



January 16, 2024

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

**Re: Comment Letter 3
1015 East Street – “Gilmore”
Comprehensive Permit (40B) Peer Review
Walpole, Massachusetts**

Dear Mr. Chairman:

The following is an update to our November 1, 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, clarifying testimony presented at public hearing as well as comments provided by Weston and Sampson in their January 11, 2024 memorandum regarding Project sewer impacts.

Our updates are noted below in “black” with the heading “01-16-24 Update:” Text shown in gray represents information contained in previous correspondence while new information is shown in black text. Comments resolved in prior correspondence have been noted and related discussion removed for clarity.

As of the most recent round of submittals and responses we have no outstanding or further comments that require additional or modified documentation.

Site Plans

Demolition Plan (Sheet C-201)

1. Comment Resolved 11-01-23.

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.

01-16-24 Update: Plans revised to show information requested. **Comment Resolved.**

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.

01-16-24 Update: Plans revised to show information requested. **Comment Resolved.**

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.

01-16-24 Update: Plans revised to show information requested. **Comment Resolved.**

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.

01-16-24 Update: O&M Plans revised to show information requested. As noted in prior comment 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. **Comment Resolved.**

6. Comment Resolved 11-01-23.

7. Comment Resolved 11-01-23.

Grading and Drainage Plan (Sheets C-401)

8. Comment Resolved 11-01-23.

9. Comment Resolved 11-01-23.

10. Comment Resolved 11-01-23.

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.

01-16-24 Update: Plans and supporting documentation revised to address comment. **Comment Resolved.**

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.

01-16-24 Update: Plans revised to address comment. **Comment Resolved.**

13. Comment Resolved 11-01-23.

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.

01-16-24 Update: Plans revised to address DPW/Town Engineer/Weston Sampson comments. **Comment Resolved.**

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

15. Comment Resolved 11-01-23.

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.

01-16-24 Update: Plans revised to show information requested. Please note, the Project will require review by the Walpole Conservation Commission for compliance with Massachusetts Wetlands Protection Regulations (310CMR10.00) which includes strict performance standards for minimizing erosion and sedimentation and managing stormwater runoff. **Comment Resolved.**

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

17. Comment Resolved 11-01-23.

Landscape Plan (Sheet C-701)

- 18. Comment Resolved 11-01-23.
- 19. Comment Resolved 11-01-23.
- 20. Comment Resolved 11-01-23.

Lighting Plan (Sheet C-703)

- 21. Comment Resolved 11-01-23.
- 22. Comment Resolved 11-01-23.

Detail Sheet (C-902)

- 23. Comment Resolved 11-01-23.

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.

01-16-24 Update: Plans revised to show information requested. **Comment Resolved.**

Existing Conditions Plan

- 25. Comment Resolved 11-01-23.
- 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.

01-16-24 Update: Plans revised to show information requested. **Comment Resolved.**

Bohler Engineering Memorandum

- 27. Comment Resolved 11-01-23.
- 28. Comment Resolved 11-01-23.
- 29. Pond #1 does not match conditions shown on plans. Please address inconsistency.

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

01-16-24 Update: Plans revised to show information requested. **Comment Resolved.**

- 30. Comment Resolved 11-01-23.

Traffic

- 31. Comment Resolved 11-01-23.
- 32. Comment Resolved 11-01-23.
- 33. Comment Resolved 11-01-23.
- 34. Comment Resolved 11-01-23.
- 35. Comment Resolved 11-01-23.
- 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.

01-16-24 Update: Applicant asserts the bike storage provided is appropriate and addresses the concern noted. We appreciate the inclusion of the space and agree it is better than providing none and bikes can be stored in individual units if needed. Given there is no generally accepted standard for what constitutes an acceptable volume of bike storage we have no objection if the Board determines the space is appropriate. **Comment Resolved.**

- 37. Comment Resolved 11-01-23.
- 38. Comment Resolved 11-01-23.
- 39. Comment Resolved 11-01-23.
- 40. Comment Resolved 11-01-23.
- 41. Comment Resolved 11-01-23.
- 42. Comment Resolved 11-01-23.
- 43. Comment Resolved 11-01-23.
- 44. Comment Resolved 11-01-23.
- 45. Comment Resolved 11-01-23.
- 46. Comment Resolved 11-01-23.

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.

01-16-24 Update: Applicant is amenable to a condition stipulating 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. **Comment Resolved.**

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.

01-16-24 Update: Applicant refers to an agreement with the Walpole Board of Selectmen that addresses off-site mitigation responsibilities and cost. Based on the response provided our comment has been addressed. **Comment Resolved.**

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.

01-16-24 Update: Plans revised to show information requested. It's our understanding that the work shown is part of the Project's mitigation agreement with the Select Board. **Comment Resolved.**

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.

01-16-24 Update: Project response indicates it is willing to repair its own site amenities, utilities, and drainage infrastructure in the event the Town needs to access or repair town-owned infrastructure which is consistent with our recommendation. We did not intend to assign any responsibility of repair or maintenance of town infrastructure to the Project. **Comment Resolved.**

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.

01-16-24 Update: Project responsibility acknowledged. **Comment Resolved.**

We appreciate the attention paid to our comments and the subsequent design changes and have no other significant comments or concerns related to the documentation provided. 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