

AZIMUTH LAND DESIGN, LLC

Civil Engineers & Erosion Control Specialists

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December 29, 2023

Millbury Zoning Board of Appeals
Town of Millbury
127 Elm Street
Millbury, Massachusetts 01527

Re: Rice Pond Village comprehensive permit application
17 Rice Road, Millbury
Stantec comments dated 12/9/2023

Dear Board members:

I want to take this opportunity to respond to the comments from Stantec Consulting Services, Inc. in a letter dated 12/9/2023. The form that this response will take is that, in the interest of brevity, I will summarize each comment, in italics, and then respond in normal text.

MassDEP Stormwater Standards

We offer the following comments on the proposed stormwater management system, specifically for compliance with the ten performance standards as outlined in the MassDEP Stormwater Management Standards. To assist in our review, we recommend the MassDEP Stormwater Checklist be provided by ALD.

The Stormwater Report Checklist is enclosed along with the revised Site Plans dated 12-29-2023.

1. Stormwater management standard 1.

We don't propose a piped discharge so we will not create scour or erosion. We confirm that the structures will drain in less than 72 hours as part of standard 3.

2. Stormwater management standard 2.

We revised the drainage calculations to use the 24 hour rainfalls prescribed by the reviewer. They are slightly higher than the ones we were using. We will add more labels to the Drainage Area Plans as the reviewer suggests.

3. Stormwater management standard 3.

We have enclosed copies of the logs for deep observation holes #'s 20-23. In response to another reviewer's comment, we noted that the total runoff to the pond will decrease very slightly in the postdevelopment condition.

4. Stormwater management standard 4.

We include the water quality volume calculation with our Stormwater Report Checklist.

5. Stormwater management standard 5.

We agree with the reviewer that the proposed residential use is clearly not a land use with higher potential pollutant load.

6. Stormwater management standard 6.

We agree with the reviewer that the project does not include a discharge to a critical area.

7. Stormwater management standard 7.

We agree with the reviewer that this is not a redevelopment project. We are not trying to claim that status. The project will comply with all MassDEP stormwater management standards.

8. Stormwater management standard 8.

We included an Operation and Maintenance plan for the construction period with our Stormwater Report Checklist. The project now has a net material balance with additional filling behind building #3. Executing the site's earthwork in one phase makes sense. We will file a SWPPP before construction begins as required under the U.S. EPA's rules.

9. Stormwater management standard 9.

We included a long term Operation and Maintenance plan with our Stormwater Report Checklist.

10. Stormwater management standard 10.

This will be a rental property and each lease will include a prohibition against illicit discharges into the site's drainage system.

General Comments

- *No calculations regarding the average annual load of total phosphorus and estimated pollution removal were included in the submittal. We question if the applicant has requested a waiver from the Board.*

We know that by infiltrating all our captured runoff that we are successfully addressing the annual load of total phosphorus on site.

- *We recommend cross-sections of the three subsurface infiltration chamber systems as shown on Detail Sheet No. 3 identifying the existing grade profile thru the cross-section.*

We can do this but it's not immediately clear what is gained.

- *We recommend all drainage pipes shall be a minimum of 12 inches in diameter.*

An 8 inch diameter HDPE pipe can easily convey the maximum runoff that will enter any of the catch basin grates.

If you have any questions at all, please contact me.

Sincerely,

AZIMUTH LAND DESIGN, LLC



James Tetreault, PE, CPESC

Cc: Stantec Consulting Services, Inc.
SJV Investments, LLC