



February 25, 2021

Ms. Kathy Joubert, Town Planner
Town of Northborough
Northborough Town Offices
63 Main Street
Northborough, MA 01532

**RE: Peer Review Letter – Facility Expansion Project
425 Whitney Street, Northborough, Massachusetts**

Dear Ms. Joubert,

This letter is to advise that we have reviewed the revised application materials submitted regarding the proposed facility expansion project located at 425 Whitney Street in Northborough, Massachusetts for consistency with local and state regulations including:

- Northborough Zoning Bylaw, effective through December 21, 2020.
- Northborough Wetlands Bylaw and Regulations effective through September 21, 2019.
- Massachusetts Stormwater Management Standards.

The materials consulted for this review include the following:

- Plan entitled "Facility Expansion Project, 425 Whitney Street, Northborough, Massachusetts," prepared by VHB, dated October 17, 2019.
- Memorandum from Northborough Planning Board to Steris A.S.T. dated March 11, 2020.
- Memorandum from Attorney Stephen F. Madaus to Northborough Planning Board dated May 27, 2020.
- Memorandum from Northborough Planning Board to Steris A.S.T. dated November 15, 2019.
- Application for Site Plan Approval and Special Permit per Groundwater Protection Overlay District filed by Isomedix Operation, Inc., dated September 13, 2019.
- Zoning Interpretation Request Form dated September 18, 2019.
- Letter from the Town of Northborough Town Engineer dated March 10, 2020.
- Letter from VHB dated October 15, 2019 responding to Northborough Town Engineer's comments.
- Letter from VHB dated January 22, 2020 regarding the Groundwater Protection Overlay District Special Permit with attachments.
- Report entitled "Stormwater Report, Facility Expansion Report," prepared by VHB, revised through October 2019.
- Letter from Northborough Fire Department to Northborough Planning Board dated September 24, 2019.
- Memorandum from KP Law to Northborough Planning Board dated September 14, 2020.

- Memorandum from Stephen F. Madaus to Northborough Planning Board dated January, 28, 2020.

BACKGROUND

The project includes the expansion of the property located at 425 Whitney Street in Northborough, Massachusetts. The project includes the construction of a 24,700 square foot building addition to an existing industrial building and associated site improvements including parking lot modifications, stormwater management improvements, landscaping, etc. We understand the proposed use of the building will include the receipt and sterilization of medical products prior to their distribution. The project is located in the Town of Northborough's Industrial Zone as well as Groundwater Protection Overlay District. We understand the project is seeking Site Plan Approval and a Special Permit from the Planning Board.

Environmental Partners has the following comments regarding zoning, stormwater management design, and civil/site development. Comments regarding traffic and activities associated with the proposed use have been prepared under separate cover.

Northborough Zoning Bylaw

The project is the Industrial District and Groundwater Protection Overlay District Area 3. We understand the Planning Board is the Special Permit Granting authority for this project. Environmental Partners has the following comments regarding compliance with the Northborough Zoning Bylaw:

1. Section 7-07-010 D(3)(c)[4] allows industrial development on lots within the Groundwater Protection Overlay District Area 3 provided the post development net runoff volume does not exceed existing conditions by more than 15%. The submitted calculations demonstrate that the proposed project meets this requirement. However, we do have recommendations regarding the time span used for the hydrologic calculations as described below. This section also states that the proposed project will not cause a violation of Class B water quality standards and will not cause a violation of Class I groundwater quality standards. Class B standards as described in 314 CMR 4, address dissolved oxygen, temperature, pH, bacteria, solids, color and turbidity. Oil and grease, and taste and odor. The project generally meets the Massachusetts Stormwater Management Standards. However, many of the pollutant described in this section are not specifically addressed in the Stormwater Management Standards. In our opinion, the proposed project, under normal operations, will likely not cause a degradation of the Class B standards.
2. Section 7-09-010 D (5)(f) regarding land clearing and grading requires weekly inspections of all erosion and sedimentation control measures. This exceeds the requirements of the United States Environmental Protection Agency National Pollutant Discharge Elimination System Construction General Permit. We recommend that weekly inspections be included as part of the "Recommended Construction Period Pollution Prevention and Erosion and

Sedimentation Controls” document submitted by the applicant and that copies of all weekly reports be submitted to Town.

3. Section 7-09-010 D (6)(b) requires four inches of loam and seed. We recommend a note be added to the landscape plan and Grading, Drainage, and Erosion Control Plan requiring a minimum of 4” of loam and seed be placed to stabilize the site.
4. Section 7-09-010 E includes requirements for monitoring and inspections. We recommend that the project notes be updated for consistency with the requirements of this section.
5. Section 7-09-020 C (1) requires projects to comply with Chapter 4-12 regarding illicit discharges. The proposed design does not appear to include any illegal discharges to the municipal storm drain system. The project plans includes a sewer ejector pump with a note that the design of the force main will be prepared following completion of survey. The plans do not include a detail for the pump station of the force main design. As described in the Stormwater Management section of this letter, the Illicit Discharge Statement has not been submitted consistent with the Massachusetts Stormwater Management Standards.
6. Section 7-09-020 C (2) requires details regarding site lighting. We recommend that details of the site lights be included on the site plans in conformance with the requirements of this section, including light pole heights.
7. Section 7-09-020 C (5) (a) [2] requires a 50 foot area of open space for industrial projects abutting residential districts. We understand that the Zoning Board of Appeals issued a variance from this requirement on August 27, 2019.
8. Section 7-09-020 C (5) (d) requires exposed storage areas, truck loading areas, etc., to be screened by abutting properties. The proposed ‘loading area’ to the rear of the proposed parking lot does not include any additional landscaping. Based on review of aerial photography, there appears to be limited vegetation between 425 Whitney Street and the adjacent property.
9. Section 7-09-030 B (2) provides parking ratios for different land uses. The applicant has provided required parking estimates using the industrial (office) and warehouse parking ratios. Based on these ratios, the applicant has estimated that 38 parking spaces are required by regulation. However, the parking requirements table shown on the Layout and Materials Plan indicates the proposed use only requires 20 parking spaces. We recommend the Board consider allowing the applicant to reduce the number of parking spaces to reduce impervious surfaces and stormwater management impacts.
10. Section 7-09-030 B (3) allows the Planning Board to authorize a 30% reduction in off-street parking spaces, subject to conditions described in the Bylaw.
11. Section 7-09-030 C (1) (a) requires the maximum driveway width to be 24 feet. The proposed driveway is 30 feet wide.
12. Section 7-09-030 C (4) (a) [1] requires parking areas with greater than five parking spaces to have a buffer of approximately 10 feet in width. EP was not asked to perform a comprehensive review of the landscape design. However, the proposed landscape plan includes the staggered planting of trees on the outside edge of the parking lot.
13. Section 7-09-030 F (1) requires bicycle parking facilities be incorporated into the site design unless waived by the issuing authority. It does not appear that bicycle facilities are included on the plans. This section requires one bicycle parking stall for every 10 vehicular parking

spaces. We recommend bicycle facilities be added to the plans consistent with the requirements of the Bylaw.

Stormwater Management and Erosion Control

EP has reviewed the projects stormwater management design for consistency with applicable local regulations, the Massachusetts Stormwater Management Standards, and standard engineering practice.

Massachusetts Stormwater Management Standards

1. Standard 1 – The project complies with this requirement. There are two direct discharges to wetlands. Prior to the discharge of stormwater to wetland resources, stormwater is treated and discharged over a rip-rap pad to reduce erosion impacts. Environmental Partners has comments regarding the riprap pad below.
2. Standard 2 – The project, as currently designed, complies with this requirement. The current design does not increase offsite peak flows to the wetlands.
3. Standard 3 – The project – as designed - provides groundwater recharge in excess of the amount required by the Standard.
4. Standard 4 – The project design provides adequate Total Suspended Solids removal, consistent with the Standards.
5. Standard 5 – The project is not considered a Land Use with Higher Potential Pollutant Loads, as described by the Standards.
6. Standard 6 – The project is located within the Groundwater Protection District and therefore the project is required to treat the 1-inch water quality volume. The project provides adequate treatment to meet the performance standards.
7. Standard 7 – The project is a mix of new development and redevelopment and meets the performance standards for a mix of new development and redevelopment.
8. Standard 8 – An erosion and sedimentation control plan has been provided and generally complies with the Standards. We do have the following comments regarding erosion and sedimentation.
 - a. A Stormwater Pollution Prevention Plan required by the United States Environmental Protection Agency's National Pollutant Discharge Elimination System (NPDES) Construction General Permit was not provided. This document, which is sometimes submitted as part of a Notice of Intent application, is required to be prepared two weeks prior to construction. We recommend this document be submitted to the Town of Northborough a minimum of two weeks prior to the start of construction for review and comment.
 - b. We recommend that copies of all SWPPP inspection reports be submitted to the Town of Northborough.
 - c. We recommend the Recommended Construction Period Pollution Prevention and Erosion and Sedimentation Controls document include information regarding protecting the bottom of all infiltration facilities during construction to prevent compaction. The bottom of all infiltration facilities should be protected from

heavy machinery. In the event that heavy machinery is allowed on the bottom of the infiltration basins, the basins ability to infiltrate water could be impacted.

- d. We also recommend the Recommended Construction Period Pollution Prevention and Erosion and Sedimentation Controls document include a section regarding the maintenance of the construction exit.
9. Standard 9 – The long Term Operations and Maintenance Plan generally meets the Standards.
10. Standard 10 – A signed illicit discharge statement needs to be signed and submitted.

Town of Northborough Wetlands Protection Bylaw

1. Section 4.2.3 states that no foundation, building, road, or sidewalk shall be placed within 35 feet of any resource area. This section also states that there will be no construction activity within 25 feet of resource areas. The proposed warehouse expansion is approximately 33 feet from the wetlands at its closest point.

Additional Stormwater Management Comments

EP has developed the following additional stormwater management comments:

1. We recommend the applicant add a note to the Grading, Drainage, and Erosion Control Plan to limit heavy machinery in the bottom of the infiltration basin.
2. We recommend stone for pipe ends, consistent with MassDOT standard specification, be installed at the rip-rap discharge pad.
3. Drain manhole 1 may need to be oversized given the configuration of piping into the manhole.
4. The Project shows a small increase in total volume of runoff for the 10 and 100-year storms. This increase is below the 15% threshold required for industrial properties located in the Groundwater Protection Overlay District. However, the time span used in the hydrologic calculations is 5 to 20 hours. Using a longer time span, such as 0 to 48 hours, may show different changes in total volumes.
5. The hydrologic drainage calculations show the french drain filling during the 10-year, 25 year, and 100-year storms. The 100 year storm shows the peak elevation in the french drain approximately 5 feet higher than the top of the storage. The french drain is showing a higher outflow than inflow for the 25 and 100-year storms. We recommend the applicant verify and revise the modeling.
6. We recommend the construction entrance be added to Construction Period Pollution Prevention and Erosion and Sedimentation Controls document. We also recommend that language be included to protect of the infiltration basin from heavy machinery.
7. We recommend the Stabilized Construction Exits detail be revised to include 2-3" stone and the depth be increased to 6 inches.
8. The plans show the ramp leading to the warehouse expansion building will create a low spot. The plans should be revised to remove the low spot or add a drainage structure to drain any water that may pond in this location.
9. Maintenance access to the infiltration basin will be limited. Vehicles will not be able to access the basin and all work will need to be performed by hand.

10. We recommend a gate be provided to allow maintenance access to the flared end structure located on the north side of the site.

Additional Civil/Site comments

1. We recommend granite curb be installed at the site entrance along Whitney Street.
2. We recommend that cut sheets of the site lights be provided. We also recommend that the applicant verify that the proposed site lights are dark skies compliant.
3. We recommend the applicant verify plans for trash disposal. There does not appear to be any outside dumpsters or provisions for trash.
4. We recommend the applicant confirm the installation of sewer force main is allowed by Public Works. We are unclear regarding the status of the design. We recommend the applicant provide details of the sewer ejector pump and wet well. The pump and force main design shown on the plans are schematic in nature.

Our review is based on the information that has been provided. As noted above, additional reviews have been prepared – and our ongoing - to address other components of the project.

We appreciate the opportunity to be able to assist you with this important project. Please feel free to contact me at (617) 429-3288 or sdt@envpartners.com with any questions or comments.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read "S.D. Turner", with a long horizontal flourish extending to the right.

Environmental Partners Group, Inc.
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