

March 11, 2022

Town of Lynnfield Conservation Commission  
c/o Ms. Emilie Cademartori, Director of Planning and Conservation  
Town Hall, 55 Summer Street  
Lynnfield, MA 01940

Re: Review of Stormwater Permit Application, Plans and Documents  
353 – 365 Broadway (Route 1), Lynnfield, MA

Dear Commission Members:

This correspondence is submitted to you as requested by Ms. Emilie Cademartori, Director of Planning and Conservation. Hard copy of the materials for our review was picked up by our firm from the Lynnfield Conservation Commission (LCC) Office on Thursday, March 3, 2022. Electronic files for our review were received from the Applicant's Engineer on Thursday, March 3, 2022.

The purpose of our review of Site Plans, Stormwater Design, Calculations, Report and Management Plan proposed for the project is to assess compliance with the Lynnfield Stormwater Bylaw (Chapter 213) and Regulations \*Chapter 320) and by reference the Massachusetts Department of Environmental Protection (DEP) 2008 Stormwater Regulations and Handbook and to assess impact of the drainage from the property.

### **PROJECT REVIEW**

The following are our comments and observations on the Site Plans, Stormwater Design, Calculations, Report and Management Plan with respect to the requirements of the regulations and standard engineering practice. The numbered comments listed below are comments that require a response from the Applicant and/or his Engineer.

### **GENERAL ISSUES:**

Since the proposed project will be disturbing more than one acre of land any Stormwater Permit issued for the project should contain a condition requiring that the Applicant obtain a NPDES Permit from the USEPA prior to any work being done on the project and provide evidence of that permit to the LCC prior to conducting any work on the site.

1. We note that the Massachusetts Department of Transportation, Highway Division was not listed on the list of abutters, however, they are the owner of the abutting Route 1 highway layout and should receive notice. This is a common occurrence as MassDOT does not pay real estate taxes and are not listed on the most recent tax list. Has evidence of the notification been provided to the LCC (white slips or green cards from certified mail or certificates of mailing)?

2. In the materials that we were provided we could not locate the following:

- There was no Stormwater Report or Stormwater Narrative, therefore, the information referenced in 320-19 A(7), A(9), A(10), A(11) and A(13) was not provided.
- There was no Stormwater Report or Stormwater Narrative, therefore, the information referenced in 320-19 B(1), B(2), B(3), B(4), B(8 - TP), B(9) and B(10) was not provided.

The Applicant should review all the requirements of 320-19 A and B as a checklist to ensure that all of the required information is provided or if not provided or not applicable provide an explanation.

3. No evaluation of catch basin inlet capture capacity, pipe capacity or where overflows from storm events greater than the 100 year storm would flow was provided.
4. Infiltration was not provided at the site; however, the test pit data indicates there is soil (fill) above ledge. Fill can be removed and replaced with Title V sand and infiltration can be provided. No written explanation as to why this is not being done was provided.
5. An explanation as to why no LID measures are proposed needs to be provided. There was also no discussion as to alternatives to the redevelopment as proposed. Are there any measures which were not proposed because they were not practicable and why are they not practicable.
6. Under the Massachusetts DEP Stormwater Handbook, the land use is considered a LUHPPL (based on an opinion issued by MassDEP during the review of the nearby Kelly Nissan project) and the discharge is to Hawkes Brook which is a CRITICAL AREA. No discussion was provided as to how the proposed plan addresses these issues was provided.
7. The book and page for the deed on the Stormwater Permit Application was completed in the wrong location. The space used is for Registered Land (which this land is not). A corrected form with the deed listed in the correct location should be provided.
8. The proposed straw wattle across paved areas will not work. The wattle will not maintain sufficient contact with the ground to prevent silty water from flowing underneath. We suggest the use of a 12" (min.) diameter compost soxx with a pea stone wedge on the uphill side to retain silt. This can be supplemented with the excavation of a temporary trench uphill of the soxx to intercept and filter the runoff.

**PLAN REVIEW:**

Because of the lack of information cited above we did not conduct a detailed plan review. However, we do have one comment on the plans.

Town of Lynnfield Conservation Commission, c/o Ms. Emilie Cademartori  
Re: Review of Stormwater Permit Application, Plans and Documents  
353 – 365 Broadway (Route 1), Lynnfield, MA  
March 11, 2022, Page 3 of 3

9. The plans should be very clear as to what pavement is remaining as is and what pavement is being replaced.

**STORMWATER REPORT & CHECKLIST, CALCULATIONS & BMP DESIGN**

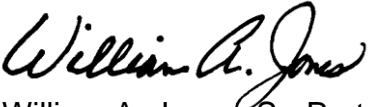
10. A summary of how the project meets each of the 10 Stormwater Standards needs to be provided.


11. NO signed Illicit Discharge Statement was provided.

We look forward to discussing the project, this report, and any questions that the LCC may have. We are available to discuss the project with the Applicant, the Town Engineer, the Applicant's Engineer and/or the Applicant's representatives, as necessary. If you have any questions regarding this matter, or should you require any additional information, please do not hesitate to contact our firm.

Very truly yours,

**LINDEN ENGINEERING PARTNERS, LLC**

  
William A. Jones, Sr. Partner

  
Richard G. Cutts, P.E., President

Cc: Mr. Patrick McAlpine, P.E., Lynnfield Town Engineer