



100 GROVE ST. | WORCESTER, MA 01605

June 25, 2021

Grafton Planning Board  
Grafton Municipal Center  
30 Providence Road  
Grafton, MA 01519

Grafton Conservation Commission T 508-856-0321  
Grafton Municipal Center F 508-856-0357  
30 Providence Road gravesengineering.com  
Grafton, MA 01519

**Subject: 109 Creeper Hill Road  
Site Plan Review  
Grafton Wetlands Regulations and Stormwater Regulations Review**

Dear Planning Board Members and Conservation Commissioners:

We received the following documents in our office on June 24, 2021 via e-mail:

- Correspondence from Feedback Earth, Inc to Grafton Planning Board and Conservation Commission dated June 24, 2021 re: Response to Graves Engineering, Inc. Review Comments...
- Plans entitled 109 Creeper Hill Road, Grafton, MA dated April 22, 2021 and last revised June 22, 2021, prepared by Asa Engineering for Waste to Feed, Inc. (2 sheets)
- Document entitled Stormwater Management Report, 109 Creeper Hill Road, Grafton, MA, dated April 26, 2021, prepared by Asa Engineering.

On behalf of the Grafton Planning Board, Graves Engineering, Inc. (GEI) has been requested to review the documents submitted and comment on their compliance with Grafton Zoning By-law with amendments through June 20, 2020; Massachusetts Department of Environmental Protection (MassDEP) Stormwater Handbook, and standard engineering practices. GEI was authorized to proceed with this review on June 9, 2021. Also, on behalf of the Grafton Conservation Commission 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 and Town of Grafton Regulations Governing Stormwater Management.

This letter is a follow-up to our previous review letter, dated June 22, 2021. 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:**

### **Zoning By-Law**

1. *The name (Feedback Earth, Inc.) and address of the applicant needs to be provided on the plans. (§1.3.3.3.d.1)*

**Acknowledged. The applicant's name and address were added to the title block of the plans.**

2. *The name and address of the subject parcel's owner needs to be provided on the plans. (§1.3.3.3.d.2 & §1.3.3.3.d.9)*  
**Acknowledged. The parcel owner's name and address were added to the title block of the plans.**
3. *Proposed utilities are not shown for the proposed building addition. The applicant should explain or show on the plans how utilities (e.g. electric) will be routed to the building addition. (§1.3.3.3.d.28)*  
**Acknowledged. Per the applicant's response and Note 3 in the upper left corner of Sheet 2, utility connections are to be made from adjacent Building 3.**
4. *The height of the proposed building is missing from the zoning information table on Sheet 2. On Sheet 2, construction note #9 indicates that the height of the proposed building shall be in conformance with the bylaws. Per the bylaw, the maximum height is 35 feet.*  
**Acknowledged. The required and proposed building heights were added to the zoning information table on Sheet 2.**
5. *GEI has no issues with the location of the proposed building addition nor with on-site traffic circulation.*  
**No further comment necessary.**

#### **Regulations for the Administration of the Wetlands Bylaw**

6. *GEI has no issues relative to compliance with the Regulations for the Administration of the Wetlands Bylaw.*  
**No further comment necessary.**

#### **Grafton Stormwater Management Regulations**

7. *The precipitation amounts used in the hydrology computations need to be derived from NRCC Cornell data. (§6.B.3.b)*  
**Acknowledged. The rainfall amounts in the hydrology computations were revised.**
8. *The plans were prepared using two-foot contour intervals instead of one-foot contour intervals. Nevertheless, GEI was able to readily follow the site's topography. GEI defers to the Conservation Commission whether the two-foot contour intervals are acceptable. (§7.B.1.h)*  
**No further comment necessary.**

#### **Hydrology & MassDEP Stormwater Management**

9. *Information in the hydrology computations and on the plans needs to be coordinated relative to the subsurface infiltration system. The hydrology computations modeled a stone envelope height of 4.40 feet, but Sheet 2 of the plans shows a 3.55-foot stone height (six inches of stone under and over the chambers plus the chamber height). The hydrology computations modeled 77 chambers (each row would be six chambers long at 7.00 feet per chamber plus end caps – approximately 44 feet total) by 13 rows of chambers wide (64.3 feet wide) accounting for an overall chamber width of 52" (4.33 feet) plus six inches of stone between rows plus one foot of stone around the perimeter. The plans call for the infiltration system to be 44 feet by 47 feet and the hydrology computations modeled the infiltration system to be 44 feet by 43 feet, but to accommodate 77 (or 78) chambers the infiltration system would have*

to be approximately 46 feet long (allowing for one foot of stone at the ends of the row) by 64.3 feet wide.

**Acknowledged.** The plans and hydrology computations were revised to account for 77 chambers within a 66-foot by 46-foot subsurface system.

10. *For the record, the plans and Stormwater Management Report need to include soil testing information associated with the subsurface infiltration system. On October 1, 2015 GEI witnessed soil testing at the then-proposed location of a subsurface infiltration system. The new infiltration system is proposed essentially at the same location as the system that was proposed in 2015.*

**Acknowledged.** Sheet 2 was revised to include the October 1, 2015 soil testing information. To confirm the applicant's understanding, no additional soil testing is necessary.

11. *The Operation and Maintenance Plan needs to replace the former owner's name (Troiano Trucking) with the new owner's name.*

**Acknowledged.** Feedback Earth Inc. is now listed as the owner in the Operation and Maintenance Plan.

### General Engineering Comments

12. *The plans should include a construction detail for the proposed concrete pad.*

**Acknowledged.** A concrete pad is no longer proposed; the construction detail is no longer needed

13. *The proposed roof downspout leaders should be drawn on the plans to depict how the downspouts will connect to the infiltration chambers.*

**Acknowledged.** Roof downspout leaders were added to Sheet 2.

14. *On Sheet 2, the "zoom detail" of the inspection port for the Cultec structures should be increased in size for clarity, and the word "optional" at the leader note for the inspection ports needs to be removed from the profile view (inspection ports are required).*

**Acknowledged.** The word "optional" was removed from the "zoom detail."

### General Comments

15. *On Sheet 1, it is confusing whether the existing foundations of Building 4 and Building 5 are to be left in place or removed – the leader notes state "existing superstructure to be removed" and "existing above ground framing to be removed" but the layout on Sheet 2 suggests that the foundations would also be removed, with a new foundation constructed for the building addition.*

**Acknowledged.** The applicant responded that Building 4 super structure is to be removed as noted on Sheet 1 and the foundation is to be left in place, and Sheet 1 was revised to clarify that the Building 5 foundation is to be removed.

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: David Janicek; Feedback Earth, Inc.  
Mahmood Azizi, P.E.; ASA Engineering  
Jaclyn Caceci, P.E.; Tighe & Bond