
October 30, 2025

Robert Lussier, PE
Director of Planning and Engineering
Bellingham Planning Board
Municipal Center
10 Mechanic Street
Bellingham, MA 02019

**Re: Zoning, General Engineering & Stormwater Design Peer Review #2
“Proposed Retail Development” 190, 194 & 198 Hartford Avenue, Bellingham, MA
CMG ID 2025-070**

Dear Mr. Lussier:

CMG is providing this letter report detailing our second zoning, general engineering and stormwater design peer review relating to the “Proposed Retail Development” Site Plan Approval and Stormwater Management Permit Applications submittal by RTE 85 Realty Corp. (Applicant) dated July 1, 2025. The project Applicant is proposing to construct a 2-story 10,000+/- SF GFA commercial building, with associated parking, access driveways, stormwater management system, Title V septic system, and associated utilities.

The project is located on three (3) adjoining parcels identified as Assessor’s Parcels 0024-0007-0000, 0024-0008-0000, and 0024-0009-0000 totaling approximately 52,579 +/- SF (1.21 +/- Acre) located on Hartford Avenue in Bellingham, MA (the “Site”). Site is located within a Residential Zoning District and the Hartford Avenue Adaptive Use Overlay District (AUOD).

CMG is in receipt of the following documents:

- Peer review response letter entitled “Response to Comments Zoning, General Engineering & Stormwater Design Peer Review #1 “Proposed Retail Development” 190, 94 & 198 Hartford Avenue, Bellingham MA” prepared by Bohler Engineering, date September 25, 2025;
- “Proposed Site Plan Documents for RTE 85 Realty Corp. Proposed Retail Development” site plan set prepared by Bohler Engineering date February 5, 2025, revise date September 25, 2025
- “Drainage Report for RTE 85 Realty Corp. Proposed Retail Development 190, 194 & 198 Hartford Avenue, Bellingham, Massachusetts” prepared by Bohler Engineering date February 5, 2025, revise date September 25, 2025
- “Vehicle Turn Movement Exhibits” Sheet EX-04, EX-05, & EX-06 prepared by Bohler Engineering, revise date September 25, 2025

- “190-198 Hartford Avenue Bellingham, MA – GIS Well Locations” Figure, date September 25, 2025.

CMG is providing this letter summarizing our review comments for the above documents to evaluate the project’s compliance with the following regulations for Planning Board consideration:

- Town of Bellingham Zoning By-Laws Chapter 240, Current Edition
- Town of Bellingham Procedural Rules, Section 7.0 Post Construction Stormwater Management Plan for New Developments and Redevelopments, Revised June 2024; and
- State of Massachusetts Stormwater Management Standards

CMG is providing the following additional technical comments and/or noting Bohler’s responses which adequately address CMG’s initial comments for Planning Board consideration:

General Site Plan Comments:

1. CMG recommends Applicant provide an Autoturn analysis truck turning figure to verify the Site is accessible via the largest anticipated emergency design vehicle and SU-30 design vehicle to demonstrate there is adequate maneuvering room for both Site driveway and dumpster access.

Bohler Response (9/25/25): Vehicle turn movement exhibits are included with the resubmission materials.

Comment Addressed

2. Applicant to provide the Planning Board with proof of Local Board of Health approval for the proposed Title septic system design prior to construction.

Bohler Response (9/25/25): Comment acknowledged.

Condition of Approval Recommendation - CMG recommends Applicant provide the Planning Board a copy of the Local Board of Health approval for the proposed Title V septic system prior to construction.

3. All snow storage areas should be clearly labelled.

Bohler Response (9/25/25): Proposed snow storage areas have been identified on the revised Site Plan.

Comment Addressed

Town of Bellingham: Chapter 240 Zoning By-Law Comments

4. 240-17 (B)(1)(b): Site plan must show names of all abutters within 300 FT of the site boundaries as determined from the latest tax records.

Bohler Response (9/25/25): Abutter information has been included in the revised Site Plan Documents.

Comment Addressed

5. 240-17 (B)(1)(b): Applicant to verify there are no wells within 300 FT of the proposed leaching field and add a note to the plan based on these findings.

Bohler Response (9/25/25): There do not appear to be any wells within 300 feet of the subject property based on available online mapping. Online GIS mapping is included in the resubmission materials for reference.

Comment Addressed

6. 240-62: Loading space area should be designated on the site plan.

Bohler Response (9/25/25): A loading area has been identified on the revised Site Plan.

Comment Addressed

7. 240-67 (A): The “Future MassDOT Expansion Exhibit” plan depicts a future sidewalk which will impact the required 15-foot street planting area if constructed.

Bohler Response (9/25/25): The project site has been designed based upon current site conditions and Town of Bellingham Zoning ByLaws. Any potential future right-of-way expansion project would need to be coordinated with MassDOT, and any potential nonconformities created would be the responsibility of MassDOT.

Comment Addressed

8. 240-67 (C): Site plan should document compliance with the 5% interior parking lot landscaping requirement.

Bohler Response (9/25/25): Parking area landscape information has been added to the Zoning Table on the revised Site Plan. The overall parking area is approximately 20,767 square feet and contains approximately 1,544 square feet of landscaped area (+/-7.4%).

Comment Addressed

9. 240-188 (E): It is not clear if the lighting design is consistent with the “residential scale” requirement and architecturally compatible with the building design. Pole light mounting heights are not clearly specified.

Bohler Response (9/25/25): Mounting heights for the proposed pole lights have been noted on the revised lighting plan. The architectural plans are conceptual in nature, and the final lighting design will be coordinated with the final architectural plans.

Condition of Approval Recommendation - CMG recommends Applicant provide the Planning Board with final lighting design prior to construction.

10. 240-188 (E): Lighting Plan depicts greater than 0.0 ft-candles of light spillover beyond the property boundary onto the adjacent residential properties at the Site’s northeast corner and eastern property line. Lighting must be designed to ensure no glare is produced on abutting residential properties within the overlay district.

Bohler Response (9/25/25): The lighting plan has been revised to show full cutoff at the residential property boundaries. Additionally, it is anticipated that the row of arborvitaes, retaining wall, and vinyl fence along the northern and eastern property boundaries will help to mitigate any potential spillover onto adjacent properties.

Comment Addressed

11. 240-188 (F): Proposed pylon sign is greater than 12 square feet and not externally illuminated. Proposed sign location should also be shown on the Site Plan.

Bohler Response (9/25/25): An approximate location for the proposed pylon sign has been identified on the revised Site Plan. The final design of the proposed pylon sign and associated illumination will be finalized once the tenants for the proposed development have been identified, and the final design will be coordinated with the Planning Board as necessary.

Condition of Approval Recommendation - Applicant to obtain a sign permit prior to installation of the proposed pylon sign.

Bellingham Planning Board Procedural Rules

Section 7: Post-Construction Stormwater Management

12. Section 7.8.1: Applicant to provide a DRAFT - EPA NPDES Stormwater Pollution Prevention Plan (SWPPP) for Planning Board review as part of the application in order to comply with the erosion and sediment control plan requirements of this section.

Bohler Response (9/25/25): The Applicant intends to prepare a SWPPP to be submitted to the Planning Board prior to construction once tenants for the proposed development have been identified.

Condition of Approval Recommendation - Applicant to provide the Planning Board with a copy of the EPA NPDES Construction General Permit SWPPP and eNOI Construction General Permit Registration for the project prior to construction.

13. Section 7.8.2 (P): Construction sequence / schedule is not provided.

Bohler Response (9/25/25): A recommended construction sequence is included on the Erosion and Sediment Control Notes and Details sheet of the Site Plan Documents.

Comment Addressed

14. Section 7.8.3 (B): Maintenance Agreements are not provided as required by this section.

Bohler Response (9/25/25): Maintenance Agreements are included in the Stormwater Operation and Maintenance Plan, and owner information and signature have been included in the agreement.

Comment Addressed

15. Section 7.8.3 (F): Annual report and certification to the Planning Board is required to be filled annually prior to February 15 and signed by the responsible party for Site stormwater management.

Bohler Response (9/25/25): Comment acknowledged

CMG Comment #2: CMG recommends a statement noting this requirement be included in the Long Term O&M Plan.

16. Section 7.8.4 (A) & (B): O&M Plan to contain notes detailing the requirements of Section 7.8.4 (A) & (B).

Bohler Response (9/25/25): The Operation and Maintenance Plan has been revised to include the notes referenced above.

Comment Addressed

17. Section 7.9.2 (A): Rational method pipe design flows for the minimum 25-year storm event are not provided.

Bohler Response (9/25/25): Pipe sizing calculations have been included in the revised Drainage Report.

Comment Addressed

18. Section 7.9.2 (H): The minimum time of concentration (Tc) to be used is five (5) minutes.

Bohler Response (9/25/25): The minimum time of concentration has been updated to 5 minutes for both the existing and proposed stormwater calculations.

Comment Addressed

General Stormwater Engineering Design Comments

19. Underground recharge system design proposes a direct overflow pipe connection to the existing catch basin located within the Route 126 right-of-way in front of the Site. This off-site pipe connection is subject to MassDOT and/or Bellingham DPW review and approval.

Bohler Response (9/25/25): Comment acknowledged. The proposed stormwater design generally mimics existing drainage conditions on site.

Condition of Approval Recommendation – Site’s stormwater system overflow pipe direct connection subject to Bellingham DPW and/or MassDOT review and approval.

20. No as-built information is shown relating to the existing catch basin or drainage system within the Route 126 right-of-way on the existing conditions plan as necessary to verify if the proposed overflow pipe connection is feasible.

Bohler Response (9/25/25): A note has been included on the revised Grading and Drainage Plan for the contractor to verify structure information of the existing catch basin prior to construction.

Condition of Approval Recommendation – Existing catch basin within Route 126 right-of-way grate rim, invert, pipe size, and materials to be verified prior to construction. Any discrepancies or modifications to the proposed project’s stormwater design are to be submitted to the Planning Board for review and may be subject to additional engineering peer review and Planning Board approval.

21. A construction detail must be provided for the outlet control structure (OCS) proposed drain manhole A-30 with interior weir and orifice specifications to match the HydroCad calculations. The correct weir and orifice information should also be labelled on the Grading and Drainage plan.

Bohler Response (9/25/25): An Outlet Control Structure detail has been included in the revised Site Plan Documents, and notes have been added accordingly to the Grading and Drainage Plan.

Comment Addressed

22. Isolator row elevated bypass manifold pipe inverts are not specified on the plans for proposed drain manholes A-50 and A-90. Bypass manifold pipe inverts should be at or above the specified design water quality volume elevation (268.10) as noted in the Stormwater Report.

Bohler Response (9/25/25): An Inlet Control Structure detail has been included in the revised plans, and invert elevations for the manifold pipes have been added to the Grading and Drainage Plan. A weir is included within the inlet control structure to direct runoff from the water quality storm event into the Isolator Row of chambers.

Comment Addressed

23. Stormwater checklist is not stamped and signed by the design engineer.

Bohler Response (9/25/25): A signed and stamped stormwater checklist has been included with the revised Drainage Report.

Comment Addressed

MassDEP Stormwater Management Standards Comments

Stormwater Standard 1: *No new stormwater conveyances (e.g. outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or water of the Commonwealth.*

24. Stormwater Report documents compliance with Standard 1.

Bohler Response (9/25/25): Comment acknowledged.

Comment Addressed

Stormwater Standard 2: *Stormwater management systems shall be designed so that post development peak discharge rates do not exceed pre-development peak discharge rates.*

25. Stormwater Report documents compliance with Standard 2. However, peak discharge rate mitigation is subject to MassDOT and/or Bellingham DPW approval for the direct connection of the overflow pipe into the existing Route 126 catch basin.

Bohler Response (9/25/25): Comment acknowledged.

Comment Addressed

Stormwater Standard 3: *Loss of annual recharge of groundwater shall be eliminated or minimized.*

26. Groundwater mounding analysis is not provided and separation to seasonal high groundwater is less than 4 FT.

Bohler Response (9/25/25): The bottom elevation of the proposed underground stormwater chambers is approximately 4 feet above the estimated seasonal high groundwater elevation. However, given that the bottom of stone elevation is less than 4 feet from the ESHGW elevation, a mounding analysis has been provided.

Comment Addressed

Stormwater Standard 4: *Stormwater management systems shall be designed to remove 80% of the average annual post construction load of Total Suspended Solids (TSS).*

27. Stormwater Report documents compliance with Standard 4.

Bohler Response (9/25/25): Comment acknowledged.

Comment Addressed

Stormwater Standard 5: *Land uses with higher potential pollutant loads (LUHPPL), source control and pollution prevention shall be implemented in accordance with the Massachusetts Stormwater Handbook to eliminate or reduce the discharge of stormwater runoff from such land uses to the maximum extent practicable.*

Not Applicable – Site is not a LUHPPL

Stormwater Standard 6: *Stormwater discharges within a Zone II or Interim Wellhead Protection Area of a public water supply, and stormwater discharges near or to any other critical area.*

Not applicable – Site does not discharge stormwater to or near a critical area.

Stormwater Standard 7: *Redevelopment Projects*

Not Applicable – Site is not a redevelopment project.

Stormwater Standard 8: *Construction period erosion and sedimentation control*

28. Stabilized construction entrance and concrete waste management areas are not labeled on “Soil Erosion and Sediment Control Plan”.

Bohler Response (9/25/25): The construction entrance and concrete waste management areas have been identified on the revised Soil Erosion and Sediment Control Plan.

Comment Addressed

29. The Site is > 1 Acre therefore an NPDES Stormwater Pollution Prevention Plan (SWPPP) in accordance with the 2022 EPA Construction General Permit (CGP) is required to be submitted prior to construction. CMG recommends the Planning Board require the Applicant to provide the DRAFT - NPDES SWPPP as part of this application (See Comment 12).

Bohler Response (9/25/25): Please see response to Comment 12 above.

Condition of Approval Recommendations – (See Comment 12)

30. CMG recommends, a copy of the FINAL – NPDES SWPPP and EPA ENOI authorization email must be provided to the Planning Board prior to the commencement of construction.

Bohler Response (9/25/25): Comment acknowledged.

Condition of Approval Recommendations – (See Comment 12)

Stormwater Standard 9: *Long term operation and maintenance plan*

31. A long-term operation and maintenance plan is provided in the submitted Stormwater Report.

In accordance with §7.8.3 of the Bellingham Planning Board’s Procedural Rules, the O & M Plan shall include the following items:

- Maintenance Agreements that specify:
 - Name, address and phone number of the Stormwater Management System Manager
 - Person responsible for financing maintenance and emergency repairs.
 - Maintenance schedule for all drainage structures
 - Signature of the Owner (s)
- Perpetual Maintenance and Enforcement – Owner is required to file an annual Operation and Maintenance Report and Certification with the Planning Board on or before February 15.

Bohler Response (9/25/25): Please see responses to Comments 14 and 15 above.

Comment Addressed

32. The O & M Plan shall include the following additional items as required by Standard 9:

- Plan showing the location of all stormwater BMPs maintenance access areas
- Operation and Maintenance Log – CMG recommend this Log also include the inspection / maintenance frequency as specified in the Massachusetts Stormwater Handbook for each Site-specific BMP to be inspected.

Bohler Response (9/25/25): An Operation and Maintenance Map has been included in the revised Drainage Report. Maintenance frequencies are included in Appendix G: Operation and Maintenance of the Drainage Report.

Comment Addressed

Stormwater Standard 10: Illicit discharges

33. An illicit discharge statement is provided in the Stormwater Report. CMG recommends the Planning Board require the Illicit Discharge Statement be signed by the “Owner” prior to construction as a condition of approval.

Bohler Response (9/25/25): Comment acknowledged.

Condition of Approval Recommendation – A signed Illicit Discharge Statement is to be provided to the Planning Board prior to construction.

If you have any questions, please contact CMG at (774) 241-0901.

Sincerely,

CMG



David T. Faist, PE
Principal Engineer