

April 16, 2020

55 Walkers Brook Drive, Suite 100, Reading, MA 01867
Tel: 978.532.1900

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

Re: **Response #2 to Stormwater Design Engineering Peer Review
SunRaise Marshall Street Solar Project**

Dear Ms. Sherman:

Weston & Sampson Engineers, Inc. (Weston & Sampson) is in receipt of the peer review letter #2, dated April 15, 2020, prepared by CMG Environmental Inc. The peer review letter was prepared for the Town of Holliston Planning Board's consideration of the Site Plan Review Application and our revised plans and stormwater report filed for the above referenced solar project, on behalf of Marshall Street Solar, LLC and SunRaise Development, LLC. This letter is intended to provide a formal response to the recent peer review comments. For simplicity, and as with the prior response, we have presented this letter in comment and response format to ensure each comment is addressed. "CMG Comment #2" refers to the second comment letter and comments have been numbered sequentially in the order that they were presented.

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.*

1. CMG Comment #2: MA-DEP Stormwater Standards Volume 3: Documenting Compliance, Chapter 1 specifically notes "Porous pavement is considered to be an impervious surface for purposes of calculating the *Required Water Quality Volume* and the *Required Recharge Volume*". CMG believes compacted gravel access roads do qualify as impervious. At a minimum the gravel road would be considered a porous pavement and still need to comply with this standard.

Response: We are willing to accept the premise of the classification of gravel roads as "impervious" for the purposes of this project. For further discussion on TSS removal considerations, see the response to the peer review comment under Standard 4 below.

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

2. CMG Comment #2: The Applicant must provide the required Recharge Volume calculation to document compliance and/or provide evidence documenting why the standard can only be met to the "maximum extent practicable" given existing site limitations (Also See Comment 14).

Response: The Stormwater Report narrative had been revised to describe the site limitations that prevent full compliance with this standard. This standard has been met to the maximum extent practicable.

3. CMG Comment #2: Hydrology calculations show Detention Basin B-1 flowing directly into Basin B-2. However the swale is not clearly defined on Sheet C204 and appears to disappear halfway to Basin 2. Recommend Sheet C204 clearly depict the flow path connecting the two (2) proposed basins.

Response: Sheet C204 has been revised to depict the flow path where runoff leaves this swale to clarify how it reaches Basin 2.

4. CMG Comment #2: Site soil test pit and boring information document shallow depths to refusal across the Site. The known depths to refusal and/or available groundwater data in the vicinity of all five (5) stormwater basins should be added to the Profile Sheets. Basin #4 shows a fairly deep cut below the refusal elevations noted in the provided soil data.

CMG recommends prior to construction soil testing be complete within each stormwater basin to verify depth to refusal and estimated seasonal groundwater to determine if ledge / rock removal will be necessary. Soil test results should be provided to the Planning Board and any resulting stormwater system design changes be submitted to the Planning Board for review /approval.

Response: Acknowledged and agreed, additional soil testing will be conducted to determine if ledge or rock removal will be necessary prior to construction. If exploration requires any changes, these changes will be presented to the planning board for review and approval.

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

5. CMG Comment #2: Water quality volume (WQV) calculations must be provided to document compliance with this standard (Also See Comment 14).

Response: Calculation of Water Quality Volume (WQV) is applicable to volume-based stormwater BMP design. Water quality treatment BMPs for this project are flow-based prescriptive BMPs, therefore an analysis using a WQV calculation is not applicable. Stormwater treatment is provided by the filtering action of grassed swales adjacent to the gravel roadway, as well as sediment forebays in Basins 1 and 4. Other areas of gravel roadway are designed to direct runoff via sheet flow across grassed areas ranging in length from 150-feet to 300-feet that function as vegetated filter strips. Runoff from all gravel roadways is ultimately directed to stormwater basins which have sufficient residence time to act as extended dry detention basins. The HydroCAD model has been revised to include an analysis using a 1-inch 24-hour storm, and the resulting hydrograph for each demonstrates that they discharge for a period exceeding 24-hours.

6. CMG Comment #2: TSS Removal calculation worksheets must be provided to document compliance with this standard (Also See Comment 14). Sediment forebays will most likely be necessary for Basin 1 & Basin 4.

Response: Sediment forebays have been added to Basin 1 and Basin 4. The stormwater report has been updated to include forebay sizing calculations. Supporting TSS removal worksheets have been added to the stormwater report for the swale, sediment forebay and basins.

Stormwater Standard 8: Construction period erosion and sedimentation control

7. CMG Comment #2: CMG recommends the Planning Board include a Condition of Approval requiring the submittal of a copy of the SWPPP and EPA NPDES CGP Registration to the Planning Board prior to the start of construction.

Response: Agreed and acknowledged.

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

8. CMG Comment #2: CMG recommends the O&M Plan including the following required information:
- Name and contact information for Responsible Party and Property Owners should be provided. The O&M Plan identifies *Sunraise Development* as Owner/Operator of the stormwater system and the plans note a different property owner J. Michael Norton, Trustee

- Schedule of maintenance tasks should also include swales, forebays, rip-rap aprons & gravel roadway maintenance.
- O&M Plan notes only one (1) detention basin but five (5) are proposed
- Plan showing location of all stormwater BMPs and maintenance access.
- Description of Public safety features (i.e. Site perimeter fencing, local Fire & Police contact phone numbers).
- Include swales, forebays, rip-rap aprons, and roadway maintenance in inspection log forms
- Legal instrument, plan and easement deed allowing Site access for the legal entity to operate and maintain BMP functions.

Response: To be clear, the land is owned by the Greenvview Reality Collateral Trust, LLC, J. Michael Norton, Trustee. The land will be leased to Marshall Street Solar, LLC, who will own the solar generating assets and appurtenant facilities constructed within the lease area, including fencing, roadways, landscaping and stormwater management systems. Marshall Street Solar, LLC will be responsible for operation and maintenance of the solar facility and stormwater features within the lease area. The information requested above has also been included in the updated Stormwater Report, dated April 15, 2020, along with current contact information for the owner, operator fire and police. Additional revisions to the O&M plan have been made to address the other comments listed above.

We appreciate the comments and trust you will find the responses and Site Plan Review Application complete and worthy of approval by the Planning Board.

Sincerely,

WESTON & SAMPSON ENGINEERS, INC.



Stephen Paul Wiehe, PG
Senior Associate



James Pearson, PE
Civil Engineer

Attachments: Updated Project Plan Set
Updated Stormwater Management Report