

March 8, 2021

Mary Ellen Schloss
Conservation Administrator
Town of Weymouth
75 Middle Street, 3rd Floor
Weymouth, MA 02189

Via email: mschloss@weymouth.ma.us

**Re: Response to Town of Weymouth Comments
200 Libbey Parkway, Weymouth, MA**

Dear Ms. Schloss:

It was a pleasure meeting with you and Jay Donovan on Thursday to review preliminarily the proposed site plan revisions and our draft responses to the comments received from the Conservation Commission and Department of Public Works. The following is a formal comment-by-comment response; Town comments are in black and FoxRock team responses are in red.

Memorandum to Conservation Commission from Mary Ellen Schloss, dated February 17, 2021

- a) **The project does not propose any groundwater recharge due to the high groundwater levels (about 2 feet below ground surface). The lack of recharge is of concern because the site discharges to a Class A water body (public drinking water supply) and herring spawning ground. South Cove is very shallow, is heavily eutrophied and experiences low water levels and heightened temperatures, especially during the summer and fall. Recharge would reduce the amount of runoff being discharged to the pond and would provide additional treatment (temperature, nutrients, bacteria, etc.) that can't be provided by the hydrodynamic separators. The rain gardens will provide some treatment, but they are quite small relative to the amount of impervious surface.**

Response: The stormwater management system design and Grading & Drainage Plan have been modified to include a subsurface infiltration/recharge system designed to handle the building roof drains.

- b) **We would like the applicant to evaluate whether there is the potential to recharge roof runoff in the area at the west of the site, adjacent to the town land, where about 5 feet of fill is proposed. If suitable fill material is used and the infiltration units are shallow, it seems that this could be possible.**

Response: This has been accomplished.

- c) **In earlier conversations with the applicant, I had asked whether they would be willing to pursue a green roof or other low-impact development measures such as rain gardens or bioswales to take runoff. They said that these measures were not feasible.**

Response: Three rain gardens are proposed adjacent to Whitman's Pond.

- d) We will want to see the (Phase 1) 21E report prepared for this site since it is a former industrial operation. The applicant has promised to provide this.

Response: We have provided the Phase 1 Environmental Site Assessment Reports.

- e) Engineering has raised questions about the detention basin at the front of the site. This basin is located on the applicant's property. It receives runoff from Libbey Industrial Parkway. It appears that it does not currently receive any piped flow from the applicant's property, but this will be confirmed. Additional analysis will be needed to confirm that the basin is prepared to handle the additional flows under all predicted storm events and to determine whether or not an overflow from the basin is advisable.

Response: The stormwater management system design and Grading & Drainage Plan have been modified to include a "retrofit" of the existing detention basin consisting of basin re-shaping, grading and berm design, riprap inlet/outlet erosion protection and expanded basin capacity. It has been designed as a wet basin and sized according to modifications to the hydrologic analysis comparing existing and proposed conditions under the design storm events.

- f) Snow storage should be located on a paved surface that drains toward treatment devices.

Response: As we discussed in our meeting, we feel the snow storage area should be on pervious grass/lawn and not on a paved surface. The pervious area will allow stockpiled snowmelt to infiltrate directly into the ground and thereby reduce the volume of runoff with winter sand collecting in the drainage system. The accumulated winter sand from the stockpiled snow will settle onto the ground surface where it will be removed as part of the spring stormwater maintenance program and the area will receive top-dressing loam and seed as warranted by the winter damage. The grading and berm design for the snow storage area directs any generated snowmelt runoff towards the parking lot where it is collected and treated by the deep-sump hooded catch basins and water quality treatment devices.

- g) Walkways and rain gardens should be sited to prevent encroachment into the existing natural buffer. Does the project propose any removal of existing trees or shrubs?

Response: The rain gardens and walkways are located within areas that have been previously disturbed or filled by site development activities. Any existing trees and shrubs in the natural buffer that require removal due to health, safety and welfare concerns will be tagged with "Removal" ribbons during an in-person site walk with the Conservation Administrator to prevent any undue vegetation removal in this sensitive area.

- h) Confirm whether the project is requesting any pruning or management of the vegetation adjacent to the pond. Are they comfortable with providing a walkway and viewing areas with visual obstructions and "wild/untamed" conditions?

Response: Trees and shrubs that are healthy and supporting the natural buffer will be tagged with "Protect" ribbons during an in-person site walk with the Conservation Administrator and it is intended that these materials will remain in their current and future natural state.

- i) Waiting for Engineering review on sizing of rain gardens, compliance with DEP Stormwater Management Standards, etc.

Response: Refer to our responses to the Public Works comment letter in the next section.

- j) Comment added on March 5th regarding Standard 5, Land Use w/ Higher Potential Pollutant Load (LUHPPL) and Standard 6, Discharge to Critical Area.

Response: The project meets the definition of a LUHPPL since the average daily trips exceed the threshold of 1,000 trips per day; however, it's important to note that the only potential risk to polluting the pond associated with a LUHPPL is the very rare possibility of a vehicle accident occurring in the parking lot and resulting in an oil/gasoline spill.

The stormwater management system includes three water quality treatment devices, one at each of the site's three discharge points. The specified Barracuda S3 and S4 models, part of the "BaySaver" Product Line manufactured by Advanced Drainage Solutions (ADS, Inc.), are equipped with oil collection bowls capable of storing up to 51 gallons of petroleum in an accessible area below the system's outlet.

The on-site property manager is responsible for implementation and maintenance of this oil-trapping feature of the Barracuda units when a spill occurs, as well as implementation and maintenance of all aspects of the Long-Term Pollution Prevention and Stormwater Operation & Maintenance Plan.

Comment Letter from Public Works, dated February 18, 2021

Water and Sewer Division

1. The existing sewer service is labeled 10" PVC on the plans. According to Sewer Division records the existing sewer service is 8" PVC. The existing pipe size should be confirmed, and the plans revised as needed.

Response: The existing sewer pipe sizes have been confirmed with DPW and shown accurately on the revised plans.

2. It is recommended the applicant contact the Water/Sewer Division to discuss the mitigation fees that will be required for this project.

Response: The applicant will discuss mitigation fees for the project with the appropriate Town departments as part of the Board of Zoning Appeals process.

Engineering Division

1. The existing conditions plan is not stamped by a licensed Professional Land Surveyor (PLS).

Response: The revised set of plans includes the Existing Conditions Survey Plan stamped by the PLS.

2. Engineering Division records show a street layout bound is located on the north side of Libbey Industrial Parkway opposite the bound labeled CB W/DISK FND, N 2895445.85, E 807366.90. The existing bound should be located and shown on the plans. Revise the plans to include a note indicating Town of Weymouth street layout bounds shall be protected during construction. Any bounds damaged or disturbed during construction will be replaced by a PLS at the contractor's expense.

Response: The revised Survey Plan includes location of the street layout bound on the north side of Libbey Industrial Parkway and Note 5. states that street layout bounds shall be protected during construction and replaced by a PLS if damaged or disturbed.

3. Existing utility poles and overhead wires (OHW) servicing 200 Libbey Industrial Parkway encroach onto the abutting property located at 220 Libbey Industrial Parkway. Add a note to the plans specifying the existing poles and OHW to be removed.

Response: Notes and labels have been added to the Site Layout Plan and Utility Plan indicating existing utility poles and overhead wires are to be removed.

4. Add a note to the plans specifying the gravel parking areas and concrete block retaining walls located on Town of Weymouth property to be removed and all disturbed areas graded no steeper than 3: 1, loamed and seeded.

Response: Notes and labels have been added to the Site Layout Plan indicating removal of paved/gravel areas and concrete walls from the Town's property and restored as loam and seed with slopes no greater than 3:1.

5. Based on the Town of Weymouth Drainage Atlas, it is estimated approximately 700 feet of Libbey Industrial Parkway is contributing runoff to the existing detention basin. Revise the pre and post-development drainage areas contributing runoff to the detention basin. Refer to the attached markup of the drainage atlas.

Response: The revised stormwater design and hydrologic analysis accounts for the pre-development drainage areas as indicated by the Town Drainage Atlas. Post-development contributory areas to the basin have been revised based on comments #9 and #10 below.

6. The two (2) existing catch basins located in the parking area between the existing building and Libbey Industrial Parkway appear to be leaching basins. The drainage area associated with the 2 basins should be excluded from the existing drainage area (1S) contributing runoff to the existing detention basin. Revise existing drainage area 1S as needed.

Response: The revised hydrologic analysis has addressed this comment. The drainage area associated with the two leaching basins has been excluded from the area contributing runoff to the detention basin.

7. An existing catch basin located in Libbey Industrial Parkway is not shown on the plans. The plan shows 2 catch basins connected in series and a single catch basin discharging into the detention basin. The single catch basin shown is also connected in series to an existing catch basin located on the south side of Libbey Industrial Parkway. Revise the plans to show the 2 sets of existing catch basins connected in series. Refer to the attached markup of the drainage atlas.

Response: The revised Survey Plan shows the added catch basin so that there are now two sets of existing catch basins connected in series.

8. On February 16, 2021 the Engineering Division observed standing water at an elevation (GPS, Town of Weymouth Datum) of 76.4 in the existing basin. The recent rain and snowmelt likely influenced the water elevation observed but based on the absence of tree growth in the bottom area, standing water appears to be a persistent condition rather than intermittent. The Pre and Post-Development watershed analyses included in the Stormwater Management Report assumes the basin is dry. The calculations should be revised to account for the standing water in the basin.

Response: The revised hydrologic analysis accounts for standing water in the detention at elevation 76.4 under existing conditions; and the equivalent volume is accounted for in the proposed wet basin retrofit hydrologic analysis and design.

9. The discharge of stormwater runoff into the detention basin, rather than towards Whitman's Pond, is preferred. Engineering requests the design be evaluated to determine if additional paved area can be discharged into the basin.

Response: The revised grading and drainage design proposes a significantly larger contributory area comprising the entire front parking lot discharging to the retrofitted wet basin; and a corresponding significant reduction of runoff towards Whitman's Pond.

10. The existing detention basin is overgrown with vegetation and needs maintenance. Revising the plans to include a retrofit of the basin is recommended. A proposed retrofit should include the removal of vegetation (trees, stumps, brush, etc.), installation of rip-rap stilling basins at the two (2) existing pipe inlets, constructing a defined/stabilized point of discharge, grading to provide additional storage volume if needed, and loam/seed of disturbed areas. The existing basin is wet, therefore retrofitting the basin to function as a wet basin should be considered.

Response: The revised stormwater design as shown on the Grading and Drainage Plan proposes the detention basin retrofit to function as a wet basin and includes vegetation removal, expanded volume, shaping of basin bottom and berms, addition of rip-rap erosion protection at three inlets and a defined rip-rap discharge point, and loam and seed of all disturbed areas.

11. Approximately 5 - 6 feet of fill is proposed along the northwest corner of the project site. Based on the depth of fill proposed it is suggested the installation of a subsurface infiltration system for roof runoff is possible at this location.

Response: The revised stormwater design as shown on the Grading and Drainage Plan proposes a subsurface infiltration/recharge system at northwest corner of the site to handle roof runoff.

12. Proposed trees and shrubs will block access to the snow storage area. The snow storage area does not appear to be large enough to accommodate the expected volume of snow. Storing snow on the proposed slope adjacent to the Town property or in the area between the parking lot and Whitman's Pond will not be permitted.

Response: The landscape design in front of the snow storage area has been revised accordingly. For winter site conditions with significant snowstorms, it may be necessary to export snow offsite.

13. The proposed grading along the property line common to 200 and 218 Libbey Industrial Parkway will result in a low point (elevation 79±) on the abutting property. The grading shown for the proposed rain gardens and stone dust path will block the flow of water from the low point. A swale along the length of the property line will be required to drain this area. If any grading is proposed on the abutting property a temporary construction easement will be required.

Response: The revised Grading and Drainage Plan proposes retaining wall, graded swale, and an 8" pipe culvert to allow the low point on the site to drain freely towards the pond. No grading is proposed on the abutting property.

14. Revise the plan to include a label for the pipe located between Flared End 3 and 4.

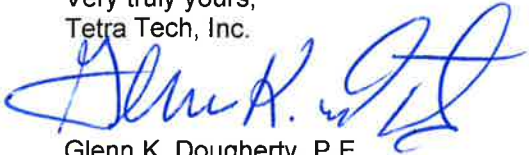
Response: The pipe label is now included on the revised plan. The rain garden at the northwestern portion of the site has been expanded to provide additional storage volume. All rain gardens are sized to accommodate up to the 25-year design storm.

15. Based on the proposed rim/invert elevations shown on the plan the depth of cover is too shallow to construct catch basins CB5 and CB10.

Response: The revised Grading & Drainage Plan proposes the building finished floor elevation as 82.50, raised from 82.00 in the previous design. The site has been raised and re-graded accordingly and now provides suitable separation between rim/invert elevations and adequate cover over the pipes, utilities and infrastructure.

I hope this letter along with the revised set of Site Development Plans and drainage calculations adequately address the Conservation Commission's and Town Engineer's concerns. Please contact me if we can assist with your review in any other way.

Very truly yours,
Tetra Tech, Inc.



Glenn K. Dougherty, P.E.
Sr. Project Manager

Cc: James Donovan, P.E., Sr. Engineer, Weymouth DPW - Engineering Division
Josh Kleinman, Director of Design & Construction, FoxRock
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