



November 1, 2023

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

**Re: Comment Letter 2
1015 East Street – “Gilmore”
Comprehensive Permit (40B) Peer Review
Walpole, Massachusetts**

Dear Mr. Chairman:

The following is an update to our September 6, 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.

Our updates are noted below in “black” with the heading “11-01-23 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 **November 1, 2023 Update**.

Site Plans

Demolition Plan (Sheet C-201)

1. The limits of abandonment vs. removal are unclear. We recommend any utilities discontinued by the Project within the public way be removed to avoid potential future settlement, utility congestion or confusion that would otherwise become the Town’s responsibility to address.

11-01-23 Update: Plans revised to show information requested. **Comment Resolved**.

Site Layout Plan (Sheet C-301)

2. It’s unclear how the loading area is intended to operate given the location of the proposed garage entrance. We recommend the applicant be required to provide a plan showing expected loading operations including clear indication of vehicle staging.

11-01-23 Update: Response indicates facility loading will be accommodated using a small area set aside at the front entry for short term deliveries with larger longer-term deliveries staged within the limited available space at the back of the building outside the garage ramp. These accommodations are modest but not atypical for urban applications and the 24’ drive/parking aisles could provide short-term supplemental space with proper oversight and controls to maintain emergency access and safe circulation. We recommend the applicant consider modifying the sidewalk layout outside the southwest corner of the building to maximize space available for loading as shown on the attached TT Sketch 1.

3. The sidewalk awkwardly terminates at the garage/loading area precluding the ability for a resident to walk around the building on a sidewalk.

11-01-23 Update: Response indicates a continuous sidewalk is not possible given site limitations nor required given the limited number of unserved parking areas, the location of the garage entrance, and low volume expected at the rear of the building. In our opinion this is a reasonable approach but suggest a modification to the circulation pattern at the rear of the facility to improve safety for exiting garage traffic as well as pedestrians. See attached TT Sketch 1.

4. Vehicles exiting the garage will have a difficulty seeing vehicles approaching from the east due to the exiting approach angle and the garage wall. Recommend applicant consider providing a mirror or similar device to providing exiting vehicles a means of considering approaching traffic.

11-01-23 Update: Response proposes adding stop bars to address the visibility/sight line concern which in our opinion are not likely to help and are potentially counter-productive. Instead, we recommend that applicant consider limiting the rear drive aisle between the garage entrance and the eastern portion of the site to one-way in an easterly direction. This change eliminates vehicles approaching the garage exit from the east while providing a less complicated traffic pattern and a bit more available space for pedestrians. See attached TT Sketch 1.

5. There appears to be no substantive space to store snow. Recommend the applicant provide a summary of how snow will be managed on site given the apparent lack of space available.

11-01-23 Update: Response indicates the facility operator will be required to remove snow from the site as needed to maintain safe access and documented in a revised O&M plan to be provided. We recommend any condition approving a Comprehensive Permit include a *condition requiring the Project to remove any temporarily stockpiled snow within 48 hours of storm end.*

6. A small portion of the patio area near the southwest corner of the building extends into the public way. Typically, private patio space would not encumber the public way.

11-01-23 Update: Comment adequately addressed by response. **Comment Resolved.**

7. There is almost no landscape relief or vertical interest in the parking area. Recommend the applicant consider forgoing 2-3 parking spaces to allow for interior landscape islands with street trees to break up the long run of parking along the building's north side.

11-01-23 Update: Comment adequately addressed by response. **Comment Resolved.**

Grading and Drainage Plan (Sheets C-401)

8. Building finish floor elevation appears to be mislabeled as 442.0 instead of 412.0. Please address in future submittals.

11-01-23 Update: Comment addressed in response. **Comment Resolved.**

9. A wall is shown along the northwest property boundary that retains approximately 5 feet of grade on the abutting property yet does not provide any offset from the property line in which to accommodate the construction without impacting the abutting property. Recommend the applicant provide a description of how they intend to construct the wall in the location shown without impacting the abutting property or otherwise modify the layout.

11-01-23 Update: Response provided and revised plans suggest work is required on the abutting railroad parcel to complete construction shown. There appears to be adequate space to complete the work without impacting the rail, but we anticipate the Project will require an access agreement with the railroad to complete construction. We recommend any decision approving a Comprehensive Permit include a *condition that the Project must confirm access rights if work is required on abutting parcels prior to issuing a building permit.* **Comment Resolved.**

10. The design includes several underground infiltration systems but does not appear to provide any test pit information verifying assumed soil conditions or estimated seasonal high groundwater. Recommend the applicant provide test pit results verifying assumed soil and groundwater conditions to demonstrate viability of the proposed stormwater design.

11-01-23 Update: Information was provided in prior submittal. **Comment Resolved.**

11. Infiltration System 1 shows no outlet despite the model indicating a 12” discharge and the system is not sized adequately to empty by infiltration nor is any overflow provided. As shown, the system will overflow to East Street via CB-101. Recommend the design be modified so that no discharge is directed to the public way.

11-01-23 Update: Revised design and updated analysis pending.

12. Off locus drainage work is proposed at the northeast corner of the site which is critical to the design and functionality of the proposed stormwater improvements and the outlet elevation which is also critical is noted as “approximate” and appears to conflict with contour and wetland information shown in the same area. Recommend the plans be modified to address the issues noted and show how the proposed system will discharge and all improvements required. Documentation provided does not demonstrate a viable stormwater design.

11-01-23 Update: Revised design and updated analysis pending.

13. The plan indicates a Bordering Vegetated Wetland (BVW) is located at the northeast corner of the site and that drainage work is proposed within it and a substantial portion of the parking lot (including Stormwater Management Area 3) is within the 100-foot buffer zone subject to jurisdiction of the Massachusetts Wetlands Protection Act.

11-01-23 Update: Response confirms Project will obtain an Order of Conditions per requirements of Massachusetts Wetlands Regulations (310 CMR 10.00). Comment addressed in response. **Comment Resolved.**

Utility Plan (Sheet C-501)

14. The proposed sewer relocation results in sewers with very shallow slopes including at least one section whose slope is substantially lower than recommended by NEWPC TR-16 which is the recognized standard for public sewer design. The Project proposes an 8-inch public sewer at 0.26% slope when TR-16 recommends a minimum 0.4% slope for 8-inch sewers. Recommend the applicant provide documentation demonstrating the proposed sewer relocations comply with minimum standards described in Chapter 2 of TR-16.

11-01-23 Update: Design revision/update pending.

Soil Erosion & Sediment Control Plan (Sheet C-601)

15. The alignment of the stone construction entrances creates an awkward entry onto East Street. Recommend the entrances be oriented at right angles to East Street as shown on the construction detail.

11-01-23 Update: Comment addressed in response and on plans. **Comment Resolved.**

16. The plan does not show any perimeter controls (ie. compost sock) along the eastern site boundary despite proposed grade being directed towards the abutting parcel. Recommend the plan be modified to incorporate perimeter controls wherever grade slopes away from the subject parcel.

11-01-23 Update: Design revision pending.

Soil Erosion & Sediment Control Notes and Details (Sheet C-602)

17. The "Compost Sock" detail shows hay bales rather than compost filter sock.

11-01-23 Update: Comment addressed in response and in plans. **Comment Resolved.**

Landscape Plan (Sheet C-701)

18. The plan shows a single canopy tree in the southeast planting area which is inconsistent with that shown on the Cover, Sheet A010 and Sheet A401 of the Architectural Package suggesting otherwise. Recommend the Landscape Plan and the Architectural Plans be coordinated to present a single expectation.

11-01-23 Update: Comment addressed in response. **Comment Resolved.**

19. The plan shows landscape improvements within the public way. Recommend any decision approving the Comprehensive Permit include a *condition requiring the Project to maintain any landscaping proposed within the public way.*

11-01-23 Update: Comment/Condition acknowledged. **Comment Resolved.**

20. The submittals include conflicting Landscape Plans with identical dates and titles. Please clarify which plan applies, Exhibit H or Landscape Plan included in the Civil Plan Set and include applicable plan in future Civil Plan sets.

11-01-23 Update: Comment addressed in response and revised plans. **Comment Resolved.**

Lighting Plan (Sheet C-703)

21. The plan indicates light from the project will spill onto abutting parcels along the entire project boundary and at significant intensity (> 2 fc) at several locations.

11-01-23 Update: Comment addressed in response and revised plans. **Comment Resolved.**

22. The plan does not appear to be consistent with proposed fixture layout. For example, light levels near the light fixture in the northeast parking area are shown to increase as you move away from the fixture. Recommend the plans be modified to reflect the fixture layout shown and that light spill onto

abutting property be eliminated or at least reduced to no greater than 0.2 fc unless otherwise approved by the abutting landowner.

11-01-23 Update: Comment addressed in response and revised plans. **Comment Resolved.**

Detail Sheet (C-902)

23. The retaining wall detail provided suggests significant excavation and the installation of geotextile fabric anchors will be required on the abutting railroad property. Recommend the applicant confirm intent or otherwise modify the design.

11-01-23 Update: See response to Comment 9. **Comment Resolved.**

Detail Sheet (C-903)

24. The details for the stormwater storage systems lack critical information required to confirm system dimensions and required separation from groundwater. Recommend the applicant be required to provide basic design information needed to reasonably conclude the systems are capable of meeting design criteria of the Massachusetts Stormwater Handbook. At a minimum, the information should include (1) separation from ESHGW, (2) system bottom elevation, and (3) isolator row elevation.

11-01-23 Update: Revised design and updated analysis pending.

Existing Conditions Plan

25. The existing conditions plan suggests the site is partially within Riverfront Area but it's unclear how that was determined or if the location is accurate. The performance standards for work within Riverfront can be very stringent and should be considered in the design but it appears the site area within the Riverfront is mostly impervious already completely suggesting the Project has a fair amount of flexibility.

11-01-23 Update: See Comment 13. Comment addressed in response. **Comment Resolved.**

26. The plan indicates the existing drain line leaving the site is a 12" line. It's unclear how the Project can propose replacing the 12" drain with a 24" drain without increasing peak discharge rates. Please clarify.

11-01-23 Update: Revised design and updated analysis pending.

Bohler Engineering Memorandum

27. The memorandum does not include figures depicting existing or proposed watershed boundaries used in the analysis. Recommend applicant provide figures showing the boundaries to assist in our review of the analysis. Please note, the analysis identifies a single discharge point (DP1) when the proposed plans indicate runoff will discharge from the site directly to East Street and to the abutting property to the east. The analysis should compare pre- and post-development conditions at each point where runoff leaves the subject property to insure no increase in discharge to any abutter.

11-01-23 Update: Information noted was included in original submission. **Comment Resolved.**

28. The memorandum indicates soil conditions were assumed and groundwater was estimated based on "boring data prepared by McPhail Associates" neither of which complies with methods prescribed in the Massachusetts Stormwater Handbook. We recognize the memorandum notes that "Test pits will

be completed to confirm onsite soil classifications and depth to seasonal high groundwater and will be provided in a drainage report prepared and submitting during subsequent permitting efforts.” However, that information is foundational to determining if the project as currently described can be constructed in compliance with applicable standards. We recommend the applicant conduct at least two (2) test pits to provide a more conclusive assessment of soil conditions given (1) draw down times approach the maximum 72-hour limit, (2) presence of nearby wetlands suggest water surface may be higher than indicated in borings, (3) analysis indicates almost no “wobble room” in the pre- vs. post peak runoff comparison and (4) options for expanding or relocating systems is limited. If test pits show inconsistent results additional pits may be needed.

11-01-23 Update: Information noted was included in original submission. **Comment Resolved.**

29. Pond #1 does not match conditions shown on plans. Please address inconsistency.

11-01-23 Update: Revised design and updated analysis pending.

30. Drawdown calculations are based on an assumed infiltration rate for the higher of two potential type “C” soils without any supporting field investigation. If actual field testing indicates soils are slower infiltrating soils, then drawdown times would exceed maximum allowed by a significant amount. Recommend applicant be required to provide at least some basic on-site testing to support critical design assumptions.

11-01-23 Update: Information noted was included in original submission. **Comment Resolved.**

Traffic

31. The building program, including number of residential units, parking supply and parking layout (surface versus garage parking spaces) presented in the traffic study update, updated architectural plans and updated site plans are inconsistent. Tetra Tech recommends that the Applicant confirm the currently proposed building program.

11-01-23 Update: Comment addressed in response. **Comment Resolved.**

32. The Applicant is seeking approval for a reduction in approximately 40 percent in the parking supply required by local zoning bylaws. The Applicant has submitted a parking narrative (dated September 6, 2023) describing the anticipated parking operations at the site and a comparison of the proposed parking supply to other area residential developments. Tetra Tech recommends that the Applicant also provide an estimate of peak parking demand based on empirical data from other similar residential developments or using industry standard parking rates published by the Institute of Transportation Engineers to ensure that adequate parking will be provided.

11-01-23 Update: Justification provided. Comment addressed in response. **Comment Resolved**

33. The traffic study included a crash analysis of the study intersections which indicated that the unsignalized Elm Street/East Street and Elm Street/West Street intersections experience above-average crash rates. Per the TIA, the Applicant commits to conducting a Road Safety Audit (RSA) at these locations to identify potential short-term and long-term improvements to enhance safety. The TIA also states that the Applicant will design and construct short-term improvements identified in the RSAs. Any improvements proposed for these locations will require review and approval by the Town. We recommend any decision approving the Project include a condition requiring the Project to

perform the RSA and construct any short-term improvements approved by the Town prior to occupancy.

11-01-23 Update: Project agrees to complete the RSA and related improvements. We recommend any decision approving a Comprehensive Permit include a condition requiring the Project to complete the Road Safety Audit and fund any agreed upon improvements prior to issuing a Certificate of Occupancy. **Comment Resolved**

34. The TIA states that the Applicant commits to designing and implementing traffic signal timing, phasing and coordination improvements at the coordinated signal system along Main Street at its intersections with East Street, Stone Street/Glenwood Avenue/West Street and Common Street/Elm Street. Any improvements proposed for these locations will require review and approval by the Town. We recommend any decision approving the Project include a condition requiring the Project to perform the work described prior to occupancy.

11-01-23 Update: Response indicates signal analysis and upgrades are included in Nov. 22, 2022 agreement with Walpole Board of Selectmen. Comment addressed by response. **Comment Resolved**

35. Tetra Tech recommends that the Applicant provide the supporting MassDOT crash data used in the TIA crash analysis for the Town to review.

11-01-23 Update: Crash data provided. Comment addressed in response. **Comment Resolved**

36. The TIA states that secure bicycle parking will be provided in a bike room within the parking garage, yet no such space is shown of the proposed garage floor plan. Tetra Tech recommends that the bike room be shown on the garage floor plan noting the anticipated bike path between the bike room and the surface lot. Please note any adjustments to parking count that result.

11-01-23 Update: Revised plans include a small (25-bike) storage room on the ground floor resulting in approximately one (1) bike storage space for every six (6) units which is at the modest end of the spectrum. Recognizing tenants can also store bikes within their units and considering the Project's location within walkable distance to the railroad station and downtown, the Board has some latitude to determine what's reasonable. We recommend the Project describe how the limited space will be used and allocated and continue discussion with the Board.

37. The fire truck turning exhibit shows the fire truck accessing the site to/from the east via East Street. Tetra Tech recommends that the Applicant also evaluate emergency vehicle access at the site to/from the west. Additionally, Tetra Tech recommends that the Applicant describe emergency vehicle access to the proposed underground parking garage and the south side of the proposed building through the 12-space parking lot. The Applicant should review the updated site plan with the Walpole Fire Department to ensure that safe and efficient access to the site will be provided.

11-01-23 Update: Response refers to prior coordination with the Fire Department but does not address the comments provided. However, our comments are for the benefit of the Board and/or the Fire Department. The Fire Department and specifically the Fire Chief is responsible for determining suitability of site access and we typically defer to the Fire Chief. We recommend any decision approving a Comprehensive Permit include a condition requiring the Project to obtain Fire Department Approval of emergency access prior to issuing a building permit. **Comment Resolved**

38. Tetra Tech recommends that the Applicant describe anticipated delivery and moving truck operations and conduct an AutoTurn analysis to confirm that these services/vehicles can be adequately accommodated on-site without impeding on-site access, circulation, and/or parking as well as operations on East Street.

11-01-23 Update: Comment addressed in response. **Comment Resolved**

39. Exhibit G suggests a package delivery pull off area will be provided which is inconsistent with the Site Plans and the Lighting Plan. Please clarify.

11-01-23 Update: Comment addressed in response. **Comment Resolved**

40. Tetra Tech recommends that the Applicant describe the anticipated trash pick-up operations and conduct an AutoTurn analysis to confirm that trash pick-up can be adequately accommodated without impeding on-site access, circulation, and/or parking as well as operations on East Street.

11-01-23 Update: Response includes a thorough description of trash management. **Comment Resolved**

41. Tetra Tech agrees with the proposed site access improvements to provide a Stop bar at the site driveway approaches to East Street. Tetra Tech recommends that a Stop sign be installed for vehicles exiting the garage and that all proposed traffic signage and pavement markings for the project be MUTCD-compliant.

11-01-23 Update: Comment addressed in response. **Comment Resolved**

42. The TIA states that the Applicant commits to implementing a Transportation Demand Management (TDM) program for the Project. Tetra Tech recommends that the Applicant coordinate the specific elements of the TDM program with the Town as a condition of approval.

11-01-23 Update: Comment addressed in response. **Comment Resolved**

43. Tetra Tech recommends that the site plans be updated to include stopping sight distance (SSD) and intersection sight distance (ISD) plans and profiles at all proposed site driveways on East Street to confirm that minimum American Association of State Highway and Transportation Officials (AAHTO) SSD and ISD criteria is met based on the observed 85th percentile travel speeds. The Applicant should ensure that any proposed landscaping, signage, and walls do not obstruct sight lines for vehicles and for pedestrians. Additionally, there is an existing horizontal curve on East Street adjacent to the westerly side of the site. The Applicant should confirm that sight line easements from nearby properties will not be required to meet minimum SSD and ISD criteria.

11-01-23 Update: Figures showing required sight triangles have been provided. **Comment Resolved**

44. The October 2022 TIA included an evaluation of SSD and ISD at one site driveway location. The site plan shows four site driveways proposed along East Street. Tetra Tech recommends that the Applicant conduct a sight distance evaluation of all proposed site driveway intersections with East Street. The evaluation should be based on the observed 85th percentile travel speeds and the calculations should be provided to the Town for review.

11-01-23 Update: Updated measurement and documentation provided. **Comment Resolved**

45. The Applicant has provided a sidewalk exhibit which presents a conceptual sidewalk extension from the proposed westerly site driveway on the north side of East Street to the existing crosswalk at

Glenwood Avenue. Per the Applicant’s September 6, 2023 response to DPW comments, the Applicant indicates that the conceptual sidewalk improvements shown in the Exhibit would be engineered and installed by the Town. Tetra Tech recommends that this assumption be confirmed with the Walpole DPW and that the Project construct the portion of the sidewalk along the site frontage.

11-01-23 Update: Response indicates a commitment to fund design and construction of the sidewalks is included in its November 22, 2022 agreement with the Walpole Board of Selectmen. **Comment Resolved**

46. Given that the trip generation estimates summarized in the TIA and TIA update take credit for available public transportation and that the Applicant is seeking approval of a parking supply approximately 40 percent less than required by zoning, Tetra Tech recommends that the Applicant inventory the existing pedestrian connections between the site and the Massachusetts Bay Transportation Authority (MBTA) Walpole commuter rail station. This should include the connection between the MBTA station and Elm Street. As part of this inventory, Tetra Tech recommends that the Applicant identify potential improvements to any existing deficiencies, including but not limited to the installation of rectangular rapid flashing beacons at crosswalks and safety enhancements at any rail crossings.

11-01-23 Update: Inventory provided. **Comment Resolved**

November 1, 2023 Update

47. There are an extraordinary number of notes, most of which are directed at the eventual site contractor and unrelated to the Board’s scope of review. We request the applicant consider removing any notes that aren’t intended to inform this review so the Board can reasonably review for acceptability. Regardless, we recommend that any decision approving the Comprehensive Permit include a stipulation that the approval only applies to the information shown or described on the Plans and does not necessarily extend to information included in any numbered note.
48. Given the extensive trenching required in the East Street travel way we recommend the Board request the applicant to resurface the full width of the roadway and that any decision approving a Comprehensive Permit include a condition requiring the project to mill and overlay the entire curb-curb width of East Street at least 50’ to either side of the Project within six (6) months of obtaining a Certificate of Occupancy.
49. It’s our understanding the Project intends to extend the sidewalk west to an existing crossing at Glenwood Avenue. The sidewalk extension and any crosswalk markings should be shown on the Site Plans including any improvements required to maintain access to the adjacent railroad parcel.
50. The proposed sewer relocation places the sewer line beneath site amenities. We recommend that any decision approving the Comprehensive Permit include a stipulation that if repairs to town infrastructure are required, the Project is responsible for removing and/or replacing the surface improvements.
51. The Project will disturb more than an acre of land area which typically requires coverage under a NPDES Construction General Permit which includes preparation of a project-specific Stormwater Pollution Prevention Plan (SWPPP). We recommend any decision approving the Comprehensive

Permit include a condition requiring the Project to provide proof of NPDES Permit coverage and a copy of the SWPPP prior to the start of construction.

We appreciate the Project's thoughtful responses and the supplemental information provided which have addressed or at least advanced our comments. We understand updated utility design information is forthcoming and expect most of our comments to be addressed at that time. 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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New or Formerly
MASSACHUSETTS BAY TRANSPORTATION AUTHORITY
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ONE-WAY circulation

ONE WAY
DO NOT
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SIGN

4' SIDEWALK & CURB

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AREA OF ADD'D
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REVISE
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TT SKETCH !
NOV 1, 2023

