
May 31, 2023

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

**Re: Site Plan, Zoning, & Stormwater Design Engineering Peer Review #2
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 second site plan, zoning, and stormwater design engineering peer review relating to the proposed Site Plan & Special Permit Application submittal #2 by CRG Acquisition, LLC (Applicant) received by CMG on March 30, 2023 and April 5, 2023.

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:

- Comment / Response Letter prepared by Engineering Design Consultants, Inc., date 03/24/23;
- “555 Hopping Brook Road A Modification of the Definitive Site Plan” 36 Sheet Plan Set, “Alternative Maximum Parking” Plan 1 of 1, and “Cut & Fill Illustration” Exhibit, prepared by Engineering Design Consultants, Inc., revise date 01/24/23 (Received 3/30/23);
- “Stormwater Calculations” 555 Hopping Brook Road, Holliston, Massachusetts” prepared by Engineering Design Consultants, Inc., revise date 01/24/23 (Received 03/30/23);
- “Stormwater Operation, Maintenance and Pollution Prevention Plan”, prepared by Engineering Design Consultants, Inc. date 01/24/23 (Received 03/30/23);
- “Approval Not Required Plan of Land” DRAFT D1, prepared by Engineering Design Consultants, Inc., date 01/24/23 (Received 04/05/23).

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.

EDC 3/24/23 Response: 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 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 Acres Lot, as well as the metes and the bounds for the Proposed Grading Easement and proposed 20-foot Wide Water line Easement that will extend through 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.

CMG Comment #2: The "Existing Conditions Plan" and "Layout and Materials Plan" must be provided as two (2) separate document plan sheets. The provided "Existing Conditions Plan" is not stamped by a license State of Massachusetts Land Surveyor.

In addition, CMG recommends the "Layout and Materials Plan" also document the same proposed property information provided on the "DRAFT- Approval Not Required Plan of Land" submitted by the Applicant showing the proposed lot reconfiguration, easements, and current abutters (i.e. separate Proposed Site Layout (100-Scale) Plan). A note referencing the requirement for a separate ANR Plan as a condition of approval must also be shown.

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.

EDC 3/24/23 Response: The response outlined in Item 1 above addresses this point as well.

CMG Comment #2: Comment Remains (See CMG Comment 1.)

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.

EDC 3/24/23 Response: 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.

CMG Comment #2: Comment Remains. Layout and Materials Plan needs to be provided as separate plan sheet (See CMG Comment 1.)

4. Current property abutter names based on the most recent Town Assessor's listing are not shown on the Existing Conditions or Site Plans.

EDC 3/24/23 Response: The Layout and Materials (100-Scale) Plan, Sheet 2 of 36, has been updated with the current certified abutters list information.

CMG Comment #2: Comment Partially Addressed. All Site Plan sheets must show the current abutter names. Remainder of Site Plan set still does not have the correct current abutter names including the DRAFT "Approval Not Required" Plan of Land 1 of 1, date 1/24/23 provided by the Applicant.

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.

EDC 3/24/23 Response: 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 conditional approval of the site plan for the reconstruction of these limits of Hopping Brook Road.

Comment Addressed

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.

EDC 3/24/23 Response: 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.

CMG Comment #2: Comment partially addressed. Plans should list property owner of the stormwater basin and indicate if any drainage easements are required.

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.

EDC 3/24/23 Response: Crosswalks have been added to the plans.

Comment Addressed

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.

EDC 3/24/23 Response: Both driveway separation from the building, bollards have been added to the turnaround limits and bollard details area included on Sheet 4 of 36.

CMG Comment #2: Plan shows bollards at 8' separation on center. CMG recommends the proposed bollard protection be installed 5' on center to deter any vehicles from potentially driving between the bollards.

9. Proposed curbing types are not noted on the Layout and Materials plans.

EDC 3/24/23 Response: Most of the project limits area 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.

CMG Comment #2: Curbing labels are shown on the plan set. Construction Details Sheet 24 shows a detail for sloped granite curb, however, the proposed site improvements do not appear to utilize sloped granite curb.

10. Driveway striping and pavement painting details are not provided.

EDC 3/24/23 Response: Both standard parking space and handicapped space striping details are included on Sheet 5 of 36.

Comment Addressed

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.

EDC 3/24/23 Response: Overall Water Main Appurtenances are detailed on both the 80 scale Utilities Plan and the 40 scale Grading & Utilities Plan.

CMG Comment #2: Construction details for the proposed water main connection and fire hydrants are not included in the plan set. CMG will defer to the Holliston Water Department regarding review of the water connection design and location. CMG also recommends the Planning Board seek input from the Fire Department regarding proposed hydrant locations and emergency equipment access.

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.

EDC 3/24/23 Response: The Isolated Wetland Details have been included on the corresponding sheets that pertain to the terminus of Hopping Brook Road.

CMG Comment #2: Isolated wetland flagging is now shown on three (3) sheets. Based on the proposed grading shown on Sheets 9 & 13, there appears to be permanent disturbances associated with the isolated wetland in order to accommodate the cul-de-sac grading. CMG requests additional information regarding the isolated wetland disturbances and recommends the applicant discuss potential resource impacts with the Holliston Conservation Commission.

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.

EDC 3/24/23 Response: The 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.

CMG Comment #2: The proposed grading easements shown on the Draft ANR Plan should also be shown on the Grading & Drainage Sheets within the Plan Set.

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.

EDC 3/24/23 Response: 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.

Comment Addressed

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.

EDC 3/24/23 Response: 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.

CMG Comment #2: Comment Remains – a calculation is required to confirm the proposed building height meets the code. “Building Height – the height of the building shall be measured as the vertical distance from the mean ground level of each side of the building to either the highest point of the exterior in the case of a flat roof or to the peak of the roof in the case of a pitched roof.” The proposed grades surrounding the building vary and the above listed calculations documenting the “building height” as noted in the Zoning By-Law must be provided.

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.

EDC 3/24/23 Response: The sign detail on Sheet 29 of 36 provides sign details and dimensions.

Comment Addressed

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.

EDC 3/24/23 Response: 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 s.f.

CMG Comment #2: Based on the submitted “Alternative Maximum Parking” Plan, there appears to be 1,658 spaces shown which does not meet the required 1,833 spaces.

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.

EDC 3/24/23 Response: Parking space dimensions and details are provided on Sheet 5 of 36.

Comment Addressed

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.

EDC 3/24/23 Response: The parking lot consists of approximately 72,800 s.f. of surface area and includes landscaped island areas that is more than twice the minimum 7,280 s.f. requirement threshold.

CMG Comment #2: A calculation must be provided to document the proposed interior parking landscape area and provided on the plan.

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.

EDC 3/24/23 Response: Lighting details are illustrated on Sheet 35 of 36 and provide that pole fixtures will not exceed 15-feet as required.

Comment Addressed

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.

EDC 3/24/23 Response: A sight distance tie is provided on Sheet 3 of 36.

Comment Addressed

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.

EDC 3/24/23 Response: A Licensed Landscape Architect has sealed Sheets 36A & 36B of 36 and outlined the specified plant materials for the project.

Comment Addressed

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.

EDC 3/24/23 Response: Bike racks are included at the prescribed ratio.

Comment Addressed

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.

EDC 3/24/23 Response: The cover sheet has been revised.

Comment Addressed

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.

EDC 3/24/23 Response: The cover sheet has been revised.

Comment Addressed

26. Section 7.3.1 f) Zone boundaries within 200-FT should be shown on the Site Layout Plan Sheets 2 through 5.

EDC 3/24/23 Response: The zone boundaries are reflected on the plan sheets referenced.

Comment Addressed

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)

EDC 3/24/23 Response: Addressed in Item 1.

CMG Comment #2: See CMG Comment #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.

EDC 3/24/23 Response: The cover sheet has been revised.

Comment Addressed

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.

EDC 3/24/23 Response: Additional contour labels and spot elevations have been added to the plans.

CMG Comment #2: Comment partially addressed. Applicant should add spot grades to the berms associated with the sediment forebays so they match the provided stage-storage tables.

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.

EDC 3/24/23 Response: 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.

CMG Comment #2: Comment partially addressed. Applicant shall include and label the buffer zones associated with the Isolated Wetland located near the proposed cul-de-sac.

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.

EDC 3/24/23 Response: The plans have been revised to show the dimensions.

Comment Addressed

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)

EDC 3/24/23 Response: Addressed in Item 1.

CMG Comment #2: Comment partially addressed (See Comment #15).

33. Section 7.3.1 p) Acreage of parcel to the nearest tenth of an Acre is not provided.

EDC 3/24/23 Response: 73.472 Acres as addressed in Item 1.

Comment Addressed

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.

EDC 3/24/23 Response: O&M Plan is attached to this response package.

CMG Comment #2: Comment partially addressed. The following information should be included in the revised O&M Plan:

- a. **Potential easement associated with the western stormwater modification should be added per Section 11.5.2.2.d. of the Holliston Planning Board Rules & Regulations.**

- b. **Estimated operation and maintenance budget per Section 11.5.2.2.f of the Holliston Planning Board Rules and Regulations.**
 - c. **Include the following statement; “maintain a log of all operations and maintenance activities for the last three (3) years including inspections, repair, replacement, and disposal”.**
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.
- EDC 3/24/23 Response: Spot elevations have been added to the plans.*
- CMG Comment #2: Spot grades are only shown at the loading docks. The applicant shall show spot grades along the entire perimeter of the building (See Comment 15).**
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.
- EDC 3/24/23 Response: Sheets 3-6 of 36 include all pertinent building egress points.*
- Comment Addressed**
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.
- EDC 3/24/23 Response: Schematic Illustrations of viewsheds from abutting representative properties and from the project site were submitted to the Board prior to the public meeting.*
- CMG Comment #2: CMG did not receive or review the above referenced “Schematic Illustrations” and defers this issue to the Holliston Planning Board for comment.**
38. Section 7.3.2 e) Dimensions, depiction, and material description of the proposed “Business Sign” are not provided.
- EDC 3/24/23 Response: The sign detail on Sheet 29 of 36 provides sign details and dimensions.*
- Comment Addressed**
39. Section 7.3.2 f) Figures and calculations relating to the “building height”, including relationship of existing and proposed grades are not provided.
- EDC 3/24/23 Response: Addressed in Item 15.*
- CMG Comment #2: Comment remains (See Comment 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.
- EDC 3/24/23 Response: Existing utility information added to the plan set.*
- CMG Comment #2: The water main located within Hopping Brook Road is now included on the grading and utility plans. Water main size and material should be noted.**
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.
- EDC 3/24/23 Response: Existing utility information has been added to the Plan Set.*
- CMG Comment #2: The proposed Title V Septic System location is not shown in the revised 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.

EDC 3/24/23 Response: A standalone SAS Design has been submitted to the Holliston BOH.

CMG Comment #2: Comment remains, see item #41.

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.

EDC 3/24/23 Response: A Licensed Landscape Architect has sealed Sheets 36A & 36B of 36.

Comment Addressed

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".

EDC 3/24/23 Response: 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.

For Holliston Planning Board Consideration

45. Consideration should be given to "harmony in scale, bulk, massing, and density".

EDC 3/24/23 Response: 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.

For Holliston Planning Board Consideration

B. Lighting

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

EDC 3/24/23 Response: Building mounted fixtures are set at 20-feet as has been confirmed is allowed under the bylaw.

Comment Addressed

C. Landscaping and Screening

47. Proposed development shall be integrated into the natural landscape.

EDC 3/24/23 Response: 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.

For Holliston Planning Board Consideration

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.

EDC 3/24/23 Response: 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 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).

For Holliston Planning Board Consideration

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.

EDC 3/24/23 Response: 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.

EDC 3/24/23 Response: 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 not preserve the natural features of the site including bordering vegetated wetland associated intermittent stream located near the northerly boundary and mature trees along the easterly Medway property boundary.

For Holliston Planning Board Consideration

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.

EDC 3/24/23 Response: 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.

For Holliston Planning Board Consideration

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.

EDC 3/24/23 Response: 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.

For Holliston Planning Board Consideration

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.

EDC 3/24/23 Response: Additional details have been added to the plan set for constructing the Earthen Berm.

CMG Comment #2: Comment Partially Addressed. CMG recommends Applicant request a waiver for construction of slopes greater than 3:1 slope but not to exceed a 2:1 slope.

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.

EDC 3/24/23 Response: No comment required.

For Holliston Planning Board Consideration

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.

EDC 3/24/23 Response: No comment required.

For Holliston Planning Board Consideration

H. Fiscal Analysis

56. CMG defers to the Planning Board for consideration of the need for analysis of fiscal costs from the development.

EDC 3/24/23 Response: No comment required.

For Holliston Planning Board Consideration

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.

EDC 3/24/23 Response: 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.

For Holliston Planning Board Consideration (Also See Comment 53).

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)

EDC 3/24/23 Response: As addressed in Item 1.

CMG Comment #2: Comment Remains.

- b. The location of existing and proposed utilities. (No on-site septic system location is shown in the plans)

EDC 3/24/23 Response: SAS Design filed with the Holliston BOH.

CMG Comment #2: Comment remains. An approximate location of the proposed septic system should be shown on the Plan Set.

- c. The site's existing and proposed topography with contours at 1-foot intervals.

EDC 3/24/23 Response: 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.

For Holliston Planning Board Consideration

- j. Estimated seasonal high groundwater elevation in areas to be used for stormwater retention, detention, and infiltration.

EDC 3/24/23 Response: 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.

Comment Addressed

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.)

EDC 3/24/23 Response: The cut/fill computation has been reviewed again and is now properly illustrated.

CMG Comment #2: Comment partially addressed. Cut and fill volumes have been updated on Sheet 33. CMG notes a discrepancy with the submitted Cut/Fill color map. The map shows a significant portion of the northern basin being cut, which contradicts the Grading Plan.

- f. Topographical features including existing and proposed contours at intervals no greater than one (1) foot with spot elevations provided as needed.

EDC 3/24/23 Response: This has been addressed in Item 58.c, a waiver from the 1-foot contour interval requirement can be sought.

For Holliston Planning Board Consideration

- 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.

EDC 3/24/23 Response: Wash station details are included in the O&M Plan.

Comment Addressed

- 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.

EDC 3/24/23 Response: Fuels & related maintenance details are included within the O&M Plan.

Comment Addressed

- 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.

EDC 3/24/23 Response: 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.

Comment Addressed

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.

EDC 3/24/23 Response: The O&M Plan has been updated.

CMG Comment #2: Comment partially addressed, see Item #34.

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.

EDC 3/24/23 Response: 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.

Comment Addressed

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.

EDC 3/24/23 Response: 2-foot Contour Intervals are labelled.

Comment Addressed

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.

EDC 3/24/23 Response: 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.

Comment Addressed

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 3/24/23 Response: 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.

CMG Comment #2: Comment remains. In order to confirm the required capacity of the modified western stormwater basin, CMG will need to verify details associated with the subcatchments as noted above. As a result, as-built information needs to be supplied to the Planning Board and CMG in order to verify conformance of the stormwater management design with the applicable regulations.

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 3/24/23 Response: 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 proposal has been the 555 Warehouse. The configuration of the 555 Hopping Brook site would allow the terminus to be established only for a short distance from the PharmaCann Site at the 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.

Condition of Approval Recommendation

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 3/24/23 Response: EDC agrees with this being a condition of approval.

Condition of Approval Recommendation

67. Footing drain and building roof drain tie in locations, details, size, & type for the building are not provided.

EDC 3/24/23 Response: 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.

Comment Addressed

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.

EDC 3/24/23 Response: 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.

Comment Addressed

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.

EDC 3/24/23 Response: The total post-developed area adds up to the total predeveloped area and a summary has been added to the calculations.

Comment Addressed

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"

EDC 3/24/23 Response: The calculations have been revised using the data below.

Comment Addressed

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.

EDC 3/24/23 Response: Test pits have been added to the corresponding plans and the forebay bottom has been adjusted accordingly.

Comment Addressed

72. Rational method design calculations do not match the Rim and Invert elevations as shown in the Grading & Utility Plans.

EDC 3/24/23 Response: The calculations and plans have been revised.

CMG Comment #2: Comment partially addressed. Rims and inverts appear consistent with the design plans. CMG noted the following pipes which appear to be undersized according to the design calculations:

- 18" – CB A6 to DMH A7
- 18" – CB A4 to DMH A5
- 30" – DMH A9 to DMH A11
- 12" – CB C2 to DMH C3
- 12" CB C1 to DMH C3
- 12" – CB D6 to DMH D8
- 12" – CB D7 to DMH D8
- 12" – CB D2 to DMH D3

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.

EDC 3/24/23 Response: The calculations have been revised.

Comment Addressed

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.

EDC 3/24/23 Response: The calculations have been revised.

CMG Comment #2: Using the static method, the modified western basin does not appear to have enough volume to meet the required recharge volume. The calculations show the basin will handle the proposed development located at 555 Hopping Brook Road but does not include impervious surfaces utilizing the basin associated with the PharmaCann Site and Roadway.

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.

EDC 3/24/23 Response: The detail has been revised to match the HydroCAD model.

Comment Addressed

76. The Basin #2 cross-section shown on the Stormwater Details does not appear to match the Grading Plan.

EDC 3/24/23 Response: The cross section has been revised.

CMG Comment #2: The elevation issue appears to be addressed; however, cross-section or berm detail should show an impermeable clay core to deter stormwater breakout through the perimeter embankment.

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.

EDC 3/24/23 Response: The deep sump catch basins, Contech Stormwater units and stormwater forebays take care of the water quality.

Comment Addressed

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.

EDC 3/24/23 Response: The deep sump catch basins, Contech Stormwater units and stormwater forebays have been sized to treat the required water quality volume.

Comment Addressed

79. Forebay sizing calculations do not appear to utilize the correct impervious areas within each drainage subcatchment.

EDC 3/24/23 Response: Forebay calculations for the impervious areas have been revised.

Comment Addressed

80. Contech water quality unit sizing designs do not appear to be labelled as shown on the Grading and Utility Plans.

EDC 3/24/23 Response: The labels on the Contech design sheets have been revised.

Comment Addressed

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.

EDC 3/24/23 Response: 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.

Comment Addressed

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.

EDC 3/24/23 Response: The deep sump catch basins, Contech Stormwater units and stormwater forebays take care of the water quality.

CMG Comment #2: Comment remains. Stage – storage tables generated by the HydroCAD model will be necessary to verify conformance regarding pond storage.

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.

EDC 3/24/23 Response: 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.

CMG Comment #2: Unless the Applicant can certify or provide a deed / tenant restriction to restrict this Site from being utilized for fleet storage and/ or any use classified as a LUHPPL; CMG recommends the site stormwater design comply with MA-DEP Stormwater Management Standards for a LUHPPL.

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.

EDC 3/24/23 Response: This section of the checklist was inadvertently checked, and a corrected version is included within the updated Stormwater Report.

Comment Addressed

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.

EDC 3/24/23 Response: Addressed in Item 85 above.

Comment Addressed

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.

EDC 3/24/23 Response: 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.

CMG Comment #2: Contech water quality units are proposed to handle the site's water quality volume. Applicant should include documentation in the stormwater report regarding the Contech's oil storage capacity in relation containing the most likely oil release (i.e. tractor trailer saddle tank volume).

87. TSS summary should be revised to include LUHPPL best management practices and pre-treatment requirements.

EDC 3/24/23 Response: 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.

Comment Addressed

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.

EDC 3/24/23 Response: EDC agrees with this being a condition of approval.

Condition of Approval Recommendation

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.

EDC 3/24/23 Response: O&M Plan is attached to this response package.

Comment Addressed

Stormwater Standard 10: Illicit discharges

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

EDC 3/24/23 Response: Illicit discharge statement is appended to the O&M Plan.

Comment Addressed

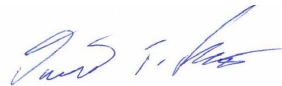
Additional Comments:

91. Soil test pit information is now included in the Plan Set, however, soil test locations are not within the limits of the proposed stormwater basins. Confirmatory soil testing must be provided within areas proposed for stormwater recharge to confirm soil class and ESHGW.
92. The proposed retaining wall located near the site entrance appears to be constructed over the proposed property line. A permanent easement should be shown on the plan set to accommodate the retaining wall.
93. Headwall labelled as HW K2 appears to directly discharge into the previously mentioned Isolated Wetlands located in direct proximity to the proposed cul-de-sac. The proposed design appears to utilize the resource area as a conveyance swale. CMG will defer to the Holliston Conservation Commission regarding the required permitting associated with the proposed wetland disturbances and impacts.
94. The proposed modifications to the western stormwater basin appear to require approximately 10' of cut at the deepest portion. The nearest test pit contained mottling at 84" below ground surface indicating that the proposed cut may cause the basin to intercept groundwater and not provide the required 2' of separation to estimated seasonal high groundwater.

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