

January 3, 2024

Mr. John Lee, Chairman 135 School Street Walpole, MA 02081 United States

Re: Comment Letter 2

Residences at Darwin Common Comprehensive Permit (40B) Peer Review

Walpole, Massachusetts

Dear Mr. Chairman:

The following is an update to our October 8, 2023 Comment Letter adjusting prior comments in consideration of supplemental material provided by the applicant including their responses to comments, revised site plans, supporting documentation, and clarifying testimony presented at public hearing.

While many of our design-related concerns have been addressed, the Project has yet to provide any documentation addressing it's proposed impervious coverage substantially in excess of that allowed as-of-right within the Water Resource Protection Overlay District. To date we have seen no submittal material addressing that fundamental concern despite the Project proposing an impervious coverage percentage more than 3X the 15% allowed. Despite this concern, we found the design changes very responsive to our prior comments and appreciate the thoughtfulness and effort of the design team. We have not received an updated Stormwater Report but do not expect it will generate comments beyond those already provided and updated in this letter.

Our updates are noted below in "black" with the heading "Jan 3, 2024 Update:" Text shown in gray represents information contained in previous correspondence while new information is shown in black text. Comments noted as "Comment Resolved" are considered addressed and will be indicated as resolved in future correspondence. Comment history will be removed but numbering will be maintained.

New comments generated on the revised submittals are included at the end under the heading **January 3**, **2024 Update**.

Groundwater Protections

1. It's important to note that the Project will be one of, if not the, closest developed property to a Walpole drinking water supply well with a proposed density that presents a greater risk than zoning compliant developments while severely limiting available options for protection of the water supply. As such, we recommend the Board require the applicant to clearly demonstrate and document its compliance with Massachusetts drinking water supply regulations and applicable local regulations and/or bylaws including providing the information required to support granting of a special permit per Section 12 of the Walpole Zoning Bylaw.

Jan 3, 2024 Update: No additional documentation has been provided.

2. There appears to be some question as to if portions of the Project lie within the Zone 1 Wellhead Protection Area in which development is not allowed to protect drinking water supplies. Given its criticality we recommend the applicant be required to clearly document how the limit of the Zone 1 boundary shown on the plans was determined including locating the well(s) from which it is derived.

- <u>Jan 3, 2024 Update</u>: Response indicates an on the ground survey was performed that confirmed the subject property is more than 400 feet for the Washington 5 wellhead however no additional documentation has been provided on the plans or in any other form supporting the statement. We recommend the surveyed boundary be shown on the plan and certified by the design engineer or other equally reliable documentation be provided.
- 3. The Project is clearly within a Zone II Wellhead Protection area and as such "must comply with local source water protection regulation ordinances, bylaw, and regulations" to comply with Standard 6 of the Massachusetts Stormwater Standards. The Project is wholly located within the Water Resource Protection Overlay District (WRPOD) and is thereby subject to requirements of Section 12 of the Zoning Bylaw which regulates activities within the WRPOD as a means of protecting its water sources. Given the Project density exceeds that allowed under Section 12 3. (2) (d) and information listed under Section 12 4. A. has not been provided, in our opinion, it does <u>not</u> comply with Massachusetts Stormwater Standard 6.

<u>Jan 3, 2024 Update</u>: Neither justification required under Section 12-3.C (4) or an updated Stormwater Management Report has been provided to date.

Site Plans

Cover Sheet

- 4. Remove redundant Zoning Schedule or clarify its intended purpose.
 - Jan 3, 2024 Update: Plans revised as requested. Comment Resolved.
- 5. Zoning Schedule indicates a 40% allowed impervious lot coverage which conflicts with the maximum coverage allowed as-of-right per Section 12. In our opinion indicating 40% as the allowed amount in the table is misleading and should be noted as 15% in the table with a corresponding note indicating a higher amount could be allowed with Special Permit.
 - Jan 3, 2024 Update: Cover sheet still conflates "allowed" with "allowed by special permit" and does not clearly acknowledge that 15% is the maximum allowed impervious coverage. We still recommend the table be modified to clearly indicate a maximum allowed lot impervious coverage of 15%. The 40% maximum coverage currently noted on the table is only allowed by Special Permit which requires substantial justification none of which has been provided to date.
- 6. Clarify if the "Total Area of Roads and Driveways" includes sidewalks and curb.
 - Jan 3, 2024 Update: Requested clarification provided. Comment Resolved.

Existing Conditions Plan

- 7. Note the vertical reference datum used.
 - Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.
- 8. Clarify how the WRPOD Zone Limits noted on the plan were determined and note the source on the
 - Jan 3, 2024 Update: Comment subsumed in prior Comment 2. Comment Resolved.

- 9. Explain the solid oval line shown along the west edge of the existing stormwater basin. If it is intended to note the 225 contour, then please show how the adjacent 225 through-contour traverses the area so the basin spillover geometry is more clearly represented.
 - Jan 3, 2024 Update: Clarification provided, and plans revised accordingly. Comment Resolved.
- 10. Please provide the license number of the Massachusetts Licensed Soil Evaluator certifying the test pit information.
 - Jan 3, 2024 Update: License No. provided as requested. Comment Resolved.

Site Plan

- 11. Note the proposed curb material on site and if the intent is to have "Cape Cod Berm" throughout the site as suggested by the plan and details we suggest only using it along the street and not extending to driveways as a means of reducing impervious area.
 - Jan 3, 2024 Update: All curb, except those sections located within the public way, has been removed. While we support the elimination of curb around driveways elimination of curb at the edge of travel way is a problem as it (1) channelizes roadway runoff at the pavement/soil joint which will tend to erode particularly on the steeper sections of road at the entry and (2) provide no vertical differentiation between travel way and sidewalk. Recommend application revise curb or grading accordingly. If curb is added, be sure to adjust drainage calculations accordingly to include added impervious area.
- 12. Extend granite curb to the limits of the public right-of-way so that only granite is used within the Darwin Lane layout.
 - Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.
- 13. Show proposed light fixtures on the Site Plan.
 - Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.
- 14. We recommend the mailbox and associated parking area be moved outside of the Darwin Lane layout as they are Project elements and not part of the public way.
 - Jan 3, 2024 Update: Mailboxes have been relocated as requested. Comment Resolved.
- 15. The snow storage areas shown are inconsequential in comparison to the area required to be served and conflicts with other site plan considerations such as maintaining intersection sight lines, proposed landscaping, and emergency access. Recommend the Board request the applicant to provide a calculation demonstrating the depth of snowfall accommodated by the areas shown. Please note, the viability of the storage areas shown is limited due to proposed tree locations limiting access.
 - <u>Jan 3, 2024 Update</u>: Plans revised to show more reasonable snow storage locations however the areas provided are small and no calculation has been provided demonstrating efficacy (contrary to response). It remains our opinion that areas designated for snow storage are inadequate to accommodate large or successive snow event given the project density and the large area occupied by roads and driveways that must be kept clear of snow for emergency access.
- 16. Describe how the "Proposed Recreation Area" is intended to serve the purpose noted.

- <u>Jan 3, 2024 Update</u>: "Recreation Area" noted was removed from the Plans and no other recreation or similar public use area is provided. Given steep slopes occupy most other open area there is effectively no useable lawn area on the site which in our opinion falls short of basic expectations.
- 17. The on-site sidewalk terminates at the "T" intersection at an accessible ramp with no opposite landing area. We recommend the Board consider requiring the applicant to extend the site sidewalk to at least the visitor parking areas including appropriate landings for accessible travel. Additionally, any driveway should be at least 20 feet deep as measured from the garage door to the nearest of either the sidewalk or edge of travel way.
 - Jan 3, 2024 Update: Visitor parking area has been eliminated but plans have been revised to address comment by providing a viable terminus for accessible route and driveways have been labeled confirming at least 20' depth. The comment indicates "The sidewalk will be an extension of the roadway cross section" rather than a true sidewalk that provides reasonable separation and refuge from vehicles for pedestrians. We do not recommend the Board approve the proposed pedestrian accommodation as described but instead require the applicant to provide a sidewalk with proper separation from the travel way. **Comment Resolved.**
- 18. The proposed 82' cul-de-sac radius is substantially smaller than the 104' radius required by the Walpole Subdivision Regulations which limits the size of vehicle that can navigate the turn without having to back up. We recommend the Board request the Applicant to provide a figure showing the largest vehicle accommodated by the geometry proposed.
 - <u>Jan 3, 2024 Update</u>: The Plans still show only an 82' diameter paved turnaround which is 6' smaller than otherwise required. Fire truck turning figures provided by the applicant show the fire apparatus bumper overhanging the roadway edge in several locations and very close to a proposed street tree, streetlight, and fire hydrant. Recommend the Board require the applicant to obtain a specific approval of the proposed cul-de-sac geometry and truck circulation plan from the Walpole Fire Chief or otherwise provide the 88' minimum required.

Grading and Drainage Plan

- 19. Provide a vertical datum reference and show hydrant on which benchmark is noted.
 - Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.
- 20. Provide a summary of proposed cuts and fills and an estimate of the total volume of fill material required.
 - <u>Jan 3, 2024 Update</u>: Figure provided indicates a net site fill of approximately 4,600 cy which equates to roughly 230 tractor trailer loads of fill which could overburden Darwin Lane. During the site walk conducted with the applicant we suggested they consider accessing the subject property from the adjacent town property to the south as a means of minimizing impacts to Darwin Lane residents. This comment will be added under the new comments provided at the end. **Comment Resolved.**
- 21. Plans shows several critical areas with a 2:1 slope which require special attention during construction to ensure adequate stabilization and long-term viability of what are, and will continue to be, surfaces prone to damage from erosion. Given the proximity of these slopes to the property line and immediately upgradient from the public water supply, we recommend the Board require the applicant to provide documentation from a Massachusetts licensed geotechnical engineer certifying the stability and long-term viability of the slopes shown and any required construction details and post installation

conditions required to maintain the slopes or otherwise modify the design to incorporate slopes no steeper than 3:1.

- <u>Jan 3, 2024 Update</u>: Contrary to response provided we saw no note or detail addressing slope stabilization requirements for the 2:1 slopes. Recommend a detail be provided showing how these areas will be constructed and maintained in a manner that ensures stability is maintained.
- 22. Show proposed light fixtures on the Grading and Drainage Plan for coordination purposes.
 - Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.
- 23. Grading plan suggests overland flow will be redirected toward the Parlon and Griffin properties and at least partially blocked (Elevation 220 and lower). Recommend the grading plan be adjusted to maintain all flow patterns at the boundary of the subject parcel.
 - Jan 3, 2024 Update: Plans revised to address conditions noted. Comment Resolved.
- 24. Top of wall elevations and contours behind units 23-28 suggest flow from 31 Darwin Lane will no longer be allowed to flow south in an uninterrupted manner s the pathway will now be blocked by a significant fill section and a wall of homes. Additionally, a large area of runoff will be directed from the site toward the boundary with 31 Darwin. We recommend the Board require the applicant to provide analysis demonstrating drainage from 31 Darwin Lane will not be impacted by the proposed project.
 - Jan 3, 2024 Update: Plans revised to address conditions noted. Comment Resolved.
- 25. The Plan shows a substantial shift in discharge location from existing conditions with no slope protection beyond a 10-foot rip-rap apron at the outlet. We recommend the existing discharge location be maintained to avoid potential offsite erosion that may occur from the change in flow pattern and intensity.
 - Jan 3, 2024 Update: Plans revised to address conditions noted. Comment Resolved.
- 26. It appears CB-7 is intended to capture all overland flow entering the site from the north and direct it to the on-site infiltration system. Given the Project has no control over the off-site areas we recommend all off-site runoff be redirected around proposed infiltration systems. It also appears flow considered at CB-7 is significantly underestimated and should be addressed as part of any revision. This apparent underestimation is addressed later in this letter.
 - Jan 3, 2024 Update: Plans revised to address conditions noted. Comment Resolved.
- 27. Given the proximity to the public water supply we recommend the applicant consider a more reliable and robust method of pretreatment prior to discharge than currently provided. In our opinion incorporating an isolator row (Stormtech) or similar pretreatment measure would enhance system performance and reliability.
 - <u>Jan 3, 2024 Update</u>: Plans revised to show isolator areas within the infiltration system however no detail is provided and no isolator protection is provided for connections from CB7 of CB8. Recommend Board request applicant to provide detail on isolator row construction including maintenance access as well as bypass piping and weir elevations.

- 28. Given the size and criticality of the infiltration system, we recommend the plans clearly indicate where inspection ports will be provided.
 - <u>Jan 3, 2024 Update</u>: Plans revised to show information requested. Request all manhole locations be added to the Layout Plan to confirm no conflicts with other proposed site improvements.
- 29. The proposed infiltration trench does not appear to comply with design or construction requirements of the Stormwater Handbook for Infiltration Trenches. The following should be addressed:
 - Describe how design meets soil testing requirements are met
 - Bottom of trench appears to be within 4' of estimated seasonal high groundwater (ESHGW) yet no mounding has been provided as required.
 - Confirm infiltration rates used are applied as required by the Handbook (not variable). Modeling results suggest a variable infiltration rate is being applied.
 - The infiltration trench is more than 14' deep which makes it effectively impossible to inspect, clean or repair and is fundamentally different than the example design provided in the Handbook.
 - Design guidance specifically precludes the use of perforated underdrains in the manner shown on the detail
 - The proposed location beneath a 10-foot fill makes it impossible to comply with construction criteria noted in the Handbook.

<u>Jan 3, 2024 Update</u>: Plans revised to address conditions noted by revising the proposed design to include an infiltration trench at the base of the slope and access path. However, infiltration trench does not meet 10' minimum setback for property line nor does the detail show observation well or sand filter layers as required. Recommend applicant revise pans accordingly.

Utilities Plan

- 30. Several water services as well as the proposed sewer force main are shown routed through the infiltration system where inadequate cover exists above the system to protect either from freezing. Please Show the proposed drainage system and light fixtures on the Utility Plan to confirm coordination of underground utilities in an extremely congested environment.
 - Jan 3, 2024 Update: Plans revised to address conditions noted. Comment Resolved.
- 31. The water services to units 1-5 all cross the sewer force main. Suggest the water main and force main be swapped to avoid the need for water to cross sewer. <u>Jan 3, 2024 Update</u>: Plans revised to address conditions noted. **Comment Resolved.**
- 32. The plans show a 6" sewer service to remain but the service is not shown on the existing conditions plan. Please clarify what, if any, sewer infrastructure exists serving the project site and how it will be used, replaced, or removed. The operability of any infrastructure proposed to remain should be verified and the proposed force main should transition to gravity prior to entering the Darwin Lane layout.
 - Jan 3, 2024 Update: Plans revised as requested. Comment Resolved.
- 33. Please describe where sewer pump station controls and alarms will be located and who will be responsible for responding to alarms and maintaining the system.

- Jan 3, 2024 Update: Pending direction from Sewer and Water Department. Status unchanged.
- 34. Please provide any testing that's been done confirming the adequacy of the existing water supply to serve the project without impacting existing users.
 - <u>Jan 3, 2024 Update</u>: Hydrant Flow Test results provided showing residual pressure of 35 psi suggesting existing water pressure is at the lower end of the permissible range but above minimum requirements. Given the Project proposes an internal water loop we do not expect significant changes in service pressures. **Comment Resolved.**
- 35. Confirm acceptability of proposed hydrant locations with Fire Department.
 - <u>Jan 3, 2024 Update</u>: Confirmation not provided but reasonable to include as a condition of approval instead.

Details

- 36. It's unclear how the pump station float levels were set or how the sizing of the wet well volume correlates to the anticipated demand. Please provide the design basis used for sizing the pump station and its wet well volumes including any a description of provisions for emergency power. As shown the wet well volume between "pump on" and "pump off" is only 21 gallons which seems very small for a station serving a nearly 10,000 gpd design load.
 - Jan 3, 2024 Update: Pending direction from Sewer and Water Department. Status unchanged.
- 37. The Allen Block Retaining wall detail indicates height is limited to 4' yet wall heights are shown as high as 6' on the grading and drainage plan. Please provide the detail anticipated for walls taller than 4'.
 - Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.
- 38. The Infiltration Trench Detail poses several fundamental issues that in our opinion make the design unsuitable to the application. See listing of concerns noted under prior comment.
 - <u>Jan 3, 2024 Update</u>: Trench no longer proposed at problem location. Outstanding concerns carried forward under prior comment 29. **Comment Resolved.**
- 39. The design of the Underground Infiltration System will submerge, and at times backflow through the critical water quality structures which will have trapped contaminants and sediments. We do not recommend routing flow in reverse through the water quality units. If the condition remains we recommend the Board require the applicant to obtain a certification from the manufacturer that the proposed design is acceptable and included in its performance analysis.
 - <u>Jan 3, 2024 Update</u>: Plans revised to address comment but separating inflow from discharge. **Comment Resolved.**

Construction Period Plan

40. It appears that the project is located outside Wetlands Protection Regulation jurisdiction and is not subject to review by the Walpole Conservation Commission. The Project will disturb more than an acre and thereby requires coverage under a NPDES Construction General Permit. We recommend a note requiring compliance NPDES permit conditions and associated Storm Water Pollution

Prevention Plan be added to the plan and that proof of coverage be provided to the Board before commencing any land clearing activities.

- <u>Jan 3, 2024 Update</u>: Plans revised to show information requested. We recommend any decision approving the Comprehensive Permit include a <u>condition requiring the Project to provide proof of NPDES Permit coverage and a copy of the SWPPP prior to the start of construction</u>. **Comment Resolved.**
- 41. Temporary sedimentation areas are not shown nor are any details provided. Limitations on placement of such areas in location where infiltration is proposed leave few if any available options and as such should be clearly shown on the plan along with an indication of the area intended to be directed to them and its flow path.
 - Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.
- 42. No information is provided describing the proposed methods for installing fill material and preventing erosion of resulting slopes. At a minimum the plans should describe the fill sequence and provide a detail for slope stabilization. Simply loaming and seeding (with or without "straw guard") a 2:1 slope will not protect it from erosion and a 12' silt sock is unlikely to provide suitable protection for the downgradient property.
 - <u>Jan 3, 2024 Update</u>: Found no information addressing 2:1 slopes. "Straw Guard" noted on the plans does not provide adequate protection or stabilization of 2:1 slopes.
- 43. Suggest the applicant provide a concrete washout detail and designate its location on the plan.
 - Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.

Landscape Plan

- 44. Proposed tree locations appear to conflict with areas designated for snow storage. Please explain how proposed street trees are expected to survive in areas designated for snow storage.
 - Jan 3, 2024 Update: Plans revised to address comment noted. Comment Resolved.
- 45. Tree locations also appear to conflict with drain and sewer infrastructure. Most notably at the location of the proposed sewer pump station.
 - Jan 3, 2024 Update: Plans revised to address comment noted. Comment Resolved.

Lighting Plan

- 46. The plan indicates a modest amount of light from the project will spill partially onto abutting property at 31 Darwin Lane. Given the proximity of the proposed sidewalk to #31 it will be difficult to provide adequate lighting of the sidewalk without such spill onto #31.
 - <u>Jan 3, 2024 Update</u>: Response indicates adjustments will be made but we have not received any revised photometric plans.
- 47. The plan does not indicate any fixture type or mounting height. Please provide.
 - <u>Jan 3, 2024 Update</u>: Plans revised to show information requested indicating a fixture height of 22.5' which seems high considering the suburban setting and number of proposed poles (12). We recommend the Board and the Applicant discuss expectations regarding acceptable/preferred light

levels as what is currently shown seems excessive in contrast to the two light poles on Darwin Lane (at intersection with Queens Court and at end of cul-de-sac) and considering the amount of ambient light likely generated from the units.

Fire Truck Circulation Plan

48. Show proposed trees and light poles on plan.

Jan 3, 2024 Update: Plans revised to show information requested. Comment Resolved.

49. Plan does not show or describe the vehicle used or its assumed performance characteristics. Please provide the model of apparatus used in the analysis and its operational metrics (i.e., Wheelbase, bumper overhang, turning radius etc.)

Jan 3, 2024 Update: Vehicle information still not provided.

50. Plans show vehicle bumper is required to travel outside the travel way and through areas designated for snow storage and street trees. This is likely due to the 82' radius used instead of the 104' radius required in the Subdivision Regulations. Recommend all trees and snow storage be kept at least 2 feet from the intended path of the fire apparatus and swept path of any protruding feature (bumper, ladder, bucket etc.).

<u>Jan 3, 2024 Update</u>: Plans revised to barely accommodate anticipated swept pat of fire truck bumper. Recommend Applicant be required to obtain Fire Department approval as described in Comment 18. This comment will be consolidated with Comment 18 in future reviews. **Comment Consolidated in Prior Comment.**

51. The proposed circulation should be reviewed and approved by the Walpole Fire Department.

<u>Jan 3, 2024 Update</u>: This comment will be consolidated with Comment 18 in future reviews. **Comment Consolidated in Prior Comment.**

Stormwater Report

52. The Project proposes to route all the flow coming from the existing detention basin behind 27 Darwin Lane and the surrounding area through a single catch basin grate and into the on-site infiltration system. As noted in prior comment, we do not recommend connecting any offsite flow into the infiltration system. The report suggests very little flow will discharge from the basin but bases this on what appear to be flawed analysis. In our opinion the model overestimates the amount of recharge provided by the existing basin. For example, the analysis suggests the existing basin has more than 5X the infiltrating rate of the proposed basin during the 10-year storm and nearly 10X the rate during the 25-yr storm despite it being less than 1/3 the size. In our opinion the analysis used to estimate offsite flow to the on-site infiltration system is materially flawed and under no circumstances should the flow be routed to the on-site infiltration system. Instead, off-site flow should be routed around the proposed stormwater management system and that routing should be sized based on guidelines provided in the Stormwater Handbook.

<u>Jan 3, 2024 Update</u>: Plans revised to address concern, but revised stormwater report has not been provided.

53. The Infiltration Trench analysis appears to apply a variable exfiltration rate which is not allowed per guidance of the Stormwater Handbook. Notwithstanding our concerns expressed about design suitability, we recommend the analysis be configured to apply a static exfiltration rate.

Jan 3, 2024 Update: Revised stormwater report has not been provided.

54. The Pre-Development Watershed Plan accurately depicts the existing flow path and discharge location which should be maintained under post-development conditions. The current design shows a significant shift in the discharge location and very little offset distance to the property line which may result in off-site erosion issues due to changes in off-stie runoff patterns.

<u>Jan 3, 2024 Update</u>: Plans revised to address discharge point however revised stormwater report has not been provided.

55. The Post-Development Watershed Plan and analysis appears to suggest all roof runoff from the Units 23-28 will be directed to the drain at the front of the units and directly to the infiltration system. This ignores the practical reality that rear portions of the roof slope toward the rear of the lot. Runoff from the rear facing section of roof should be routed through the swale and CB-7 otherwise documentation should be provided demonstrating the gutters are sized properly based on the pitch of the roof to accommodate the storm events analyzed and are routed to the front of the building.

<u>Jan 3, 2024 Update</u>: Plans revised to show information requested. However revised stormwater report has not been provided.

56. Provide calculations or specifications demonstrating the proposed stormwater management system meets the 44% TSS removal requirement prior to infiltration. Include performance information for the proposed water quality unit.

Jan 3, 2024 Update: Revised stormwater report has not been provided.

57. The Construction Period Pollution Plan (sic.) which presumably should read "Construction Period Pollution Prevention Plan" assumes site capacity for construction activity that may not exist. For example, item 6 indicates top and subsoil shall be stockpiled without realistically proposing a location where that can be done while accommodating the sequence of construction that follows. Nor does the plan provide any practical option for temporary sedimentation basins given the volume of fill proposed, resulting steep slopes and the proposed location and depth of the trench drain. Given the combination of factors including a relatively small site, very dense development, fill volume, required infiltration area protection, steep slopes, location within Zone II and lack of buffer to downgradient Zone I, we recommend the Board require the applicant to provide a more thorough and readily achievable construction phasing and execution plan addressing all activities that could negatively impact the downgradient watershed protection zones.

Jan 3, 2024 Update: Revised Pollution Prevention Plans have not been provided.

- 58. Walls and Slopes should be included in the list of stormwater system components and included in the inspection and maintenance section of the Operation and Maintenance PlanStorm (sic.) Water Control and Mitigation System.
 - Jan 3, 2024 Update: Revised O&M Plans have not been provided.
- 59. Given the proximity to the public water supply we recommend the Board consider requiring an Annual Stormwater Management System Inspection Report prepared by an approved Massachusetts licensed professional civil engineer be submitted to the Town demonstrating the system is being inspected and maintained as required and is preforming as intended.
 - <u>Jan 3, 2024 Update</u>: Applicant has agreed to the conditions described. We recommend that any decision approving the Comprehensive Permit include a <u>condition requiring the Project to provide an Annual Stormwater Management System Inspection Report prepared by an approved Massachusetts licensed professional civil engineer demonstrating performance of all required inspection and maintenance of stormwater management systems and components. **Comment Resolved.**</u>

Traffic

- 60. The traffic memo reports that the posted speed limits are 30 mph eastbound and 35 mph westbound on Common Street approaching Darwin Lane. Google Street view imagery indicates a posted speed limit of 30 mph westbound in the vicinity of 556 Common Street. Tetra Tech recommends that the Applicant confirm the regulatory speed limit in this area.
 - <u>Jan 3, 2024 Update</u>: Comment addressed by December 22, 2023 response letter from Chappell Engineering Associates. **Comment Resolved.**
- 61. The traffic memo included an evaluation of stopping sight distance (SSD) and intersection sight distance (ISD) at the Darwin Lane/Common Street intersection. The evaluation was based on procedures outlined in the American Association of State Highway and Transportation Officials' (AASHTO) A Policy on Geometric Design of Highways and Streets 7th Edition, 2018 which is consistent with industry standards. Tetra Tech recommends that the sight distance calculations be provided to the Town for review.
 - <u>Jan 3, 2024 Update</u>: Comment addressed by December 22, 2023 response letter from Chappell Engineering Associates. **Comment Resolved.**
- 62. The traffic memo recommends that any proposed landscaping, fences, walls, or signs in the vicinity of the site driveway be kept low to the ground (less than 2 feet above street level) or set back outside the sight triangles as defined by AASHTO. Tetra Tech recommends that the Applicant include sight distance triangles on the final site plans showing the areas to remain clear of obstructions (i.e., signage, vegetation, etc.) to ensure that safe stopping sight distance and intersection sight distance will be met.
 - <u>Jan 3, 2024 Update</u>: Comment addressed by December 22, 2023 response letter from Chappell Engineering Associates. **Comment Resolved.**
- 63. Common Street has curved horizontal and vertical alignments through the intersection with Darwin Lane. Tetra Tech recommends that the Applicant prepare sight distance plans and profiles of this

intersection to demonstrate that adequate sight distance is provided including stopping sight distance for the entire travel lane width in each direction on Common Street.

- <u>Jan 3, 2024 Update</u>: Comment addressed by December 22, 2023 response letter from Chappell Engineering Associates. **Comment Resolved.**
- 64. The Institute of Transportation Engineers' Trip Generation Manual, 10th Edition trip Generation Land Use Code (LUC) 220 (Multifamily Housing Low-Rise) trip rates were applied to 28 units. Tetra Tech generally agrees with the use of this land use category. However, ITE has published a more recent version of the Trip Generation Manual. Tetra Tech recommends that the Applicant revise the trip generation estimates to be based on the 11th edition of the Trip Generation Manual.
 - <u>Jan 3, 2024 Update</u>: Comment addressed by December 22, 2023 response letter from Chappell Engineering Associates. **Comment Resolved.**
- 65. The traffic memo recommends that the Applicant install a speed hump on the site driveway before its intersection with the Darwin Lane cul-de-sac. Tetra Tech recommends that the Applicant explore alternative traffic calming measures (including along Darwin Lane) as opposed to a speed hump on the site driveway since the proposed Stop bar and Stop sign at the site driveway/Darwin Lane intersection would be anticipated to slow vehicles down along the site driveway.
 - <u>Jan 3, 2024 Update</u>: Comment addressed by December 22, 2023 response letter from Chappell Engineering Associates. **Comment Resolved.**
- 66. Tetra Tech recommends that the proposed landscaping on-site be less than 2 feet tall where the internal site driveway splits east and west. Additionally, designated snow storage in this area should be reconsidered so that it does not impede sight lines at this internal intersection.
 - Jan 3, 2024 Update: Comment partially addressed by December 22, 2023 response letter from Chappell Engineering Associates which includes alternative traffic calming measures for consideration but does not provide an actionable recommendation. Given the proposed site access drive's offset from the Darwin Lane approach combined with the calming effect created by the prevalence of on street parking, additional traffic calming measures at the Project approach may be unwarranted. As the Project traffic engineer, Chappell should determine and clearly state if additional measures are warranted and if so, show those proposed improvements on the Site Plans for consideration by the Board. It is not the Board's responsibility to determine what if any measures are required.
- 67. Tetra Tech recommends that any proposed traffic signage and pavement markings be compliant with the Manual on Uniform Traffic Control Devices (MUTCD).
 - <u>Jan 3, 2024 Update</u>: Comment addressed by December 22, 2023 response letter from Chappell Engineering Associates. **Comment Resolved.**
- 68. Tetra Tech recommends that the Applicant review proposed Fire Access with the Walpole Fire Department to ensure the proposed geometry is acceptable.
 - <u>Jan 3, 2024 Update</u>: Comment addressed by December 22, 2023 response letter from Chappell Engineering Associates. **Comment Resolved.**

January 3, 2023 Update

- 1. All visitor parking spaces have been eliminated. While the Project provides 4 spaces for each unit (2 garage, 2 driveway) providing no other accommodation for visitors seems short sighted.
- 2. The Project provides almost no useable open space and the current plans do not include the recreation and open space amenities described in the original application. The lack of any useable open space or programmed amenities in combination with the proposed building density is likely to increase risk of encroachment onto the adjacent unoccupied Zone 1. We recommend the Board require the Applicant to address the lack of useable open space.
- The east end of underground detention system still extends into an area where other utilities are proposed. Please revise to ensure adequate separation is provided and geometry accurately reflected in stormwater analysis.
- 4. Please explain the intent of the solid white lane line proposed at the edge of pavement. It seems unnecessary.
- 5. Please provide a stop bar at the proposed stop sign.
- 6. The 220 contour appears to be missing in front of Units 20, 21, 26 and 27 and between units 9 and 10. Please address on future submittals.

We recommend the Board require the Applicant to focus its attention on providing documentation and justification in support of its proposal to exceed the maximum 15% allowed impervious coverage as that analysis/debate may inform design. If you have any questions or comments, please feel free to contact us at (508) 786-2200.

Very truly yours,

Sean P. Reardon, P.E.

Vice President

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