

Beth Rosenblum

From: CERO_NOI@MassMail.state.ma.us
Sent: Wednesday, April 19, 2017 11:18 AM
To: wad@cgpllc.net; judith.schmitz@state.ma.us; scott@goddardconsultingllc.com
Cc: cero_noi@state.ma.us; Beth Rosenblum; cero_noi@state.ma.us
Subject: MassDEP NOI File Number

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL REGIONAL OFFICE
8 NEW BOND STREET, WORCESTER, MA 01606 508-792-7650

Date: 04/19/2017 Municipality SOUTHBOROUGH

RE: NOTIFICATION OF WETLANDS PROTECTION ACT FILE NUMBER

The Department of Environmental Protection has received a Notice of Intent filed in accordance with the Wetlands Protection Act (M.G.L. c. 131, §40):

Applicant CAPITAL GROUP PROPERTIES, LLC	Owner Address
Address 259 TURNPIKE ROAD, SUITE 100,SOUTHBOROUGH MA 01772	
Locus 0 TURNPIKE ROAD , SOUTHBOROUGH MA 01772	

This project has been assigned the following file # : **CE 290-0981**
ISSUANCE OF A FILE NUMBER INDICATES ONLY COMPLETENESS OF SUBMITTAL, NOT APPROVAL OF APPLICATION
Although a file # is being issued, please note the following:
9/20/2016 Comments for Additional/Revised Information Received through 9/8/2016:

It appears that jurisdictional wetlands will be used for stormwater detention for this project. 310 CMR 10.05 (6)(k) states that "No Area Subject to Protection under M.G.L. c. 131, Section 40 other than bordering land subject to flooding, isolated land subject to flooding, land subject to coastal storm flowage, or riverfront area may be altered or filled for the impoundment or detention of stormwater ... and the applicable performance standards shall apply to any such alteration or fill." The applicant has not provided sufficient information to demonstrate that no resource area alteration will result from the proposed detentions basins. 310 CMR 10.02(2)(c), 310 CMR 10.02(4) and 310 CMR 10.02(5) do not appear to apply to the wetlands containing the proposed detention basins. The detention basins that were created within existing wetlands in 1983 were not designed, constructed, installed and/or improved in accordance with the 1996 Stormwater Management Policy or 310 CMR 10.05(6)(k) through (q).

It appears that changes to the outlet structures are proposed for 4 out of 5 of the existing impounded wetlands. The impacts of the outlet structure changes to the wetlands are unclear. For example, the hydrology report indicates that the outlet from Pond A-2 will be changed from a 15" culvert with an invert of 424.97' to a 24" culvert with an invert of 424.20. Sheet C3.03 depicts a 15" pipe, while Sheet C6.02 depicts an existing 24" pipe. Will water level changes occur within the wetlands that will result in alterations?

Will the proposed site hydrology result in water levels within the vernal pools similar to existing conditions?

A TSS removal summary has not been provided to demonstrate that all treatment trains meet Stormwater Standard 4.

ADDITIONAL REQUIREMENTS:

401 Water Quality Certification (314 CMR 9.00) may be required. The project qualifies for 401 Certification under the Army Corps of Engineers' General Permit for Massachusetts (MAGP), provided that the project meets certain conditions outlined in 314 CMR 9.03 and 9.04, and the conditions under MAGP. The MAGP and Stream Crossing Guidelines are available on the web at <http://www.nae.usace.army.mil/Missions/Regulatory/StateGeneralPermits/MassachusettsGeneralPermit.aspx>. Select either "Massachusetts General Permit" or "Massachusetts River and Stream Crossing Standards" from the left side menu.

Regards,
for MassDEP,

(508)-767-2722
Judith.Schmitz@state.ma.us

Beth Rosenblum

From: CERO_NOI@MassMail.state.ma.us
Sent: Tuesday, September 20, 2016 11:22 AM
To: wad@cgpllc.net; judith.schmitz@state.ma.us; scott@goddardconsultingllc.com
Cc: cero_noi@state.ma.us; Beth Rosenblum; cero_noi@state.ma.us
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8 NEW BOND STREET, WORCESTER, MA 01606 508-792-7650
Municipality SOUTHBOROUGH

Date: 09/20/2016

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Regards,
for MassDEP,

(508)-767-2722
Judith.Schmitz@state.ma.us

Beth Rosenblum

From: CERO_NOI@MassMail.state.ma.us
Sent: Tuesday, May 10, 2016 12:10 PM
To: wad@cgpllc.net; scott@goddardconsultingllc.com
Cc: cero_noi@state.ma.us; Beth Rosenblum; cero_noi@state.ma.us
Subject: MassDEP NOI File Number

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL REGIONAL OFFICE
8 NEW BOND STREET, WORCESTER, MA 01606 508-792-7650

Date: 05/10/2016

Municipality SOUTHBOROUGH

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Although a file # is being issued, please note the following:

The site plans should contain clear labels for all wetland impact areas and wetland replication areas, and the labels should correspond to the numbering protocol that is used in the NOI narrative. The NOI appears to underestimate the proposed impacts to Bank. The destruction of vegetation along a Bank qualifies as alteration and both Banks of a stream must be included in the calculations of total impacts.

The Estimated Construction Schedules contained on the Phasing Plans should indicate when the wetland replication areas will be constructed. Specifications should be provided describing the species composition of the proposed wetland seed mix. Red maples may not be suitable for plantings within the detention basins. Specific calculations should be provided to show how the area beneath the arch culverts was determined for the purpose of meeting the Openness Ratio requirement contained in the Massachusetts Stream Crossing Standards.

The Stormwater Management Summary does not contain sufficient information to demonstrate that the project complies with the Massachusetts Stormwater Management Standards. Are any of the proposed stormwater basins designed as infiltration basins? If so, these basins must be setback at least 50 feet from wetlands and have a minimum separation of 2 feet to high groundwater. Basin 409 does not contain an emergency spillway. Soil test pit locations are depicted on the Site Plans however no soil logs are contained in the NOI. Details should be provided for proposed basin outlet structures. Sufficient calculations are not provided to demonstrate how the project meets Stormwater Standards 3 and 4. TSS removal documentation must be provided for CDS Models 2015, 2020 and 2025 along with detailed operation and maintenance specifications for these units (see Chapter 4 of the Massachusetts

Stormwater Handbook). Can Standard 3 be met in full if the project is re-designed with less impervious area or if LID Site Design Credits are achieved? Two stormwater basins discharge into Vernal Pool 2, thus Standard 6 does not appear to be met (see Table CA2: Standard 6 in Vol. 1, Chapter 1 of the Massachusetts Stormwater Handbook).

In addition, the Sudbury Reservoir and the MWRA Open Canal (Wachusett Aqueduct) area Class A Public Drinking Water Supplies, and therefore, their tributaries and bordering wetlands are designated as ORWs and afforded protection in the Massachusetts Surface Water Quality Standards, 314 CMR 4.00. 310 CMR 27.00, Massachusetts Underground Injection Control regulations, may be applicable to the infiltration systems proposed for this project.

ADDITIONAL REQUIREMENTS:

401 Water Quality Certification (314 CMR 9.00) may be required. The project qualifies for 401 Certification under the Army Corps of Engineers' General Permit for Massachusetts (MAGP), provided that the project meets certain conditions outlined in 314 CMR 9.03 and 9.04, and the conditions under MAGP. The MAGP and Stream Crossing Guidelines are available on the web at

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