



February 26, 2019

Daniel C. Hill, Esq.
Hill Law
Six Beacon Street, Suite 600
Boston, MA 02108

**Re: 40B - Peer Review
Goodridge Estates
Sterling Road
Lancaster, Massachusetts**

Dear Mr. Hill:

Per our discussion the following is a list of comments generated during our review of the project-related Stormwater Management Report prepared by GLM Consultants dated July 5, 2018 (latest revision 12/27/18). The purpose of our review was to summarize key findings and identify areas where the materials are inconsistent or otherwise may not meet generally acceptable standards.

Stormwater Management Report:

1. Stormwater Report is consistent with what we'd expect to see for a preliminary design submission however it does not fully document or demonstrate the Project's compliance with the Massachusetts Stormwater Management Standards or the Town of Lancaster Stormwater Management Rules and Regulations which should be required for final review by the Town.
2. Existing conditions watershed mapping does not accurately identify the boundaries of Sub-catchment 3S. Based on readily available terrain data roughly 5 acres Bestway of New England property flows overland through the subject property before it reaches an on-site existing wetland conveying flows to Design Pont 3. Under proposed conditions an earthen berm appears to be proposed along the western boundary of the subject property thus changing the off-site runoff patterns and increasing the potential for increased ponding and/or flooding on the Bestway of New England property. This directly conflicts with the applicant's statement that existing uncaptured off-site runoff not associated with the Project will continue to flow overland without change.
3. Applicant does not provide on-site soils investigation documentation that is identified as being performed to determine groundwater elevations and confirm soil classifications. This information is critical as it is the basis for many of the Project's design decisions and calculations.
4. Natural Resources Conservation Service (NRCS), Hydrologic Soil Group (HSG) Mapping for the subject parcel indicates the presence of HSG A soils along the southern property boundary. The presence of A soils on the subject parcel excludes the Applicant from the "maximum extent practicable" option under Massachusetts Stormwater Standard 3 since the site is not comprised solely of C and D soils. The need to meet this standard may result in larger stormwater basin footprints and/or reconfiguration of the proposed drainage systems.

5. South of the subject parcel is a designated cold-water fishery (Goodridge Brook). Stormwater runoff leaving the site at Design Points 2 and 3 (potentially Design Point 4) are conveyed overland to Goodridge Brook. No documentation is provided by the Applicant demonstrating that these discharges do not meet the definition of being near a critical area. Discharges to the ground near a critical area requires at least 44% of total suspended solids (TSS) be removed prior to discharge to an infiltration structure/practice per Massachusetts Stormwater Standard 3 AND requires a water quality volume (WQV) equaling 1.0 inch of runoff times the total impervious area of the post-development project site per Massachusetts Stormwater Standard 4. Applicant's stormwater calculations indicate a water quality volume equaling 0.5 inch of runoff times the total impervious area of the post-development project site. The need to provide a 1.0-inch WQV may result in larger stormwater basin footprints.

We are happy to discuss any of our comments at your request. Please don't hesitate to contact us with any questions, or if you require additional information.

Very truly yours,



Sean P. Reardon, P.E.,
Vice President

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