

November 1, 2024

Town of Milton
Engineering Department
525 Canton Avenue, 2nd Floor
Milton, MA 02186

Attn: Ms. Marina Fernandes, P.E.

**Re: Initial Stormwater Peer Review
0 Blue Hill Avenue– Early Education Center
Milton, MA**

Dear Ms. Fernandes and Board Members:

Bohler Engineering is in receipt of a comment letter from Horsley Witten Group, Inc. (HW), dated October 21, 2024. On behalf of Applicant Viking Development LLC, Bohler offers the following responses. For clarity, the original comments are in italics, while our responses are directly below in bold type.

Stormwater Review

Comment 1. *Standard 1 states that no new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.*

a. *The Applicant has proposed no new untreated discharges. The stormwater management proposed for the Property does not appear to discharge into the waters of the Commonwealth. The Applicant has one discharge point that outlets along the property's frontage. This stormwater is routed to the southeastern corner of the property to a natural depression area. After some ponding, the stormwater flows offsite to the Blue Hill Avenue drainage system. This proposed routing follows the existing conditions drainage path onsite. HW has no further comment.*

Response: **No response needed.**

Comment 2. *Standard 2 requires that post-development runoff does not exceed pre-development runoff.*

a. *The Applicant has provided boring information for the site in the drainage report. HW recommends that the Applicant provide the boring locations on the Existing Conditions Plans or the Drainage Plans to confirm the borings are within proximity of the stormwater management features.*

Response: **The locations of the test pits and soil borings have been added to the plans. Please note that test pits 1-3 are close to the proposed basin but not within the basin due to inaccessibility to the basin area because of trees. Based on the topography of the area and consistency with NRCS soil mapping, soil conditions in the basin are expected to be the same as found in the test pits.**

b. *The Applicant calls out 2 locations within the Blue Hill Avenue Right of Way 'TBM-A/B'. It is unclear what this refers to. HW recommends adding this to the legend.*

Response: **"TBM-A/B" refers to temporary benchmarks set by the surveyors, and this has been added to the legend.**

c. *The Applicant calls out for a 14' section of guardrail to be removed in the Blue Hill Avenue Right of Way. This is outside the noted limit of work on the plans. HW recommends reviewing and revising the limit of work as needed.*

Response: **The limit of work has been revised to include the guiderail removal.**

d. *The Applicant has shown a roof drain system that collects downspouts from the building. It is unclear what invert or slope this system is designed for. HW recommends that a detail and a note be added to the plan to clarify this portion of the drain collection system.*

Response: **Callouts have been added to the plan to clarify the design of the roof drains.**

e. *The Applicant has provided a Grading Plan. It appears contour 94 and contour 93 are connected on the south side of the Plan. HW recommends reviewing and revising the plan as needed.*

Response: **The grading on the south side of the plan has been revised to increase the undisturbed buffer to the abutter to the south and the contour issue noted above was addressed during the regrade.**

f. *The Applicant has provided a Grading Plan. The Applicant has proposed a riprap outfall area east of the basin which acts as a collection area for the overflow before draining to the southern portion of the site. It appears the grading on the roadway side has a slope greater than 2:1. HW recommends providing a slope of at least 3:1 with proximity to the roadway or moving the outfall and spillway south to drain from the southeast corner of the infiltration basin directly toward the southeast depressional area onsite.*

Response: **The riprap outfall area has been moved north away from the driveway to provide a flat shelf adjacent to the driveway where guiderail is now proposed as a barrier to the change in grade.**

g. *The Applicant has provided a Grading Plan. The Accessible ADA parking spots have grade callouts that exceed the maximum allowable slope of 2%. This occurs in the southernmost spot. HW recommends reviewing and revising the plan as needed.*

Response: **The grading at the southernmost ADA spot has been revised to be less than 2%.**

h. *HW recommends calling out the invert of each culvert on the Grading plans.*

Response: **Inverts of each culvert have been added to the grading plans.**

i. *The Applicant has provided Grading Details. HW recommends providing details for a stabilized outfall and/or scour hole, sediment forebay, and drainage swale. HW also recommends dimensioning and selecting stone sizes where needed on these details.*

Response: **A detail for the scour hole has been added and stone size is specified. The detail does not show dimensions as the intent is for the scour hole to be built to the grades shown on the grading plan. The sediment forebay is also to be built per the grading plan. Details for the swales have been added and calculations used to determine the swale dimensions and riprap lining size are included in the revised drainage report.**

j. *The Applicant has proposed a cleanout detail on the Detail plans. It is unclear where this is on the site plans. HW recommends reviewing and revising the plans as needed.*

Response: **Cleanouts have been added to the roof leader collection system on the grading plan.**

k. *The Applicant has proposed a turf underdrain for the playground area. It is unclear where this drains or if it is connected to the proposed drainage system. HW recommends the Applicant review and revise the plans to clarify this portion of the drainage system.*

Response: **The plans have been revised to show the underdrain tying into the storm sewer system.**

l. *The Applicant has provided a forebay sizing calculation page. It is unclear how they achieved the required size. HW recommends showing the full sizing calculation.*

Response: **The forebay sizing is based on the impervious area draining to it, and is sized following MassDEP requirements. The forebay calculations have been added to the original forebay sizing calculation page and can be found in the revised drainage report.**

m. *The Applicant has proposed several locations on the Grading Plan which require stone to stabilize steep slopes or depressions at the bottom of slopes to slow or change the direction of the flow of water. HW recommends showing stone sizing calculations and dimensioning for scouring holes and outfalls onsite as some areas appear to be at the bottom of steep slopes or in confined locations. The Applicant should demonstrate that there will be no excessive scour and that the slopes will be stable.*

Response: **Stone sizing calculations are provided within the revised drainage report for the drainage swales and scour hole.**

n. *The Applicant has provided a Catch Basin Area Map in Appendix F. It appears that the area flowing toward CB-A21 does not match the grading. A portion of the north side of the driveway and the area downhill would not flow to the catch basin. HW recommends reviewing and revising the exhibits and calculations as needed.*

Response: **The catch basin area map has been revised as recommended.**

Comment 3. *Standard 3 requires that the annual recharge from post-development shall approximate annual recharge from pre-development conditions.*

a. *The Applicant has provided recharge calculations in Appendix F of the Stormwater Report. It is unclear how the storage provided below the outlet was calculated for the Recharge Equation. HW recommends the Applicant provide the HydroCAD stage storage printouts for the infiltration basin to confirm recharge storage for compliance with Standard 3.*

Response: **The HydroCAD stage storage printout for the proposed infiltration basin is included in the revised drainage report and demonstrates that the amount of groundwater recharge provided is over seven times the required recharge volume.**

Comment 4. *Standard 4 requires that the stormwater system be designed to remove 80% Total Suspended Solids (TSS) and to treat 0.5-inch of volume from the impervious area for water quality.*

- a. *The Applicant has provided treatment train calculations to confirm water quality treatment. The treatment train references deep sump catch basins and the infiltration basin sediment forebay. The Applicant appears to meet total TSS removal requirements. The Applicant appears to comply with Standard 4.*

Response: **No response needed.**

Comment 5. *Standard 5 is related to projects with a Land Use of Higher Potential Pollutant Loads (LUHPPL).*

- a. *The Applicant has provided a traffic report that states the site will not have more than 1,000 vehicle trips per day and therefore is considered a LUHPPL, therefore Standard 5 is not applicable.*

Response: **No response needed.**

Comment 6. *Standard 6 is related to projects with stormwater discharging into a critical area, a Zone II, or an Interim Wellhead Protection Area of a public water supply.*

- a. *The site is not within a critical area, therefore Standard 6 is not applicable.*

Response: **No response needed.**

Comment 7. *Standard 7 is related to projects considered Redevelopment. A redevelopment project is required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2, Standard 3, and the pretreatment and structural best management practice requirements of Standards 4, 5, and 6. Existing stormwater discharges shall comply with Standard 1 only to the maximum extent practicable. A redevelopment project shall also comply with all other requirements of the Stormwater Management Standards and improve existing conditions.*

- a. *The proposed project is considered a new development. Therefore, Standard 7 does not apply.*

Response: **No response needed.**

Comment 8. *Standard 8 requires a plan to control construction related impacts including erosion, sedimentation or other pollutant sources.*

- a. *HW recommends that the Applicant include a note on the Erosion & Sediment Control Plan that states catch basins within 100 feet of the construction entrance shall have silt sacks in them for the duration of construction.*

Response: **This note has been added to the lower right corner of plan sheet C-801.**

- b. *The Applicant shows a stone swale on the north side and south side of the project. HW recommends adding a silt sock at the base of the slope while the site is under construction to provide additional sediment and erosion control from steep slopes.*

Response: **The silt socks have been added as recommended above the proposed swales, as shown on plan sheet C-801.**

- c. *The Applicant has provided an Erosion and Sediment Control Plan. It appears that some of the proposed slopes on the plan are 3:1 or steeper. HW recommends providing a detail for erosion control blanket to help stabilize slopes during the grass establishment period in areas where the stone is not being used.*

Response: A detail for erosion control blanket has been added to plan sheet C-802 and the areas where the slope blanket are anticipated to be needed are shown on plan sheet C-801.

d. *The proposed project requires land disturbance of greater than 1 acre. Therefore, a Stormwater Pollution Prevention Plan (SWPPP) per the EPA NPDES Construction General Permit will be required. HW recommends that the Applicant provide a copy of the SWPPP to the Town a minimum of 14 days prior to land disturbance.*

Response: A SWPPP will be prepared and can be provided to the Town if requested.

Comment 9. Standard 9 requires a Long-Term Operation and Maintenance (O & M) Plan be provided.

a. *The Applicant references a Stormwater System Operations & Maintenance Plan as part of the Stormwater Report. The plan lists several post-development controls including Parking lot sweeping, rip-rap aprons, scour holes, and sediment forebays. It appears these items are described in the post-development stormwater controls but not listed in the stormwater maintenance log checklist. HW recommends adding these development controls to the maintenance log checklist.*

Response: The post-development controls noted above have been added to the stormwater maintenance log checklist included in the revised drainage report.

b. *The Applicant has provided a maintenance log as part of the Stormwater Operation Maintenance Plan. HW recommends providing a checklist for each type of stormwater control to help identify what needs to be inspected and maintained for each.*

Response: The inspection and maintenance requirements for each type of stormwater control area outlined in the Stormwater Operation Maintenance Plan.

c. *The Applicant has provided a Stormwater Operation and Maintenance Plan and a Long-Term Operation and Maintenance (O&M) Plan. HW recommends including the responsible party's contact information in both O&M Plans. Further, HW recommends that the Applicant have the owner and/or responsible party review and sign the O&M Plan. The ZBA may choose to make receipt of the signed O&M Plan a condition of approval.*

Response: Contact information for the responsible parties has been added to the O&M Plan.

d. *The Applicant has provided a simple exhibit illustrating where all the stormwater practices and items that need to be maintained are located on the project site as part of the O&M Plan. HW recommends adding locations of outfalls, swales, scour holes, and forebays as part of the exhibit to be maintained regularly.*

Response: The requested features have been added to the O&M Plan exhibit.

e. *The Applicant has provided a Stormwater Device Location Plan Exhibit in the O&M Plan. HW recommends confirming all catch basin structures to be inspected are called out on the Exhibit.*

Response: All catch basins are now indicated in the O&M Plan exhibit.

Comment 10. Standard 10 requires an Illicit Discharge Compliance Statement to be provided.

a. *The Applicant has provided a signed illicit discharge statement. The Applicant appears to comply with Standard 10. HW has no further comment.*

Response: No response needed.

Comment 11. General Comments.

- a. *The Applicant has proposed a single 6" water line on-site to provide domestic water and fire service. Per Section 4-3 of the Town's water regulations, no connection shall be made between the fire system and the domestic water supply. It is unclear if this is specific to inside the building or the service from the main. HW defers to Milton Water Department for clarification.*

Response: **The Applicant will coordinate with the Milton Water Department on this comment.**

- a. *HW recommends the Applicant confirm that all additional stormwater-related comments from the Town (e.g. Planning, Public Works, Conservation Commission) have been addressed as part of this project approval process.*

Response: **The Applicant will work with all applicable Town departments to address further stormwater comments, if any.**

CONFORMANCE WITH MILTON ZONING BYLAW

HW also reviewed the Site Plan Application for conformance with the requirements of the Town of Milton, Massachusetts Zoning Bylaw as amended through March 14, 2022 (Bylaw).

Response: **Acknowledged**

Article III. Use Regulations

The project site is located within the Residential A District. As defined in Section 275-3.1.C, "no building or land shall be used which is intended for manufacturing or commercial purposes except for one or more of the following.". The exemption includes a use for educational purposes allowed by a non-profit educational corporation. However, the Applicant has noted that pursuant to state law no bylaw shall prohibit or require a special permit for the use of land or structures for the purpose of operating a childcare facility. The Applicant references the Massachusetts State Legislature's Dover Amendment Section 3 of M.G.L., chapter 40A.

Response: **Acknowledged**

Article IX. Height Regulations

- a. *The Applicant has proposed a primary building onsite. The building height is 22 feet as noted on the plans. Per Section 275-9-1. No building shall be greater than 35 feet in height. The roof of the proposed building does not exceed the height requirements.*

Response: **Acknowledged**

Article X. Area Regulations

- a. *275-10.1. A – Lot Size: Minimum Lot Size: 40,000 square feet
The total lot area provided is 299,513.*

Response: **Acknowledged**

b. 275-10.1. A – Lot Frontage: Minimum Lot Frontage: 150 feet
The frontage provided for the project parcel is 402.1 feet.

Response: **Acknowledged**

c. 275-10.2. G – Front Yard: Minimum Setback: 50 feet.
The front yard setback provided for the project lot is 101.4 feet.

Response: **Acknowledged**

d. 275-10.3. F – Side Yard: Minimum Setback: 35 feet
The side yard setback provided for the project lot is 59.3 feet.

Response: **Acknowledged**

e. 275-10.4. D – Rear Yard: Minimum Setback: 50 feet
The rear yard setback provided for the project lot is 596.1 feet.

Response: **Acknowledged**

f. 275-10.5. B – Building Coverage and Floor Space: Maximum Floor Space: 30% of the gross lot area
The maximum floor area ratio proposed is 5.3%.

Response: **Acknowledged**

g. 275-10.5. B – Building Coverage and Floor Space: Maximum Building Coverage: 15% of the lot area
The proposed building coverage on the site is 5.3%.

Response: **Acknowledged**

h. 275-10.6. B – Open Space: Minimum Open Space Coverage: 75% of the building area + all parking and driveways
The proposed Open Space area (263,300sf) is 727% of the total developed area required (75% building area plus parking and driveways; 36,200sf).

Response: **Acknowledged**

Article XI. Parking Regulations

a. 275-11.2. D.1- For each preschool or kindergarten, there shall be at least 3 parking spaces for every 2 instructional rooms.
The Applicant has provided 57 parking spaces where 23 are required based on the number of instructional rooms proposed.

Response: **Acknowledged**

b. 275-11.6. E Width and Construction – The bylaw states driveways to and from parking lots shall have a maximum width of 24 feet and a curb cut of no more than 32 feet.

Response: **Acknowledged**

c. *The Applicant has provided a driveway leading to a parking area with a width of 26 feet and a curb cut of approximately 56 feet. HW recommends clarifying the reasoning for the widths and seeking relief or reviewing and revising as required.*

Response: **Acknowledged**

d. *275-11.8.C – Parking Setbacks: Minimum 30 feet from any front, side, or rear lot line. The proposed parking lot front yard setback of at least 32 feet for a drive aisle and parking area. The proposed parking lot spaces are set farther back from lot lines.*

Response: **Acknowledged**

Article XII. Administration

The Applicant meets the site plan and procedure requirements of this section of the Zoning Bylaw.

Response: **Acknowledged**

Article IX. Board of Appeals

The Applicant meets the procedure requirements of this section of the Zoning Bylaw.

Response: **Acknowledged**

We trust the above as well as the attached information are sufficient for your continued review of the project. Should you have any questions or require additional information, please do not hesitate to contact us at (508) 480-9900.

Sincerely,

Bohler Engineering MA, LLC


Andrew Platt


Lucien M. DiStefano

cc. Steve Stanish, P.E. (HW)