

*Comprehensive Permit Review of  
Site Plan  
Cedar Ridge Estates  
708 Prentice Street, Holliston, Massachusetts*

*December 16, 2005*

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<p><b>Owner</b> R &amp; C and C &amp; R Trust 1200 Washington Street Boston, Massachusetts 02118</p> <p><b>Applicant</b> Green View Realty, LLC 189 Hartford Avenue, Suite 2-1 Bellingham, MA 02019</p>	<p><b>Engineer/ Surveyor</b> Coler &amp; Colantonio, Inc. 101 Accord Park Drive Norwell, Massachusetts 02061</p> <p><b>Content</b> Thirty-three (33) Drawings dated January 19, 2005, revised October 31, 2005</p>	<p><b>Location</b> 708 Prentice Street – Access off Marshall Street, south of Prentice Street intersection.</p> <p><b>Assessors' Reference</b> Map 7, Block 3, Lots 19 and 22</p> <p><b>Zoning Districts</b> AR-1 Agricultural Residential District A</p>
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## **SECTION I: INTRODUCTION**

### **PLANS, DOCUMENTS, AND EXHIBITS**

In undertaking the engineering peer review of this project, PSC reviewed the plans, calculations, documentation and exhibits provided by the Project Development Team including the following:

1. *Cedar Ridge Estates – Chapter 40B Housing Development, 708 Prentice Street Holliston, Massachusetts* containing thirty-three (33) drawings, prepared by Coler & Colantonio, Inc., Norwell Massachusetts, dated January 19, 2005 and revised October 31, 2005.
2. *Traffic Study for Cedar Ridge Estates Holliston Massachusetts* prepared by Coler & Colantonio, Inc. Norwell, MA dated October, 2005. (Reviewed separately by PSC on November 3, 2005).

In conducting this peer review, additional information was obtained from the following:

1. 760 CMR 31.00: Housing Appeals Committee: Criteria For Decisions Under MGL c.40B, §§20-23.
2. *Massachusetts Department of Housing & Community Development Guidelines for Local Review of Comprehensive Permits, October, 1999.*
3. *Flood Insurance Rate Map (FIRM), Town of Holliston, Massachusetts, Middlesex County.* Community Panel Number 250195-0003 C, revised September 10, 1982.
4. *Town of Holliston Zoning Map* amended through May 2005.
5. *Town of Holliston Zoning Bylaws* as amended through May 2005.
6. *United States Department of Agriculture; Natural Resources Conservation Service Soil Survey of Middlesex County, Massachusetts.*
7. *Massachusetts Natural Heritage Atlas, 2003 Edition*
8. *Massachusetts Environmental Policy Act Office, 301 CMR 11.00 MEPA Regulations*

## **PROJECT DESCRIPTION**

The Project is based upon the Comprehensive Permit Application Submitted by Green View Realty, LLC to construct a residential development off Prentice and Marshall Streets in Holliston, Massachusetts to provide two-hundred four (204) units on a distributed among fifty-five (55) structures of between two and four units each.

The overall project will be accessed by three main roadways that access Marshall Street in three locations. Each of the three proposed roadway sections is shown having two eleven-foot (11') travel lanes with an additional one (1') foot Cape Cod Berm on either side for a total pavement width of twenty-four (24') feet. No sidewalks are provided for the project roadways. Three visitor parking spaces are designed for the project. An unsized, looped water system is provided with two connection points to the Marshall Street municipal system. Septic flows will be conveyed via a force-main system to a wastewater treatment plant that discharges to a large leaching-field system along the

southern property line (behind Buildings 31-34). This report identifies issues and recommendations that may be appropriate for inclusion in the *Report on the Comprehensive Permit* to be submitted to the Zoning Board of Appeals. The *Site Plan* consists of thirty-three (33) drawings dated January 19, 2005 and revised October 31, 2005. The drawings are signed and sealed by Kelley Killeen of Coler & Colantonio, Inc. The existing parcel contains numerous Bordering Vegetated Wetlands, Inland banks and other resources. The project locus was a former NPL site 'Bird Property'.

Under existing zoning requiring a 80,000 sq-ft lot area and 225 feet of frontage, approximately 12-16 dwelling units would likely be developed on the parcel. Under the current proposal for 202 dwelling units, the project would be developed at approximately one thousand two hundred fifty percent 1250% of the by-right density.

The remaining sections of this report identify revised and supplemental information necessary to accurately compute Statutory Minima and satisfactorily complete the minimum Contents of the Application. This report also included recommended Technical Reviews should the Board of Appeals approve the Comprehensive Permit Application.

## **SECTION II – STATUTORY THRESHOLDS**

The application includes calculations of statutory minima as they relate to consistency with local needs. Issues relating to the computation of statutory thresholds are summarized as follows:

### **COMPUTATION OF STATUTORY MINIMA**

1. The application should provide a computation of the existing 40B Housing Inventory. The Housing Inventory based upon DHCD counts as of August 1, 2005 and should reflect the applicant's contribution as well as the potential addition of affordable housing stock from the Winter Woods, Balancing Rock, Hollis Hills, Highland Meadows, Andrew School and Cutler Properties. The project increase toward the 10% standard should then be reassessed.
2. A computation for General Land Area Minimum should be provided to indicate acreage added by the project to the existing Town Low and Moderate Income Housing areas. The Statutory Standard requires that 1.5% of the total Town land area be held for affordable Chapter 40B housing. For Holliston, 1.5% is equivalent to approximately 179.9 acres. The application should document existing Chapter 40B land areas including any approved project areas inventoried in Item #1 above.

## **SECTION III – CONTENTS OF THE APPLICATION**

The contents of the application as submitted are deficient and fail to incorporate information required by the Board of Appeals to fulfill its responsibilities under the Comprehensive Permit Process. Issues relating to the content of the application are summarized as follows:

## **PROJECT ELIGIBILITY LETTER**

3. The Comprehensive Permit application should contain a *Project Eligibility* or *Site Approval* letter dated within the previous two years. This letter, normally issued by a state or federal housing agency to the developer, indicates that this described project is eligible under a particular housing program. Generally included in the application package, the Board or Appeals would not open the hearing until in receipt of this document.

## **EVIDENCE OF SITE CONTROL**

4. Evidence of Site Control – The applicant should provide documentation demonstrating control of the property. Suitable documentation would be a copy of the deed, purchase and sale agreement, option agreement or similar articles.

## **EXISTING SITE CONDITIONS PLAN**

5. Existing specimen trees over 12-inch caliper along the limits of construction should be added to the *Existing Site Conditions Plan* to facilitate preservation.
6. Identify the pipe material, approximate age, and condition of the watermain in Marshall Street. The proposed water services are to tap into the existing Marshall Street through the new 50-foot easement across the former Doyle property and along Drive 4 in the southern portion of the project.
7. Inspection of the Flood Insurance Rate Map for the Town of Holliston, Number 250195-0003 C, revised September 10, 1982 indicates that site lies within Zone C, outside the 100-year jurisdictional floodplain of Cedar Swamp.
8. At least one site benchmark is provided in a tree that is likely to be disturbed during construction. At least three permanent benchmarks should be provided for the project.
9. Please indicate whether the existing structure behind Building 1A is to remain. (Refer to Sheet C15).
10. Monitoring well locations should be provided on the plans.
11. Additional benchmarks should be provided for the project. It appears that TBM #2 will be disturbed by the construction road. TBM #1 in the large oak tree behind the tennis court appears acceptable.

## **EXISTING SITE CONDITIONS REPORT**

12. As set forth in the Department of Housing and Community Development's Guidelines for Local Review of Comprehensive Permits, the Applicant is required to submit a narrative detailing "alternative site uses under existing zoning." This document should be incorporated into the project narrative. Additionally, submission of a scaled sketch plan would be desirable and appropriate as backup to document the required narrative. The site plan can be a working document as long as it is sufficient to substantiate the narrative. The Alternative should address development of the project in conformance with existing Zoning dimensional requirements for AR-1 including use, setbacks, and height.
13. The narrative should summarize conditions in surrounding areas to the project. Included in the narrative should be a discussion existing traffic patterns and character of open areas in the neighborhood.
14. A first level Environmental Assessment in accordance with MGL Ch 21E should be furnished for the project.
15. Fire flow test data should be submitted for the existing watermain in Marshall Street. The proposed water service has been looped which would help to maintain adequate service if pressure is found to be marginal.
16. The narrative should address investigation for any features of historic or archeological significance.

## **PROPOSED SITE DEVELOPMENT PLANS**

### ***Site Planning***

17. Please provide additional information regarding the 'recently acquired lot' shown on Sheet C23. It appears that either a portion, or the entire existing lot shown as Assessors Map 7, Block 3, Lot 21 has been transferred to the project. A portion of the proposed entrance radius extends onto the neighboring Map 7, Block 3, Lot 28 parcel. Please verify whether a portion of this lot has been purchased as well.
18. The interior cul-de-sac near the Prentice Street/Marshall Street intersection should be provided with guardrail or other barrier to ensure that vehicles do not attempt to drive through this area as a short cut to reach Marshall Street.
19. Curb transitions and ramps should be provided for the walking trails. Pavement markings should be provided for all roadway crossings.
20. It appears that Road 4 is intended to serve as an emergency entrance only. If this is the case, indicate whether it is to be gated. Provide a maintenance schedule for this roadway to ensure that it is kept clear during wintertime months.
21. Any portion of the septic leaching system that is designed beneath pavement areas will be required to be vented.
22. An Isolated Land Subject to Flooding exists in the area behind Buildings 3,5,7,8,9, and 11. A large excavation has been created around the perimeter of this existing wet area

with a footprint elevation approximately one foot lower than this existing elevation. Soils and groundwater information should be provided for this basin, as well as the connected basin adjacent to the entrance from Marshall Street. Please verify that the capacity of both basins will be maintained for the calculated storm events. Also provide a detail of the berm between the existing wet area and the surrounding excavation. A gentler slope may be warranted for the design of this interior berm.

23. There are rock outcrop areas near portions of the proposed soil absorption system, particularly in the southeast corner of the system beneath Road 4. It is not clear that the subsurface soils are conducive to wastewater recharge in this area. Please provide soils data including percolation rates and depth to bedrock for the soil absorption fields. Due to relatively close location of proposed Buildings 31 and 32, and Road 4 directly above the leaching area, it is important that this system function as designed.
24. A fence or low plantings should be provided around the detention basins to help deter personal injuries.
25. Sloped granite or concrete curbing should be specified
26. The onsite pedestrian walking trails should be better integrated to afford the greatest utility to the entire project while maintaining privacy to individual residences. Portions of the paths that closely parallel the rear of buildings 18, 19, 21, 23, and 24 should be moved further into open areas.
27. Amend the plans to indicate the entirety of on-site wetlands, lands subject to flooding and other resource areas and buffers as approved by the Holliston Conservation Commission. No buffer zones have been provided on the drawings.
28. Extensive work will be undertaken within DEP resource areas. Provide information concerning erosion/siltation control to protect on-site wetlands and streams. A sequence of construction and erosion and sedimentation control plans should be developed due to the complex nature of the site construction. Also, describe measures required to protect the Marshall and Prentice Street pavements and drainage system from construction impacts.
29. Temporary stilling basins will be required to address dewatering activities and general site runoff during construction. A Construction Stage plan should be provided to include such temporary storm water management measures. Construction staging areas with appropriate stabilization measures should also be provided for each work area and shown on the drawings.
30. A Landscape Plan should be developed that incorporates street tree design with individual lot plantings. Additional buffering should be provided between walking trails and adjacent residences.
31. The storm water management system as currently designed, will significantly and directly impact existing Resource areas. Two of the largest basins on the project will either completely subsume isolated resource areas (Basin 7P) or will directly impact existing groundwater hydrology (Basin 4P). To ensure that the resource areas are adequately protected, storm water management basins should be designed with a minimum buffer that allows for vehicular access around the entirety of each basin for future maintenance. The 50-foot no disturbance zone that is provided by local regulations could be reduced, but should not be eliminated.

32. There is no provision for wetland replication. The wetland replication should be provided in an area in the project that would not be impacted from the new roadways. A wetland seed mixture should be specified for mitigation areas that are tolerant to any road salts.
33. It appears that additional Best Management Practices should be employed in the drainage design. Neither basin has been equipped with a sediment forebay, and it is not clear that there is provision for either in-line or off-line oil-water separation to remove hydrocarbons. Prior to each stormwater discharge to the basins, a structural water quality structure should be added to the treatment train. Due to the concentration of relatively large contributing pavement areas into two detention basins, it is recommended that of a vortex-type oil and sediment removal system be provided prior to outfall into each basin. Such systems are reliable in removing water-borne hydrocarbons.
34. It appears that a portion of Drainage Basin 2P near the Prentice Street/Marshall Street intersection extends off the property. Also verify that Basin 7P grading is contained within the project boundary.
35. If any of the drainage facilities are to be maintained by the Town, drainage easements should be provided and shown on the plans.
36. Indicate whether dumpsters will be provided for the project. Ensure that any such dumpster locations are easily accessible for both tenants and refuse vehicles.
37. If centralized trash collection facilities using large rear loading dumpsters are proposed, provide concrete pads to accommodate interchange of empty and full dumpsters.
38. All dumpsters should have permanent, attractive enclosures. A construction detail should be provided.
39. Multifamily developments typically may be required to have common mailbox locations. This could present a significant site circulation issue. The location for a common mailbox facility with associated parking should be shown.
40. *Sedimentation and Erosion Control Plans* were submitted but should be expanded to incorporate additional measures such as settling basins, construction staging areas and details, dust and runoff control measures, and existing inlet protection. General SWPPP notes should be added to the drawing set.
41. The applicant should confer with the Holliston Fire Department and provide documentation from the Department indicating their concurrence with fire access to buildings, emergency response times, water pressure and volume, alarms, and other fire protection related matters. The geometry of the roads and all on-site driveways should accommodate the largest Fire Department's design vehicle. Documentation should be provided indicating that the Fire Department approves the layout and methods of construction of the on-site access and circulation system.
42. The applicant should confer with Police Officials and provide documentation indicating that they are satisfied with access and safety issues during construction and operation of the project.



43. Any temporary construction signage should be shown and details provided on the size, illumination, style, and legend.
44. It is not clear where the project will incorporate a permanent entrance sign. Details on the size, illumination, style, and legend of any proposed sign should be given.
45. A detailed *Construction Phasing Plan* showing access and utilities for each phase should be submitted.
46. The site should be fenced and secured during construction.
47. Given the density of this project and roadway lengths, snow storage is a concern. Snow storage areas should be designated outside paved or on adjacent grassed areas that maximize recharge.
48. In accordance with Architectural Access Board (AAB) requirements, all sidewalks should be constructed with compliant ramps. Specify the location of van-accessible spaces and provide an overall site inventory to verify conformance to the requirements CMR 521.
49. The number and location of accessible dwelling units should be described and associated accessible parking stalls should be indicated on the drawings. The applicant should verify that the walkway and parking area grades for the accessible route adhere to all current Architectural Access Board regulations.
50. A *Site Lighting Plan* should be developed using a maximum pole height of 16 feet. Light fixtures should be consistent with residential scale and style typically acceptable in the town.
51. A photometric plan should be provided.

### ***Access, Circulation, and Parking***

52. There are only 3 visitor spaces provided for the entire project. Because there is very little space for street parking for the project, accessibility will become an issue, particularly during winter months when plowed windrows further limit available street parking. Please provide a parking inventory for the project.
53. A 24 foot travel width pavement would provide additional space for snow removal and would facilitate passage of emergency vehicles past parked vehicles. The current design calls for (2) eleven-foot travel lanes with an additional 1-foot Cape Cod Berm on either side. An additional foot should be added to each travel lane.
54. A shoulder and guardrail should be considered along the western edge of the Drive 5 between Building 37 and the tennis courts and also in the cul-de-sac just north of the courts.
55. The Road 2 intersection with Drive 6 is steep on both Road 2 approach ends (7%+). A leveling area should be provided on both sides prior to the intersection. Ideally, the leveling area should be increased to 100 feet using a 2-3% grade. Also, the driveway entrances to the Building 40, 43, 46 and 48 units should be more clearly graded. All have very steep cross-slopes.

56. Road 2 contains fairly steep grades. It is recommended that concrete or granite curbing be substituted for the bituminous curb shown on the details. Concrete or granite provides a more highly visible and durable roadway edge that would be less subject to plow damage and would better segregate vehicular and pedestrian sidewalk traffic. Concrete or granite should also be provided for the Drive 1 turnaround and Drive 6 and 7 cul-de-sacs.
57. Site distance information should be provided at Road 2 and Drive 4 intersections with Marshall Street.

### ***Grading***

58. Construction of the proposed site improvements will involve substantial earthwork with cuts and fills exceeding 10 feet in certain areas. General information on the structural reuse of onsite soil types should be provided.
59. Total cuts and fills should be identified and the net volume of cut/fill brought on or off site should be estimated. The anticipated number of off-site truck trips necessary to transport the net cut/fill volume should be provided.
60. It is recommended that both basins should be graded using side slopes of roughly 3 horizontal to 1 vertical (3:1). It appears that the basins use side slopes of 2 horizontal to 1 vertical (2:1). For a 2:1 slope, we anticipate that the embankments shown may not be stable. All onsite embankments should be designed under the direction of a geotechnical engineer. We anticipate that impervious cores and surface protection will be required. To the extent that organic or other unsuitable soils underlie these basins, these soils will have to be removed and replaced with structurally suitable soils. In general, downgradient side slopes should be in the range of 4 horizontal to 1 vertical. To accommodate the more gentle side slopes, the portion of the site devoted to retention and detention basins may have to be increased.

### ***Landscaping***

61. A *Landscape Plan* has not been provided for the project. A plan showing plantings, street trees and buffer areas should be developed by a Registered Landscape Architect and included in the submission material. Initially, the plan can be general in nature with a definitive plan provided prior to construction.
62. Provide a typical planting plan for the project. A *Tree Protection Plan* should be provided for any remaining trees to be preserved along the perimeter of the site.
63. The *Landscape Plan* should limit turf areas and use plants requiring minimal irrigation.

## **PROPOSED SITE CONDITIONS REPORT**

64. Although a *Proposed Site Conditions Report* was not submitted for review. An appropriate site development narrative would describe relevant site development and architectural design issues. The provided narrative should be supplemented to include descriptions of bedroom mix data, proposed affordable/market rate ratios, ground coverage data, proposed landscaping/buffers, and Chapter 21E remedial action.

65. Specific arrangements for operation and maintenance of the sewer pump station should be detailed.

## **PROJECT IMPACTS**

66. The construction should be performed in accordance with applicable laws and regulations regarding noise, vibration, dust and sedimentation. Any impacts from noise, vibration, or required blasting during construction should be identified.
67. Portions of at least 10 of the units and a large portion of the rear on-site basin is constructed within the 100-foot buffer zones relating to bordering vegetated wetlands. The extent of construction within buffer zones should be minimized to the extent practicable and a minimum buffer zone should be maintained to minimize direct alteration of wetlands during construction and to facilitate maintenance.
68. Two of the four basins directly impact Resource areas. Indicate whether a Water Quality Certification will be required as a component of construction for either area.
69. The Applicant should prepare and submit for review, a detailed management plan indicating the organization and funding mechanism for a homeowners' association or other organization that will be responsible for maintaining the on-site parking, access, utilities, and landscaping and for contributing to ongoing maintenance of the shared wastewater facility.
70. An assessment of project impacts was not provided. A project impact analysis must be submitted to identify and evaluate project impacts for relevant components of environmental quality. The analysis should be quantitative and should be proportional to the significance of the impact.
71. Identification and evaluation of impacts on municipal services should be identified and evaluated. Identification and evaluation of impacts on municipal infrastructure and finance should be identified and evaluated.
72. Due to substantial earthwork, the extent of construction traffic including truck trips should be identified. Proposed truck routes and scheduling should be shown. The analysis should include a distribution breakdown. The development team should provide a rough construction schedule with anticipated milestone dates for major components of the project.
73. A Traffic Management Plan should be submitted that has the approval of the Holliston Chief of Police. As a minimum the Traffic Management Plan should identify the number of truck trips, proposed truck routes, and an overall construction schedule. It is not clear whether the Police Department has reviewed the current design.

## **PRELIMINARY ARCHITECTURAL DESIGN**

74. Signed and sealed preliminary architectural drawings were not provided for review and are a required component of the submission.

75. Elevations of all sides of all buildings and garage structures should be provided. Building sections should be provided.
76. Information on exterior finishes and colors should be provided.
77. The height of each building should be calculated, as set forth in the Zoning Bylaw Building heights should be provided for each of the basic unit styles.

## **BUILDING TABULATION**

78. A unit count from the index sheet (C2) indicates that two-hundred four (204) units are proposed for the project. The traffic study cites two-hundred (200) units and the figure tabulated for the ENF is one-hundred ninety nine (199) units. Sheet C17 also shows 199 units. Please verify the latest configuration and unit count for the project.
79. Information for housing types and bedroom mix data was provided. However, rooms that are not a living room, dining room, kitchen, or bath should be considered as a bedroom for the purposes of wastewater generation, but not for the purposes of quantifying the bedroom mix.
80. The affordable units should be designated on the plans and should be uniformly distributed throughout all buildings. Verify the proposed distribution of the affordable units.
81. Indicate the number of handicapped accessible units and designate their location.

## **UTILITIES PLAN**

82. The project water, gas and electric service enters the site within the “50’ easement within recently acquired lot”. Appropriate easements and legal mechanisms should be identified and provided for installation of a private utility in a way in the event that this easement would become an accepted public way.
83. Fire flow testing should be furnished to verify available pressure and volume. A letter report from a fire protection or mechanical engineer should be submitted stating that available pressure and volume of water is adequate for fire protection and domestic uses.
84. Some buildings appear to be located close enough to create common fire zones necessitating provision of sprinkler systems.
85. The underground absorption system covers an extensive footprint with existing elevations that differ by about 14 feet between the ends of the leaching beds. Please provide additional contours around the entirety of this system to demonstrate its feasibility at this location.

## **UTILITIES PLAN – STORMDRAINS**

86. The plan identifies all the on-site basins that accommodate runoff as 'drainage basins'. Whether retention, detention or a combination of both, for these basins to be effective, they must be empty prior to a storm event. It is possible that both might intercept a groundwater base flow. All basins and recharge structures must be designed such that spring high groundwater is below the bottom of the basin. Soils and groundwater information should be provided for each proposed basin area for review
87. Cascade grates should be specified for all catch basins located on profile grades of 6% or greater.
88. Please indicate whether the large culvert shown on Sheet C15 between Basins 4P and 5P is intended to be an equalization structure between the large and small basin. Currently, no outlet or overflow provision is designed for either basin. Verify that any flooding during large storm events does not impact the function of either basin.
89. Under circumstances where more than 2-feet of standing water is expected for an extended duration after a storm (or 4-feet at any time), fencing or other barrier would be recommended to protect residents. Please indicate the length of time for full stormwater discharge for each aboveground basin.
90. Drywells should be provided to recharge roofwater from each unit. Due to the possibility of high groundwater, drywells for roofwater should be interconnected wherever practicable. Drywells for roofwater should be located one foot above groundwater, preferably in locations that have percolation rates of less than 20 minutes per inch.
91. The on-site system of stormwater detention/retention basins have been sited on the drawings. Their designs should be generally revised based upon the following criteria:
  - a. Provide permeability tests for all on-site basins.
  - b. Locate recharge basins in locations that can facilitate recharge of all stormwater within 48 hours following cessation of inflow. Install drywells or leaching galleys at the bottom of all basins to accommodate frozen ground conditions. Ensure that these facilities are located in pervious soils above groundwater.
  - c. Maintain a minimum 25 foot undisturbed zone between the basin embankments and the edge of bordering vegetated wetlands to allow for vehicular maintenance access.
  - d. Provide a preliminary design report from a geotechnical engineer establishing design guidelines for basin embankments. Incorporate these design recommendations in revised basin designs.
  - e. Locate the bottom of basins such that they do not intercept groundwater.
  - f. Provide protective measures around any basin designed to detain a water depth of greater than 4 feet.
  - g. Provide vehicle access to the bottom of all basins to facilitate maintenance.

## **REQUIRED EXEMPTIONS**

92. Submit a tabulation of the variances requested from applicable intensity requirements of the Zoning Bylaws. Include a tabulation of the dimension or parameter required by the Zoning Bylaws versus that proposed to be provided by the applicant.

93. Submit a tabulation of departures from the Planning Board's Rules & Regulations, which serve as Town construction standards. Describe why there is a public interest in allowing various downgrades.

#### **FEDERAL AND STATE PERMITS AND MEPA COMPLIANCE**

94. Assuming 2-bedroom units, the proposed 203 unit development will generate approximately 44,660 gallons of sewage per day. The ENF reports a total 58,000 gpd will be generated from 199 units within the project. Please provide the project unit and bedroom count and verify that all dens and 'bonus rooms' are included as bedrooms on the floor plans.
95. The project will result in the disturbance of more than one acre of land, and thus will require the applicant to obtain coverage under the federal Construction General Permit (CGP). The CGP outlines a set of provisions construction operators must follow to comply with the requirements of the NPDES stormwater regulations.