

August 29, 2023

Nazih Elkallassi, Chairman
Town of Wareham
Zoning Board of Appeals
54 Marion Road
Wareham, MA 02571

Re: Initial Peer Review
Warren 176 Main St QOZB, LLC
Special Permit, Variance, and Site Plan
Review Application
ZBA Case 31-23
176 Main Street
Wareham, MA

Dear Mr. Elkallassi and Members of the Zoning Board of Appeals:

In accordance with our contract to conduct a peer review of Warren 176 Main St QOZB, LLC's Special Permit, Variance, and Site Plan Review application associated with the Proposed Site Improvements Plan at 176 Main Street in Wareham, Massachusetts, Allen & Major Associates, Inc. (A&M) is pleased to provide the following comments. The comments presented below are based on the review of the design documents provided to A&M by Wareham Planning and Community Development. A&M did not conduct a field assessment of the project but can do so if the ZBA requires.

In conducting the peer review, A&M reviewed the following documents:

- Proposed Site Improvements Plan at 176 Main Street Wareham, Massachusetts prepared for Warren 176 Main St QOZB, LLC prepared by G.A.F. Engineering, Inc. dated July 18, 2023;
- Stormwater Report for 176 Main Street Site Development 176 Main Street Wareham, MA prepared for Warren 176 Main St QOZB, LLC prepared by G.A.F. Engineering, Inc. dated July 18, 2023;
- Cover letter, Impact Statement, Applications, Building Department denial letter, certified abutters list, Quitclaim Deed and checklist prepared by G.A.F. Engineering, Inc. dated July 20, 2023;
- Letter from the Wareham Fire Department dated August 8, 2023.

A&M reviewed the information/materials, listed above in conjunction with the applicable requirements of:

- Town of Wareham By-Laws revised October 25, 2021;
 - Division IV, Article III Earth Removal Regulations;
 - Division V, Article XI, Article I Stormwater Management & Article II Illicit Discharge;
 - Division VI, Article I Wareham Wetland Protective By-Law.
- Town of Wareham Zoning By-Laws Revised April 12, 2022 with additional Amendments from October 2022 Town Meeting not yet approved by the Attorney General;
 - Article 4: Overlay Districts
 - Article 6: Density and Dimensional Regulations;
 - Article 7: Design Standards and Guidelines;
 - Article 9: Parking;
 - Article 10: Landscaping;

- Article 12: Performance Standards;
- Article 15: Site Plan Review.
- Massachusetts Stormwater Handbook, Volumes 1 through 3, as applicable under the Massachusetts Wetlands Protection Act (310 CMR 10.00) with focus on the Stormwater Management Standards.
- National Fire Protection Association (NFPA 1) and the Massachusetts Amendments (527 CMR 18) as applicable to site development plans.

The following represents A&M's review comments. A&M may submit additional comments based on supplemental information provided after the initial peer review.

Variance Request

The proposed project is seeking a variance request for a reduction to the required landscape buffer (Article 10: Landscaping). Based on the Zoning By-Laws §1040 Landscape Buffers, the proposed commercial use is required to provide a minimum 20-ft landscape buffer to the adjacent uses consisting of single and two-family houses located on the southwesterly and westerly side of the property and 10-ft to adjacent commercial uses on the remainder of the property. The submitted material does not provide any explanation or narrative on the variance request. Please note that no landscaping is being proposed, fence or otherwise.

A&M defers to the Zoning Board of Appeals as to the merits of the application as provided as to whether it meets the statutory requirements of section 1470.

Wareham By-Laws and Zoning By-Laws

1. The proposed site improvements are located within the Floodplain Overlay District, therefore subject to subject to Article 4: Overlay Districts, subsection 420 Floodplain Overlay District. A permit is required for development in the Floodplain Overlay District, per §420.10. The applicant should provide an update to the ZBA on the status of the permit. The plans should be updated to note and refer to the overlay district. If the proposed improvements costs are equal to or greater than 50 percent of the structure's market value, then the project would be considered a substantial improvement and the structure would need to be brought into compliance with current FEMA and building code regulations. Has the applicant considered the impacts that may be required to the building and what the potential impacts will be to the site to accommodate the improvements?
2. The proposed project is required to obtain a Stormwater Management Permit (SMP) in accordance with Wareham By-Laws Division V, Article XI, Article I Stormwater Management. The applicant should provide documentation on the status of the SMP.
3. The proposed project is located within the Wareham Village 1 and 2 Zoning District and is subject to Article 7: Design Standards and Guideline, subsection 730 Wareham Village Districts. No architectural plans have been submitted; therefore A&M is unable to review for compliance with subsection 730 Architectural Design Guidelines. The applicant/architect should provide a statement for the record on how the proposed modifications will conform to the applicable section of the Zoning By-Laws. The ZBA may consider a condition of approval requiring the architectural modification of the building to be in compliance with subsection 730 of the Zoning By-Laws.
4. Zoning By-Law Section 1031 requires "new projects or expansions exceeding 5,000 square feet of non-residential development or more than three multi-family dwelling units, the landscape plan shall be prepared by a registered landscape architect whose seal shall appear on the plan." Landscaping is currently shown on the site plans but has not been prepared by a Landscape Architect. A landscape

plan should be provided in accordance with the Zoning By-Law. Please provide a landscape table showing the requirements and what is being provided.

5. The proposed project is proposing a new sign in the location of the existing sign and will be subject to Article 11: Signs. The applicant will be required to submit to the Director of Inspectional Services a completed sign permit application, together with all supporting materials specifically building and sign dimensions, materials of which the sign is comprised, colors, attachment methods and the position of the sign.

Site Plan & Drainage Calculations

6. The existing conditions plan is not stamped by a Professional Land Surveyor registered in the Commonwealth of Massachusetts. The plan should be endorsed by a PLS for record.
7. The layout plan should be updated to show the location of curbing in accordance with §934 Surfacing and Curbing of the Zoning By-Laws.
8. The applicant proposes restriping an area of existing pavement to remain along the Main Street portion of the site adjacent to the 6 parking stalls. There appears to be an opportunity to remove the excess asphalt and reduce the impervious area on this site improving the overall runoff condition. Would the applicant be willing to remove the excess asphalt in this area? If the applicant is amenable to this suggestion, the opportunity exists to regrade the site driveway to promote runoff into the drainage trench versus directly into Main Street also improving the general runoff condition.
9. Test pit symbols should be added to the Drainage & Grading plan. It appears that the drainage system is located within the estimated seasonal high-water table, based on redoximorphic features (elevation 5.5) in Test Pit #2. The design engineer should review the elevations and revise the plans accordingly.
10. After the estimated seasonal high groundwater elevation is confirmed under Comment 9, the applicant is required to provide a groundwater mounding assessment if less than four feet of separation is provided from the bottom of the stormwater system to the confirmed seasonal high water table.
11. Please clarify the intent of the existing stone trench located along Main Street and its intended function including details on depth, etc. The trench is not modeled within the HydroCAD stormwater model.
12. The design engineer should review the proposed watershed divide line between watersheds "1S" & "2S" on the northerly side of the building. The grading indicates the dividing line should be adjusted.
13. The design engineer should review the HydroCAD input for Pond 1P, which has discrepancies in the top of stone elevation as compared to the elevations noted on the detail (sheet 8). The plans and/or calculations should be revised and updated accordingly.
14. It appears that the design engineer is utilizing pond storage in the HydroCAD model in addition to the proposed subsurface leaching pits. The plans do not depict the intended location of this storage on the plan. It appears the parking lot is being used as the ponding area in all storm events. Based on the peak elevations reported in the HydroCAD report, water will be ponding against the building during the 10-year event and greater storm events. This should be clarified or revised. The rear door elevation is listed at 12.5 while the 100 year ponding in this area is at 12.79.
15. The design engineer should revise the TSS calculation worksheet for the Infiltration Trench. The infiltration trench only receives 80% TSS removal with the appropriate pre-treatment, therefore the design engineer cannot take additional credit for the catch basin in the overall calculation for the entire drainage system. The design engineer should update the TSS worksheets accordingly.

16. The proposed infiltration drawdown calculation reports that the system will take approximately 416 hours to completely drain after a 100 year storm event occurs. That would render the system unavailable to receive additional stormwater for nearly 17 days after significant precipitation. It is acknowledged that the design is based on redevelopment of a site where limited stormwater controls currently exist, however the potential for increased and repeated flooding of the property should be evaluated and the design revised accordingly. The design statement refers to the use of 0.27 inches per hour as the "conservative" rate of the soil as indicative of the drawdown time. Additional evaluative measures should be performed to further determine the underlying soils condition and consider the use of a double ring infiltrometer, or similar test, to determine the infiltrative ability of the soil.
17. The design engineer should review the grate capacity of the proposed catch basin. Based on the HydroCAD report, the catch basin is proposed to receive over 5 cfs, which exceeds the typical capacity of a standard grate. The plans should be revised accordingly or provide an analysis of the grate's capacity.
18. No details on site lighting nor a photometric plan have been provided, A&M is unable to review impacts on surrounding properties or compliance with Zoning §1243 Lighting Standards or §1533 (11).
19. The project exceeds the maximum access road length of 150 feet without provisions for a fire apparatus turn around (NFPA 1 18.2.3.5.4) for dead ends. The Wareham Fire Department is the Authority Having Jurisdiction (AHJ) for fire access roadways. The design engineer should provide a vehicle movement path showing the anticipated circulation on-site as requested by the Wareham Fire Department. Please identify and note the distance to the closest fire hydrant on the plan. Please provide any correspondence with the Fire Department that approves the circulation path as designed.
20. The applicant shall be required to coordinate with the Sewer Department for connection to the system. Correspondence should be provided for record to the Board. It should be noted that the Town of Wareham is currently under a moratorium for additional sewer flow into the municipal system.
21. The applicant shall be required to coordinate further with the Wareham Fire District on an available water connection as shown on the drawings. Correspondence should be provided for record to the Board.

In order to track any changes made to the proposed project, A&M recommends the applicant/engineer provide a written response to the items identified above and/or supplemental information necessary to review the application.

Very Truly Yours,

ALLEN & MAJOR ASSOCIATES, INC.

Philip Cordeiro, PE
Branch Manager