as the contractor should utilize loam and seed or approved equal to stabilize the temporary drainage swales.
This was not correct and loaming & seeding for stabilization has been added to the SWPPP as well as stone check dams.
18. On page 15 of the SWPPP, no erosion controls are proposed for the Sediment Basin. This section should not be left blank as the contractor will utilize erosion control measures to stabilize basins during construction.
This was not correct and erosion control measures have been added for the Sediment Basins.
19. Sediment basin sizing calculations are not provided within the SWPPP.
Sediment sizing calculations have been added to the SWPPP.
20. On page 19 of the SWPPP, a rain gauge location is not listed. A rain gauge should be included in the SWPPP to show accurate rainfall amounts in the Stormwater Construction Site Inspection Report. Please note, the closest rain gauge listed on wunderground.com is located on Claybrook Farm Road (KMAMEDWA20).
Onsite rain gauge is required with correlation to the Claybrook Gauge CMG has referenced.
21. On page 21 of the SWPPP, name of personnel and training completion date are left blank. The 2017 CGP requires training be complete prior to filing the EPA Notice of

Intent. A copy of the signed training form and training date must be included within the SWPPP. **Mr. Iarussi's training credentials will be provided prior to the commencement of any work activities.**

22. All five (5) erosion control related plans submitted by EDC, Inc. identified as Timber Harvest Plan Sheet 1, Intermediate Construction Erosion Control Plan Sheet 1, Erosion Control Plan Sheet 2, Stormwater Pollution Prevention Plan Sheet 33, and Stormwater Pollution Prevention Plan Sheet 34 must be referenced in the SWPPP and included within SWPPP Appendix A. **All project plans are properly referenced in the SWPPP.**
23. Stormwater Inspection Report form appears to be an older version and not in compliance with the 2017 CGP. CMG recommends the form be updated to the current version and list each specific type / location of E&S control measures to be inspected.
The current Stormwater Inspection Report has been added to the SWPPP.

General Erosion Control Plans Comments:

1. The "Timber Harvesting Plan" should show 5 Acre parcels to be cleared and grubbed one at a time. Currently, there are only two (2) zones shown, which does not conform to the EPA NPDES clearing and grubbing regulations.
The Phase 1 Timber Harvest Plan is for tree cutting and removal only and this plan does not apply to grubbing activities. The Phase 2 Plan does detail the 5-acre cells along with the requisite Erosion Control Methods & Procedures.
2. A schedule showing the order at which the 5 Acre parcels will be cleared should be shown on the "Timber Harvesting Plan".
As CMG has recommended, the 5-acre cells are numbered on the Phase 2 Plan in the order they will be cleared.
3. A gravel construction road should be shown along the steep slope to access the fallen timber in "Zone A".
As CMG has recommended, a temporary gravel construction road is shown on the Phase 2 Plan.
4. A note should be included in the "Non-Disturbance Task Notes" indicating there shall be no work within a 5 Acre parcel until the previously disturbed 5-acre parcel is stabilized.
As CMG has recommended, a note has been added to see Phase 2 Plan and on the Phase 2 plan, note 4 has been added to note that each 5-acre cell will be stabilized before proceeding to the next cell.
5. The stability method for each 5 Acre parcel should be indicated on the "Timber Harvest Plan".
The stabilization methods and procedures have been added to the Phase 2 plan. The Timber Harvest Plan is only for tree cutting and removal only, no grubbing shall take place during timber harvesting tasks Phase 1.
6. On the Erosion Control Plan, sediment control for the temporary swales should be indicated in the "Construction Sequence for Sediment Control".
This has been added as Note 3 on the Phase 3 plan and the Phase 2 Plan.

7. Erosion control measures for the sediment basins and temporary stockpiles should be included in the “Construction Sequence for Sediment Control”.
Erosion control measures have been added to the Phase 2 Plan.
8. Subgrade utilities, final pavement coat, and final loam and seed is not included in the “Construction Sequence for Sediment Control”.
This has been added to the notes on the Phase 3 Plan.
9. On the “Stormwater Pollution Prevention Plan, Page 33 of 37”, there are two different construction sequences shown. There should be one cohesive construction sequence shown on this plan. Furthermore, the 5-acre clearing and grubbing sequencing should be included in the construction sequence.
As CMG has recommended, the Construction Phasing Schedule has been modified to include the 5-acre clearing and grubbing note and the second construction sequence has been removed from Sheet 33.
10. The “Stormwater Pollution Prevention Plan, Page 34 of 37”, shows six (6) separate clearing and grubbing zones. Per CMG’s previous comments, the clearing and grubbing area shall be separated into 5-acre parcels (roughly 10 different zones for the 50 acres of disturbances). The overview map and sequencing should be revised to include sequencing for the 10 separate parcels.
Sheet 34 indicates the general overview of the construction SWPPP, while the Phase 2 & Phase 3 Plans identify the 5-acre zones.

Town of Holliston Stormwater Land Disturbance Permit (SLDP) General Comments:

11. The submitted plan set includes approximately four (4) different construction sequence plans. The engineer should include one (1) cohesive sequencing plan within the SWPPP and provide the same on the plans (SLDP Condition #1).
The Plans have been further detailed with 3 separate phases through the upcoming winter season through early spring, with reference to the approved overall project SWPPP Sheets 33 and 34 of 37 Plans.
12. Once approved, the construction sequence shall be submitted to the residential abutters within 300’ of the property in accordance with Permit requirements Permit (SLDP Condition #2).
EDC will forward to the Certified Abutter’s with USPS Evidence of Mailing.
13. A pre-construction meeting shall be scheduled through the Planning Board Office and CMG at least 48 hours prior to commencement of work (SLDP Condition #4).
EDC is prepared to schedule as soon as possible in order for Soini Corp. to collect the felled trees for transfer to the sawmill.