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May 5, 2025

Ashland Zoning Board of Appeals
John F, Trefethen, Chair
101 Main Street
Second Floor
Ashland, MA 01721

Attn: John F, Trefethen, Chair

Re: 10-50 Main Street – Comprehensive Permit
Response to April 1st Hancock Associates Peer Review Response.

Dear Mr. Chairman,

Bohler Engineering is in receipt of an additional comment letter from the Hancock Associates, received on April 1, 2025. On behalf of Applicant SLV Ashland, LLC, Bohler offers the following responses. For clarity, Hancock Associates' comments are in **italics,** while our responses are directly below in **bold** type. Any comments that are noted as closed out or addressed are greyed out for ease of reference.

Initial Review of Submission
760 CMR 56.05 contains the required elements of a submission of a Comprehensive Permit to the Zoning Board of Appeals. The following is a review of the submission with regard to my civil review of these requirements:

- Preliminary site development plans with the locations and outlines of proposed buildings; the proposed locations, general dimensions, and materials for streets, drives, parking areas, walks and other paved areas; and proposed landscaping improvements. Any project of five or more units must have a site plan stamped by

  The applicant has satisfied this requirement. A Plan set has been submitted. As noted below, critical information to support peer review is missing from plan set and supporting documents.

  Item closed

Response: **Acknowledged, no further response needed.**

- An existing condition report on the proposed site and the surrounding areas.

  The applicant has complied with this requirement. An existing condition plan is part of the site plan set, however it is signed and stamped by a Civil Engineer. The plan should be stamped and signed by a Massachusetts Professional Land Surveyor.

  Hancock Comment 4/1/25:
  The revised survey dated June 21, 2024 is stamped by a registered land surveyor. This comment has been addressed by the Applicant.

Response: **Acknowledged, no further response needed.**

- Tabulation of proposed buildings by type, size, and footprint, impervious coverage, and open space, including percentage of tract to be occupied by buildings, parking and paved vehicular areas.

The applicant has submitted tabulations for the buildings within the application, however the percentage of tract to be occupied by buildings, parking and paved vehicular areas is missing from the table.

Hancock Comment 4/1/25:
Percentage of tract occupied by buildings, parking and pave vehicular areas has been updated on the plan set. Item closed.

Response: **Acknowledged, no further response**

- A preliminary utilities plan (water, wastewater, drainage, and storm water management facilities).

The applicant has satisfied this requirement within the site plan set referenced above. The plans have been developed to a very high level far beyond the preliminary regulatory threshold, however key features normally part of these plans are missing such as details and erosion control measures.

Hancock Comment 4/1/25:
See comments regarding Erosion Control below.

Response: **Refer to applicant response regarding Erosion Control below.**

- List of requested Waivers.

The Applicant has complied with this requirement. As peer review proceeds, the list may require updating. It is unclear from the waiver list if the Applicant is seeking any waivers which are related to the commercial component of the development. The Applicant should provide a separate zoning compliance table for the commercial development. We recommend the Board schedule a comprehensive waiver review with the Board at an upcoming hearing. The waiver list provides commentary on the requested waivers contradictory to information on the plan set. An example of this is Section 5.4.4, Parking Lot Screening where the claims a "robust set of plantings" screening residential neighbors. Lastly, the Applicant refers to future information being provided to the Board with regard to waiver requests. The Applicant should provide all documentation required to define the nature and extent of all relief required for the Board to adequately review the total project, potential impacts and mitigation that may be necessary.

Hancock Comment 4/1/25:
Per the applicant's response to comment Z3, "An updated waiver list will be submitted when once the peer review process has been completed and the Applicant is able to confirm exactly what waivers are needed, as well as which waiver may no longer be required." Item remains open.

May 5th Response from Applicant: Updated waiver list (see Exhibits D) have been prepared and submitted. It is more typical to review the waiver list at the end of the public hearing process after all disciplines have been reviewed, but we nevertheless have submitted waiver lists, from both Ashland zoning and wetland bylaws, per the request of Hancock Associates.

Technical Review:

Comment Z1: *Applicant should add the dimensional waiver request information to the plan set. The Zoning Table on Sheet C-301 appears to be incomplete.*

Response: **Dimensional waiver information will be added to the plan set once the review process is further along. Please note the dimensional waivers were included in the overall Comprehensive Permit application submitted to the ZBA.**

Hancock Comment 4/1/25:
Item remains open.

May 5th Response from Applicant: Dimensional waivers have been added to the Zoning Table on Sheet C-301. The full list of waivers have been updated and submitted as Exhibits D.

Comment Z2: *The Total Lot Coverage list in the Unit summary table is listed as 49%, while the lot coverage list on the Site Plan sheet C-301 is 26.2%. Please review and revise accordingly.*

Response: **The Zoning Table has been revised to reflect the proposed updates, as shown on Sheet C-301 of the enclosed Preliminary Site Plan Documents. The total proposed lot coverage is calculated to be approximately 24%± and the total impervious coverage proposed on-site is calculated to be approximately 48%±.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response**

Comment Z3: *The applicant requests waivers for "the Town of Ashland Stormwater Management Bylaw (Chapter 247) and Regulations requiring a permit for any activity requiring Site Plan Review, any activity resulting in land disturbance of equal to or greater than 10,000 square feet or will increase impervious surface more than 50% of the parcel, any redevelopment project, and any activity that will alter, fill, or degrade a wetland." The applicant should specify which sections of the Ashland Bylaws are being requested to be waived with an explanation of why said standard cannot be met for the project.*

Response: **A Waiver Request document, dated March 15, 2024, was submitted with the initial Comprehensive Permit Application which include the necessary waivers and associated reasons for same. An updated waiver list will be submitted once the peer review process has been completed and the Applicant is able to confirm exactly what waivers are needed, as well as which waiver may no longer be required.**

Hancock Comment 4/1/25:
Comment to be resolved when the updated waiver list is provided. Item remains open

May 5th Response from Applicant: The Applicant has resubmitted its waiver requests as attachments Exhibit D. A waiver in its entirety from the Ashland Stormwater Management Bylaw has been requested.

Comment Z4: *The site is located in the Industrial Zoning District with Ashland Downtown District A Overlay district and Photovoltaic Installations Overlay District. Residential B Zone abuts the property to the Northeast and south. Ashland Development District C is across Main Street. The project requests a waiver from §282- 4.1.1 for front yard setback (permitted: 8' minimum, 15' maximum. requested:17.1' building and 2.5' for retaining wall), and maximum permitted height (permitted: 38'/3 stories. requested: 69' 11," 6 stories). The building height includes 5 stories over 1 story of parking garage, with 60'-11" over the existing street grade.*

The plans do not identify the setbacks provided. These should be enumerated in both the plans and waiver list. The waiver for a retaining wall along Main Street seems appropriate given the steepness of the embankment along Main Street.

Also, the permitted side yard listed in §282-8.5.6.1 is 12' and the permitted side yard value listed on the Site Plan is listed as 30'. Please revise.

Response: **The proposed building setbacks are indicated in the Zoning Table on Sheet C-301 of the enclosed Preliminary Site Plan Documents.**

The permitted rear yard building setback back has been revised to be 12', as shown on the enclosed Preliminary Site Plan Documents. The permitted side yard building setback in Section 282-85.6.1 appears to be a minimum of 10' and the Zoning Table has been updated to reflect same.

Hancock Comment 4/1/25:
The 12.9' retaining wall setback not enumerated on the site plan. Under Parking Requirements, 366 standard parking spaces are listed, but this number of parking spaces includes the 8 ft x18 ft handicap spaces. We recommend listing both the total number of spaces and the number of standard parking spaces in the Parking Requirements Table. Item remains open.

May 5th Response from Applicant: The retaining wall dimension of 12.6' has been revised and added to the site layout and zoning table on sheet C-301. Standard and total parking counts have been broken out within the zoning table on sheet C-301.

Comment Z5: *Lettering will be affixed to the smokestack in the northern corner of the existing building. The ZBA to confirm that this is not considered a "roof sign." See §Ch.282-5.3.3.9. The Chapter 40B process cannot waive zoning requirements for any commercial components of the proposed project.*

Response: **The Applicant has not prepared a signage package as of yet due, as the project is still in schematic design. The lettering shown on the smokestack was conceptual. The Applicant would expect to need to submit a comprehensive permit modification request later on the process (post permitting) so that the ZBA can review and approve the full exterior signage package. And should any waivers be needed from zoning bylaws, they will be identified at that time.**

Hancock Comment 4/1/25:
The Board should request the Applicant provide preliminary sign details during the public hearing process sufficient in detail to afford review and to determine if waivers are required. Dealing with waivers after issuance of the permit is not recommend.

May 5th Response from the Applicant: The Applicant reaffirms its commitment to submit a detailed signage package to the ZBA for its review and approval after the Comprehensive Permit has been issued. To date, the Applicant has no branding, marketing or other necessary information required to create a signage package. In addition, 40B regulations allow the ZBA to grant waivers for any component of this project, not just the residential component.

Comment Z6: *386 parking spaces are provided versus 390 stated on the project plans. The parking required is stated as two per unit plus one space per 180 square feet of retail space with a shared parking reduction allowed in§282-8.5.13. The Applicant stated at the opening public hearing that the commercial space may contain a restaurant with 150 seats. The parking required for restaurants is one space per four seats. It is unclear if the restaurant will occupy the entire retail area. The Applicant should provide more information regarding the highest parking demand possible to ensure adequate parking is provided. The*

proximity of the proposed parking servicing the retail should also be clarified. The connectivity and availability of garage parking to the retail should be clarified.

Response: **The project proposes a total of 371 parking spaces. In response to a similar comment from the MDM Traffic Peer Review (comment #8a), VAI prepared a parking demand analysis that concluded a peak parking demand of 308 when considering the retail, restaurant and residential uses.**

Hancock Comment 4/1/25:
No further comment. Item closed.

Response: **Acknowledged, no further response**

Comment Z7: *§282-5.4.4 stipulates that one tree per 10 spaces shall be provided with each of said trees shall not be further than 5 feet from a parking cell. There appears to be only 19 trees provided that meet this requirement while 23 trees are required. Note that §282-5.4.4.4 states that the Planning Board may determine that the planting requirements are impractical and may instead the parking areas may be provided with additional landscaped area that more effectively screens it from public view. The Applicant should clarify compliance here and assist the Zoning Board in their review in place of the Planning Board's discretion.*

Response: **A minimum of 23 trees are proposed along the perimeter of the proposed parking area within five feet of a proposed parking space, as shown on the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment Z8: *282-5.4.4.1 states that there shall not be more than 25 parking spaces per cell. Cells shall be separated by landscaped islands or buffer areas. One parking cell is 37 spaces long and should be revised to comply with this requirement or a waiver requested.*

Response: **The Landscape Sheet has been revised accordingly.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Site Survey:

Comment SS1: *Existing site utilities are missing from "Existing Conditions Plan" that can be found on the "Existing conditions and Demolition Plan." Please coordinate the plans.*

Response: **The referenced plans have been coordinated.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment SS2: *The survey is stamped by an engineer but includes bearings and bounds. It is required to be stamped by a Professional Land Surveyor per 250 CMR.*

Response: **An updated survey has been provided and stamped by a Professional Land Surveyor.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment SS3: *Applicant should provide abutter information not provided (record owner, street addresses, and lot numbers) on Existing Conditions and Site Plans. It would be helpful to the Board if buildings on adjoining lots could be shown either on the plans or on a context plan at a smaller scale.*

Response: **Abutter information adjacent to the subject site has been included on the Overall Site Plan of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment SS4: *Extent of all the site property lines not shown, this could also be added to a smaller scale context plan.*

Response: **An Overall Site Plan has been included in the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment SS5: *Street information (street width, public/private) is provided for Main Street, but not Myrtle, Pleasant and Water Streets. Please correct.*

Response: **Additional information for Myrtle, Pleasant and Water Streets has been included in the enclosed Preliminary Site Plan Documents**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment SS6: *The location of the discharge point for the existing stormwater pump station on site is not shown. Please correct.*

Response: **The location of the discharge point of the existing stormwater pump station is shown on Sheet C-201 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment SS7: *The Applicant should provide information on the source of the 18" outlet at the raceway as well as connections from the municipal drainage system in Main Street and details on the existing raceway plug and discharge. The raceway is noted on the Demolition Plan as being removed. Hancock understands from discussions with Town Staff, municipal*

drainage currently enters the raceway discharging to the canal. Since the raceway should therefore remain, it should be shown on project plans, especially the Utility Plan. The Board should consider a condition requiring a full assessment of the structural condition of the raceway and full integration into the structural design of the building. Since the raceway serves as a conveyance for municipal drainage, easements should be created and granted to the town, as well as a full operation and maintenance plan moving forward.

Response: **It is Bohler's current understanding that the existing raceway does not receive any stormwater runoff and the intent is to remove the raceway as part of the project. Therefore, the current project is designed presuming the removal. However, the Applicant is conducting an additional assessment of the raceway to confirm the assumptions. Should the additional diligence provide new information, then the design will be updated and modified for subsequent review by the Town and its consultant.**

Hancock Comment 4/1/25:
Subsequent to the Applicant's response letter, the Applicant provided CCTV inspections of the raceway furthering the conclusion that the raceway has been dammed, and no municipal drainage enters the raceway. The video was forwarded to Ashland DPW on 4/1/25. In an email from Doug Small, DPW Direct, he notes "The culvert under Myrtle Street is blocked with flowable fill preventing water from moving between the north and south side of the street ".

In a subsequent email from Becca Solomon, Conservation Agent, "DPW and Conservation are actively investigating a suspected Sanitary Sewer Overflow (SSO) in this area that was identified by OARS 3 Rivers while they were investigating e.coli and surfactant levels in the Sudbury. The area just outside the walled-up outlet of the raceway was a positive hit for these pollutants, and DPW is working to schedule a dye test to investigate if there is a leak or unknown pipe under the building that is leaking into the raceway. Looking at the videos forwarded, the likelihood of this has significantly gone up. The potential connection to building plumbing needs to be reviewed further".

Hancock recommends a note be added to the plans requiring the Applicant work with Ashland DPW during the excavation and removal of the raceway to address any and all concerns discovered. A condition of approval can be crafted to further ensure that all work related to the decommissioning of the raceway is the responsibility of the Applicant. Item remains open.

May 5th Response from Applicant: A note has been added to Sheet C-201 as follows, "APPROX. LOCATION OF RACEWAY TO BE REMOVED. CONTRACTOR TO COORDINATE WITH ASHLAND DPW PRIOR TO AND DURING THE EXCAVATION AND REMOVAL OF THE RACEWAY TO ADDRESS ANY AND ALL CONCERNS DISCOVERED."

Comment SS8: *The Existing Conditions Plan should be updated providing more grades in Main Street in the area of the project entrances. It is unclear how proposed conditions may impact the municipal drainage system.*

Response: **A new updated survey is included with the revised plans which shows additional topography in the roadways. The proposed project is not anticipated to have any impact on the existing municipal drainage system. Proposed entrances will be graded with a ridge line on the back side of the pedestrian crosswalks in order to maintain the existing gutter flow in Main Street and direct stormwater runoff into the site for stormwater management.**

Hancock Comment 4/1/25:
See previous response.

May 5th Response from Applicant: Bohler maintains this comment is addressed with the additional information provided. Hancock's 4/1/25 comment only states

"see previous response" We ask Hancock to specify what additional information may still be outstanding if it believes this comment has not yet been addressed.

Comment SS9: *Vertical datum NGVD 29 required by §343-7.6.10.6. The existing conditions plan indicates that benchmarks were set on NAVD 88 vertical datum. Please provide a note on the plans detailing the differential.*

Response: **The Existing Conditions Survey consists of elevations referring to the NAVD88 vertical datum. A note reflecting the same has been included on the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
Please provide a note on the plans detailing the differential between the NGVD 29 and NAVD 88 vertical datums. Item remains open.

May 5th Response from Applicant: The Existing Conditions Survey has been revised to include the differential of 0.702 to note #3 on page 1 of 3. Sheet C-401 has also been revised to include a similar note.

Erosion Control:

Comment EC1: *An Erosion and Sedimentation Control Plan was not included in the submission and should be provided per §343-7.6.10.11. It should include details on construction access, erosion controls, locations of stockpiles and staging. Specific details as to how the Sudbury River will be protected during the construction of the new retaining wall and flood gates should be provided.*

Response: **A Soil Erosion and Sediment Control Plan and an Erosion and Sediment Control Notes and Details Sheets have been included in the Preliminary Site Plan Documents. As the existing retaining wall is proposed to remain, the proposed new retaining wall will be built on the predeveloped portion of the site and is not anticipated to impact the Sudbury River. Check valves are proposed at the proposed outlet discharge points, as indicated on Sheet C-401 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
A strawbale detail is provided but only silt fence is called out around the site perimeter. Please address as silt fence alone is insufficient to properly control sediment. Also, provide silt fence and hay bales on both sides of the culverts through the flood wall. There is a concern that the Sudbury River side erosion controls could be washed out. Additional erosion controls could prevent construction period silt and sediment from entering the Sudbury River. Item remains open.

May 5th Response from Applicant: Please refer to revised sheet C-801. Strawbales have been added to the silt fence call out. Additionally, strawbale and silt fence have been added to the 'project side' of the wall as an additional barrier at the openings in the wall.

Comment EC2: *Existing soil contamination may preclude the use of construction sediment basins, an alternative to sediment basins should be provided on the Erosion and Sedimentation Control Plan. Given the existence of contamination on site coupled with high groundwater levels, a note should be added to provide a preliminary indication of how dewatering will occur.*

Response: **Dewatering options during the construction of the project are being analyzed and a final strategy will be developed later in the process. There are several options available, but a final dewatering strategy has not been established at this time, but will be finalized post permitting.**

Hancock Comment 4/1/25:
Given the documented contamination on site and presence of an Activity Use Limitation (AUL), the Applicant should provide a preliminary list of alternatives for the site dewatering strategy. The Applicant should demonstrate that the site dewatering strategy is acceptable with consultation with the Conservation Commission for input in crafting a suitable condition for the ZBA decision. Item remains open.

May 5th Response from Applicant: A final dewatering strategy will be determined later in the process in consultation with the LSP and the General Contractor. However, based on the known and anticipated conditions, it is likely one of the following strategies will be utilized. The general contractor will either A) containerize water for off-site disposal, B) treat water for reinjection as groundwater, or C) Treat water for discharge to surface water under a NPDES DRGP. These options are also not mutually exclusive. One or more options may be used during construction. We realize that groundwater reinjection may not be a preferred option due to the shallow depth to groundwater and due to the limited room on site.

Comment EC3: A preliminary construction sequencing schedule should be added to the Erosion and Sedimentation Control Plan.

Response: A construction sequencing schedule will be developed in close coordination with the general contractor. A GC selection will not occur until post permitting when a final set of Construction Documents has been completed and can be bid.

Hancock Comment 4/1/25:
A construction sequencing plan is required under the MassDEP stormwater standards and will be required for the Conservation Commission submittal. A condition can be crafted to address this within the ZBA's decision. Item closed.

Response: Acknowledged, no further response needed.

Site Plans:

Comment L1: The plans do not depict snow storage areas. Runoff and snowmelt from the proposed site flows to the Sudbury River. No snow should be stockpile upstream of the flood gates or over stormwater BMPs such as sediment basins or filter strips. The Applicant should demonstrate that adequate area for snow storage is provided with consultation with the Conservation Commission.

Response: Proposed snow storage areas have been included on Sheet C-301 of the enclosed Preliminary Site Plan Documents. Snow storage will be stored in available areas on site and have been indicated on the site plans. Any excess snow that cannot be stored on site will be removed in accordance with state and local regulations. Snow shall be stored and managed such that it does not block nor impact the functionality of the outlet pipes or check valves. The stormwater Operation and Maintenance Plan and Long-Term Pollution Prevention Plans have been revised to clarify that snow shall not be stored over stormwater BMPs. Areas of snow storage will be reviewed with the Conservation Commission during the Notice of Intent process.

Hancock Comment 4/1/25:
Hancock recommends signage be added to the plan specifically prohibiting snow storage in areas critical to the function of the drainage system. Given the limited area, the total snow storage area provided should be included on the plan. We recommend the area for snow storage be at least 5% of the open paved areas being plowed. Item remains open.

May 5th Response from Applicant: 'No snow storage' signs have been added to the plans in areas that perform critical support to the function of the drainage system. Fencing has also been added on either side of these areas to help further define and protect that particular area. Snow storage areas are shown on the site plans and any snow that is not able to be stored in these areas will be removed in accordance with state and local regulations.

Comment L2: *Approximately 15,000 sf of retail space is proposed. The applicant should address how the retail space is supported with loading, dumpsters, etc.*

Response: **Notation indicating the locations of the proposed loading and dumpster in support of the proposed non-residential uses, as shown on Sheet C-301 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
Hancock defers to the Ashland Board of Health for review of the proposed commercial dumpster as it is less than 5 feet from the buildings on either side. The plan refers to details for the dumpster on the architectural plans. These plans were not submitted. Applicant should provide details showing fencing and provisions for recycling. If the commercial building is to be multi-tenant, it may not be appropriate to have a single dumpster for the restaurant and other retail users. The Applicant should address this concern. Item remains open.

Response: **May 5th Response from Applicant: The trash enclosure has been relocated and proposed at 10'x20'. The enclosure is large enough for multiple dumpsters and/or combination of dumpster and recycling. A final strategy will be created in consultation with the trash and recycling contractor. The fencing material will likely be a Trex or vinyl fencing and likely will be black in color.**

Comment L3: *The Utility plan is missing proposed drainage pipes that are on the Grading Plan. Please coordinate the plans.*

Response: **The proposed drainage pipes have been included on the Utility Plan, as shown on Sheet C-501 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment L4: *Provide size slope and material of all sewer and drain pipes.*

Response: **Notation of the anticipated size, slope and materials of the proposed sewer and drain lines has been included on the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment L5: *Water lines should be cement lined ductile iron per §344-23(A).*

Response: **The material of the proposed water lines has been revised to be cement lined ductile iron, as shown on Sheet C-501 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment L6: *The stormwater report mentions sediment basins and vegetated filter strips under the water quality section. However, neither are called out on the plans. Likewise, the operation and maintenance plan include a water quality device which is not called out on the utility plan.*

Response: **The Stormwater Report has been revised to remove sediment basins to reflect the enclosed Preliminary Site Plan Documents. Notation indicating the locations of the proposed vegetated filter strips and the proposed water quality unit has been indicated on Sheet C-401 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
Approximate locations for vegetated filter strips are shown on Sheet C-401 but Hancock is confused with regard to the intended function. These areas are adjacent to paved drainage channels from the paved parking area to the proposed pipes through the rear wall. The first flush (treatment volume as defined by MassDEP) will be immediately directed to the discharge pipes without treatment. A detail of the vegetated filter strips along with clarification of how they will function is needed. The drainage reports claim that given the site is redevelopment with constraints, treatment is provided to the extent practicable. Hancock is unable to verify this statement without further detail. Can the paved drainage channels be changed to vegetated treatment swales? Item remains open.

May 5th Response from Applicant: The intent and purpose of the filter strips and overall water quality approach was discussed with Hancock on 4/8/2025. As a result of this discussion, the plans have been revised to redirect portions of runoff in the northwestern parking area to a proposed Rain Guardian Turret for additional water quality treatment. In addition, a water quality treatment unit was added in the eastern parking area to intercept runoff and provide additional water quality treatment. The proposed discharge from the water quality treatment unit is subject to Conservation Commission approval as part of the Notice of Intent process.

Comment L7: *Provide a site details plan in accordance with standard engineering practice per §343-7.6.11. Also include the following details:*

1. *Proposed retaining wall that will replace the existing wall between the project site and the Sudbury River.*
2. *Tide gate detail*
3. *Stormwater pump station*
4. *Underground Stormwater Storage Chambers Detail. Including information on how infiltration into groundwater will be prevented and depth to groundwater §343-7.6.16.*

Response: **1. A graphical detail of the proposed retaining wall has been included in the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
A detail of the wall is provided however details of the stormwater pump station and underground storage system have not been provided as noted. The details can be preliminary in nature. They are needed to understand the intended function of the system. The drainage report calls for the use of the underground system in "larger storm events". Given the extremely simplistic drainage calculations provided, there is no way to understand how the system will function in relation to various storm events including the treatment storm of one inch of rainfall in a 24-hour period. Item remains open.

2. A check valve detail has been added to the plan set. Final details and specifications for the valve can be coordinated with the Town's peer reviewer prior to construction.

Hancock Comment 4/1/25:

The detail provided is for a Red Valve TideFlex valve. Hancock is aware of these valves requiring a certain amount of head to achieve the necessary cracking pressure to activate. Given stated intent of these pipes being the initial flow path for smaller storms, we suggest the Applicant further investigate that these valves are suitable. Hancock has further questions about the stormwater design of the project. See comment above. Item remains open.

3 & 4. The stormwater pump station and underground tank are intended to help minimize ponding of stormwater in the rear parking area as well as the adjacent parking garage. Stormwater inlets are set at an elevation above the discharge pipes in the wall and when stormwater rises above these inlets, runoff will be collected and conveyed into the tank for additional storage then pumped via the pump station. This is not anticipated to occur under normal operations but in conditions where an increase in the height of the river may impact flows.

Construction level details for both the stormwater pump station and underground tank have not yet been developed as much of the design remains at a schematic level as is customary during a Comprehensive Permit public hearing process. However, a preliminary detail of the tank has been added to the plan to indicate the general intent of the design. Formal design of the pump station and tank can be coordinated between the Applicant, their designer and the Town's peer reviewer prior to the start of construction and after comments have been received during the Notice of Intent process. We would expect this additional review to be included as a condition to the Comprehensive Permit.

Hancock Comment 4/1/25:
As stated above preliminary details are necessary to confirm design intent. We are not looking for construction level details. Sufficient detail is needed to answer questions about the intent of stormwater design of the project. See comment above. Item remains open.

May 5th Response from Applicant: The following responds to all additional comments received on 4/1/25 relative to comment L7. Per the manufacturer, the cracking pressure for the TideFlex valve is 1-2 inches and the valve will increasingly open with more head. At about 14 inches of head, it will snap to full flow. Enclosed is additional data from the manufacturer.

The proposed stormwater pump system was also discussed with Hancock during an 4/8/25 call and it was clarified that the system is intended to react to storms and not try to stay ahead of them. Under lower storm events, stormwater runoff will be directed to the culverts in the wall. When water elevations start to pond on site and exceed the elevation of the overflow, water will be captured and directed to the underground pump system. The pump system will consist of a concrete tank with a duplex pump setup and a backup generator. A preliminary detail of the tank has been added to the plan to indicate the general intent of the tank design. The formal design of the pump station and tank can be coordinated between the Applicant, their designer and the Town's peer reviewer prior to the start of construction and after comments have been received during the Notice of Intent process.

Comment L8: *Provide area of wetlands and floodplain in total sf and percent of lot area per §343-7.6.10.2.*

Response: **The areas of the wetland and floodplain and the percentage of the lot area for same has been included in the Zoning Table, as shown on Sheet C-301 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment L9: *Show the locations of test pits and observation wells.*

Response: **Existing monitoring wells have been added to the Site Plan Set on the various design sheets.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Site Grading:

Comment G1: *This project will include earthwork involving contaminated soils. The Applicant should provide the Board with an estimated quantity of total earthwork as well as import and/or export anticipated. The Project LSP will have to generate a Soil Management Plan. Preliminary details of this plan should be provided to the Board.*

Response: **A RAM Plan has been prepared and previously submitted to the Town of Ashland. The RAM Plan discusses current site conditions and future plans for the management of soils on site. The Project LSP, in coordination with the Geo-Technical Engineering Team and the General Contractor, will prepare a Soil Management Plan once the Site Development Plans and Building Plans are developed post permitting, when the project has entered into the Construction Document stage.**

Hancock Comment 4/1/25:
The Zoning Board should consider any approval that the Final Soil Management Plan be shared with the town prior to construction. Work that may encounter contaminated soils will be the responsibility of the LSP as overseen by MassDEP. Item closed.

Response: **Acknowledged, no further response needed.**

Comment G2: *The retaining wall between the project site and the Sudbury River is to be rebuilt. To mitigate the risk of flood gate failure, the new wall should be designed to be capable of containing the lateral forces of floodwater on either side. A preliminary design of the wall should be provided to assist the Board in understanding the scope of the work.*

Response: **A graphical detail of the proposed retaining wall has been included in the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment G3: *The existing conditions depicts a retaining wall and two 12" drainpipes that allow floodwater to pass in either direction between the site and the Sudbury River. The proposed project rebuilds the retaining wall and replaces the twelve-inch drain pipes with three twelve inch pipes equipped with tide gates preventing flow from the river side to the site. The applicant should explain the reasoning behind the use of the tide gates and impact on existing flood storage currently provided on site. The applicant should provide preliminary compensatory flood storage calculations in accordance with §310 CMR 10.57(4)(a)1.*

Response: **The existing site features a unique condition where the flood elevations enter over the wall with the existing outlet pipes being the only means of discharging**

stormwater runoff from the site. It is also noted that the site has an existing pump house that historically collected and pumped stormwater runoff from the site over the wall and into the river. The pipes act as a hydraulic restriction of free flow of flood waters between the river and the site; therefore, we do not believe that the pipes, nor the check valves, impact the site's ability to provide flood storage. This is consistent with DEPs requirement that there be no restrictions between areas used for compensatory storage when providing for floodplain mitigation.

Check valves are being provided to prevent potential nuisance impacts to the site's ability to drain when the height of the river may impact flows.

Compensatory flood storage calculations are provided in the supplemental stormwater information submitted with this response.

Hancock Comment 4/1/25:
According to the Applicant's submitted documents, compensatory flood storage is not required below elevation 185 within the project site. While we acknowledge the presence of a hydrologic constraint due to the flood wall and culverts, it is important to note that, under existing conditions, floodwater does enter the site through the culverts. As such, the proposed addition of check valves to the culverts could exacerbate flooding downstream by reducing flood storage capacity. We request that predevelopment and post-development volumes be provided for the project site incrementally between elevations 179 and 185. Ultimately the final ruling on whether compensatory storage is required will be a matter for the Conservation Commission.

The Applicant has also stated that water quality is not viable on the northeast portion of the site due to site conditions. While the redevelopment stormwater regulations state that the proposed is subject to the stormwater standards to the "maximum extent practicable," there is a concern that the applicant has not exhausted all alternatives for providing water quality for the project site. Given that the Applicant believes that compensatory flood storage is not required between elevations 179-185, could the rear portion of the site be raised which would increase the potential for implementing stormwater treatment? Item remains open.

May 5th Response from Applicant: To clarify previous communication, it is not the Applicant's belief that compensatory storage is not required below elevation 185 but rather it does not need to be calculated on an elevation-by-elevation basis due to the retaining wall providing a physical restriction between the site and the river. Based on discussions with Hancock, it is our understanding that we meet the regulatory requirements for compensatory storage.

Our contention is that we are not changing the flood storage and 100% of the 100-year flood stays on site under proposed conditions. However, if flows prior to the 100-year event (not regulatory required) bypass the site and goes downstream, that the existing floodplain is able to handle it. Practically speaking, the site provides a very small flood storage below elevation 185 (13,544 CY) in relation to the overall downstream floodplain and any concerns related to the culverts being blocked and pushing this flood storage pushed downstream. To alleviate this concern, our office looked at the flood map and the Sudbury River adjacent to the site has an approximate 10-foot elevation change between the sections at Myrtle Street and Fountain Street (refer to attached FEMA Map) and it is anticipated that there is sufficient gradient in the river to convey the volume without impacting downstream properties.

As noted above, the plans have been revised to redirect portions of runoff in the northwestern parking area to a proposed Rain Guardian Turret for additional water quality treatment. In addition, a water quality treatment unit was added in the eastern parking area to intercept runoff and provide additional water quality

treatment. The proposed discharge from the water quality treatment unit is subject to Conservation Commission approval as part of the Notice of Intent process.

Comment G4: *Given the location of proposed parking within an area prone to flooding, the Applicant should provide a Preliminary Emergency Response Plan for Flood Events per §343.7.6.15. The response plan should include instructions for residents during a flood, location where cars should be moved, operation of the tide gates, and protocol for the stormwater pump station. Cars left within flood prone area can pose a risk to the environment.*

Response: **The project will be professional managed by a 3rd party management company with experience with similar/flood plain situations. The Applicant would expect as a condition within the Comprehensive Permit that the Applicant will need to submit a "Flood Event Plan" to the Building Department for its review and approval as a condition to receiving an occupancy permit.**

Hancock Comment 4/1/25:
Given the change of use from commercial to residential, we believe a draft of a Flood Event Plan should be provided to the Zoning Board during the hearing process. Item remains open.

May 5th Response from Applicant: The Applicant has submitted a preliminary Flood Management Plan/Narrative as well as an accompanying illustration. These have been included as Exhibits B & C. These are both preliminary, but representative of how flood events might be handled. We would ask the ZBA to be mindful that flood management plans are not required under existing zoning and are not a requirement of non 40B projects. However, we are providing these plans in an effort to be responsive to the peer reviewer requests. We expect final versions of these plans to be a condition in the Comprehensive Permit and a pre-requisite to receiving a Certificate of Occupancy.

Comment G5: *The Proposed Grading Plan depicts what appears to be an infiltration basin with a base elevation of 179 and an outlet through the rear retaining wall of 180.3. Stormwater between 179 and 180.3 will have to infiltrate into the ground. This is counter to the directives contained in the Site's Activity and Use Limitation (AUL). There is also no information provided verifying the required offset to seasonal high groundwater.*

Response: **The depressed areas on the site near the outlet pipes have been removed from the plan and stormwater runoff will flow overland from the parking areas to the outlet pipes. Infiltration of stormwater runoff is not proposed for this site consistent with the AUL.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Utilities:

The project proposes connection to the municipal sewer and water systems in Main Street and Myrtle Street via gravity lines.

Comment U1: *The Applicant should provide sewer design flow and water demand and comment on the capacities of the municipal systems to service the project.*

Response: **The applicant anticipates similar comments from Haley Ward as part of their specific water and sewer peer review. This information will be provided as a consolidated response to their anticipated future peer review letter.**

Hancock Comment 4/1/25:
Comment to be resolved when sewer design flow and water demand calculations are provided. We defer to Haley Ward's water and sewer review. Item remains open.

Response: **Applicant awaits Haley Ward's review.**

Comment U2: *The proposed development features elevation changes from the street surface of Main Street to five stories above the ground surface. The Applicant should perform flow testing proximate to the site and determine the sufficiency of the existing municipal system to supply adequate volume and pressure for fire suppression systems. The Applicant should consult with the Ashland Water Department in this preliminary review.*

Response: **The applicant is in coordination with Ashland Water Department. There is a winter moratorium in place restricting the ability to perform a hydrant flow test. The applicant will perform the test prior to issuance of a building permit and is hopeful this test may be able to be scheduled prior to April 15th 2025.**

Hancock Comment 4/1/25:
Comment to be resolved when hydrant flow testing information is provided. Item remains open.

May 5th Response from Applicant: The Applicant submitted a formal request to the Town DPW approximately 8 weeks ago to conduct a hydrant flow test. To date, we have received no response from the Town and followed up the week of April 27th 2025.

Comment U3: *No elevation information is provided for the existing and proposed sewer. It is unclear if pumping will be required, which would necessitate an emergency generator. Garage drains will also be required to be connected to the municipal sewer system in accordance with Massachusetts State Plumbing Code. The Applicant should provide preliminary information for these items to define the scope of the project and possible impacts to the municipal infrastructure.*

Response: **Existing and proposed sewer information has been included on the enclosed Preliminary Site Plan Documents and the Existing Conditions Plan. It is currently anticipated that a sewer pump will be required for the proposed garage and the proposed retail / restaurant building while the proposed residential building is proposed to connect via gravity. However, the proposed design will be confirmed later in the process once the architectural plans have been developed with adequate construction details.**

Hancock Comment 4/1/25:
This could be an appropriate condition of any approval. We defer to Haley and Ward. Item closed.

Response: **Acknowledged, no further response needed.**

Lighting:

Comment LT1: *Light levels to the rear of the retail building appear to be very low. The Applicant should review the sufficiency of lighting along pedestrian pathways in and from the parking lot.*

Response: **The Lighting Plan has been revised to increase luminance at the rear of the proposed retail building, as shown on Sheet L-201 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:

Some parking spaces in the rear of the building appear to be just as dark as in the previous submission. Item remains open.

May 5th Response from Applicant: The applicant reviewed light levels and is comfortable with the plan as proposed. We believe there is adequate lighting for safety purposes and we do not want unnecessary illumination which could be more visible to neighboring properties.

Comment LT2: *It is unclear if proposed parking lot lighting and wall packs will be shielded and "Dark Sky" compliant.*

Response: **The proposed light fixtures are intended to be fully shielded, as indicated on Sheet L-201 of the enclosed Preliminary Site Plan Documents.**

Hancock Comment 4/1/25:
We recommend a condition that site lighting fully comply with "Dark Sky" Requirements. Item closed.

Response: **Acknowledged, no further response needed.**

Stormwater:

The proposed stormwater system includes a variety of BMPs throughout the site, including underground detention systems, stormwater pump station, and tide gates. Treatment is provided through sediment basins and filter strips. The applicant considers this site as a redevelopment.

The applicant requests waivers from the Town of Ashland Stormwater Management Bylaw (Chapter 247) and Regulations requiring a permit for any activity requiring Site Plan Review, any activity resulting in land disturbance of equal to or greater than 10,000 square feet or will increase impervious surface more than 50% of the parcel, any redevelopment project, and any activity that will alter, fill, or degrade a wetland. As requested in Comment Z2, the applicant should specify which sections of the Stormwater Management Bylaw should be waived with an explanation of why each standard cannot be met for the project.

Comment SW1: *A simplistic rational design calculation is provided as a preliminary stormwater report. This is insufficient in determining his project's stormwater characteristics given the environmental sensitivity of the site and hydraulic complexity of the downstream retaining wall, flood gates and stormwater pump station. The Applicant should provide preliminary hydrologic and hydraulic design calculations outlined in the MassDEP stormwater standards and 343-7.6.16(c). Calculations should include the impact of the wall outlets and flood gates, the proposed pump stations, and the proposed Stormwater storage chambers. The existing stormwater raceway and the Sudbury River should be modeled as separate design points as they are separate resource areas.*

Response: **As noted in the initial submission, the project is naturally reducing flows to the river due to the decrease in the impervious area on site. The site is directly adjacent to the Sudbury River which has a massive watershed and any change in the number of discharge pipes is inconsequential to the flow that the river is carrying. In addition, due to the sites proximity to the river, we want to allow the stormwater runoff to discharge from the site prior to the peak elevations of the river occurring.**

The stormwater pump system is not intended for peak rate mitigation. As noted above, it is intended to help minimize ponding of stormwater in the rear parking area as well as the adjacent parking garage when the height of the river may impact flows. Stormwater inlets are set at an elevation above the discharge pipes in the wall and when stormwater rises above these inlets, runoff will be collected and conveyed into the tank for additional storage then pumped via the pump station.

Formal design of the pump station and tank can be coordinated between the Applicant, their designer and the Town's peer reviewer prior to the start of construction and after comments have been received during the Notice of Intent process.

A waiver from Chapter 343 – Stormwater Management of the Town regulations is requested as part of the Comprehensive permit application. The stormwater management system will be designed in accordance with DEP regulations.

As noted above, it is Bohler's current understanding that the existing raceway does not receive any stormwater runoff and is intended to be removed as part of the project. Therefore, the current project is designed presuming its removal and single design point. As previously mentioned, we are conducting additional diligence on the raceway and will provide additional information as soon as available. Should our initial assumptions change, we will provide an updated design for review.

Hancock Comment 4/1/25:
Downstream impacts cannot be determined without additional information and detail requested. While flows may be naturally reduced onsite by a decrease in impervious area, it is unclear how the outfall from each of the wall culverts will be impacted. Multiple culverts are labeled on the plan having outfall invert elevation two feet below grade. This needs to be rectified. A preliminary HydroCAD model and analysis should be provided. Hancock has been involved with the review of Chapter 40B projects for over 15 years and projects of this size and scope always provide preliminary analysis of this type. Other concerns are enumerated in earlier comments that can only be addressed with such a preliminary analysis. Item remains open.

May 5th Response from Applicant: The elevation discrepancy at one of the outlets is noted and will be discussed and determined as part of the Notice of Intent process with the Conservation Commission. It may be a survey discrepancy or that the outlet is obstructed and needs to be cleaned.

Based on discussions with Hancock during a 4/8/25 call, a preliminary HydroCAD model will not provide any additional information beyond what has been provided. A detailed model will be developed prior to construction to confirm that the outlets are designed appropriately.

Comment SW2: Green roofs are proposed in open areas above the garage parking. Green roofs can be beneficial to a project, including reducing heat island effect, provide water quality volume, and possibly reduce peak rates due to the stormwater volume provided. However, green roofs are not considered pervious area because no infiltration can occur and stormwater needs to be captured in a system under the green areas and conveyed to a discharge point. It appears the Applicant has counted the green roof area toward the pervious area onsite for both peak rate calculation and the status of the project as a redevelopment. The Applicant should provide calculations for both the total impervious and stormwater design considering these roofs as impervious.

Response: **Green roofs are not proposed as part of the project. An updated impervious area calculation is provided in the supplemental stormwater information.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment SW3: Provide a MassDEP stormwater checklist.

Response: **A completed stormwater checklist is provided along with the supplemental stormwater information included with these responses.**

Hancock Comment 4/1/25:
This comment has been addressed by the Applicant. Item closed.

Response: **Acknowledged, no further response needed.**

Comment SW4: Provide Pre- and post-development watershed plans per §343-7.6.16(11).

Response: **Pre- and post-development watershed maps are not needed for this site as they do not change under post-development conditions. A waiver from Chapter 343 – Stormwater Management of the Town regulations is requested as part of the Comprehensive permit application.**

Hancock Comment 4/1/25:
Pre and post development watershed plans are required under MassDEP Stormwater Standards. See previous comments. Item remains open.

May 5th Response from Applicant: Based on discussions with Hancock during an 4/8/25 call, a preliminary HydroCAD model will not provide any additional information beyond what has been provided. A detailed model will be developed prior to construction to confirm that the outlets are designed appropriately.

Comment SW5: Provide volume of runoff calculation per §344-14(E).

Response: **This project is not a subdivision nor is it proposing to be a subdivision. As such, no subdivision regulations apply. The Applicant does not intend to request a waiver from Chapter 344 – Subdivision of Land of the Town regulations as it is unnecessary as the proposed project is not a subdivision.**

Hancock Comment 4/1/25:
Given the unique outfall situation though the existing retaining wall and the floodplain on the "river side" of said wall, it is prudent that future downstream flooding impacts are considered. Volume of runoff calculation would prove that the site does in fact lower the risk flooding to downstream properties. Item remains open.

May 5th Response from Applicant: As noted above, our contention is that we are not changing the flood storage and 100% of the 100-year flood stays on site under proposed conditions. However, if flows prior to the 100-year event (not regulatorily required) bypass the site and goes downstream, that the existing floodplain is able to handle it. Practically speaking, the site provides a very small flood storage below elevation 185 (13,544 CY) in relation to the overall downstream floodplain and any concerns related to the culverts being blocked and pushing this flood storage pushed downstream. To alleviate this concern, our office looked at the flood map and the Sudbury River adjacent to the site has an approximate 10-foot elevation change between the sections at Myrtle Street and Fountain Street (refer to attached FEMA Map) and it is anticipated that there is sufficient gradient in the river to convey the volume without impacting downstream properties.

Comment SW6: Provide Rational pipe design per §344-14(B).

Response: **Please see previous response. It is however noted that the pipe systems will be sized based upon the rational method and this information will be reviewed with the Conservation Commission during the Notice of Intent process.**

Hancock Comment 4/1/25:
No further comment.

Response: **Acknowledged, no further response needed.**

Comment SW7: Stormwater recharge is not provided due to onsite soil contamination. However, the stormwater report mentions sediment basins onsite. The Applicant should provide how the sedimentation basins will be utilized to limit contaminated soil impacts. It appears these areas will be excavated below current surfaces.

Response: **Sediment basins have been removed from the proposed design.**

Hancock Comment 4/1/25:
We do not disagree with the removal of the sediment basins due to the contaminated soils onsite. However, there is effectively no water quality provided for portion of the parking area. Refer to comment G3 regarding water quality. Item remains open.

May 5th Response from Applicant: As noted above, the plans have been revised to redirect portions of runoff in the northwestern parking area to a proposed Rain Guardian Turret for additional water quality treatment. In addition, a water quality treatment unit was added in the eastern parking area to intercept runoff and provide additional water quality treatment. The proposed discharge from the water quality treatment unit is subject to Conservation Commission approval as part of the Notice of Intent process.

Comment SW8: The Applicant should provide TSS Removal Worksheets for each treatment chain (each outlet). Also Provide Water Quality Volume or Water quality flow rate calculations for all water quality BMPs. The Town of Ashland requirement for water quality is 80% TSS, 40% Total Phosphorus, and 30% Total Nitrogen removal 343-8.1.6. This requirement can certainly be met for the conventional pipe and manhole stormwater system on the southwest side of the site. The Applicant's Stormwater Report claims the reduction in impervious inherently increased stormwater treatment. This approach does not meet the intent of the regulatory requirement of improving site conditions to the maximum extent practicable. In accordance with Massachusetts DEP Stormwater Handbook Volume 3, the Applicant is required to complete computations to determine whether proposed structural BMPs fully meet the requirements of Standards 2 through 6. At a minimum, the Applicant is required to demonstrate that proposed stormwater management system meets Standards 2, 3, and the structural BMP requirements of Standards 4, and, if applicable, 5 and 6 to the maximum extent practicable and demonstrate that measures have also been proposed to improve existing conditions. The Applicant should provide a completed "Redevelopment Checklist" set forth in Volume 2 Chapter 3 given the environmental sensitivity of the site.

Response: **The project is providing stormwater improvements to the maximum extent practicable due to the floodplain requirements and AUL limitations both of which limit the feasibility of stormwater management. Refer to the enclosed supplemental stormwater information for a description of the water quality treatment, compliance with redevelopment standards, and a completed Redevelopment Checklist. As noted above a waiver from Chapter 343 – Stormwater Management of the Town regulations is requested as part of the Comprehensive permit application. The stormwater management system will be designed in accordance with DEP regulations.**

Hancock Comment 4/1/25:
Hancock disagrees that water quality onsite is being provided to the maximum extent practicable. Refer to comment G3. Item remains open.

May 5th Response from Applicant: As noted above, the plans have been revised to redirect portions of runoff in the northwestern parking area to a proposed Rain Guardian Turret for additional water quality treatment. In addition, a water quality

treatment unit was added in the eastern parking area to intercept runoff and provide additional water quality treatment. The proposed discharge from the water quality treatment unit is subject to Conservation Commission approval as part of the Notice of Intent process.

Traffic Assessment and Fire Access:

The Applicant has provided a Traffic Impact Assessment in accordance with the Massachusetts Department of Transportation (MassDOT) Guidelines for traffic impact assessments and the standards of the Traffic Engineering and Transportation Planning professions for the preparation of such reports. The report presents information regarding anticipated trip generation, historic crash data and some evaluation of intersection safety regarding safe sight distances.

Comment T1: *We defer to the Professional Traffic Operations Engineer engaged to review the report by the Board.*

Response: **Response not required.**

Comment T2: *A swept path analysis has been provided showing the movements of an emergency vehicle through the site. The Board should seek input from the Ashland Fire Department regarding this analysis.*

Response: **Swept path exhibits for the modified site layout have been provided utilizing Ashland's Fire Truck.**

Hancock Comment 4/1/25:
Swept path analysis plans were provided. Again, we recommend that the Board seek input from the Ashland Fire Department for their review of these plans.

May 5th Response from Applicant: The applicant has worked closely with MDM Transportation and has redesigned the project entrances to satisfy and address comments issued by both MDM and the Ashland Fire Department. The updated engineering plans and SWEPT Path Analyses have been submitted under separate cover for review by MDM and the ZBA. We believe all outstanding issues relating to turning movements have been addressed.

We trust the above as well as the attached information are sufficient for your continued review of the project. Should you have any questions or require additional information, please do not hesitate to contact us at (508) 480-9900.

Sincerely,

Bohler, LLC

John Kucich, PE

Eric G. Dubrule, PE