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April 4, 2023

Grafton Conservation Commission
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Grafton, MA 01519

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gravesengineering.com

**Subject: 118.5 Old Westboro Road Lot A and Lot B & 8 Morgan Drive
Grafton Wetlands Regulations and Stormwater Regulations Review**

Dear Conservation Commissioners:

We received the following documents via e-mail on March 28, 2023:

- Correspondence from Quinn Engineering, Inc. to Grafton Conservation Commission dated March 28, 2023, Re: "Lot A" and "Lot B" 118.5 Old Westboro Road / #8 Morgan Drive...
- Plans entitled Proposed Lot Development Plan in Grafton, Massachusetts, "Lot A" – 118 1/2 Old Westboro Road dated January 20, 2023 and revised March 24, 2023, prepared by Quinn Engineering, Inc. for Diveri (sic) Builders, Inc. (4 sheets)
- Plans entitled Proposed Lot Development Plan in Grafton, Massachusetts, "Lot B" – 118 1/2 Old Westboro Road dated January 20, 2023 and revised March 24, 2023, prepared by Quinn Engineering, Inc. for Diveri (sic) Builders, Inc. (4 sheets)
- Plans entitled Proposed Lot Development Plan in Grafton, Massachusetts, #8 Morgan Drive dated January 20, 2023 and revised March 24, 2023, prepared by Quinn Engineering, Inc. for Diveri (sic) Builders, Inc. (3 sheets)
- Document entitled Stormwater Report, Project: #118.5 Old Westboro Road ("Lot A" and "Lot B") & #8 Morgan Drive, Grafton, MA dated January 20, 2023 and revised March 24, 2023, prepared by Quinn Engineering, Inc.

Graves Engineering, Inc. (GEI) has been requested to review and comment on the plans' and supporting documents' conformance with applicable Town of Grafton "Regulations for the Administration of the Wetlands Bylaw", Town of Grafton "Regulations Governing Stormwater Management", MassDEP Stormwater Handbook and standard engineering practices.

This letter is a follow-up to our previous review letter dated March 21, 2023. For clarity, comments from our previous letter are *italicized* and our comments to the design engineer's responses are depicted in **bold**. Previous comment numbering has been maintained.

Our comments follow:

Regulations for the Administration of the Wetlands Bylaw

1. *The Lot A plans need to include elevation labels for the existing contours near the southwestern corner of the site. Additionally, the Lot B plans need to include elevation labels for the existing contours on the eastern portion of the site. (§V.B.3.c)*

Acknowledged. Elevation labels for the existing topographic contours were added to the plans.

2. *The Lot B plans need to include the material of the proposed twin six-inch outlet culvert pipes. (§V.B.4.d)*

Acknowledged. Sheet 2 of the Lot B plans was revised to call for Sch. 40 PVC pipe.

Grafton Stormwater Management Regulations

3. *The Stormwater Report needs to demonstrate compliance with the Total Phosphorus (TP) removal requirements. (§6.B.4)*

Acknowledged. Total Phosphorus removal calculations were added to the Stormwater Report at Standard 4: Water Quality, Section H. GEI has no issues with the calculations nor with compliance relative to Total Phosphorus removal.

4. *GEI has no issue with the Lot A, Lot B, and 8 Morgan Drive plans showing the topographic contours as two-foot intervals, but defers to the Conservation Commission if the topographic contours need to be shown at one-foot intervals. (§7.B.1.h)*

No further comment necessary.

5. *The Pre-Development Catchment Plan depicts Subcatchment 6S and Pond 2P in the southeastern corner of the project site. The routing diagram and hydrology calculations need to include this subcatchment and pond for comparison to the post-development conditions. (§7.B.1.o)*

Acknowledged. The revised Stormwater Report contains pre-development hydrology calculations for Subcatchment 6S and Pond 2P (Analysis Point #2). GEI has no issues with the calculations nor with peak rate attenuation to this analysis point.

6. *The Lot A, Lot B, and 8 Morgan Drive plans need to include the estimated total area and total volume of disturbed area. (§7.B.2.g)*

Acknowledged. Note 9 was added to the following plans/plan sheets: Lot A, Sheet 2; Lot B, Sheet 2; #8 Morgan Dive, Sheet 1.

7. *The check dam sections of the O&M Plans on Sheet 4 of the Lot A plans, on Sheet 4 of the Lot B plans, and Sheet 3 of the 8 Morgan Drive plans need to define what a "significant rainfall event" is— a rainfall amount should be provided. (§7.B.3.g)*

Acknowledged. The check dam sections of the O&M Plans were revised to specify a rainfall amount of two inches or greater.

8. *The installation, maintenance, and repairs records need to be maintained for five years. Currently, Stormwater BMP Long Term Operation and Maintenance (O&M) Plan Note 2(A) on Sheet 4 of the Lot A plans, on Sheet 4 of the Lot B plans, and on Sheet 3 of the 8 Morgan Drive plans indicate records will be maintained for three years. (§7.B.3.i)*

Acknowledged. Notes were revised to show that the records are to be maintained for five years.

Hydrology & MassDEP Stormwater Management

9. *GEI reviewed the hydrology computations and found them to be in order. The revised hydrology computations are also in order.*

10. *The Standard 10 section of the Stormwater Checklist indicates that an Illicit Discharge Statement was included, however GEI did not receive a copy of the Stormwater Report with the statement.*

Acknowledged. Upon further review, Standard 10 in Section 5 states that “An Illicit Compliance Statement must be submitted.” GEI understands that such a statement for each lot is to be provided by the developer. GEI defers to the Conservation Commission when the Illicit Discharge Statements are to be provided to the Commission.

General Engineering Comments

11. *GEI has no issues.*
No further comment necessary.

General Comments

12. *GEI did not review the plans for compliance with 310 CMR 10.00, the Massachusetts Wetlands Protection Act Regulations.*
No further comment necessary.

We trust this letter addresses your review requirements. Feel free to contact this office if you have any questions or comments.

Very truly yours,
Graves Engineering, Inc.



Jeffrey M. Walsh, P. E.
Principal

cc: Scott Jordan; EcoTec, Inc.
Kevin Quinn, P.E.; Quinn Engineering, Inc.