

# EXPEDITED ENGINEERING, LLC

*Civil Engineers & Erosion Control Specialists*

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January 15, 2025

Karina Quinn  
Town Planner  
Town of Southborough  
17 Common Street  
Southborough, Massachusetts 01772

Re: 250 Turnpike Road, Southborough Comprehensive Permit Plan  
Peer review from Howard Stein Hudson

Dear Ms. Quinn:

We received the comment letter from the peer reviewer Howard Stein Hudson dated 20 December 2024. On 14 January 2025, we had a virtual meeting with Patrick Bogle and Katie Enright of HSH to discuss their review.

I'd like to take this opportunity to briefly explain how each of their comments will be addressed. The form that this letter will take is that I will repeat the first line of each of HSH's comments in *italics*, if the comment can be summarized that briefly, and then respond in normal text.

*Based on our review of the referenced documents, HSH offers the following preliminary comments:*

## ***Zoning Regulations – Chapter 174***

*174-6 – Applicability. The applicant has requested a waiver from this section . . .*

No response necessary.

*174-8(A) Schedule of Use Regulations. The applicant requests a waiver from this section . . .*

No response necessary.

*174-8(B) Schedule of Use Regulations. The applicant requests a waiver from this section . . .*

No response necessary.

*174-8.2(C) Prohibited Uses. The applicant requests a waiver from this section . . .*

No response necessary.

*174-8.2(D) – RA Residence A District – Development Standards*

- Building unit #1 is located 2 feet from the proposed side property line where 25' is required.*

Acknowledged.

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- *Units 30-32 are all approximately 24-26' from the rear yard setback where 50' is required.*

Acknowledged.

- *Provide architectural plans to verify building height in accordance with maximum building height of 35 feet / 2 ½ stories (including basement heights per the definition of story) and maximum floor area ratio of 0.18 to which a waiver was requested.*

We will provide architectural plans.

*174-8.9 – WFP Wetland and Floodplain District*

- *The proposed development is not located within a FEMA Floodplain so this overlay district is not applicable.*

Agreed. No response is necessary.

*174-9.1 - Common Driveways*

- *Common driveways serving more than two or more detached single-family dwellings shall not be permitted in any district. Since the plan lists this access from Turnpike Road as a driveway serving 32 units, provide an alternative means of access or a waiver is needed from this section.*

We will request a waiver.

*174-11 Signs*

- *174-11(C)(2)d – a waiver was requested from the requirement that no sign may be illuminated between 10:00p.m. and 6:00 a.m. HSH defers to the board for approval of this waiver.*

No response necessary.

- *174-11(E)(1) – Special Permit – a waiver was requested from this section however it is unclear if this waiver is required . . .*

No response necessary.

*174-12 – Parking and loading regulations*

- *174-12(C)(2) – Dimensional Requirements for parking . . .*

No response necessary.

- *174-12(E)(1) – Dwellings: two spaces for each dwelling unit containing one or two bedrooms . . . Confirm the number of spaces by showing spaces at the appropriate size throughout the development.*

We will add dimensions and labels to the Plans to confirm this.

- Confirm that the additional surface spots are located directly adjacent to the 3 bedroom units . . .

We will extend sidewalk to 3 bedroom units #'s 18 and 19 south of the cul de sac circle.

- *... Provide a minimum of 23' from the back of curb to face of building along the side of the roadway where the sidewalk is provided . . .*

We will make revisions to a few units' locations to satisfy this standard.

- *Provide building architectural plans to verify that the internal parking spaces within the garages are a minimum of 9 ½ feet wide and 18' long*

We will provide architectural plans to verify this.

- *It is noted that the parking provided is reliant on tandem parking for the residents (1 parking within the garage and 1 parking within the driveway). Confirm whether the applicant has considered adding additional visitor parking to avoid people parking on the street for gatherings and holidays.*

We are considering additional visitor parking spaces.

- *Verify that the garages and building entrances are accessible in accordance with the state regulations for accessible units.*

We will provide architectural plans to verify this.

- *Provide electric charging stations into this layout per new state regulations.*

We will comply with the regulations.

- *174-12(G)(1) – Egress*
  - *Any Driveway likely to carry more than 200 trips per average business day must comply with the following criteria within this section on Route 9 . . .*

We will comply with the relevant criteria and will make that clear with notations on the Plans.

#### *174-12.1 – Outdoor illumination*

- *The proposed development is located within the Residence A zone which would be subject to the LZ-1 zoning within 174-12.1(E)(2), however the proposed development does not directly apply to the spirit and intent of the regulations . . .*

We will add lighting per the suggestion of the reviewer.

- *174-12.1(F) Provide a total site lumen limit calculation per table 1.*

We will provide this table.

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- *Provide the appropriate calculations per table 2: Lighting Limits for residential uses.*

We will provide this table.

- *Provide information in compliance with 174-12.1(G-R) to verify compliance with these regulations.*

We will provide this information.

*Landscape plan comments have been provided under a separate cover by James Emmanuel, RLA LEED AP from James K. Emmanuel Associates.*

No response necessary.

***174-13.1 – Concept Plans***

- *174-13.1(A) – Applicability. Any use which is designated in 174-8 as being subject to this article required concept plan approval by town meeting prior to being acted upon for special permit approval. It is recommended that the applicant request a waiver from this section.*

We will request this waiver.

***174-13.1 – Major Residential Development***

- *174-13.2(1) – Applicability. Major residential development, that is, the creation of eight or more lots or construction of eight or more dwelling units within an eight-year period from or on a property or set of contiguous properties in common ownership. It is recommended that the applicant requests a waiver from this section.*

We will request this waiver.

***174-13.3 Lower Impact Development***

- *174-13.3(C) – Applicability. This bylaw shall be applicable to all new development . . .*

We will request a waiver from this regulation.

***Wetland Protection Regulations***

*170-2 – Jurisdiction. The applicant has requested a waiver from this section . . .*

We will revise our waiver request to not be a blanket waiver from the entirety of the Bylaw.

***Subdivision Regulations***

*244-4 – Plan Requiring approval. The applicant is requesting a waiver from this section since the Zoning Board of Appeals is the permit granting authority within all Chapter 40B applications. This waiver request is appropriate.*

No response is necessary.

*244-6 – Limit on dwelling on a lot. This proposal is to construct 32 townhouse units on a single parcel of land, and this would require planning board approval. The applicant is requesting a waiver from this section since the Zoning Board of Appeals is the permit granting authority within all Chapter 40B applications. This waiver request is appropriate.*

No response is necessary.

*244-8(B) – Standards of Adequacy. Provide the following information . . .*

We will provide this information.

*Per 4.1.3.1, all plans submitted shall conform to the requirements of the town subdivision rules and regulations 244-10*

We will add a road profile to the Site Plans and will clarify separation at utility crossings.

*244-13(A)(4) – Dead-end streets. Dead-end streets shall not exceed the lesser of 1,000 feet or the length needed to accommodate 12 lots. Please revise the design or request a waiver.*

We will request a waiver.

*244-13(A)(7) – Provide grading for the revised entrance out to Route 9 and confirm that this requirement has been met.*

We will satisfy this requirement

*244-13(B)(2) – Confirm that at a minimum, the curb cuts for the proposed units are at least 10' in width with a 3' radius flare for the pavement entrances.*

We will confirm this and indicate it on the Plans.

*244-15(A) – Easements. Expand the proposed 20' utility easement to 30' per this section or request a waiver.*

We will expand the easement to 30 feet width.

*244-16(B) – Drainage System.*

- The HydroCAD modeling is lacking significant level of detail and modeling to verify that the proposed drainage network will work as proposed . . .*

We will revise the Drainage Report and the drainage area plans to address these comments.

*244-17 – Water Supply and Fire Hydrants.*

- Several hydrant locations do not meet the required separation requirements to the proposed sewer infrastructure. Please adjust.*

We will revise hydrant locations.

- The waterline is proposed with a “Y” layout and two dead end stubs. This will lead to frequent purging of the waterline. Please provide a water loop to prevent this.*

We will investigate all options for looping water mains.

*244-22 – Curbs and Berms. Curbing shall be straight or radial granite curbing with a seven-inch initial reveal from exposed face above gutter line. Revise details.*

We will revise details as necessary.

*244-27 – Special Construction Details. Retaining walls shall be constructed whenever the slope of land adjacent to the street would be too steep for the stability of soil [generally in excess of one (1) foot vertical to two (2) feet horizontal] or would require grading for more than thirty (30) feet back to meet the existing grade at a slope of one to two (1:2).*

- Significant retaining walls are proposed around the exterior of the development adjacent to the bordering vegetated wetlands. Where retaining walls are not proposed, 1:1 slopes are proposed directly adjacent to property lines or local no alteration zones adjacent to BVW. Section 244-20F – maximum slope shall not exceed two (2) horizontal and one (1) vertical in fill. It is advised that the slope be revised to 3:1 which is a mow-able and maintainable slope with exceptions for 2:1 in circumstances where the grade is unavoidable in compliance with the regulations. Anywhere the slope is equal or greater than 2:1 erosion control blankets or geotextiles shall be used to maintain vegetation.*

We propose the use of North American Green SC150BN geotextile fabric rated for use on slopes as steep as 1:1 whenever slopes on site are steeper than 3:1 per the detail on sheet D1.

- A 1:1 slope is proposed directly off the side of the foundation and edge of driveway adjacent to unit 1. Please detail how this will be constructed and maintained within this close proximity to the property line.*

We will likely change this design to include a low retaining wall.

- Several of the area drains behind units 11-3 are located within sections of 1:1 slopes. This could lead to undermining of the pipes within this area. It is suggested that these drain lines be adjusted out of this section of steep slopes and the slopes be revised.*

We will revise this design as suggested.

- A 1:1 slope is proposed off the driveway from unit 2 which then drops 6 feet to the wetland. Provide guardrail and slope stabilization through this section.*

We will add a guardrail. As noted above we are considering using a low retaining wall here.

- A retaining wall is proposed approximately 1 foot away from the existing property line which abuts the abutter noted as 5 Sarsen Stone Way. Please provide a guardrail for vehicular safety and detail how this wall will be constructed with allowance for erosion control and room to construct the wall. This guardrail should extend along the section of 1:1 slope and along the wall abutting unit 20.*

We will do so.

- Unit 26 directs water 17.5' down a 1:1 slope directly at units 27 through 29. Please revise to remove the flooding concern for these units.*

We will propose the installation of area drains at the base of this slope.

#### ***Stormwater and Erosion Control Regulations***

*154-3 – Applicability. The applicant has requested a waiver from the entirety of the Stormwater and Erosion Control Regulations. HSH does not believe that this is appropriate as it is the applicant's duty to work with the municipality to determine which of the sections within the bylaw can be complied with and which would pose a significant hardship on the applicant over and above the state regulations. It is requested that the applicant review the regulations and provide individual waivers from sections that would be required to be waived.*

We will revise our waiver request.

*7.6(i)(viii) . . . Please provide the soil logs for the remainder of the test pits performed onsite.*

We will provide the remainder of the deep observation hole soil logs.

*7.6(l)(1) – provide detailed cut and fill calculations.*

We will provide these calculations.

*7.6(o) – Stormwater and Erosion Control Management Plan. Provide a stormwater and erosion control plan in accordance with 7.6(o)(3-4).*

We will provide this Plan.

*8.1(g) – Post-Development Stormwater Management Criteria for New Developments. Revise stormwater calculations to comply with this section.*

We will provide the revised calculations.

#### ***Comprehensive Permit Regulations***

*4.1.2 – The applicant requests a waiver from a complete financial pro forma . . .*

No response necessary.

*4.1.3.8 – Provide electric and/or gas lines through the development.*

We will show electric lines. We will determine if gas service will be used and if lines should be shown.

*4.1.3.13 – A waiver has been requested from the requirement to show the location and results of soil, percolation and water table tests . . .*

We will provide the remaining soil logs.

*4.1.5 - Provide building architectural plans per this requirement.*

We will provide architectural plans per this requirement.

*4.1.6 – Provide this traffic analysis, neighborhood plan, etc. . .*

We will provide a traffic report.

*4.1.12 – Prepare and provide an “Environmental Analysis” in accordance with this section for review.*

We will provide an environmental analysis in accordance with this section.

*4.1.15 – Prepare a long term monitoring plan per this section.*

We will provide a long term monitoring plan per the regulation.

*6.5 – Access – To assure reasonable standards of public safety, there shall be adequate means of access to a comprehensive permit development. Typically, this means at least two means of access to the property if eleven (11) or more dwelling units are proposed or otherwise recommended by the DPW, the fire chief and the police chief. Please provide information on the single entrance and exit provided for this 32-unit development and how this satisfies this requirement.*

We believe state fire regulations have a much higher standard of unit size before a second means of egress is mandated.

- Provide a swept path analysis of the largest fire truck for the town through the proposed development to determine the vehicle’s ability to access all units.*

We will provide a swept path analysis of the Town’s largest fire truck passing through the site.

#### ***Sewage Disposal Regulations***

*223-6(D)(1-10) – provide elevations and dimensions per this section. Certain items appear to be missing.*

We will provide additional information.

*223-29(E) – Leaching Area Requirements – utilizing a design percolation rate of 20 minutes per inch the factor associated with this rate would be 0.50 sf/gal vs the 0.53 rate that was utilized within the design. Please revise the calculations.*

We will request a waiver from this section. We are meeting the state, title 5 standards and this system will be on several feet of sand .

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*223-29(E) – Leaching Area Requirements – the bottom area of the trench will not be considered without prior approval of the Board of Health. Please provide approval or revise the design calculations.*

- Verify that garbage grinders are not allowed within the rental development per note #6 or revise the system in accordance with 310 CMR:15.240(4) and request a waiver per this bylaw.*

Garbage grinders will not be allowed within these units. Trench bottom area is allowed per Title 5.

*Per 223-32 and 15.211 Title 5 minimum setback distance requirements, the project is located within the outstanding resource water of the watershed associated with the reservoir which would be subject to a 100' setback from the soil absorption system from wetlands which border or are tributary to a surface water supply. Revise the septic field location to be outside of this setback from the adjacent wetland systems shown approximately 50' away.*

There is no tributary in the area in question on the USGS map of this area, the MassMapper State GIS system or the Town of Southborough GIS maps. An offset of 50 feet is in compliance with the applicable regulations.

- 15.211 Minimum Setback Distances - Provide a minimum of 20' between the soil absorption system and unit 15 due to basement separation requirements.*

We will reverse the layout of unit 15 so that only the garage slab floor is within 20 feet of the soil absorption system.

*223-54 – Capacity. A septic tank shall have an effective liquid capacity of not less than 150% of the design flow estimated.*

- 223-58 – Tanks in Series. The capacity of the first compartment is at least equal to the requirements in 223-54 or at a minimum the criteria spelled out within 15.224 of the Title 5 regulations. Revise the tank size and/or provide calculations to support the minimum hydraulic detention times required.*

We will revise the tank sizing.

*Revise outlet tee below flow line per the requirements of 223-62.*

We will revise the outlet tee.

*223-70 – Confirm that the invert elevation of the outlet from the septic tanks is at least one foot above the SHWT elevation.*

We will provide confirmation.

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223-73 – Alternation. Dosing shall alternate when the total volume of waste to be disposed of exceeds 5,000 gallons per day. Alternating siphons and pumps shall discharge to separate disposal areas of equal size. Revise the design to accommodate this.

We will request a waiver from this section of the regulations as we believe the standard pressure dose system arrangement of alternating pumps but one receiving soil absorption system is better.

*223-74 – Capacity. Confirm that the dosing tanks have the capacity to discharge a volume adequate to cover the dosed leaching area to a depth of at least one inch in not over 15 minutes.*

We will provide confirmation.

*223-87 – Standby power. Provide location and callouts for backup generation, panels, fuel, etc. for when emergency power is needed.*

We will address this requirement.

*The 2" lateral inverts are noted as being at elevation 309.00. Please confirm this is a typographical error.*

We will fix this error.

*The finish grade is called out as 310.50. Please confirm this is a typographical error.*

We will fix this error.

*The 1/8" perforations are listed within the notes as 4' spacing but depicted within the diagram as spaced "5' typ" confirm spacing.*

We will fix this inconsistency.

*Confirm construction and stone standards have been complied with per 223-119 and 223-120.*

We will do so.

*223-123 – confirm the grade above and adjacent to the leaching trench slopes at a minimum of 2%.*

We will confirm this and indicate it on the Plans.

*Provide test pit #11 information as it is located within the proposed septic system.*

It will be provided.

*The force main pipe size is called out as two different dimensions between the plans and the septic profiles. Please confirm pipe size and material.*

The inconsistency will be fixed.

**310 CMR 15.00 Title 5 Regulations**

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*15.212(2) - . . . Please provide a mounding analysis and revise the design of the system accordingly.*

We will provide a mounding analysis.

*15.220(k) - Provide the location of every water supply, public and private.*

- The abutter at 258 Turnpike Road is noted via the well drillers report as having a domestic well on the property. Please locate and depict on the plan.*

The most recent as built plan of that property does not reflect the presence of a well but we will confirm that it has been abandoned.

*15.221(7) - The top of all systems components, including septic tanks, distribution box, pump chambers, dosing chamber, and soil absorption systems shall be installed no more than 36" below finish grade. The proposed design shows the top of the system approximately 45" below finish grade. Please revise.*

We will revise the surface grading.

*Provide sewer service callouts in conformance with 310 CMR:15.222*

We will do so.

*15.231 – Dosing Chambers and Pumps. Per the calculations with sheet 2, it is noted that the volume below the pump on is 3,234 gallons however note 5 calculates the total volume within the system which would need to be held per 15.231 is 3,251 gallons. The emergency gallons calculated is within 10 gallons of the requirement. Please increase the pump chamber to accommodate the additional gallons required.*

We will revise the pump chamber.

*Confirm venting criteria meets the items spelled out within 15.241*

We will add venting to address the circumstance of the soil absorption system being located partially below pavement.

#### ***Generic Plan Comments***

##### ***Existing Conditions Plan Comments:***

We will revise the existing conditions plan plotting to avoid inaccurate scale. Regarding the lot line between Lots A and B, it will be revised for this project.

##### ***Site Layout Plan comments:***

- The proposed industrial development is noted as not being included within this development. However, the site plans, stormwater design, drainage calculations and*

*narrative, all study this industrial development and multifamily development as dependent on one another for the stated outcome.*

- *The development of the 40B should be isolated from the development of the contractors' yard within the industrial parcel as they are two different permitting paths and it cannot be anticipated that they will be constructed at the same time.*

We showed the contractor's yard building on Lot A to show that it will not impede access. Also, the drainage system on Lot A discharges to the detention basin near Parkerville Road and located primarily on Lot B.

- *Existing drainage pipe from the industrial parcel outlets to an existing drainage basin and drainage easement on the proposed parcel. Proposed building units #1 and #2 are depicted on top of this drainage system. Please show how this drainage system connection can be maintained.*

This pipe will be rerouted.

- *Per Massachusetts Building Code, a pedestrian safety fence on top of a retaining wall greater than 30" must be a minimum of 42" from the top of the wall for pedestrian fall protection. Please add a safety fence where required.*

We will add a safety fence.

*Grading, Drainage and Erosion Plan Comments:*

- *Several buildings appear to have basement elevations multiple feet within the groundwater table as evidenced by the adjacent wetland elevation. It is recommended to have a basement elevation at least 2 feet above the groundwater table based on good engineering practices.*

Some units should not have been shown with basements.

- *Sections of the proposed driveway/sidewalk exceeds ADA running slope maximums of 5%. Please detail the proposed sidewalk in compliance with ADA accessibility standards.*

We are investigating our options in this regard.

- *The infiltration drywells behind unit 24 and unit 10 show testing in the area but this testing has not been provided to determine SHWT, soil texturing, etc. Please provide soil testing evidence to support this determination.*

We will provide the testing information.

- *The infiltration drywell behind unit 21 does not show testing near the system yet denotes a SHWT elevation within the detail callout. Provide evidence to support this determination.*

We will provide the log of deep observation hole #24 in this area.

- Provide roof drainage inverts into the infiltration drywells so that the HydroCAD calculations can verify that these systems do not backup the inverts.*

We will do this on the detail sheet.

- Provide top and bottom of retaining wall elevations.*

We will add this information.

- The proposed limit of work is located outside of the proposed property line. Reduce the limit of work to be located within the property limits.*

The lots are in common ownership. We will add an easement on Lot A.

- The erosion and sediment control plan depicts what looks like haybales as the primary source of erosion control. It is preferred that the straw wattle with silt fence backing be the primary source of erosion control on the site.*

The symbol looks like a straw bale but the detail on sheet D1 shows it is a combination of a straw wattle and silt fence.

- The erosion control notes state that the entirety of the project including the site entrance and utility work will surpass 5 acres. A phased construction management plan will need to be developed per the Construction General Permit as part of a Stormwater Pollution Plan (SWPPP) filing under MEPA requirements.*

We will prepare and include an interim grading plan in the Site Plan set which will reduce the area exposed at once to less than 5 acres.

*Detail Plan Comments:*

- It is recommended to expand the site exit construction mat detail to a minimum of 24' in width to accommodate two-way traffic in and out of the site.*

We will do so.

- Provide test pit information for the drywell infiltration chambers located behind units 10, 24, and 21. Provide a mounding analysis for these systems where less than 4' separation to SHWT and/or ledge is noted from the most restrictive test pit within or near the system.*

We will do so.

- Per the stormwater manual, table IB.1, one soil sample for every 5,000 ft of basin area is recommended with a minimum of three samples are required for each infiltration basin.*

We will review this. We may be in compliance already.

- The most restrictive test pit (TP 23) for the Retain-it infiltration chambers shows 40" down from an elevation of 320 yielding a SHWT elevation of 316.67'. Provide a mounding analysis for this system.*

We will do so.

- Provide overflow outlets for each of the infiltration drywell chambers in case of clogging or other soil restrictions so the system does not only have to rely on infiltration as the primary outlet.*

We will do so.

- Area drain A is shown as taking a large section of water from the rear of the townhouses 12-17, however the contours depict that the water will be directed mostly at the rear of the units. Revise the grading to reflect the design intent and provide calculations to support this drainage runoff.*

We will relocate these area drains.

*Drainage Comments:*

- Subcatchment 7, 8 and 9 are analyzing watershed patterns which are external to the project analysis. Each of these watershed areas will have an intricate system of pipes, manholes, and basins which would need to be quantified to verify if any of the water does in fact make its way into the proposed development drainage network.*

We will review the Sarsen Stone drainage to confirm this.

- The LiDar imagery located within the pre- and post- watershed maps does not corroborate the detail of pond storage and outlet detail that is modeled within the existing HydroCAD pond nodes 7P and 8P. Provide additional detail on where this information was obtained.*

We will do so.

- The pre-development and post-development watershed maps are difficult to read and hard to understand where the information is coming from. The reaches/analysis points identified within the HydroCAD should be labeled within the Pre- and Post- development watershed maps for clarity.*

We will try to improve their clarity.

- Please provide pre- and post- analysis points for the abutters to the south and east comparing the existing runoff to the proposed runoff from the new untreated grass areas, roof and reduction of woodland per 154-9(A)(6).*

We will add these.

- *Revise the soil and cover information for the existing site wetlands to reflect soil group D and water surface.*

We will make the requested revision.

- *Provide a soil listing printout for both the pre- and post- development HydroCAD.*

We will add this printout to the drainage report.

- The area listing depicts a large portion of Subcatchment 7S as HSG D whereas the Wed Soil Survey soils depict this soil as group B.

There are conflicting opinions about how to categorize such areas but we will defer to the reviewer.

- *Another approximately half-acre of area is depicted as HSG group D within the pre and post development HydroCAD. Please provide determination for utilizing this group instead of group B or group C as shown within the NRCS Map for the site.*

We will revise this modeling.

*Massachusetts Stormwater Standards and Stormwater Checklist:*

- *A Notice of Intent (NOI) Application was not included within the provided material.*
- *It is noted that the project is minimizing disturbance to existing trees and shrubs, however the project appears to be cutting the majority of the upland located within the project site including that which exists within the town no disturbance buffer. Please explain how the resource areas will be protected from erosion and sedimentation control and the interests of the Wetlands Protection Act be protected by this project in close proximity to the resource areas.*

We will address these questions.

- *Standard #1*
  - *Revise the calculations within the Stormwater Checklist in accordance with Volume 3, Chapter 1, Page 2 of the Massachusetts Stormwater Handbook.*
    - *Provide updated Rip-Rap calculations for each outlet for the revised drainage design.*

We will do so.

- *Standard #2*
  - *Standard 2 includes the proposed design for the industrial parcel to the north. As stated above, the 40B rental development should have a drainage design and Site*

*Plan design which stands on its own separate from this development in the event that one or the other is not permitted or constructed at the same time. Revise the calculations provided per the above comments.*

We will do so.

- Standard #3
  - *In general, the site appears that each system which is being utilized for infiltration is being captured into a Contech CDS Filtration Unit prior to discharging into the system.*

No response necessary.

- *Provide the required calculations per the Massachusetts Stormwater Handbook to quantify that the site meets the 44% TSS requirement prior to entering an infiltration practice and provide additional calculations to support the additional drywell systems being utilized for recharge within the site. Provide additional drawdown calculations for the other three drywell systems within the site.*

The smaller infiltration structures are fed only by roof runoff which is considered clean. We will add the additional drawdown calculations requested.

- Standard #4
  - *Provide calculations weighted over the site and various treatment trains per the above comments relative to 90% TSS and 60% TP.*
  - *Provide BMP specific water quality calculations to verify that each system is treating the required amount that is being directed to that system.*
  - *The CDS flow-based sheets are noted to be attached to the document but cannot be located, only the sheets relating to operation and maintenance. Supply information from the supplier that details the removal efficiency for the given flow rates through the pipes for each unit.*
  - *The box should be checked within the stormwater checklist to show soils with rapid infiltration rates are being utilized.*

We will provide information and revise the form as requested.

- Standard #5
  - *The Post drainage maps show that drainage from the proposed contractors yard development within the industrial land to the north flows into the property and into the site's wetlands. It is listed within standard #5 that the proposed residential*

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*development is not a land use with higher potential pollutant loads but verify that the proposed industrial development to the north which contributes to the drainage of this site is also not a land use with a higher potential pollutant load.*

We will do so.

- *It is noted that the Stormwater Pollution Prevention Plan (SWPPP) was included within the stormwater report. Please provide a draft copy for review.*

We will do so.

- *Standard #6*
  - *Appropriate BMP's have been used within the proposed design to satisfy this criterion.*

No response necessary.

- *Standard #7*
  - *This project is not a redevelopment as stated within the submittal documents.*

No response necessary.

- *Standard #8*
  - *The proposed grading and drainage plans depict retaining walls and grading approximately 1' from the side lot lines. The proposed erosion control is proposed at a width of approximately 1.5' with additional space needed to install these measures. Please detail how these measures can be installed in concert with the proposed site features and grading.*

We will review this design.

- *Standard #9*
  - *Provide all six items listed within the Massachusetts Stormwater handbook Volume 1, Chapter 1, page 23 within the operation and maintenance plan.*

We will do so.

- *Standard #10*
  - *An illicit discharge statement has been provided.*

No response necessary.

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If there are any questions, please don't hesitate to contact me. Thank you.

Sincerely,

EXPEDITED ENGINEERING, LLC

A handwritten signature in blue ink, appearing to read "James Tetreault".

James Tetreault, PE, CPESC

Cc: Howard Stein Hudson  
FD 250 Turnpike, LLC