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Millbury Planning Board
127 Elm Street
Millbury, Massachusetts 01527

MILLBURY PLANNING BOARD

RE: 19 Canal Street

Dear Members of the Board:

This letter is in response to comments received by this office on June 10, 2021 from the Town's consultant, Stantec regarding the above referenced project. We have reviewed these comments and provide the following responses. For clarity we have inserted Stantec's comments followed by our responses in bold.

Our responses are as follows:

SITE PLAN

The Millbury B-1 Zoning District requires a minimum lot area as per Section 32.8 Special Density Provision for dwelling units more than two. We note the parcel of land contains 120,550 square feet and question if the provided lot area complies with Section 32.8 Special Density Provision.

Stantec (06/10/2021) Comment Remains - We note sheet 2 of 9 stamped by a professional land surveyor shows an area of 120,550 square feet and the summary table on sheet 3 of 10 identifies an area of 125,500 square feet.

Under Section 32.8 the required lot area is as follows:

(b) The lot area provided shall not be less than twelve thousand five hundred (12,500) square feet, and also not less than the smaller of:

(1) One thousand two hundred fifty (1250) square feet per dwelling unit, plus five hundred (500) square feet per bedroom, plus the ground coverage for any nonresidential use; or

(2) For new structures only, seventy-five (75) per cent of the lot area per dwelling unit presently provided on the site, in cases where the site is presently occupied by a dwelling

There is no dwelling currently on the site. The proposed development contains

59 dwelling units with a total of 73 bedrooms. The required lot area is equal to (1,250 sq.ft./DU)*59 units + (500 sq.ft./bedroom)*73 bedrooms = 110,250 sq.ft. The zoning table on the Layout Plan (Sheet 2 of 9) has been revised.

Section 12.4 - Site Plan Review, Subsection 12.44 – Contents and Scope of Application of the Town's Zoning Bylaws requires specific information be shown on the Site Development Plan. Stantec has performed a technical review of these requirements with the understanding the Town Planner will perform an independent review of the Site Plan for conformance with the site plan review zoning bylaw. In general, the site plan conforms to the Town's Zoning Bylaws, with the following exceptions. The following list refers to the Millbury Planning Board Submission of Site Plan Review Checklist:

c) We recommend the applicant provide additional documentation regarding the monitor wells located on-site.

Stantec (06/10/2021) Comment Remains – See Stantec's response under Environmental Impact Assessment.

A copy of the transmittal letter of a Supplemental Assessment prepared by CEA has been provided.

f) Construction of the two 16-foot-wide paved drives off Canal Street will require reconstruction of the existing sidewalk and curbing. We recommend these improvements be further identified on the site plan.

Stantec (06/10/2021) Proposed sidewalk reconstruction/improvements are shown on sheet 3 of 10. We note the fire truck turning radius at the intersection with Canal Street appears to indicate the fire truck will traverse the sloped granite curb and grass island at the driveway entrance. We recommend this issue be addressed by JMGA.

The width of the driveway entrance has been increased to 18 feet to accommodate the fire truck turning radius.

m) Stantec recommends existing topography along the easterly property line and abutting Town of Millbury Athletic Field be shown on the site plan. at two-foot (2') intervals. We note a 4-foot retaining wall is proposed along the easterly property line.

Stantec (06/10/2021) The additional topography has been provided on sheet 4 of 10 which identifies a 4-foot retaining wall is proposed approximately 2 feet off the easterly property line. We recommend the provisions for fencing and temporary construction easement on the abutting property be addressed by JMGA

The existing chain fence along the property line will remain during question. With the design of the wall it is not anticipated there will be any disturbance on the Town property.

o) The applicant has indicated the site will be serviced by municipal water and sewer. We note a segment of the existing on-site sewer line will be removed and question if the applicant has received approval from the Town DPW and Aquarion Water Company regarding these service connections.

Stantec (06/10/2021) We recommend status of review from the Town DPW and Aquarion Water Company be addressed by JMGA

Plans have been submitted to the Town DPW, and Aquarion Water Company and is waiting on responses and their engineers are reviewing those.

7. Development Impact Statements are to be prepared by the applicant to identify all significant positive or adverse impacts and propose an acceptable program to prevent or mitigate adverse impacts. We offer the following comments:

- a. Traffic Impact Assessment: Stantec reviewed the Traffic Impact Statement submitted for the proposed development under separate letter report dated May 4, 2021

Stantec (06/10/2021) Comment Remains – Stantec has not received a formal response from JMGA.

The traffic engineer will be providing responses with a separate letter.

- b. Environmental Impact Assessment: Stantec requests the applicant provide additional documentation regarding the monitor wells located on-site. We have reviewed the online Massachusetts Department of Environmental Protection (MassDEP) eDEP files for 19 Canal Street and surrounding properties in Millbury MA and reviewed some of the material provided to Stantec regarding site history. The site has a history as a freight depot associated with an extensive railroad yard dating back to the 1890's. This historical use represents the potential for soil and groundwater impacts related to railway use and associated contaminants of concern including petroleum hydrocarbons, pesticides, herbicides and coal and wood ash which contains petroleum hydrocarbons and metals. Future redevelopment of the site should anticipate the need for soil management and analytical testing of soils to evaluate soil quality and the need for offsite disposal. Additionally, soil analytical testing should be considered if future use of the property could include residential use, gardening and other activities that could result in exposure to soils based upon intensity and frequency of use. Groundwater quality should also be assessed if construction dewatering may be necessary or if there is a potential for use of groundwater for drinking or irrigation purposes.

The 19 Canal Street address is not listed by the MassDEP as being a waste site or having had a reportable release of oil and/or hazardous material (OHM). There are four closed waste sites along Howe Ave west and north of the site. There are five closed waste sites south and southeast of the site. Although all waste sites are closed indicating a condition of no significant risk has been achieved, the potential exists that residual impacts from these disposal sites could have potentially impacted soil and groundwater at the site. This suggests that soil and groundwater management as referenced above may need to be incorporated into site redevelopment.

Stantec (06/10/2021) JMGA has provided a copy of a November 5, 2020 Phase II Limited Subsurface Investigation (PH II) as prepared by Corporate Environmental Advisors (CEA) for Map 45 Lot 207A, Millbury, MA

As concluded by CEA, the metals arsenic and lead were identified in soils from one PH II location at concentrations above their respective RCS-1 Reportable Concentrations pursuant to the Massachusetts Contingency Plan (MCP) 310 CMR 40.0000. CEA recommended 120-day notification of these results to Massachusetts Department of Environmental Protection (MassDEP). CEA also recommended additional soil investigation with analytical testing to estimate the volume of soil impacted by arsenic and lead.

Stantec found no indication on the MassDEP web site that notification had been made as recommended by CEA. Based upon the November 5, 2020 date of the CEA report, MassDEP notification should have been provided by March 5, 2020. The presence of the metals in excess of reportable concentrations suggest the potential for exposures to construction workers during site development and future occupants of the property that could pose a risk without additional assessment and regulatory compliance. Until regulatory compliance is attained, there are implications that future owners of the property may be responsible for addressing the reportable concentrations identified. The data available also support the need for soil management during construction and any potential off site soil disposal. Stantec would recommend the status of the Site regarding regulatory compliance and additional assessment as recommended by CEA be provided by the applicant.

A copy of the transmittal letter of a Supplemental Assessment by CEA prepared by CEA has been provided.

Section 12.4 - Site Plan Review, Subsection 12.45 – Design Standards of the Town’s Zoning Bylaws requires applicant to adhere to general principles regarding site design. In general, the Project Site Plan appears to conform to the Town’s Design Standards, with the following exceptions:

1. Landscaping: As shown on sheet 4 of 9, proposed grading includes fills between 2 and 5 feet within the site. As such, retaining walls are proposed along the easterly and westerly property line in varied height between 2 and 6 feet. We recommend the applicant provide final designed stamp drawings of the proposed retaining walls and evaluate the need for fencing at these locations. We note proposed retaining walls are approximately 2 feet off the property line and question the need for temporary construction easements from the abutting properties.

Stantec (06/10/2021) As previously noted, Stantec recommends provisions for fencing and temporary construction easement on the abutting properties be addressed by JMGA. We also recommend the applicant provide final designed stamp drawings of the proposed retaining walls

As suggested by the Town Planner, retaining wall design plans will be

submitted for review and approval prior to construction.

2. Circulation: Proposed parking area internal circulation and traffic signage be identified on the site plan. We note proposed parking area location is not in compliance with the recommended location of on the side or rear of the building.

Stantec (06/10/2021) Comment Remains – We question if the applicant has requested a waiver from the Board.

We will consult with the Town Planner will request if required by the Board.

Stantec recommends the proposed parking area consider one-way traffic circulation with diagonal parking and appropriate signage.

Stantec (06/10/2021) One-way signage has been provided on sheet 3 of 10. We recommend pavement markings and additional one-way signage be provided on the plan.

Additional pavement markings and signage has been provided.

3. The provided Architectural plans do indicate the proposed signage along Canal Street.

Stantec (06/10/2021) Comment Remains - The provided Architectural plans do not indicate the proposed signage along Canal Street.

Dimensions of the proposed signage will be provided for the Board to review.

STORMWATER MANAGEMENT

MassDEP Stormwater Standards

1. No new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.

The project is designed with no untreated discharges and the applicant provided rip-rap sizing calculations to confirm no erosion or scour at outfall FES1. We note however outfall FES1 discharges to the abutting Town of Millbury Athletic Field and question the need for an easement or provide evidence that such discharge is satisfactory to the Town of Millbury.

Stantec (06/10/2021) As previously noted under existing conditions a portion of the site drains toward the north (Auto Body/Hardware Store) and to the northeast (Town's Athletic Field). Proposed conditions will redirect flow from the Town's Athletic Fields to the Auto Body/Hardware Store property. We question the need

for an easement or provide evidence that such discharge is satisfactory to the Auto Body/Hardware Store property and Town of Millbury.

There is a swale flowing north along the eastern property line between the locus and Town athletic field which directs flow toward the Auto Body/Hardware Store property in the existing conditions. Spot grades have been provided on the Town's property showing this swale. A plan at 1"=20' has been provided showing the direction of water flow. There is no discharge onto the field in the existing condition and peak runoff rates toward the Auto Body/Hardware Store to the north (Reach 2R) are reduced in all storm events.

2. Standard 2 – Stormwater management systems must be designed so that post-development peak discharge rates do not exceed pre-development discharge rates. As identified in the summary, the project will not result in an increase in peak flows under post- development conditions for the 2, 10, and 100-yr storm events. Our review of the drainage calculations is as follows:

- a. The Pre-Development and Post-Development Drainage Area Maps should be revised to include the location and labels of the Drainage Reach 1R and 2R.

Stantec (06/10/2021) Comment Remains – Stantec has not received revised drainage area maps.

The revised maps have been provided.

- b. The Drainage Area Map layouts do not accurately depict the Stormwater model. We recommend Drainage Reach 2R be separated into 2 different reaches, one at the northeast and one at the northwest of the property line. A portion of P5 drains toward the northwest, onto the Auto Body/Hardware Store. Another portion of P5 drains toward the Town's athletic field. We recommend the Applicant to further investigate the channel along the wall so that flow is mitigated towards FES1 and does not go over the wall.

Stantec (06/10/2021) Comment Remains – See Stantec response to Standard 1.

See response to Standard 1.

GENERAL COMMENTS

Stormwater

1. Stantec recommend cross sections of the proposed subsurface infiltration chambers Nos.1 thru 4 identifying items such as existing and proposed grades, refusal and/or seasonal high groundwater be provided on the plans

Stantec (06/10/2021) Recommend cross section of proposed subsurface infiltration chamber Nos 1,3 and 4 as shown on sheet 9 of 10 be resubmitted due to inconsistencies regarding existing/proposed grades; chamber and ESHGW elevations.

The cross sections have been revised.

2. Infiltration Chamber 2 bottom stone is at elevation 369.70'. The test hole data for TH1 notes that the estimated seasonal high groundwater elevation is at 374.5'. We recommend the Applicant address this issue.

Stantec (06/10/2021) We recommend sheet 2 of 9 be revised with the correct ESHGW Elevation.

The revised sheet has been provided.

Respectfully,

John Grenier

John Grenier
J.M. Grenier Associates Inc.

cc: Elite Home Builders, LLC