



January 13, 2022

Attn: Mary Ellen Schloss  
Planning & Community Development Department  
Town of Weymouth  
75 Middle Street  
Weymouth, MA 02189

RE: Massapoag Street – Definitive Subdivision  
Weymouth, Massachusetts

Dear Ms. Schloss and Members of the Commission;

This letter is being submitted in response to the Weymouth Conservation Commission (WCC) staff comments provided by Town of Weymouth via email on December 7, 2021, regarding the proposed Massapoag subdivision Notice of Intent (NOI) submittal in Weymouth, Massachusetts. Crocker Design Group, LLC (CDG) offers the following responses to each comment below. In addition, the following revised and supporting documents are enclosed:

- Enclosure 1: Definitive Subdivision Plans with revision date of 1/11/22 (under separate cover)
- Enclosure 2: Stormwater Analysis & Report, revised 1/11/22 (Under separate cover)

Original comments provided by Town of Weymouth indicated below in standard text with CDG's response in **bold text**.

### **COMMENTS**

- Filing Fee is incorrect. See filing fee sheet, line (2)(c).
  - The flat fee for NOI for subdivisions is \$750 (not \$500). Additional \$250 is owed.
  - The fee is \$.04 per sq ft of floodplain or buffer zone disturbed. The fee was calculated at \$.02/sq ft. With 37,000 sq ft of disturbance x \$.04/sq ft this should be \$1,480. Applicant paid \$740. An additional \$740 is owed.
  - In total, an additional \$250 + \$740 = \$990 is owed. Check should be provided made payable to Town of Weymouth.

**CDG Response: Acknowledged. A check for the additional \$990 was submitted to the WCC on 12/8/21 by the Applicant.**

- In my email, I've attached an excerpt from the Weymouth Wetlands Protection Regulations (section 8.02) regarding information to be provided with an NOI submittal, and I note the following:
  - 8.02(7) requires discussion of effect of proposed project on local wetland values, including wildlife, erosion control, aesthetics, and recreation; Section 8.02(9) requires signed statement of wetlands professional regarding function of the resource area and proposed construction impacts (I interpret this to be long-term impacts of construction, not just construction period).

**CDG Response: The project proposes no impacts to any wetlands and provides for average buffer zone widths/tree preservation areas that far exceed the minimum 25' required per the regulations. The revised plans provide for average buffer widths as follows:**

- **Northern Wetland System: 75-Foot Average Buffer Width**
- **Western Wetland: 70-foot Average Buffer Width**
- **Southern Wetland: 53-Foot Average Buffer Width**
- **Overall Project Weighted Buffer Average: 64 Feet**

**As you can see, the revised buffer zone widths on the latest plans far exceed what is required by the Wetland Regulations for residential projects. We also note the revised design provides for additional tree preservation in the northwest corner of the property, where the previous open basin was proposed.**

- 8.03(13) requires that drawings indicate "all existing structures, trees with diameter of 6" or more at breast height, fences, rock and ridge outcroppings, stone walls, and historic sites. Detail proposed alterations."

**CDG Response: CDG's survey team performed a visual count of the trees in the field. CDG's survey team identified 113 existing trees with diameter of 6" or more at breast height will be anticipated to be removed within 100ft BVW buffer zone. However, the project has been designed to provide significant areas of buffer zone preservation areas around the perimeter of the site, as described in the comment response above.**

- 8.04 requires that the following are staked before site inspections, the corners of houses or other structures nearest the wetland resource area; limit of work. Please stake the infiltration basin locations. Wetland flagging should be refreshed as it will need to remain in place until a Certificate of Compliance is issued.

**CDG Response: The corners of proposed houses, the proposed basins and the limit of work were flagged before the Conservation Commission's site walk on 12/13/21. The wetland flags were also refreshed prior to the site walk as requested.**

- The Conservation Commission is very concerned about the town's ability to support increased water withdrawals without adversely impacting stream flows, lake levels and aquatic species, including river herring. We encourage all measures to reduce water demand from the project, including reducing the amount of lawn areas and using drought-tolerant seed mixes and plantings.

**CDG Response: Comment noted. The project minimizes lawn areas behind the homes which in turn, maximizes the extent of wetland buffer and tree preservation accordingly. This also minimizes the amount of lawn area that would otherwise be irrigated.**

- The Weymouth Engineering Division will be reviewing the project for compliance with DEP Stormwater Management Standards. Conservation staff comments are below and will be supplemented by Engineering comments. Staff comments:

- Disagree with project documents that state that the project does not discharge to a critical area. The wetland to the north of the project is tributary to the Mill River, an Outstanding Resource Water and "critical area" under DEP Performance standards. Attached is an excerpt of drain atlas Sheet 44, tracing the wetland to the Mill River.

- **CDG Response: The stormwater checklist and report were revised to identify the Critical Area and to confirm the 1" water quality treatment is provided as required for discharges to Critical Areas.**

- Stormwater should be treated to critical area standards. Water quality volume should be 1". I believe the documents state that they will be treating 1" of WQV. Please confirm.

**CDG Response: In the revised Definitive Subdivision Plans, dated 1/11/22, the stormwater management system was revised to include two (2) underground infiltration chamber systems with ADS Isolator Rows for water quality treatment. The underground infiltration systems were designed to treat 1" of WQV accordingly. Please see Section 4 of the Stormwater Analysis and Report.**

- What precipitation data was used for the modeling? Can system meet peak flow requirements if NOAA-14 precipitation data is used?

**CDG Response: NOAA-14 precipitation data is used in the existing and proposed HydroCAD models, and it meets peak flow requirements.**

- How do pre- and post runoff volumes compare?

**Please see the table in the revised Stormwater Management Report, dated 1/11/22, enclosed. The project results in an overall net reduction of stormwater volume.**

- Response in Stormwater checklist, standard 7, states that project is only required to meet standards to “maximum extent practicable” because it is a small residential project with no discharge that may potentially affect a critical area. This is incorrect. Area is tributary to an ORW. See above.

**CDG Response: Acknowledged. The revised stormwater checklist identifies the project, and the project has been designed to fully comply with the new development requirements accordingly.**

- The water quality unit in DMH4 is located more than 75 feet from the roadway surface. This will be impossible to maintain properly. Need to place the WQU close to the street.

**CDG Response: These separate water quality units are no longer proposed on this project and have been replaced with the ADS Isolator Row system which is integral with the ADS Stormtech underground infiltration systems now proposed.**

- Need to confirm who will be responsible for maintenance following construction. Will a homeowner’s association be created? If so, HOA documents will have to be developed and recorded.

**CDG Response: A Home Owners Association (HOA) will be created. HOA documents will be developed by the Applicant.**

- Design includes grassed swales to direct lawn runoff to infiltration basins. Plans do not include a construction detail of the swale. Long-term O & M plan does not include maintenance of the swales. Assume this would be done by homeowners since no easement shown. Would need to include mowing/maintenance as part of continuing conditions in the Order of Conditions.

**CDG Response: Infiltration basins have been replaced with underground infiltration chamber systems with an isolator row for water quality treatment. The plans also include details for the construction of the swale, shown on Sheet C-8.1. The Long-Term O&M has been modified to include the conveyance swales. The Lotting Plan has been revised to incorporate drainage easements over the swales. It is the applicant’s intent that a Homeowners Association will be created that will be responsible for the maintenance and upkeep of the conveyance swales.**

- Stormwater checklist is from 2018. Project has been revised since that time. Is there a need to submit new checklist or have changes not been that significant?

**CDG Response: A new Stormwater checklist has been filled out, stamped and signed and is enclosed with the revised Stormwater Management Report.**

- Hydrocad calcs printed funny and it is hard to read all the info.

**CDG Response: Acknowledged. Revised HydroCAD calculations have been included in the revised Stormwater Report, enclosed with this letter.**

- Proposed conditions watershed map is missing CN#s.

**CDG Response: Acknowledged. The Proposed Conditions Watershed Map has been updated to include the revised Stormwater Management design and includes CN numbers.**

- Construction-period controls

- Project will need a SWPPP and construction general permit prior to start of construction. Had a SWPPP been prepared for the previous work that was outside Conservation jurisdiction? Will this SWPPP be revised?

**CDG Response: A revised SWPPP will be prepared for the construction of the remaining infrastructure and lot and drainage construction accordingly.**

- Project entails a lot of work on fairly steep slopes. Will need more controls during construction than just the perimeter fencing. Will you be proposing temporary sediment basins, diversion swales and berms, etc.? Will these be detailed in the SWPPP?

**CDG Response: The Erosion and Sedimentation Control Plan has been revised to show perimeter silt sock with wire backed silt fence. Locations of proposed stockpiles have also been identified. The revised SWPPP, to be prepared, will address anticipated locations of temporary sediment basins if/where required.**

- Should not be using infiltration basins as construction period sedimentation basins (unless is allowed and follow procedures to restore as per stormwater standards).

**CDG Response: We concur. The open basins have been replaced with subsurface infiltration systems. The plans identify these areas to be protected during construction accordingly.**

- Order of Conditions. We have not yet compiled recommendations on conditions, but these may include:

- Split rail fence and conservation signs where limit of work is at or close to the 25-foot buffer (e.g., along rear of lot 6 and part of Lot 5)

**CDG Response: The revised plans identify split rail fence locations as well as proposed locations for the use boulders along the limit of disturbance/tree preservation areas. Conservation signs have also been incorporated. Refer to the revised Site Plan sheet.**

- Possible continuing conditions that restrict disturbance in the 100-foot buffer (e.g., where proposed limit of disturbance is fairly close to no-disturb area).

**CDG Response: The Applicant is open to such a condition.**

- Requirement that new owners provide proof that they have copy of Order of Conditions and are aware of the continuing conditions.

**CDG Response: Applicant is amenable to such a condition.**

- Recorded documents regarding future maintenance of stormwater system.

**CDG Response: Applicant is amenable to such a condition.**

Should you have any questions or require any further information, please do not hesitate to contact Gabe Crocker, P.E. at [gabecrocker@crockerdesigngroup.com](mailto:gabecrocker@crockerdesigngroup.com) or 781-919-0808.

Sincerely,  
Crocker Design Group LLC



Gabe Crocker P.E.  
President