

December 17, 2025

Mr. Greg Wands, Chair  
Conservation Commission  
Town of Ashland  
101 Main Street  
Ashland, MA 01721

RE: Peer Review – The Residences at Ashland, 61 Waverly Street, Ashland, (Assessor’s Map 15, Parcel 12), Wetland Notice of Intent (NOI).

Dear Mr. Wards:

GCG Associates, Inc. has reviewed the following information regarding The Residences at Ashland, a Chapter 40B Development, Site Plan at 61 Waverly Street in Ashland, MA. This peer review is limited to the State of Massachusetts general laws, codes, and regulations only, as directed by the Ashland Conservation Department.

Documents:

1. Wetland Notice of Intent package, (WPA Form 3, Wetland Fee Transmittal Form, Ashland Local Filing Fee Calculation Worksheet, Narrative, Locus Map, Wetland Border Report with wetland delineation forms, Certified Abutter List, Notification to Abutters, supporting calculations, O&M, Geotechnical Subsurface Evaluation) for The Residences at Ashland, 61 Waverly Street, Ashland, MA., prepared by SMMA, dated October 29, 2025.

Plan References:

1. “The Residences at Ashland, 61 Waverly Street, Ashland, MA. Notice of Intent” (Site Plan), prepared by SMMA dated October 29, 2025, last revised 08/01/2025, consists of 16 sheets as following:

Cover Sheet  
Existing Conditions Plan (GLM)  
C-101 Existing Conditions Plan  
C-111 Site Preparation Plan  
C-121 Layout and Materials Plan  
C-131 Grading & Drainage Plan  
C-141 Utility Plan  
C-151 Planting Plan  
C-501 Details I  
C-502 Details II  
C-503 Details III  
C-504 Details IV

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|-------|--------------------------------|
| C-505 | Details V                      |
| C-506 | Details VI                     |
| C-507 | Details VII                    |
| ES100 | Site Lighting Photometric Plan |

Additional Support Documents provided by the Ashland Department of Public Works (DPW).

1. Waverly Street Drainage Photos – Existing Waverly Street drainage system conditions photos set, consists of 24 Photos, provided by the Ashland DPW, received 11/21/2025 through email.
2. Waverly Street, 61 to 68 Culvert and Associates Drainage Map. Provided by the Conservation Department as part of the Peer Review scope, received 11/21/2025 through email.

This project is currently under the Zoning Board of Appeals' review for Comprehensive Permit application per M.G.L. Chapter 40B, for a multi-family residential development (The Residences at Ashland Crossing) at 61 Waverly Street (Map 15 Parcel 12). A 40B comprehensive permit would be based on a preliminary site plan in nature, further development/construction details should be provided with the Building Permit application according to the Comprehensive Permit approval conditions. Under the Comprehensive Permit process, the applicant has been requested waivers for the Ashland By-Laws associated with Wetland Protection and Stormwater Management. Hence, this peer review will be based on the Commonwealth of Massachusetts General Laws (M.G.L.), Chapter 131 Section 40, and 310 CMR 10.00 – Wetland Protections, and associated Stormwater management requirements per Massachusetts Stormwater Handbook (MSH), as required under 310 CMR 10.05(6)(k) through (q).

Based upon our review of the above information, we offer the following stormwater comments with respect to compliance with the 310 CMR 10.00 and associated Massachusetts Stormwater Handbook (MSH) Standards. The numerical section of the regulations is referenced at the beginning of each comment unless it is a general comment. Since this is a NOI submittal, the site plan has been moving forward from the 40B preliminary plan to final design. The review comments are based on plan details suitable for building permit and construction.

**GENERAL COMMENTS:**

1. The site plan set consists of 16 plan sheets. However, the cover sheet listed 15 plan sheets only. Plan C-131 should be Grading and Drainage Plan, and plan sheet C-141 - Utilities Plan was not included in the plan list.
2. The project consists of approximately 10 acres of proposed work limit, which exceeds the 1-acre limit of work threshold and requires a NPDES (National Pollutant Discharge Elimination System) CGP (Construction General Permit) and requires a SWPPP to be filed at least 14 days prior to start of construction.
3. There were wetland resource areas located on-site delineated by Goddard Consulting, (see NOI package, Appendix 4.04 - Wetland Border Report). Three sets of wetland flags were marked on the field, BVW (Bordering Vegetated Wetland) Group 1 - GCA1-GCA95; BVW Group 2 - GCC1-GCC20; and Bank of Intermittent Stream Group 3 – GCS1-GCS11. All three sets of wet flags shown on the plan were labeled GCG#, there were three flags labeled GCG#53, there were missing flags #A1, #A79, #C9, #C10, #S2, and #S10. GCG recommends relabeling the wet flag numbers to match the A, C, and S series as referenced on the wetland border report. The wetland boundary requires Conservation Commission approval.

Proposed works (drainage outlet connection) within Waverly Street:

4. The proposed bioretention area and the surface infiltration basin are equipped with outlet pipes, which connect and discharge to an existing catch basin and drainpipe system within Waverly Street. The drain carries the outflow from the site to the downstream stone box culvert located at the northern side of 73 Waverly Street crossing beneath the roadway. The Ashland DPW has identified the box culvert consists of a 12" RCP inlet pipe (east side) and transitioned to a 3-foot wide field stone, open bottom culvert with varies height (approximately 3' to 4'). The ceiling of stone culvert is equipped with steel beams support (which are rusty/rotting conditions). The proposed drainage connection requires DPW Road Opening Permit approval. Based on the DPW provided site photos, the stone box culvert is in poor condition. The condition of the current conditions of the existing 12" RCP pipe on Waverly from the existing catch basin (proposed to be converted to drainage manhole - DMH 1-1 for connection) should be evaluated which should include a Closed-Circuit Television (CCTV) inspection of the pipe at minimum. Visual inspection of existing photos from inside the culvert by the DPW shows the pipe to appear to be disjointed and not at a uniform grade. This drain line is approximately 6" to 12" below the catch basin rim, as shown on the DPW photo, the RCP does not have the recommended minimum pipe cover (12" minimum). This pipe is too shallow for constant vehicle live load with lacking pipe cover protection. The applicant should provide calculations and documentation that the existing RCP's condition and capacity are suitable to handle the overflows from this development.
5. GCG recommends having the applicant to assess if there is any intermittent stream associated with the existing Stone Box Culvert, (upstream and downstream). The MassMapper/MassGIS contours layer indicated the intermittent stream (Wet flags series GCC1 to GCC20) slopes toward the downstream 12" RCP stone box culvert inlet. Typically, the 12" RCP creates a contraction at the entrance and form an intermittent stream/drainage swale in front of the RCP. Which would require Conservation Commission review as stated in 310 CMR 10.02(2)(d) and 310 CMR 10.05(6)(b). 10.02(2)(d) stated that activities outside the areas subject to protection under M.G.L. c. 131, § 40., could altered an area subject to protection and 10.05(6)(b) stated that the Order shall impose conditions setting limits on the quantity and quality of discharge from a point source (both closed and open channel), when said limits are necessary to protect the interests identified in M.G.L. c. 131, § 40. Therefore, the Conservation Commission may also have jurisdiction over the resource area located at the stone culvert area.
6. The proposed DMH 1-1 and CB 1-1 rims grade are approximately 7" higher than the existing catch basin rim which would not work with the existing roadway grade and should be addressed. (Lowering the proposed drain manhole and catch basin rims to match existing catch basin rim would create an insufficient pipe cover issue. GCG recommends using ductile iron pipe for locations where it has less than 2 feet of cover over pipe.
7. The existing stone culvert under the road appears to be connected to the wetland located on site which the development discharges into. An evaluation and understanding of the connection should be performed to have a full understanding of the impact of the development on the stone culvert which is in very poor shape. Additional wetlands may need to be flagged. Adding flow or impacting the flow to this culvert should not be permitted as it may impact the stability of the

culvert. The visual inspections reveal the steel beams on top of the culvert have corroded as mentioned above which support the slab above it.

## **SITE PLAN SET**

### **C-101 - Existing Conditions Plan**

1. Soil test pits SH-TP-105 and SH-TP-106 were both terminated by refusal (on boulders) at elevation 230.5 and 234.5, respectively. Also, there is an exposed surface of ledge shown approximately 10 feet west of TP-106 on this plan. There appeared to be a series of boulders or probably ledge beneath the proposed subsurface infiltration basin B-2B. Soil logs indicated gravelly loamy sand found at both pits, which is considered well drained soil. If these two pits were refusal on boulders and not ledge, should the (estimated seasonal high groundwater) ESHGW be aligned with the nearby wetland surface elevation 228+. The proposed infiltration pipe/stone bed system's bottom of stone is at elevation 229 and with the required minimum 2' separation to bedrock, the bottom of the excavation would be approximately 15 feet below the surface ledge and 3' below the nearby wetland. GCG recommends performing additional soil test pits (with heavy equipment) at the proposed infiltration system B-2B location to clarify any ledge and ESHGW concerns. GCG recommends providing surface spot grades at wetland flags GCA-26 to GCA-29, which should provide reasonable indication of the actual ESHGW elevation near the area. (The ESHGW elevations found in TP-102 and TP-103 were relatively close to the nearby wetland surface elevation).
2. GCG does not recommend installing large infiltration systems in ledge or bedrock. Removal of ledge to allow for infiltration may open up fissures/cracks in bedrock which can redirect flow paths of the groundwater possibly drying up wetland or opening up other avenues for the water to flow. Since this site is directly upgradient of Waverly Street and has a ledge face along the street, the stormwater design and building construction need to prevent any possibility of groundwater breakout through this ledge face onto Waverly Street. Blasting or hammering of ledge could very easily redirect the groundwater flow.

### **C-131 Grading and Drainage Plan.**

3. The Legend's CPE (Corrugated Polyethylene Pipe) shall be specified with smooth interior.
4. The proposed southeastern subsurface infiltration basin label should be B-2B, (B-2A labeled), the northern subsurface infiltration basin label should be B-2A, (B-1A labeled), to match Details A5, plan sheet C-505 and the HydroCAD models.
5. Both subsurface infiltration basin B-1A and B-2B consist of 48" diameter CMPs (corrugated metal pipe) embedded in stone bed, which are identified as Shallow UIC Class V Injection Wells. MassDEP requires a minimum 10 feet setback to water supply line. Both proposed systems are within 10 feet of the proposed water supply line, 10' minimum setback required. The proposed CMP is not a durable material, considering buried in a high moisture environment and 7 to 8 feet below surface. GCG recommends replacing it with more durable pipe material.
6. Roof drain pipe size (diameter) along the building perimeter should be specified on the plan.
7. The two subsurface infiltration basins outlet pipe connect to OCSs 2-1 and 3-1, should have the pipe diameter specified on the plan.
8. Architecture building roof plan should be provided to show roof runoff collection system directing the portion of roof runoff to the assigned roof drain according to the watershed map. Proposed

parking lot garages' roof plan should be provided to ensure the roof runoff drains to the assigned watershed.

9. The proposed 12" roof drain pipe at the northern side of building connects to WQU 2-1 has a pipe slope of 8%, which would have a flow full velocity of 12.8 feet per second, not accounting the roof height's hydraulic head unless there is a substantially small flow from the roof runoff, the flow velocity is expected to exceed the 12 feet per second. CBs 2-2, 2-5, 2-12, 3-1 3-2, 3-3 and 3-4 outlet pipes were set at 5.0%, with a flow full velocity of 10.2 feet per second, since the inflow watersheds are relatively small, the flow velocity could be below 10 feet per second. The eastern 12" roof drain connects to DMH 1-4 pipe slope should be 0.015 ft/ft. The plan has utilized 12" diameter drain pipe for the entire site, GCG recommends providing pipe sizing, capacity, and velocity analysis for review.
10. All drain manholes should have a minimum of 0.1 feet internal drop to compensate the hydraulic drop within the structure.
11. OCS 1-2, an inlet pipe is needed to connect the basin to the OCS to allow outflow at 231.50.
12. Bioretention basin surface area did not match the HydroCAD calculations.
13. WQU 1-1 is a 3' diameter structure with proposed three 12" pipe connection. GCG recommends increasing the structure to 4' diameter. DMH 2-2 and DMH 2-7 should be considered with 5' diameter structure.
14. The proposed DMH 1-1 and CB 1-1 rim elevations are 7" +/- above the existing Waverly Street ground grade and should be addressed.
15. The plan stated no ESHGW find at elevation 225' (TP-8). Is the foundation drain at 234.30 necessary?
16. The proposed retaining wall at the northern side of CMP infiltration basin B-2B should be designed to support the hydraulic pressure from the nearby CMP infiltration basin and with impervious function prevent breakout through the wall surface.

#### C-505 – Details V

17. Detail C1 – OCS 1-2 "E" elevation should be 223.55.
18. Detail C1 – OCS 3-1 "A" elevation 231.42' did not match the plan C-131 (232.42 shown).
19. Detail C1 – OCS 3-1 "B" elevation 231.46' did not match the HydroCAD (232.46 used).
20. Detail C1 – OCS 3-1 "E" elevation 231.42' did not match the plan C-131 (FES = 232.20 shown).
21. Detail C1 – OSC inlet pipe size should be specified, where applicable.
22. All OCS structures have a standard width of 4' and equipped with 2.0' long sharp-crested rectangular weir (at invert "D"). The details should call out the 2" weir width on the top view and specify the top of the weir wall, where it widened to 4'.

#### C-507 – Details VII

23. Detail A5 Bioretention Area Section – the detail shows the bottom of bioretention soil at elevation 216.67, which does not match the HydroCAD storage bottom elevation (215.67), the base of the bioretention basin area should be specified on the plan. Based on the HydroCAD report, the bottom of the bioretention soil (Engineered Soil Mix) area should align with the surface area at elevation/contour 202. This detail calls for 1'-4" depth of bioretention soil (min.), but the HydroCAD calculations were based on 2.33', MassDEP MSH requires the depth of the soil media between 2 and 4 feet, and a minimum of 30 inches for nitrogen removal credit. See additional Bioretention comments under the "Hydrologic Modeling and Supporting Information" below.

24. The proposed surface infiltration basin is constructed in fill; the proposed earth berm is approximately 7.5+/- feet over the existing grade. An earth berm construction detail should be provided, the berm should be constructed with an impervious (low permeability) material core embedded into the existing earth base, pipe should be bedded in the low permeability core material.

### **Hydrologic Modeling and Supporting Information (NOI Package Appendix 4.02)**

#### HydroCAD report - Existing Hydro:

1. Majority of the existing site surface coverage was modeled as Woods/grass combination, which means 50% woods and 50% grass per Technical Release 55, (TR55), Table 2-2c. Footnote #5. GCG reviewed the historic aerial image from 1995 to current street view image and found that the site consists of predominantly dense woods coverage for the past 30 plus years. GCG recommends replacing the Woods/grass combination surface to Woods, in good condition. The portion of >75% Grass cover surface used in sub-catchments EX 1.2 and Ex 1.3 were deemed reasonable, where relatively matching the open area at the northerly portion of the site as shown on current aerial image. Sub-catchment EX 2.1 Tc should start from the high point, (GCG scaled approximately 200'+/- of total flow length). Minimum Tc should be 6 minutes (0.1 hour) per TR55. However, the Tc in this case should have relatively minor impact on calculations.
2. Existing Hydro analysis points: GCG recommends setting the design points (DP) based on the existing runoff flow direction. The existing sub-catchments EX-1.1 and EX-1.2 surface runoff drains toward Waverly Street and flows southwestward to DP-1. However, Sub-catchments EX 1.3 and 2.1, both drains north and northwestward to the existing wetland and intermittent stream (wet flag series GC S1 – S10) and onto the abutting property at 63 Waverly Street. A new design point should be added to the northern property boundary at the intermittent stream. Sub-catchment EX 3.1 drains southwestward onto the East Union Street drainage system (DP-3); Sub-catchment EX2.2 drains southeastward onto East Union Street drainage system (DP-2). There is an existing high point in front of utility pole #20 on Waverly Street. Therefore, majority of the existing project site runoff drains southwestward along Waverly Road with small portion of the site runoff drains northward to the existing catch basin (proposed DMH 1-1).

#### HydroCAD report - Proposed Hydro

3. As recommended in comment #1 above, all existing Woods/grass combination surface cover to remain should be modeled as Woods, good cover.
4. Sub-catchment PR 1.2, this watershed consists of the proposed bioretention basin surface area, since the bottom of the bioretention soil (engineered soil mix media) at 215.67 (HydroCAD), or at 216.67 (shown on Detail A5, C507), discrepancy to be resolved, is below the ESHGW at 217.5 (SB-TP-101). The bioretention area's base will be lined with impervious liner, which eliminated all exfiltration function of the system (become Bio-detention system). GCG is not against modeling the bioretention/biodetention area surface with grass CN value. However, the HydroCAD Pond BIO 1: Bioretention model also takes 35% void credit within the engineered soil mix layer for stormwater storage, then the bioretention area surface (in sub-catchment PR 1.2) should be modeled as water surface CN=98. GCG recommends keeping the bioretention area surface with grass surface CN value and eliminate the 35% void credit used in the pond model BIO 1.
5. Tc used in TR-55 should be 0.1 hour or 6 minutes minimum.
6. Sub-catchment PR 1.3 – The proposed Tc slope should be verified; there appeared to be 3H:1V side slope along the basin earth berm. The Tc with 29' flow length and 2% slope used on the calculation should be verified.

7. Sub-catchments PR 1.4, the surface infiltration area (100-year event ponding surface) should be modeled as water surface with 98 CN value. The exfiltration rate has been credited to the basin surface area during the pond modeling.
8. Pond B-2A: CMP Infiltration – the proposed 2' long weir in a 4' wide concrete structure should have the top of weir wall elevation specified in the design.
9. Pond B-2B: CMP Infiltration – the proposed bottom of system (229.00) is 13' below the exposed surface ledge (242 contour) shown on the existing conditions plan. The two nearby test pits (TPs 105 & 106) were terminated due to refusal on boulders (the extent of the boulders should be determined, by additional test pits performed with heavy excavator equipment capable of removing boulders). This is relatively large subsurface infiltration system, buried in ledge should be avoided. The proposed outlet 2" orifice invert at elevation 232.46 is a foot higher than the invert" B" elevation shown on Detail C1, sheet C-505. The proposed 2' long weir in a 4' wide concrete structure should have the top of weir wall elevation specified in the design.
10. Pond B-2C: Surface Infiltration – the proposed 12" outlet pipe length and inverts do not match with plan sheet C131. The proposed 2' long weir in a 4' wide concrete structure should have the top of weir wall elevation specified in the design. Should the proposed 1" orifice and two (2) – 4" orifice be vertical? (horizontal modeled). The proposed outlet orifices appeared to be buried in the earth berm; a connection pipe from the basin to the OCS is needed. The Board-Crested Rectangular Weir dimensions should be specified on the plan with erosion control armor. Emergency spillway sizing calculation should be provided, based on brimful conditions, (no pond storage, no outlet and capable to allow 100-year inflow passing through without overtopping the earth berm), MSH Vol. 2, Ch. 2, Pg. 91.
11. Pond BIO 1: Bioretention – The bioretention soil layer thickness (215.67 -218.00 = 2.33') does not match with the Detail A5, C-507, which shown 1' - 4". GCG does not recommend using the 35% voids in the bioretention soil layer for stormwater storage volume, since the bioretention area surface was modeled as grass cover surface in sub-catchment PR 1.4. The calculated bioretention surface area appeared to be larger than the contours surface area shown on the plan. The proposed 2' long weir in a 4' wide concrete structure should have the top of weir wall elevation specified in the design. The proposed bioretention soil/engineered soil mix depth should be between 2' to 4', and 30" minimum depth to qualify for Nitrogen removal credit. T
12. Design Points – the pre-development site runoff mainly flows toward Waverly Street (southwest direction, due to the high point in front of utility pole #20, sub-catchments EX 1.1 and EX 1.2). and majority of the remaining site runoff drains northeastward to the on-site wetland and discharges to the house 65 Waverly Street intermittent stream. There are minor runoff drains southward to East Union Street (east and west directions). Therefore, the CMP infiltration basins B-2A and B-2B overflow to the on-site wetland should be compared with the pre-development flow toward 65 Waverly Street (recommended a new Existing Hydro design point). The proposed surface infiltration and bioretention area outflows are designed to discharge to the existing catch basin on Waverly Street, which discharge northeastward to the stone box culvert. This discharges to the opposite direction of the pre-development flow pattern, drainage pattern should not be altered especially the downstream outfall discharge to a private property. Moreover, the proposed DMH 1-1 and CB 1-1 rim elevations are approximately 7" higher than the road grade, based on Google street view image, which is infeasible.
13. Operation and Maintenance Plan, the catch basin should be inspected, and inlet grate be cleaned at a minimum of 4 times per year. There is no indication of any roof drain collection system shown on the NOI package. The building (main structure and garages) roof collection system, gutter and leader or roof drain inlet should be part of the roof runoff inlet system and should be inspected and cleaned at a minimum of twice per year.
14. The proposed development generated more than 1,000 vehicle trips per day as stated in the project narrative and is a Land Uses with Higher Potential Pollutant Loads (LUHPPL), the

- proposed BMPs appeared to meet the treatment requirements for LUHPPL project. However, the bioretention area should be modified to meet the minimum engineered soil mix layer depth.
15. The bottom of the bioretention area is proposed below the ESHGW, buoyancy calculations should be provided, to ensure there will be sufficient soil weight to counter the buoyancy force.
  16. TSS Removal Calculation Worksheet – this worksheet was not intended to address 90% TSS removal requirements. The Bioretention Area requires pretreatment to achieve a total of 90% TSS removal, (Bioretention/Biodetention soil media thickness should be addressed). The proposed surface infiltration basin and CMP infiltration basin/ (Subsurface Structure). Both require pretreatments to qualify for the 80% TSS removal credit. This project is a LUHPPL and with rapid soil, the proposed deep sump hooded catch basin (25% TSS removal credit) combined with the WQU (50% TSS removal credit) do meet the 44% TSS removal pretreatment requirements. GCG recommends utilizing the US EPA (Region 1), BMP Performance Analysis (Curve or Extrapolation Tool) to address the 90% TSS removal rate and nutrient removal requirements, as recommended by MassDEP.

### **Summary**

The applicant should verify the ESHGW and boulders/ledge extent at the CMP infiltration system (B-2B) location. The overflow discharges to Waverly Street should be re-evaluated, the existing site runoff flows southwestward to the Waverly Street drainage system, but the post-development overflow drains northeastward to the stone box culvert and altering the pre-development drainage pattern. Any runoff discharge or overflow connection to a municipal drainage system should require the Ashland DPW approval. GCG recommends providing documentation that the existing drainage system conditions and sufficient capacity to handle the development flows. Runoff peak and volume should be controlled when discharges to existing drainage system to avoid downstream flooding. Provided evidence that the blasting or hammering of ledge will not impact the groundwater flow on site which could adversely impact the wetlands and Waverly Street.

If you have any questions regarding this matter, please contact our office.

Respectfully submitted,  
GCG ASSOCIATES, INC.

*Michael J. Carter*

Michael J. Carter, P.E.  
Project Manager