



March 7, 2024

Mr. Kenneth Buckland
Director of Planning and Community Development
Town of Wareham
54 Marion Road
Wareham, MA 02571

Subject: Planning Board Peer Review
Proposed Eversource Training Facility
37 Doty Street
Wareham, Massachusetts 02576
CEC Project 323-322

Dear Mr. Buckland:

On behalf of the applicant for the above referenced property NStar Electric Co. d/b/a Eversource Energy (Eversource), Civil & Environmental Consultants, Inc. (“CEC”) has prepared this memorandum in response to comments provided in a memorandum from Allen & Major Associates, Inc. (“A&M”), dated February 15, 2024.

The comments provided are summarized below in italics, followed by CEC’s response in bold.

A&M COMMENTS

WAREHAM BY-LAWS AND ZONING BY-LAWS:

1. The proposed project is located within the Commercial Strip (CS) District and is subject to Article 7: Design Standards and Guideline, subsection 760 Design Standards & Guidelines for Commercial Districts. The design engineer should review the applicable section and provide statements on how the proposed project meets the standards and guidelines.

CEC Response: The property is in the Commercial Strip District, however access to the facility will be controlled through a gated access at the main site drive and will not be accessible to the public. The project is designed to comply with the Design Standards and Guidelines to the maximum extent practicable while maintaining Eversource requirements for the safe use of the site for training and emergency response functions. The proposed project includes many upgrades to the currently vacant cinema property including to the interior and exterior of the building, parking areas, and perimeter controls.

A building permit was issued for the proposed building improvements and an Order of Conditions was issued for the project from the Wareham Conservation Commission.

2. *Zoning By-Law Section 1031 requires “new projects or expansions exceeding 5,000 square feet on 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.*

CEC Response: An updated Landscape Plan is included as part of the attached Site Plans and it is stamped by a Registered Landscape Architect. The plan includes landscape improvements along the property boundary with Doty Street and along the site access. Access will be controlled through a gated fence and not accessible to the public.

To provide safe access to the site during emergency response functions, the existing parking lot islands are proposed to be removed. The proposed landscaping design includes new landscaping along Doty Street.

3. *The proposed project is subject to Article 12: Performance Standards, subsection 1260 Analysis of Development Impact: Stormwater Runoff in Compliance with MS4. The project is subject to an MS4 Stormwater Management Permit (MS4 SMP) issued by the Planning Board. The applicant should provide documentation on the status of the MS4 SMP for the record. The design engineer should provide additional narrative and calculations to show/demonstrate compliance with the removal of 90% Total Suspended Solids (TSS) and removal of 60% Total Phosphorus from the total post-construction impervious surfaces for new development and removal of 80% Total Suspended Solids (TSS) and removal of 50% Total Phosphorus from the total post-construction impervious surfaces for redevelopment.*

CEC Response: The proposed project maintains the existing site drainage patterns with no new discharges into the municipal system.

Proposed stormwater upgrades include the addition of stormwater quality units and modifications to the existing detention basin. Generally, the stormwater runoff from the roof will continue to be routed to the existing underground infiltration system while the parking lot runoff will be collected by deep sump hooded catchbasins and routed through water quality units to a sediment forebay and the existing detention basin prior to discharge into the existing wetland system on-site.

The proposed stormwater design achieves greater than 90% TSS removal and 50% Phosphorus removal. The calculations and narrative are included in the revised Stormwater Management Report.

4. *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.*

CEC Response: The proposed project maintains the existing site drainage patterns with no new discharges into the municipal system. The Applicant requests that the Planning Board review the submitted documents as the SMP for the project.

SITE PLAN & DRAINAGE CALCULATIONS:

5. *The Stormwater Report, Section 2.2 Existing Conditions states the existing boundaries were taken from the previous Flagship Cinema drainage report by SITEC Inc., dated October 18th, 2000. The watershed plan provided within the report is cutoff and A&M is unable to review and confirm the watershed boundaries used within the calculations. The design engineer should provide a new watershed map for review. Based on the HydroCAD report, it appears that the existing conditions analyzed and reported appear to be the existing conditions of the site as it appears today. The design engineer should clarify the intent of the statement about reuse of the “existing boundaries”. To make a full evaluation of the site and the proposed impacts of the project at the design point, the design engineer should provide a comparison table showing the original existing conditions values from the 2000, the current values using 2023 existing conditions relative to the proposed conditions.*

CEC Response: The existing watershed mapping and narrative has been updated and included in the Stormwater Report.

6. *Under Standard 7, the design engineer states that the project is considered redevelopment and had been designed to the maximum extent practicable. The design engineer should review Chapter 3 Checklist for Redevelopment Volume 2: Technical Guide for Compliance with the Massachusetts Stormwater Management Standards.*

Redevelopment is defined to include:

- *Maintenance and improvement of existing roadways, including widening less than a single lane, adding shoulders, correcting substandard intersections, improving existing drainage systems and repaving;*

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- *Development rehabilitation, expansion and phased projects on previously developed sites, provided the redevelopment results in no net increase in impervious areas; and*
- *Remedial projects specifically designed to provide improved stormwater management, such as projects to separate storm drains and sanitary sewers and stormwater retrofit projects. Components of redevelopment projects that include development of previously undeveloped sites do not meet the definition. The portion of the project located in previously developed area must meet Standard 7, but project components within undeveloped areas must meet all the Standards.*

The design engineer should provide more documentation and how the project complies with the redevelopment section given the noted increase in impervious surfaces throughout the site.

CEC Response: The project does include the addition of approximately 0.75 acres impervious area from existing conditions, largely due to the elimination of the parking lot islands. As such, the Stormwater Report has been updated to categorize the project as a new development per the MADEP Stormwater Management Standards and includes stormwater upgrades as described in the updated Stormwater Report.

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.*

CEC Response: The time of concentration for sheet flow has been updated for the pre and post calculations. The 2-year event is 3.35” in both the Stormwater Report and the HydroCAD analysis.

8. *According to the project narrative, the design engineer states that the proposed building has an existing roof drain dry well to infiltrate the roof runoff and they are to remain in place, which contradicts the HydroCAD report. The HydroCAD report has the entire roof area directed into the detention basin. The design engineer should review the input areas contributing to Watershed A1: Flow to existing Detention Basin and revise the report and calculations accordingly.*

CEC Response: The HydroCAD analysis has been revised to remove the roof runoff from the detention basin. The roof runoff will continue to be routed to the existing infiltration area.

9. *The design engineer should review the input area of the building, which does not match the existing conditions plan. Since the building is connected directly into the dry well system*

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for the roof area, the use of unconnected roofs in HydroCAD is not correct. Please review calculations accordingly.

CEC Response: The HydroCAD analysis has been revised to remove the roof runoff from the detention basin. The roof runoff will continue to be routed to the existing infiltration system.

10. The HydroCAD model for Pond P1: Ex. Detention Basin should be revised to have the rectangular weir and orifice routed through the existing 24 inch outlet pipe.

CEC Response: The HydroCAD model has been revised so that the rectangular weir and orifice are routed through the existing 24” outlet pipe.

11. The design engineer is providing a water quality swale seeking a 70% TSS removal rate. No calculations or design information has been provided to support the water quality swale. The design engineer should provide the required calculations for the sizing of the water quality swale in accordance with the Stormwater Handbook and applicable details on the plans.

CEC Response: The water quality calculations have been updated and are included in the revised Stormwater Report.

12. The design engineer is providing a sediment forebay, but no calculations have been provided. The design engineer should provide the required calculations for the sizing of the sediment forebay in accordance with the Stormwater Handbook and applicable details on the plans.

CEC Response: The calculations for sizing the sediment forebay have been added to the revised Stormwater Report.

13. The design engineer is stating 70% TSS removal in the worksheet for an extended dry detention basin, The Massachusetts Stormwater Handbook allows 50% TSS removal when combined with a sediment forebay. The TSS worksheet should be updated accordingly to reflect the reported values in the handbook or provide documentation justifying the higher TSS removal rate.

CEC Response: The water quality calculations have been updated and included in the revised Stormwater Report.

14. The illicit discharge compliance statement is not signed. Please provide a signed copy for the record.

CEC Response: A signed copy of the illicit discharge compliance statement is included in the updated Stormwater Report.

15. Existing Conditions Plan

- a. The existing conditions plan is not stamped by a Professional Land Surveyor registered in the Commonwealth of Massachusetts. The plan shall be endorsed by a PLS for record.*
- b. Note 1, states that the property line information was taken from a plan dated March 7, 1989, however the property line at the southwest corner at the intersection of Route 58 and Doty Street differs from the record plan.*
- c. The tree line on the easterly side of the main driveway appears to be incomplete and facing the opposite direction.*
- d. Three catch basins are located on the westerly side of the existing building. What type of catch basins are these and where do they connect to? The final determination and discharge point may have an impact on the watershed plans and should be reviewed.*

CEC Response:

The existing conditions plan is stamped by a Professional Engineer and will be stamped by a Professional Land Surveyor.

The note on the existing conditions plan is revised to include current property information.

The existing treeline is revised.

The catchbasins referenced are proposed to be removed as part of the project. Labels for the catchbasins to be removed are added to the Plans.

16. Erosion & Sedimentation Control/Demolition Plan

- a. No work is shown on this plan. The plan should be updated to show the proposed erosion control measures being installed to protect the existing drainage system, downgradient properties, and the wetland resource areas.*
- b. The plan should identify the areas being demolished, cleared, removal of topsoil, etc.*
- c. Two existing catch basins, located on the westerly side of the building will be located within the proposed material logistics storage and meter training area. Are these catch basins to remain or to be removed and how will they be protected during construction if to remain?*

CEC Response: The plans have been updated to show the proposed erosion and sedimentation controls. The information on the proposed demolition work is also updated to clearly specify the areas being demolished and cleared.

17. Site Layout

- a. *The site layout plan illustrates several new utility poles with camera and lights to be installed in close proximity to the perimeter. What are the purpose of the lights and what are the hours of operation? A photometric plan should be provided to confirm and verify that the light spillover has been minimized.*

CEC Response: A photometric plan showing the location of the proposed lights and lighting levels is included as part of the submission.

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.*

CEC Response: Water quality volume calculations are provided in the revised Stormwater Report. To minimize the disturbance around the existing pond and the wetlands buffer zone, an access drive around the pond was not provided. Any required maintenance of the pond will be conducted from accessible areas of the site.

Rip-rap dissipation pads were added to the outlets into the detention pond.

The frame and grate on the outlet control structure is designed to function as the emergency spillway.

19. Detail Sheets

- a. *No detail is provided on the extended detention basin. Detail should be provided showing the minimum side slope, finish treatment of side slope and bottom area, access road, etc.*
- b. *A spillway detail is provided on Sheet C801, but A&M is unable to find where the detail is being used. Please identify the spillway location and provide the elevation of the spillway crest.*

CEC Response: As the upgrades to the existing detention pond are minimal, we do not provide a detail. The spillway detail has been removed.

20. The site currently has mature vegetated areas adjacent to Doty Street and Route 58 and based on the site layout plan a majority of this vegetation is being removed to accommodate the proposed training areas. The applicant is proposing to install new landscape along the frontage as shown on Sheet C700. To the extent the existing vegetation can be maintained, is there an opportunity to review the dimensions of the training areas and determine if they can be lessened to preserve the mature vegetated areas. As previous mentioned above, the limits of clearing should be added to the demolition plan.

The proposed training areas are reduced from the prototypical size required by Eversource to conduct a safe, active training environment for their personnel. The extent of the existing vegetation along Doty Street will be maintained as much as possible. Over 40% of the total site area (approximately 8.0+/- acres) of the site will remain undisturbed as vegetated open space as part of the project.

CEC Response:

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.

CEC Response: The applicant will verify the condition of the existing drainage structures prior to construction and provide documentation as necessary.

22. The abutter list provided with the application appears incomplete as it only encompasses lot A1. Lot B1 contains portions of the building and stormwater management areas that would require inclusion in the list.

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CEC Response: An updated abutter's list can be requested for Lot B1 however the abutters for Lot B1 are the same as for Lot A1.

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.*

CEC Response: Detail Sheet 3 shows the concrete pads in the Substation, Underground, Vault and Truck Training Areas. There are no anticipated uses of hazardous materials unique to the training areas of the proposed site.

24. *The application notes the parking lot will be used for staging of vehicles as part of emergency response operations. For clarity, is it the intent that the lot be used for long term storage/staging, mechanical repair, or refueling?*

CEC Response: The parking lot will not be used for long term storage/staging or mechanical repair. Only during emergency response operations, line trucks will be refueled in the parking lot through fuel delivery trucks. The Eversource environmental team has protocols in place before, during and after emergency responses which include notification of MADEP and subcontractors responsible for implementing any spill prevention measures to ensure appropriate mitigation measures are in place.

RELATIONSHIP TO OTHER PERMITS:

25. *The applicant is also required to submit a Notice of Intent to the Wareham Conservation Commission for work within 100 feet of a resource area protected under the Wetlands Protection Act. Under the Wetlands Protection Act, additional comments may apply.*

CEC Response: The applicant submitted a Notice of Intent to the Wareham Conservation Commission and received an Order of Conditions for the project.

26. *As part of the conservation process, the wetland lines shown on the proposed plans requires verification. The date of the wetland line is not noted on the plans. Verification of the line occurs simultaneously during the Notice of Intent. The final resource area evaluation may result in additional changes pertinent to the Planning Board's review of the application.*

CEC Response: The applicant submitted a Notice of Intent to the Wareham Conservation Commission and received an Order of Conditions for the project.

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We hope that you find these responses helpful in your evaluation of the Site Plan Review Application before the Planning Board. Please feel free to contact us with any questions at bpotvin@cecinc.com or via phone at (774) 501-2176.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Brian E. Potvin, P.E.
Principal



Chris Vandenberghe, P.E.
Project Manager

CC: Philip Cordeiro, P.E., Allen & Major Associates, Inc.

Sonia Raposo, Assistant to the Planning Department, Town of Wareham

Attachments