## AZIMUTH LAND DESIGN, LLC

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February 21, 2024

Kenneth Perro, Chairman 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 1 February 2024

Dear Mr. Perro:

I want to take this opportunity to respond to the comments from Stantec Consulting Services, Inc. in a letter dated February 1, 2024. 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. Provide additional confirmation of infiltration areas draining in 72 hours. We provided additional calculations showing that all the infiltration structures will drain in less than 72 hours when receiving the recharge volume.
  - 2. Revise drainage area maps, provide additional documentation of system, verify storage volume above concrete chambers.

We revised the Drainage Area Plans as suggested. We have attached a copy from the HydroCAD company's support page indicating that the program takes into account the thickness of devices, be they pipes or Retain-It concrete modules in calculating the available storage when one device is embedded within another described volume. Based upon this and the fact that the stone under the chambers is connected to the stone outside of the chambers which connects to the stone on top of the chambers, it's clear that water discharged into the chambers will rise in the stone outside of and then over them.

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- 3. *This comment has been addressed.* No response is necessary.
- 4. Provide documentation of TSS removal by proposed CDS units. Enclosed is a brief report prepared by CDS including testing data from the State of New Jersey and the University of Florida.
- 5. This comment has been addressed. No response is necessary.
- 6. This comment has been addressed. No response is necessary.
- 7. This comment has been addressed. No response is necessary.
  - 8. Provide additional details and a construction schedule.

There is a detail of the sediment control barrier on detail sheet D1. We revised it switch to straw wattles behind silt fence in place of straw bales. We added a detail of a diversion swale to that sheet. We also added a note to the general note calling for temporary settling basins are to have 2:1 or flatter sides and to have a capacity at least equal to DEP standards of 3,600 cubic feet per acre of area from which it receives drainage. We call for a silt sack insert to be used on the existing catch basin in Rice Road in front of this site.

We added the following general construction schedule to sheet D3:

Construction will start within 90 days of receiving all necessary permits.

Site work to have utilities installed, parking areas graded and a base course of pavement installed will take place within 7 months.

First building construction will progress within 30 days of receiving a building permit and be completed within 12 months.

Building #2 construction will be started when first building is 50% or more leased and will be completed within 12 months.

Building #3 construction will be started when second building is 50% or more leased and will be completed within 12 months.

Approximately 6.5 acres will be cleared. The project now has a net material balance with additional filling behind building #3. Executing the site's earthwork in one phase makes sense. Areas that are cleared but not being worked on in that or the next week shall have temporary stabilization such as stump grindings applied. We will file a SWPPP before construction begins as required under the U.S. EPA's rules.

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9. Provide clarification of access to infiltration structure #1. We switched the access to infiltration structure #1 from exiting pavement between garages to exiting the pavement off the end of the parking area behind building #1. This access will be via a 15 foot wide gravel path with a 3:1 slope in the middle and flattened at both ends.

10. This comment has been addressed.No response is necessary.

## 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 have now included a Phosphorus removal calculation worksheet in the Stormwater Report Checklist.

• 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.

These were added to the cross sections on detail sheet D3.

• 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. We have added this request to the list of requested waivers.

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