



DEPARTMENT OF PUBLIC WORKS
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BRAD STONE
STORMWATER MANAGER
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October 15, 2025

Alison Manugian
Assistant Town Manager / Community Development Director
62 Arlington Street
Dracut, MA 01826

Re: Murphy's Farm Comprehensive Permit Application

Dear Alison,

Per request, I am providing comments regarding the proposed Murphy's Farm project. The following project documents were used in part for my review:

- Peer Review Comment Form prepared by Green, A Lochner Company (Updated 9/10/2025)
- Drainage Report prepared by Civil Design Consultants, Inc. (Revised September 15, 2025)
- Comprehensive Permit Site Plan for Murphy's Farm (19 Sheets) prepared by Civil Design Consultants, Inc. (Revised 10/2/25)
- Outline of Waiver Requests Letter prepared by Johnson & Borenstein, LLC (Revised September 16, 2025)

The project has been peer reviewed for the Town, including the stormwater management system components. As such I have not done a full independent review of the design documents and began my review by looking at comments already provided to the Town, as well as the other documents referenced above. I offer the following comments:

1. Stormwater basin cross section details need to be provided for clarity, regardless of subdivision requirements (Peer Review Comment #54A). These need to be specific to each basin rather than a typical detail. In my experience the absence of these often results in improper construction of basins as well.
2. A design infiltration rate of 12.34 in/hr is proposed at IB-1 (Peer Review Comment #155), based on in-situ testing. In-situ testing needs to be conducted at the receiving

layer (Stormwater Handbook Vol. 3), and the introduction of loam to the basin bottom, now the receiving layer will not allow the basin to achieve those infiltration results as that material will be much more restrictive than the parent C Horizon soils here. The infiltration rate needs to be adjusted appropriately or an alternative bottom of basin material proposed, such as a sand media layer.

3. Inlet protection within Poppy Lane (Plan Sheet C-6) via catch basin filter bags or similar often cause more problems than they prevent due to lack of maintenance and are unlikely to receive approval from the DPW for their use there. Additionally silt-laden stormwater runoff or the discharge of other pollutants from the site entering Town roadways is prohibited, as it is a violation of the Town's Illicit Discharge By-Law (Chapter 25).
4. It appears that the erosion control barrier (ECB) referenced for the perimeter of the site (Plan Sheets C-6 and D-2) are the biodegradable coir logs, as I did not see reference to any other suitable barrier. Coir logs are not standard ECBs as they are expensive, heavy and cumbersome to install; and I have not seen them used for this type of development. They're more typically used in shoreline restoration projects. They would perform adequately for erosion control provided crews take the time to install them correctly, but I would suggest the applicant revisit that proposal and submit revised plans if need be.
5. I could not readily find a reference to foundation drains within the plan set. Any drains necessary needs to be prohibited from connecting to the stormwater system.
6. There's only one waiver request noted in the letter from Johnson & Borenstein, LLC relative to the Town's stormwater standards. Presumably the intent is to meet all other performance standards within the Stormwater Erosion Control Bylaw, and the Stormwater Management Rules and Regulations. Requirements of Sections 9 through 13 of the Rules and Regulations, if not provided now, should be made as a condition of approval. Many of these are necessary for the Town to remain in compliance with EPA's NPDES program requirements.

Please let me know if you have any questions or would like additional information. Thank you.

Sincerely,



Brad Stone | Stormwater Manager

cc: Ed Patenaude – Public Works Director