
April 18, 2023

Planning & Economic Development Board
Attn: Barbara Saint Andre
Town of Medway
155 Village Street
Medway, MA 02053

**Re: Project Description Narrative & Development Impact Statement – Major Site Plan
“ETS Equipment Rental, Inc – Proposed Commercial Building”
CMG ID 2020-149: 39 Alder Street Medway, MA**

Dear Planning & Economic Development Board,

On behalf of ETS Properties LLC, (Applicant), CMG is writing you this letter to describe the proposed work located at 39 Alder Street in Medway, MA (the “Site”). Site is currently an approximately 7.42 +/- Acre vacant undeveloped industrial property in the West Industrial (WI) zoning district. Site is also located within a Groundwater Protection Overlay District and contains both wetlands and riverfront conservation resource areas. Town water and sewer services are available within the adjacent Alder Street right of way.

Project Narrative

The project Applicant is proposing to construct a 12,054 s.f. industrial steel building in order to re-locate their existing ETS Equipment Rental, Inc. business currently operating in Hopedale, MA. The current business sells, rents, and services a variety of small earth moving equipment, boom lifts, scissor lifts, and related equipment.

The proposed building will provide facilities for ETS offices, interior display area, 2nd floor equipment parts storage, five (5) large equipment service bays, and an equipment wash bay. In addition, there will be exterior customer / employee parking, outdoor equipment storage, ETS tractor trailer delivery vehicle parking, and an equipment loading ramp.

There will be one (1) proposed 2,500-gallon capacity diesel fuel above ground storage tank (AST) and dispensing system and one (1) 1,000-gallon capacity “off-road” diesel AST at the Site. All ASTs and dispensing systems are required to meet applicable Local / State / Federal petroleum storage regulatory requirements.

The project is considered “new” development, is located in a “critical area” (i.e. Groundwater Protection District), and is considered a Land Use with High Potential Pollutant Load (LUHPPL) under the Massachusetts Stormwater Management Standards. CMG’s proposed stormwater management design will meet these standards.

ETS is proposing to have fifteen (15) employees at this location including the owner Estevao Costa. Normal business hours of operation will be Monday – Friday 7:00 AM to 5:00 PM.

The project will provide a total of twenty-four (24) motor vehicle parking spaces. Two (2) of these parking spaces will include an electric vehicle charging station and one (1) will be ADA / AAB accessible. ETS’s specific use is not included in Table 3; Schedule of Off-Street Parking Requirements. CMG believes the most nearly comparable use is as follows: combination of both Office (1 Space / 300 s.f.) and Warehouse / Distribution facility (1 space / 2 employees largest shift + 1 space / 1,000 s.f.). ETS estimates there will be a total of five (5) employees within the equipment service area during normal business hours and ETS only performs maintenance on their own equipment.

CMG does not anticipate the need for pedestrian access to the Site due to its location within an industrial park. However, there is an existing sidewalk located on the opposite side of Alder Street. In addition, a bicycle rack with a minimum capacity for two (2) bicycles will be installed near the building’s entrance in accordance with zoning requirement of 1 bicycle / 20 spaces.

CMG estimates total proposed impervious coverage = 62,312 +/- s.f. (1.43 +/- Acres) which is approximately 19 % of the total site area (7.42 +/- Acres). The Site is within a Groundwater Protection Overlay District and will require a Special Permit as the project will render impervious greater than 15% of the lot. The project will provide an underground drywell system with pre-treatment for the recharge of stormwater from all impervious areas. Additionally, stormwater Hydro-filter water quality units will be provided for the building’s metal roof due to protect and prevent contamination of the existing groundwater quality.

Proposed project on-site mitigation measures include the following given the Site’s location within additional Medway Conservation Commission regulated resource areas and buffer zones and in accordance with Massachusetts Stormwater Management Standards:

- Entire Site’s stormwater runoff will be recharged within underground chambers with no surface stormwater basins;
- HydroStorm water quality units will provide both Total Suspended Solids and oil/ grease removal
- HydroFilter water quality units will provide building metal roof runoff with enhance TSS and metals treatment due to the Site’s location within a Groundwater Protection District;
- Project will provide a limited area of undisturbed wooded area at the front of the Site; and
- Wetland Buffer & Riverfront Habitat Enhancement & Plantings (To be determined in conjunction with the Conservation Commission NOI permit process).

Applicant anticipates starting construction during the Fall of 2023 with completion sometime during Spring 2024 dependent on the successful completion of Local/ State/ Federal land use permitting.

Town of Medway Groundwater Projection District (Zoning Section 5.6.3)

Fuel Storage in a Zone II Aquifer:

Applicant is proposing two (2) above ground diesel fuel storage tanks (ASTs) for use with re-fueling ETS vehicles and construction equipment and machinery. The proposed ASTs will be double-walled construction designed to contain 100% of the tank contents. Each AST will be set on a concrete pad and surrounded by a concrete containment dike capable of containing 110% of the volume of each tank’s storage capacity.

The vehicle and equipment re-fueling dispensers and areas will be designed in accordance with the requirements of 527 CMR 1.00, NFPA 1, NFPA 30, NFPA 30a, and 40 CFR Part 112 (SPCC Regulations).

According to 310 CMR 22.21(2)(b)5, wellhead protection zoning and non-zoning controls submitted to the Department in accordance with 310 CMR 22.21(1), shall collectively prohibit the siting of liquid petroleum products within the Zone II, or Zone III unless such storage is:

- 1) above ground level;
- 2) on an impervious surface; and
- 3) either in containers or ASTs within a building, or outdoors in covered containers or ASTs in an area that has a containment system designed and operated to hold either 10% of the total possible storage capacity of all containers, or 110% of the largest container’s storage capacity, whichever is greater.

It is important to note 310 CMR 22.21(2)(a)5 prohibits petroleum storage in the Zone II and III only for bulk stations, terminals, and those facilities with specific SIC Codes associated with bulk stations and terminals. The proposed AST system at ETS Equipment Rental, Inc. is a refueling facility for ETS vehicles and equipment only, and not a bulk station or terminal.

Special Permit to render impervious more than 15% of a lot:

CMG estimates total proposed impervious coverage = 62,312 +/- s.f. (1.43 +/- Acres) which is approximately 19 % of the total site area (7.42 +/- Acres). The project will provide an underground drywell system with pre-treatment for the recharge of stormwater from all impervious areas. Additionally, stormwater Hydro-filter water quality units will be provided for the building’s metal roof due to protect and prevent contamination of the existing groundwater quality.

Existing and Proposed Easements

There is an existing 35’ x 125’ “drainage easement” at the front of the Site for an existing Town of Medway stormwater basin associated with Alder Street. This easement appears only to encompass a portion of the existing storm basin based on the 1999 plan on file with the Norfolk Registry of Deeds. A portion of the Town’s stormwater basin forebay is located outside of the legal easement boundary and may need to be addressed as part of the PEDB permitting process.

The Applicant is also proposing a grading easement on the neighboring property currently owned by the N/F Frasca. CMG understand the two parties have met and informally agreed to explore the grading easement. The Applicant will provide more detailed easement description and/or plan as part of the permitting process.

Anticipated Local / State / Federal Permits:

- Medway Planning & Economic Development Board (PEDB) Site Plan Approval
- Medway PEDB Special Permit Approval for Groundwater Protection District & Construction Equipment / Machinery sales, leasing or rentals
- Medway Design Review Committee
- Medway Conservation Commission Notice of Intent (NOI)
- Medway Land Disturbance Permit
- Medway Building Permit
- EPA NPDES Construction General Permit
- 40 CFR Part 112 EPA Spill Prevention Control & Countermeasures (SPCC) Plan

Development Impact Statement

1) Traffic Impact Assessment:

- a. Site is located near the end of Alder Street within the industrial park in an area with minimal existing traffic. ETS uses its own four (4) delivery vehicles to transport equipment to various job Sites throughout Massachusetts on a daily basis and will have an estimated 15 employees on-site during normal business hours Monday – Friday 7:00 AM – 5:00 PM.
- b. Applicant does not believe the proposed use will generate more than 100 trips / day to or from the Site on the adjacent roadway during the peak hour based on his existing use. Therefore, Applicant is requesting the PEDB not require a full “traffic impact assessment”.

2) Environmental Impact Assessment:

- a. The below Environmental Impact Assessment is required as the proposed project is subject to the Town’s Stormwater and Land Disturbance Bylaw.
- b. Environmental Impact Assessment Narrative:
 1. *Air and water quality:* All equipment maintenance is proposed to be indoors within the proposed building. ETS construction equipment and vehicles will be maintained on a routine basis and kept in good condition.

2. *Surface water and groundwater:* Exterior parking and storage areas are designed to provide stormwater treatments and routine inspections to prevent pollution of surrounding air and water.
3. *Flooding potential;* Site is not within a mapped FEMA flood zone.
4. *Increases in impervious surfaces;* All stormwater runoff from Site impervious areas, including the building metal roof, will be treated and recharged to site groundwater in accordance with MA-DEP Stormwater Management Standards.
5. *Potential for erosion and proposed or existing control measures:* “Erosion and Sediment Control Plans and Details” Sheet C-4.0 & C-4.1 are provided within the Site Plan Set. Site is also subject to compliance with the EPA NPDES Construction General Permit as it will disturb greater than 1 Acre of land.
6. *Noise levels:* Site is located within an Industrial Park and in close proximity to nearby State Highway Route 495. Noise levels are expected to be similar to the surrounding industrial uses.
7. *Harmful or noxious emissions:* Applicant does not anticipate the proposed indoor construction equipment service / maintenance will result in any harmful or noxious emissions.
8. *Damage or threat to wetlands and flood plain:* The proposed project is subject to both MassDEP Wetlands Protection Act and the Town of Medway Conservation Commission Rules and Regulations. The proposed Site design is required to prevent any damage to wetlands and flood plain is subject to both MassDEP and Conservation Commission review and approvals.
9. *Smoke:* The proposed use is not anticipated to produce any smoke.
10. *Odors:* The proposed use is not anticipated to produce any harmful or noxious odors.
11. *Vibration:* The proposed use is not anticipated to produce any harmful or noxious odors.
12. *Waste disposal:* All waste will be stored, managed, and disposed of in accordance with applicable State and Federal regulations.
13. *Off-site environmental drainage impacts:* The proposed project is designed to meet the Land Use with High Potential Pollutant Load (LUHPPL) Standards in accordance with the Massachusetts Stormwater Management Policy. The proposed project will not increase off-site stormwater runoff in comparison with pre-development conditions and provide adequate treatment in accordance with LUHPPL standards.

- c. The project does not exceed any of the Massachusetts Environmental Policy Act (MEPA) *301 CMR Section 11.03 Review Thresholds* and therefore is not required to file an Environmental Notification Form (ENF) and/or Environmental Impact Report (EIR).
- 3) Neighborhood Impact Assessment: Project is located within the West Industrial zoning district and is surrounded by adjacent industrial properties. The Town of Medway Approved at 11-15-21 Town Meeting to amend the Zoning By-Law to include ETS’s proposed use of “Construction Equipment/Machinery Sales, Leasing and Rentals within the WI Zoning district.
- 4) Parking Impact Assessment: Not Required -Project proposes less than thirty parking spaces.

CMG is enclosing for your review the “ETS Equipment Rental Inc. Proposed Commercial Building” Site Plan Set and Stormwater Report, date 4/12/23 and associated project submittals detailing the project.

Please contact me at (774) 241-0901 with any questions or if you need more information. Thank you.

Sincerely,
CMG



David T. Faist, P.E.
Principal Civil Engineer

cc. Estevao Costa, ETS Properties, LLC