allenmajor.com

April 5, 2024

Michael King, Chair Town of Wareham Planning Board 54 Marion Road Wareham, MA 02571 ALLEN & MAJOR ASSOCIATES, INC.

Re: Third Peer Review Eversource Wareham Training Facility Special Permit/Site Plan Review PB Case 22-23 37 Doty Street Wareham, MA

Dear Chair King and Members of the Planning Board:

In accordance with our contract to conduct a peer review of the Eversource Wareham Training Facility's Special Permit/Site Plan Review at 37 Doty 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 Planning Board requires.

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

- Plans entitled "Eversource Energy 37 Doty Street Wareham, MA Permitting Plans October 2023 prepared for Eversource Energy prepared by Civil & Environmental Consultants, Inc. dated October 11, 2023, revised March 27, 2024".
- Stormwater Report for Eversource 37 Doty Street Wareham, MA prepared for NStar Electric Company prepared by Civil & Environmental Consultants, Inc. dated October, 2023 revised March 2024.
- Cover Letter prepared by Civil & Environmental Consultants, Inc. dated October 12, 2023.
- Impact Statement prepared by Civil & Environmental Consultants, Inc. dated October, 2023.
- Special Permit/Site Plan Review Application, Checklists, abutters list, denial letter from the building department and Cover Letter/Impact Statement prepared by Civil & Environmental Consultants, Inc. dated October 12, 2023 revised March 8, 2024.
- Response to Planning Board Peer Review letter dated March 7, 2024
- Response to Planning Board Peer Review letter dated March 27, 2024.

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

- Town of Wareham By-Laws revised October 25, 2021;
 - o Division IV, Article III Earth Removal Regulations;
 - o Division V, Article XI, Article I Stormwater Management & Article II Illicit Discharge;
 - o Division VI, Article I Wareham Wetland Protective By-Law.
- Town of Wareham Zoning By-Laws Revised April 24, 2023
 - Article 6: Density and Dimensional Regulations
 - Article 7: Design Standards and Guidelines
 - Article 9: Parking

Civil Engineers • Environmental Consultants • Land Surveyors • Landscape Architects

- 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.

Wareham By-Laws and Zoning By-Laws

2. 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 of the By-Laws and what is being provided associated with the required buffers and parking lots.

Updated Comment: The applicant has provided an updated landscaping plan stamped by a registered Landscape Architect. The applicant is seeking to remove the existing landscaped islands within the main parking field to "provide safe access to the site during emergency response functions". The lack of landscaped islands is not in compliance with Section 1060 Parking Lots of the Zoning By-laws. The applicant has not requested a waiver/variance of the Planning Board, so it is unclear how the current application complies with the By-law.

Updated Comment: The applicant has provided a narrative outlining their opinion relative to the removal of the interior curbing. A&M defers to the Planning Board on the requested relief.

Site Plan & Drainage Calculations

7. The design engineer should review the time of concentration calculation for sheet flow and update the calculations accordingly. The value for the 2-yr event differs from the actual 2-yr rainfall event as noted within the HydroCAD report.

Updated Comment: The applicant indicates the 2-year calculation has been revised, however, the HydroCAD worksheets continue to reflect a value of 3.20" of rainfall in the two-year event.

Updated Comment: The rainfall value remains incorrect on the revised plans. A&M directs the applicant to review the "Sheet Flow calculator" on Page 8 of the HydroCAD (and subsequent sheets), that the rainfall is noted as 3.20" versus the design storm value of 3.35". This should be corrected. While it may not materially affect the drainage calculations, it should be remedied for record.

- 8. Issue resolved, no further comment.
- 12. Issue resolved, no further comment.

- 13. Issue resolved, no further comment.
- 16. Issue resolved, no further comment.
- 17. Issue resolved, no further comment.
- 18. Grading/Drainage Plan
 - a. The extended detention basin as designed does not meet the Massachusetts Stormwater Handbook Standards and should be updated to include the following:
 - i. Provide calculations demonstrating that the required water quality volume meets the 24-hr time to allow solids to settle.
 - ii. A 15-ft wide access road is required around the basin providing access to the forebay and the outlet control structure.
 - iii. No emergency spillway has been provided.
 - b. Several drainage pipes are shown discharging into the grassed water quality swale and do not have any rip rap dissipation pads. The plans should be updated to provide appropriately sized pads at each outfall based on the maximum anticipated velocity. The design engineer should provide appropriate calculations to support the design.

Updated Comment: The updated report has changed the classification of the existing stormwater basin without support information (see comment above). The access to the basin for routine maintenance is available through a limited area on the north side of the basin. The remainder is hindered by the chain link fencing around the truck training area. If the applicant's intent for maintenance is to remove the chain link fence for access, it should be noted in the Operation and Maintenance plan. Please clarify. The plan has been revised to include rip-rap at the pipe entry points, but no calculations have been provided to support the areas shown.

Updated Comment: The applicant has provided revisions to the drainage basin and narrative; however no discussion was provided on the maintenance access to the basin which is a necessary component to a complete stormwater application.

- 19. Issue resolved, no further comment.
- 20. Issue resolved, no further comment.
- 21. The site relies on multiple stormwater management areas to function. The applicant should provide a statement for record that the existing systems have been inspected and maintained in accordance with the Stormwater Handbook before receiving additional flows as a result of the increased impervious. Any structures requiring cleaning, should be cleaned and documented prior to receiving additional stormwater runoff. These will include the catch basins, dry well systems, detention basin, and basin inlets and outlets.

Updated Comment: A&M has no issue with the intended inspection to be conducted prior to construction. Should the Planning Board act on the application, A&M suggests a condition be added to require this work to be performed and the results provided to the Planning Office.

22. Issue resolved, no further comment.

23. Neither the plans or narratives identify the potential uses for the series of concrete pads on the easterly training site. Their use should be identified to the extent it may have impact to the adjacent resource areas or stormwater basins. Potential impact could include use of hazardous material that would drain into the catch basin and flow through the system.

Updated Comment: The applicant has provided a detail of the concrete pads satisfying the original comment. The plans or narrative do not describe the proposed activities and A&M defers to the Planning Board if additional detail is required to satisfy any concerns.

Updated Comment: The applicant has provided a written response indicating that the pads would be used as part of the onsite training and may contain various devices and transformers. The information provided may be sufficient for the Board's review of the application and defers to the need for any additional information.

Additional Comments

- 25. The drainage report narrative and HydroCAD calculations have been revised but contain discrepancies that need to be reviewed, revised and/or clarified.
 - a. Issue resolved, no further comment.
 - b. Issue resolved, no further comment.
 - c. The proposed project is showing an increase of 2.0 cfs at the design point for the 100-yr storm event. An exceedance during the 100-year storm event is allowable if the applicant is able to confirm that no downstream flooding will occur. The applicant has provided this statement, but no documentation that indicates downstream will not occur.

Updated Comment: The previous peak flow design provided for a runoff of 2 cfs however, the newest version has increased to 3.0 cfs with no discussion on the increase. A&M concurs that the increase may be de minimus toward the resource area given its size but increases should be minimized to the extent practicable. As a further note, the Town of Wareham Zoning By-Laws (Section 1267) requires that post development discharge rates may not exceed predevelopment discharge rates with no exemptions for individual storm events (i.e. 100 year event). A&M recommends the applicant review the design to determine if the increase can be mitigated.

- 26. The applicant has removed the grading shown in the parking lot, therefore this issue has been resolved.
- 27. The resized detention basin does not meet the required 1-ft of freeboard. The 100-yr elevation in the basin is 34.76 and the HydroCAD stops at elevation 34.80. The plans call for the top of the basin to be at elevation 35. The design engineer should review and revise the basin accordingly.

Updated Comment: The applicant notes that the project is a redevelopment of an existing stormwater system and A&M agrees. However, redevelopment requires that the proposed project be an improvement over existing conditions unless it can be demonstrated to be infeasible. It appears feasible to provide the one foot of basin freeboard that would be required of a new application. Unless the applicant can justify not creating this freeboard, A&M recommends it be included in the plans.

- 28. Issue resolved, no further comment.
- 29. Issue resolved, no further comment.

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