



Open Comments  
Defer to Board  
Conditions of Approval

PROJECT NAME Murphy's Farm PEER REVIEW  
DATE 6/7/2024  
UPDATED: 4/25/2025  
PROJECT NO. 24016.0106

### Peer Review Comment Form

NO.	SHEET NO.	SECTION	GREEN'S COMMENT	Applicant's RESPONSE	CONFIRMED BY	DATE
ZBA Review						
	APPLICATION					
1	4	Subdivision Regulations 6.2.1.5	The Applicant requests waivers for if the submission does not meet regulations. The Applicant shall provide a list of waivers that are applicable to the specific project. The Applicant shall provide explanation stating what is being provided and why a waiver is being requested for each waiver.	A full list of waivers is now provided		
1A	4	Subdivision Regulations 6.2.1.5	A list of waivers was not submitted. Please provide.	The Substantive Waiver Request is now provided for review.		
1B		Subdivision Regulations 6.2.1.5	An outline of Principal Substantive Waiver Request has been provided. This outline states that formal waiver request will be provided at a future date. Therefore, this comment remains open until the formal waiver request is provided.	A final set of formal waiver requests will be provided prior to the close of the Board's public hearing.		
2		Zoning Bylaw 7.2.2.C	The Applicant shall include an analysis of the impacts of the proposed development, including natural environment, public services, economics, social environment, and visual environment.	While the proposed project is a Multifamily development, it is proposed under 40B, not the Town of Dracut Multifamily Development regulations. As such, we believe that this requirement is not applicable	JT	11/8/2024
	SITE PLAN					
3	C-1	Zoning Bylaw 3.2.3	The proposed project is within R-1 zoning district. The R-1 district only permits single family dwelling homes but the applicant is proposing multifamily dwellings. We defer to the Board if this is acceptable.	The project is proposed under 40B, allowing for the construction of multifamily dwellings.	JT	11/8/2024
4	C-1	Zoning Bylaw 2.4.5.B.9	The proposed building height should be added to the zoning table. Please revise.	The proposed buildings do not have full architectural plans, however their height will comply with the zoning bylaw.	EN	10/29/24
5	C-1	Subdivision Regulations 6.4.1 #9	No project benchmark data is shown. Please provide.	Project benchmark data is now provided on sheet C-1	EN	10/29/24
6	C-1	Zoning Bylaw 2.4.12	The site landscaping shall be 20% of the total impervious surface of the project. Please provide the required and provided on the plans.	A waiver to Zoning Bylaw 2.4.12 is requested.		
6A	C-1	Zoning Bylaw 2.4.12	We defer to the Board for waiver approval.			
7	C-2A	Subdivision Regulations 6.4.2 #8	Benchmark 1 points to a existing catch basin with elevation of 168.51 but the record rim elevation is 168.30, please clarify.	Catch basin rim has been adjusted.	EN	10/29/24
8	C-2A/C-2B	Zoning Bylaw 2.4.5.B.6	Please add bearings and distances of all property lines. It appears some are missing.	Missing bearings and distances are now provided.	EN	10/29/24
9	C-3A/3B		Please provide a legend for the Layout and Materials Plan including all different hatches.	A legend is now provided on sheet C-3.	EN	10/29/24
10	C-3A/3B	ADA	There is a ramp between 9D and 8D but there is no ramp on the other side of the street. This occurs in other locations as well. There should be sidewalk ramps on both sides of the street. Please revise.	ADA Ramps are now provided at all street crossings.	EN	10/29/24
11	C-3A/3B		There are limited pavement markings throughout the plans. The plans should have crosswalks, stop bars, etc. Please revise.	Crosswalks, stop bars, and other pavement markings are now provided.	EN	10/29/24
12	C-3A/3B	MA Stormwater Handbook V2 CH2	Porous pavement should have a setback of 10 feet from slab foundations, 20 feet from cellar foundations, and 10 feet from property lines. Please confirm these setbacks have been met.	Porous pavement is no longer proposed.	EN	10/29/24



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13	C-3A/3B	Subdivision Regulations 7.4.3	There shall be at least two means of egress for each subdivision except for a cul de sac. While there are two means of egress to the site, the houses off of roadway "D" only has one means of egress and they are not part of a cul de sac. We defer to the Board if this is acceptable.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
14	C-3A/3B	Zoning Bylaw 2.4.5.B.8	The cover sheet has a table of required minimum setbacks but it does not state the minimum setbacks provided. The plans also do not show the setbacks for the buildings. Please provide setback distances for the buildings and update the table to indicate what is being provided.	The Land Use Table on sheet C-1 has been updated to provide the minimum setbacks provided.		
14A	C-3A/3B	Zoning Bylaw 2.4.5.B.8	The minimum rear setback provided is missing. Please update plans to include rear setback provided or explain why it is N/A.	As disclosed in the substantive waiver request, it is unclear under the Zoning Bylaw if the project lot contains a rear lot line, and which boundary might constitute a rear lot line.		
14B	C-3A/3B	Zoning Bylaw 2.4.5.B.8	We defer to the Board for the waiver request.			
15	C-3A/3B/D-3	Zoning Bylaw 2.4.5.B.9/2.4.11/Subdivision Regulations 6.4.8 #15	The location, size, and type of all signs and exterior lighting shall be shown on the plans. There are details for stop signs but the stop signs are not shown on the plans. Please show where stop signs will be located on the plans. There are lights shown but no details or photometric plans for the lighting. Please provide lighting details conforming to dark sky compliance.	A waiver is requested for Zoning Bylaw 2.4.5.B.9. The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
15A	C-3A/3B/D-3	Zoning Bylaw 2.4.5.B.9/2.4.11/Subdivision Regulations 6.4.8 #15	We defer to the Board for waiver approval.			
16	C-3A/3B	Subdivision Regulations 6.4.3 #11	North arrow is shown but it is not identified as magnetic or true north. Please indicate on the plans.	Project horizontal datum is NAD83, and is now shown on plan north arrows.	EN	10/29/24
17	C-3A/3B	Zoning Bylaw 6.1.8.1.D	Parking stalls shall be 20' depth but the proposed project provides 18' depth. Please revise.	The parking stalls have been revised as requested.	EN	10/29/24
18	C-3A/3B	Subdivision Regulations 7.6.5.1	Has the project been reviewed by the fire department? Location of hydrants will need to be coordinated with the fire department. Please provide turning movements showing how a fire truck will maneuver through the site and turn around in the cul de sacs.	Project is undergoing review by the fire department to confirm adequacy of hydrant locations and internal movements of a fire truck.		
18A	C-3A/3B	Subdivision Regulations 7.6.5.1	The fire truck turning movements overlap the curb and parking stall lines in some locations. Please revise as needed to make sure the fire truck can maneuver within the roadway limits. We recommend that approval from the Fire Department be made a condition of approval.	The provided fire truck turning movement has been revised to make these corrections.		
18B	C-3A/3B	Subdivision Regulations 7.6.5.1	The turning movements still overlap with the curb at some locations such as in front of #1C and between #10D and #8D. Please revise as needed to make sure fire truck can maneuver within the roadway limits. A fire hydrant was moved in front of Building #18B behind a parking space. This is also the case for the fire hydrant in front of building #4A. Verify that these will be accessible for fire department use. We recommend that approval from the Fire Department be made a condition of approval.	The Applicant has been in contact with the local Fire Department, who has signed off on the proposed design.		
18C	C-3A/3B	Subdivision Regulations 7.6.5.1	We recommend revising the turning movements to be completely within the curb limits. Although if the Fire Department is ok with this then this comment can be closed. We did not receive the Fire Department approval letter and defer to the Board to confirm.			
19	C-4A		Has the project been coordinated with the gas company for work within the ROW? It appears there is proposed work within the easement including a light pole, a proposed tree, etc. Also, is there an existing gas line within the easement? Please show all existing utilities on the plans.	No coordination has occurred yet with the gas company, however coordination will occur prior to any land disturbance within the easement.		
19A	C-4A		We recommend that approval from the gas company be made a condition of approval.			
20	C-4A	MassDOT Design Guide Chapter 8	There is an existing 12" RCP culvert that connects wetland J to wetland A. The proposed project calls to maintain the existing RCP and cross it with a new roadway. Has the pipe been CCTV'd to verify the pipe is in good condition? Also, a 12" culvert is smaller than minimum size for culverts per the MassDOT Project Development Design Guide. The design guide recommends a minimum of 18" for culverts at roadway crossings. We recommend installing a new culvert meeting MassDOT design guide.	A new 18" Culvert is proposed.	EN	10/29/24



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21	C-4B		The proposed culvert will require work within the wetlands. We defer to the Conservation Commission if this is acceptable.	The proposed wetland crossing has been removed.	EN	10/29/24
22	C-4A/4B		The match lines between C-4A and C-4B appear to be off. Please revise the viewport so there is no missing information.	The plan set has been revised as requested	EN	10/29/24
23	C-4A/4B		Behind 6B it appears there is a retaining wall crossing over an existing sewer within the Town's easement. Has this wall been coordinated with DPW? What is the material of the existing sewer line?	The proposed retaining wall has been removed.	EN	10/29/24
24	C-4A/4B	Subdivision Regulations 6.4.4 #13	Please add the following note, "No building or structure shall be built or placed on any lot without a permit from the Health Department if such a permit is required."	The requested note is now shown on sheet C-1.	EN	10/29/24
25	C-4A/4B	Subdivision Regulations 7.15.1.2	The applicant shall insure adequate drainage of all low points along the roadways. There are low points between 6E and 5E, 12D and 11D, and near 3E that is curbed with no drainage outlet. By not having a catch basins at the low point or allowing runoff to sheet flow off there are concerns with adequate drainage at low points. Please confirm.	Drainage design has been revised to include closed-drainage with catch basins, manholes, and drainage basins. Catch basins are provided at low points.	JC	10/31/2024
26	C-4A/4B	Stormwater Rules and Regulations G.2	Runoff from roadway F flows onto Wheeler Street. Catch basins should be installed upstream of intersections where proposed work connects to existing streets, to minimize the flows from the proposed area carried over public ways. Please revise.	Roadway 'F' has been removed.	JC	10/31/2024
27	C-4A/4B	Subdivision Regulations 6.4.4.3	The plan shall show how the proposed grades will tie into the existing grades within and outside of the subdivision. There are locations on the Grading, Drainage, and Utilities Plans where the way the grades tie in are not realistic. They are shown tying into an existing grade perpendicular instead of with a radius. This may affect the limit of tree clearing and the amount of work done within wetland buffers. Please revise.	Proposed grading has been revised to tie into existing grade with curves instead of perpendicular lines.	EN	10/29/24
28	C-4A/4B	Subdivision Regulations 6.4.4.1	It is difficult to identify which utilities are existing and which utilities are proposed on the Grading, Drainage, and Utilities Plans. The proposed utilities shall be overlaid existing with a darker line weight. Please revise.	Line weights have been revised for clarity.	EN	10/29/24
29	C-4A/4B, C-5A/5B/5C	Subdivision Regulations 6.4.4.8	The rims and pipe sizes, lengths, and materials should be shown on the Grading, Drainage, and Utility Plans and the Plan and Profile plans. The water line bends should be provided and the tees should be drawn perpendicular. Please revise.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.	MW	4/17/2025
29A	C-4A/4B, C-5A/5B/5C	Subdivision Regulations 6.4.4.8	Rims, inverts, materials, and lengths have been provided on the Plan and Profile plans addressing the drainage related comments. Please confirm all water and gas tees and bends are shown correctly. The water and gas lines should be shown correctly to confirm their constructible location. The water shall maintain 10' minimum separation from the sewer lines. Please confirm and revise as needed.	As above, the project is not subject to Subdivision Regulations, and so no water/gas tees or bends are shown on the provided plans. However, the Applicant will construct all water mains in compliance with the Kenwood Water District Guidelines, and a note is now provided on sheets 4A through 4C stating that water shall maintain a 10' minimum separation from the sewer lines.	JT	4/24/2025
29B	C-4A/4B, C-5A/5B/5C	Subdivision Regulations 6.4.4.8	A note was added about water and sewer crossings but not to maintain 10' minimum separation when running parallel. Please add the note that water shall maintain a 10' minimum separation from the sewer lines when running parallel. As noted previously, we recommend showing the water lines as to be constructed so, no utility conflicts can be confirmed prior to construction.	Note 4 on sheets C-4A, C-4B, and C-4C have been updated to specify a minimum of 10-Ft of horizontal separation.	MW	4/17/2025
29C	C-4A/4B, C-5A/5B/5C		As noted previously, we recommend showing the to be constructed alignment of the water line instead of a schematic alignment. The main concern was that there might not be adequate separation between water and sewer once the water is constructed. Since the note has been added to confirm the water and sewer will have adequate separation, this comment is closed.		JT	4/24/2025
30	C-5A		What is the purpose of SMH-33 and the pipe to SMH-4? It appears to be at a high point and no services would be connected to it. Please clarify.	The plan set has been revised as requested.	JC	10/31/2024
31	C-5A/5B/5C	Subdivision Regulations 7.15.1.3	The Applicant shall intercept groundwater in the subsoil along the roadway where within three feet of the proposed roadway surface. The test pit information should be added to the profiles to confirm the roadway has at least three feet separation to groundwater. Please revise.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.	JT	1/31/2025
31A	C-5A/5B/5C	Subdivision Regulations 7.15.1.3	Please clarify if the groundwater is within three feet of the roadway surface and the Applicant is seeking a waiver.	As above, the project is not subject to Subdivision Regulations, and so the test pit information has not been provided on the plan/profile sheets. However, test pits throughout the site indicate that the 3'Ft of separation required under the subdivision regulation will be met.	JT	1/31/2025



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32	C-5A/5B/5C	Subdivision Regulations 6.4.5 #1	The plans are at scale 1":60' horizontal and 1":12' vertical scales. The Subdivision regulations require 1"=40' horizontal and 1"=4' vertical. We defer to the board if this is acceptable.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
33	C-5A/5B/5C	Zoning Bylaw 2.4.5.B.6/Subdivision Regulations 6.4.5 #2	Please add bearings and distances of all tangents along proposed roadway centerline and the right-of-way. Please add radii, length and central angle of all curves and points of intersection of all tangents with tangent lengths. Please add stationing every 25' in vertical curves, frontages, and lot numbers.	A waiver is requested for Zoning Bylaw 2.4.5.B.6. The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
33A	C-5A/5B/5C	Zoning Bylaw 2.4.5.B.6/Subdivision Regulations 6.4.5 #2	We defer to the Board for waiver approval.			
34	C-5A/5B/5C	Subdivision Regulations 6.4.5 #3	Please provide labels for sight distances on vertical curves. Please show all underground utilities in the profile and provide vertical clearances.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
34A	C-5A/5B/5C	Subdivision Regulations 6.4.5 #3	We defer to the Board for waiver approval.			
35	C-5A/5B/5C	Subdivision Regulations 7.4.8	Are the proposed street names "Roadway X"? If not, add proposed street names to the plans.	Street names to be provided prior to final plan authorization.		
35A	C-5A/5B/5C	Subdivision Regulations 7.4.8	Street names have not been provided. Please provide.	Street names will be provided at the time of plan approval. During design/permitting, we believe that 'Roadway X' with all buildings on that street being numbered #X, provides more clarity during discussion		
35B	C-5A/5B/5C	Subdivision Regulations 7.4.8	We recommend street names be provided prior to final approval. We defer to the Board for Street Name approval.			
36	C-5A/5B/5C	Subdivision Regulations 7.6.2	The minimum grade of the roadway should be 1.5%. Please revise.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
36A	C-5A/5B/5C	Subdivision Regulations 7.6.2	We defer to the Board for waiver approval.			
37	C-5A/5B/5C	Subdivision Regulations 7.6.2	Once the horizontal alignment data is added, confirm the minimum centerline radius and maximum curb return/pavement junction radius are met.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
37A	C-5A/5B/5C	Subdivision Regulations 7.6.2	We defer to the Board for waiver approval.			
38	C-5A/5B/5C	Dracut Bylaws Chapter 13 Section 16 (B) / FHA/ADA	The plans do not show any accessible parking spaces. The plans should be revised to have a minimum of 2% of the parking to be accessible parking. Please revise.	Accessible parking spaces are now provided throughout the development.	JC	10/31/2024
39	C-5A/5B/5C	Subdivision Regulations 6.4.5.3.vi-xi	All existing and proposed utilities shall be shown on the profile sheets, including proposed drainage, water, electric, telephone, cable, and gas. Please label vertical clearances between any crossing utilities. Please revise.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
39A	C-5A/5B/5C	Subdivision Regulations 6.4.5.3.vi-xi	It is recommended to provide this information to confirm there are no utility conflicts. We defer to the Board for waiver approval.			
40	C-5A/5B/5C, D-1	Subdivision Regulations 7.6.2	The maximum paved width should be 22' for a Residential roadway and 26' for a Neighborhood roadway. The proposed plan provides a 26' pavement width. Please clarify why the proposed project is using the Neighborhood roadway width instead of the Residential width. There is also no ROW shown for the roadway. Please clarify why there is no proposed ROW shown.	The roadways have been reduced to 22' in width.	JWT	10/31/2024



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41	C-5B/5C		The force main that crosses the box culvert does not have a positive pitch and will be full under the culvert at all times. Is there a way to allow the force main to have a positive pitch?	The proposed force main has been removed.	JC	10/31/2024
42	C-5B	MA Stormwater Handbook V2 CH2	Pervious pavement shall not be installed on slopes steeper than 5%. A portion of roadway F is steeper than 5%. Please revise.	Porous pavement is no longer proposed.	JC	10/31/2024
43	C-6A		Please provide perimeter controls for the work along Wheeler Street.	No work is now proposed along Wheeler Street.	JC	10/31/2024
44	C-6A		How will infiltration BMPs be protected during construction?	Erosion control details and notes provided on sheet D-2. Infiltration BMPs are not to receive stormwater runoff from unstabilized areas.	MW	1/27/2025
44A	C-6A/D-2		Note 12 only refers to catch basin protection. There are no notes describing how the stormwater basins will be protected from sediment from runoff and compaction from construction vehicles. Please provide additional notes or show on the plans.	The "General Construction Sequencing" note on sheet D-1 has been updated to indicate the order that construction will occur in order to protect stormwater basins from sediment runoff/compaction.	MW	1/27/2025
45	C-6A/6B		Please provide inlet protection for new catch basins.	The plan set has been revised as requested.	JC	10/31/2024
46	C-6A/6B	Subdivision Regulations 6.4.6 #8	Add/edit note to see full project notes on sheet D-1.	The plan set has been revised as requested.	JC	10/31/2024
47	D-1	Subdivision Regulations 6.4.8 #1	For the typical cross section, please add guardrail location, depth of cover for all underground utilities, and widths for curb, grass strips, parking, and ROW guardrail location. Please provide 5' minimum depth of cover for water lines to prevent pipes from freezing.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations. 5-Ft minimum cover has been specified in the roadway cross-section detail.	MW	4/17/2025
47A	D-1	Subdivision Regulations 6.4.8 #1	It is recommended to provide a more detailed typical roadway cross section to assist the contractor to install properly. It is recommended to have more than one typical section to represent the different roadway cross sections throughout the project. For example the roadway cross section does not show parking on either side of the road and this type of roadway is used for most of the project. The guardrail should be shown to determine the location of it offset from the edge of road. Please revise.	As above, the project is not subject to Subdivision Regulations, and so cross sections for every roadway configuration are not provided. However, a "Typical Roadway Cross-Section (Half-Curb/Half Swale)" and a "Typical Parking Stall Cross Section" are now provided on sheet D-1. We believe that the combination of these three cross sections will provide sufficient information for every roadway configuration.	MW	4/17/2025
47B	D-1	Subdivision Regulations 6.4.8 #1	Please provide a typical roadway cross section detail for when the roadway has parking on either side of the road. Please show offset for guardrail.	A "Typical Roadway Cross-Section (Parking both sides)" detail is now provided on sheet D-1. The guardrail offset is included in the details mentioned above (6" Offset from edge of pavement to the face of the guard rail).	MW	4/17/2025
48	D-1	Subdivision Regulations 7.9.3	The sidewalks shall meet ADA compliance. Accessible curb ramp type A is not an ADA compliant ramp. This allows for a greater than 2% cross slope. Accessible curb ramp type C should have a callout noting 1.5% slope for the triangular portion to align with MassDOT standard detail E 107.6.0. Accessible curb Ramp type A and D, per MassDOT standard details, the minimum transition length should be 6'6". ACR Type E, the curb and curb transition labels are pointing to the wrong place. Please revise curb ramp details.	The plan set has been revised as requested.	JC	10/31/2024
49	D-1		Where does the underdrain for the retaining wall drain to? Please show on the plans.	No retaining walls are now proposed.	JC	10/31/2024
50	D-1		Please show the curb in the timber guardrail detail.	No curb is proposed along the segment of Roadway 'A' which will utilize the guardrail.	JC	10/31/2024
51	D-1	MA Stormwater Handbook V2 CH2	Please provide minimum of 3' separation to seasonal high groundwater for porous pavement per MA Stormwater Handbook.	Porous pavement is no longer proposed.	JC	10/31/2024
52	D-3		Provide detail for Eone pump station with back up calculations for sizing.	The Eone pump station has been removed.	JC	10/31/2024



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53	D-4	Stormwater Rules and Regulations G.18	Catch basins adjacent to curbing shall be built with granite curb inlet. Please revise detail.	The plan set has been revised as requested.	JC	10/31/2024
54	D-4	Subdivision Regulations 6.4.8 #2 &#3	Please provide cross sections for all infiltration and detention basins with elevation of seasonal high groundwater. The lined detention basin appears to have some permanent ponding based on invert information and assuming the liner is buried. Please revise.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.	JT	1/31/2025
54A	D-4	Subdivision Regulations 6.4.8 #2 &#3	A detail showing the stormwater basins in cross section view is recommended in order for the contractor to correctly install the basins. It is unclear where the liner will be installed for DB-1 and what will be installed above it. It is unclear if the basins will just be graded or if they will be loam and seeded or if new material will be installed. The cross section should also include the elevation of seasonal high groundwater relative to the bottom of the basin to confirm separation requirements are met. Please provide more detail to better understand what is being proposed.	As above, the project is not subject to Subdivision Regulations, and so cross sections for drainage basins are not provided.	JT	1/31/2025
54B	D-4	Subdivision Regulations 6.4.8 #2 &#3	The system of concern was the lined detention basin which has been removed from the project. Therefore, this comment is closed.		JT	1/31/2025
55	D-4		Provide size of pipe in typical infiltration trench detail. Also, IT-1 elevations in the detail do not match the plans. Please revise.	Previously proposed infiltration trenches have been removed. Infiltration Trench details have been updated to show newly proposed trenches.	JT	11/12/2024
55A	D-4		IT-2 and IT-3 elevations in the detail do not match the plans. Please revise.	Trenches IT-2 and IT-3 have been removed.	MW	1/27/2025
56	D-4		Based on CDCI-14, it appears that IB-3 has less than 2' separation to groundwater. Please revise to have a minimum of 2' separation to groundwater.	The plan set has been revised as requested.	JC	10/31/2024
57	D-4	MA Stormwater Handbook V2 CH2	Infiltration basin should be a minimum of 50 feet from any slope greater than 15%. IB-3 appears to be within 50 feet of a slope greater than 15% and is infiltrating next to a wall. It is not recommended to infiltration against a wall. Please revise.	The previously proposed IB-3 has been removed.	JC	10/31/2024
57A	D-4	MA Stormwater Handbook V2 CH2	This comment is reopened while IB-3 has been removed from the project, subsurface system-4 appears to not meet the requirement. It appears subsurface system-4 does not have a minimum of 50 feet from any slope greater than 15%. Please revise.	MA Stormwater Handbook V2 CH2 specifies a 50-Ft separation from slopes greater than 15% for infiltration basins, not for subsurface systems.	JT	4/24/2025
58		Subdivision Regulations 6.3.1.7/6.4.7	Please provide landscape plans for proposed landscaping.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
58A		Subdivision Regulations 6.3.1.7/6.4.7	We defer to the Board for waiver approval.			

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	Stormwater Report					
59		Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.B.2.e.	The site shall be designed to ensure post development peak volumes do not exceed predevelopment peak volumes. Please provide a table showing the pre vs post peak volumes.	A waiver has been requested for Stormwater Rules and Regulations 7.B.2.e. The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
59A		Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.B.2.e.	We defer to the Board for waiver approval.			
59B		Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.B.2.e.	Based on the workshop meeting on 3/12/2025, there is a concern the wetlands do not have capacity for the drainage discharging to them. The project shall ensure post development peak volumes do not exceed predevelopment peak volumes. Please provide a table showing the pre vs post peak volumes.	The Drainage Narrative has been revised to show volumes as well as peak rates. The waiver for volumes is requested for the 2- and 10-year design storm events for DP-5. The increased volumes are "de minimus", and are due to grading restrictions in the vicinity of PWP-5G. Infiltration is not feasible, and as such post-volumes cannot meet existing volumes for these storm events.		
59C		Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.B.2.e.	We defer to the Board for waiver approval.			
60	HydroCAD		The HydroCAD model has a total existing area of 50.96 acres and proposed area of 48.91 acres. Please revise HydroCAD calculations so the total existing area matches the total proposed area.	The plan set has been revised as requested.	JC	10/31/2024
61	HydroCAD		The HydroCAD model is showing that the porous pavement is completely flat but the roadway is pitched. The volume within the porous pavement should only account for the amount of storage in the porous pavement before it overflows at the low point. Please revise.	Porous pavement is no longer proposed.	MW	10/31/2024
62	HydroCAD	Stormwater Rules and Regulations 7.G.15	IB-2 has less than 1 foot of freeboard. Please revise to have a minimum of 1 foot of freeboard.	The previously proposed IB-2 has been removed.	JC	10/31/2024
63			Water Quality flow rate calculations should be provided to confirm the correct stormceptor model is provided. Please provide.	Water Quality flow rate calculations are now provided for review.	JT	1/31/2025
63A			A WQF rate has been provided for a CDS structure. There are no details for the CDS structure in the plans and there are no callouts to indicate where a CDS structure will be used. Please revise plans to indicate where CDS structure will be used. If multiple CDS structures will be used, the water quality flowrate should be calculated for each in the stormwater report and the required WQF should be noted in plan details. Please revise.	"DMH-1" is now properly called out as a CDS structure. Manufacturer calculations are now provided as part of the drainage report, and a construction detail is now shown on sheet D-3.	JT	1/31/2025
64	Tab 5: Closed Drainage System Calculations	Subdivision Regulations 7.15.9.2	Please provide inlet analysis calculations showing the grates have capacity and gutter spreads at the inlets.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.	JT	4/24/2025
64A	Tab 5: Closed Drainage System Calculations	Subdivision Regulations 7.15.9.2	We recommend these calculations be provided since roadways are being designed as part of the project. This will verify that the spacing of the drainage inlets are adequate. Please provide or explain how spacing between inlets were determined.	As above, the project is not subject to Subdivision Regulations, however inlet analysis calculations are now provided.	JT	4/24/2025
64B	Tab 5: Closed Drainage System Calculations	Subdivision Regulations 7.15.9.2	The inlet analysis is not clear if the structures have capacity or not. The calculations should provide the required and provided capacity. Please revise.	Provided capacity from the closed-system storm drain sizing sheet has been added to the inlet analysis sheet.	JT	4/24/2025
65	Tab 5: Closed Drainage System Calculations	Stormwater Rules and Regulations G.12	Closed drainage is designed for the 10 year storm event. Drainage pipes shall be sized to contain the 25 year storm event. Please revise.	Waiver requested for Stormwater Rules and Regulations G.12	JT	4/24/2025
65A	Tab 5: Closed Drainage System Calculations	Stormwater Rules and Regulations G.12	We defer to the Board for waiver approval.		JT	4/24/2025

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65B	Tab 5: Closed Drainage System Calculations	Stormwater Rules and Regulations G.12	The calculations have been revised to use the 25 year storm event. Therefore, this comment is closed.		JT	4/24/2025
66	Tab 5	Stormwater Rules and Regulations G.14/Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.G.14	Provide backup calculations showing the proposed 15' box culvert meets stream crossing standards in accordance with the latest edition of the Massachusetts Stream Crossing Handbook and is designed for the 50 year storm event.	Box culvert has been removed.	JC	10/31/2024
67	O&M		Who will be responsible for the maintenance of the pervious pavement?	Porous pavement is no longer proposed.	JC	10/31/2024
68	O&M		Who will be responsible for the maintenance of the EONE pump stations? Who would be alerted for an emergency failure?	The Eone pump station has been removed	JC	10/31/2024
69	O&M	MA Stormwater Handbook V2 CH2	Porous pavement should be cleaned using vacuum sweeping machines monthly. Please revise.	Porous pavement is no longer proposed.	JC	10/31/2024
70	Test Pits	MA Stormwater Handbook V2 CH2	IB-2 has no test pits nearby. Please provide a test pit where the BMP is proposed to confirm soils and seasonal high groundwater.	The previously proposed IB-2 has been removed.	JC	10/31/2024
71	Test Pits		Please provide additional test pits/borings for porous pavement. At a minimum there should be additional test pits/borings performed to verify soils and seasonal high ground water for 8G and 5D due to limited or no test pits performed within these areas for proposed porous pavement.	Porous pavement is no longer proposed.	JC	10/31/2024
72	Existing Conditions Watershed Plan		Please confirm that EWA-2B and PWA-2B would discharge to DP-2 and not DP-1. Based on the contours it appears these areas would discharge to DP-1.	Proposed work associated with Roadway F has been removed. No changes in flow to Design Point 2 are now proposed	JC	10/31/2024
73	Existing Conditions Watershed Plan		EWA-5B discharges to a wetland that has a 12" culvert discharging to another wetland. This wetland should be a separate discharge point. The pre and post peak rates and volumes should be compared for this wetland. Please revise.	The wetland is wholly contained to the site and modeled as a pond to account for the culvert discharge. We do not see the need to separate the subcatchments to determine the off-site runoff.		
73A	Existing Conditions Watershed Plan		Based on the workshop meeting on 3/12/2025, EWA-5B discharges to a wetland series J but the HydroCAD model shows it discharging to wetland series A. The pond for wetland series J has been removed from the existing conditions. The wetland series J is still modeled as a pond under proposed conditions. Wetland series J should be modeled as its own discharge point and not modeled as a pond under existing and proposed conditions. The pre and post peak rates and volumes should be compared for these wetlands. Please revise.	Wetland series 'J' was modeled as a pond to ensure that the proposed culvert was sized sufficiently. Wetland series 'J' is now modeled as a reach with the proposed pipe. A reduction in peak rate and volume of runoff directed towards wetland "J" is proposed.		
73B	Existing Conditions Watershed Plan		If the Wetland Series J pipe is to be modelled in proposed conditions then, the existing Wetland Series J pipe should be modelled under existing conditions. Please revise.			
74	Existing Conditions Watershed Plan		Please conform boundary between EWA-7 and EWA-8. It appears EWA-8 should be larger and EWA-7 should be smaller.	The plan set has been revised as requested.	JC	10/31/2024
75	Proposed Conditions Watershed Plan		Additional grading should be provided to the grading plans to confirm the area shown in PWA-5H will discharge to the proposed catch basin and not run onto neighboring properties.	The plan set has been revised as requested.	JC	10/31/2024
76	Proposed Conditions Watershed Plan		Additional grading should be provided to the grading plans to confirm the area shown in PWA-5D. The current grading indicates the area around 4A/5A would discharge toward building 1D instead of around the building. Please revise.	The plan set has been revised as requested.	JC	10/31/2024
77	Proposed Conditions Watershed Plan	MA Stormwater Handbook V2 CH2	Porous pavement must not receive runoff from other drainage areas. Please revise.	Porous pavement is no longer proposed.	JC	10/31/2024
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78	C-4A		There is no pretreatment for stormwater discharging to DB-1. Please provide pretreatment.	DMH-1 is now properly labeled as a "CDS", providing pre-treatment for Subsurface System-1 (Previously DB-1)	JT	1/31/2025
79	C-4A/D-3		There are no Drain Manhole Details. Many DMHs appear to require a structure larger than the standard 4' diameter. For example PDMH-8 appears to require a larger manhole based on pipe configuration. Please identify larger manholes, otherwise revise configuration to accommodate 4' manhole structures. Please revise plans and include details.	A Drain Manhole detail is now provided on sheet D-3. DMH Configurations have been revised to accommodate 4' manhole structures.	JT	1/31/2025
80	C-4A		Information for pipes in and out of SUB-1 are missing. Please provide lengths, diameters, materials, slopes, and inverts.	The previous 'Sub-1' has been reconfigured and is now 'Subsurface System-3'. Detailed information for pipes in/out of each subsurface system are now provided on sheet D-4.	MW	1/23/2025
81	C-4A		PWA-5D shows a portion of the property at 23 Elizabeth drive discharging to PHW-3 culvert. It appears there is a stone wall being installed/replaced along the property line which would block runoff from 23 Elizabeth Road to enter the culvert and would result in ponding at the wall on their property. Please provide a drainage solution to this issue.	As shown on sheet C-3, a portion of this stone wall will be removed in order to construct the roadway and drainage system.	JT	1/31/2025
82	C-4A		There are several utility conflicts. For example, gas line is conflicting with PDMH-3B and pipe leaving PDMH-3A conflicts with light pole. Please revise design to eliminate utility conflicts.	Utility conflicts have been eliminated.	JT	4/24/2025
82A	C-4A		Gas line is conflicting with PDMH-7. Please revise	Utility conflicts have been eliminated.	JT	4/24/2025
82B	C-4A		15" HDPE pipe connecting POS-4 to PDMH-26 is conflicting with PSMH-3. Please revise and consider angle of crossing utilities for constructability, the more parallel the more likely utilities can't be supported during construction.			
83	C-4A		The contours for DB-1 are not constructable due to contour 135 passing through contour 134. Please revise.	DB-1 has been replaced with Subsurface System-1	MW	1/23/2024
84	C-4A		Please provide inverts for POS structures. Please revise.	Inverts for POS are provided in the detail for each system on sheet D-4. These inverts are intentionally left off of sheet C-4A.	MW	1/23/2024
85	C-4A		There are many catch basins located at cross walks. Please revise grading and catch basin locations to avoid low points at these locations.	Catch basins have been relocated out of the path of travel for cross walks.	MW	1/23/2024
86	D-2		A check dam detail is included, but not identified on plans. Please indicate on plans where check dams are proposed.	The provided check-dam detail is included as they are referenced in the "Construction Sequencing" note on sheet D-1. Check-dams are to be installed as-needed during construction based on site conditions.	MW	1/23/2024
87	D-3		Indicate on plans when "Typical Catch Basin with Curb Inlet" or "Shallow Cover Catch Basin at Vertical Curb Detail" are being used, there seems to be some overlap on when they would be used. If these do not have a four foot deep sump they will need to discharge to a manhole with a deep sump and hood. Catch basin structures without deep sums shouldn't be needed due no issues with existing utilities. Therefore, all catch basins should have deep sums and hoods. Please revise details or explain why structures with no sums are needed.	"Shallow Cover Catch Basin at Vertical Curb Detail" has been removed. "Typical Catch Basin with Curb Inlet" detail has been revised to refer ONLY to grate/frame configuration.	MW	1/23/2024
88	D-3		Double grate catch basins appear to be much larger than typical catch basins in plan view, but the detail shows that their basin structures are roughly the same size. Please clarify. Also, please provide a hood on the double grate catch basin detail.	The Double Catch Basins have been updated in plan view to approximate to-scale size. A hood for the outlet pipe is also provided.	MW	1/23/2024
89	D-4		There are currently no contours for forebays to confirm the design meets the calculations. Please provide contours to the forebays to clearly define the separation between the basins and the forebays.	Forebays are now shown with contours.	MW	1/23/2024
90	D-4		There are two infiltration basins listed at IB-2. Please revise so there is only one IB-2.	IB-2 has been repurposed as 'Subsurface System-2'	MW	1/23/2024



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91	D-4		The pipe orientation does not match the isolator row detail. There are no additional manholes and piping to connect the isolator row to the rest of the subsurface system. Please revise.	A revised typical "Isolator Row" detail is provided for the new Subsurface Systems.	JT	1/31/2024
92	D-4		The typical outlet structure shows the invert out at the same elevation as the vertical orifice but the invert for DB-1, DB-2, IB-1, and IB-3 show the vertical orifice much higher than the outlet pipe. It is not clear if this is feasible with the proposed invert and vertical tee. Please review and confirm. Also, the outlet pipe would be permanently submerged. The invert should be adjusted to match the detail or the detail should be revised. Please revise.	Revised	JT	1/31/2024
93	D-4		The test pits are not shown in the details for IB-1, IB-2, IB-3, DB-1, DB-2, and infiltration trench. Were test pits performed at all BMP locations? Please provide test pits for each BMP and provide seasonal high groundwater elevation at each BMP.	Additional test pits have been performed. All test pit logs are now located on sheet D-5. Seasonal high groundwater elevation is now shown at each BMP.	MW	1/23/2025
94	D-4/HydroCAD		The detail should note how many chambers are proposed and how many isolator rows are proposed. The detail only notes how many isolator rows are proposed. It is not clear if the isolator rows are being accounted for in the HydroCAD model. The isolator rows should not be accounted for because they won't infiltrate like the rest of the system since they are subject to more sediment. Please confirm and revise.	Isolator rows are sized off-line in HydroCAD. No storage or infiltration credit is taken. A revised Isolator Row detail showing a typical inlet/outlet with water quality weir is provided on sheet D-4.	JT	4/24/2025
94A	D-4/HydroCAD		This comment was previously addressed and now is reopened. Isolator Rows have been added to the HydroCAD model for peak rate attenuation. Please see comment above and remove the isolator rows from the HydroCAD model.	Isolator rows were added to the drainage calculations per comment 103A to show that they function as-intended as off-line systems with overflow through a weir in higher storm events. Isolator rows are no longer shown as part of the model in the drainage calculations.	JT	4/24/2025
95	D-4/HydroCAD		The outlet manhole for the subsurface system appears to have a weir per the HydroCAD calcs. There should be detail for this structure and the invert should be identified on the plan. Please revise.	A typical subsurface system outlet structure detail is now provided on sheet D-4.	MW	4/17/2025
95A	D-4/HydroCAD		Plans do not show grate for subsurface system outlet structure, but detail calls for Manhole Frame & Grate. Please verify if structure will have cover or grate.	The detail has been updated to specify a solid cover for the proposed subsurface system outlet structures.	MW	4/17/2025
96	HydroCAD		DB-1 is modelling a 6" horizontal orifice. It is not clear where this is in the plans. It appears this is the HDPE/PVC tee in the outlet structure. It is assumed the bottom of the tee is capped and the top is open. The outlet pipe is an 8" pipe so, it is not clear that the tee is a 6x6x8 tee. The orifice is also modelled at elevation 134.90' which is the same elevation as the rim of the structure. This is not constructable as it would conflict with the rim. Please clarify and revise.	N/a	MW	1/23/2024
97	HydroCAD		DB-2, IB-1, and IB-3 are modelling a 48"x48" orifice/grate but DB-1 does not model the grate. The current configuration of the outlet structure can't be modeled in hydroCAD due to having two layers of controlling devices (outside and inside the structure). Please explain why the approach taken is the most accurate and conservative option.	N/a	MW	1/23/2024
98	HydroCAD		IB-3 is modelling a 15" pipe but the plans show 12" pipe. Please clarify.	IB-3 (Now Subsurface System-4) now correctly models a 12" outlet pipe.	MW	4/17/2025
98A	HydroCAD		SUB-3 & SUB-2 shows 12" pipe in plans but 15" in HydroCAD. Please revise.	Plans have been revised to show 15" pipes per HydroCAD.	MW	4/17/2025
99	HydroCAD		The proposed Tc calcs have varying (50'-100') sheet flow entries but existing Tc calcs all have the first 50' as sheet flow. Typical industry standard is to have the first 50' as sheet flow for Tc calcs. Please revise proposed Tc calcs to use sheet flow for the first 50'.	Calculations have been revised as requested.	JT	1/31/2024
100	HydroCAD		The proposed Tc calcs for PWA-5C and PWA-8B have direct entries or 7.4 min and 7.3 min respectively. Typical industry practice is to only use direct entry for Tc of 6 min when calculated Tc is 6 min or less. Please revise.	The proposed Tc entries for PWA-5C and PWA-8B were based off of the Tc from the closed-drainage calculations. The Tc for these watersheds in HydroCAD have been revised to 6 min.	JT	1/31/2024
101	Recharge Calcs		The recharge calcs for the subsurface system notes that the lowest invert is at 146.70 but the HydroCAD models the weir at elevation 144.70. Please revise.	Calculations have been revised as requested.	JT	1/31/2024

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102	Recharge Calcs/HydroCAD		The recharge calcs for IB-3 use 2.41 in/hr infiltration rate but the HydroCAD calc use 8.270 in/hr. Please confirm and revise infiltration rate.	Calculations have been revised as requested.	JT	1/31/2024
103	Forebay Calcs		How was the isolator row sized? Please provide backup calculations to confirm it provides adequate pretreatment.	Isolator Row stage-storage tables are provided in the drainage report for each system.	JT	4/25/2025
103A	Forebay Calcs		Isolator Row for Subsurface system 2 is not identified on the plans. This should be shown on the plans. Isolator rows are typically designed with a water quality flow rate. Please coordinate with the manufacturer to confirm the number of chambers needed based on the receiving area. The isolator rows should be part of the layout but wrapped in filter fabric so it can filter into the other chambers, an overflow into the chambers can be provided. The isolator rows as shown with a weir and separate from the system may have peak elevation issues due it not being large enough for large storm events. Please revise.	The label for the isolator row for subsurface system 2 is now provided. The isolator row is located adjacent to PDMH-16. Isolator rows for all subsurface systems (where applicable) are now included as part of the HydroCAD calculations to confirm that they are sized adequately to handle peak flows. The isolator rows were not included previously so as not to take any credit for reductions in peak flow rates. Edited 3/27/25 - Per comment 94A, Isolator rows are no longer modeled as part of the drainage calculations.	JT	4/25/2025
104	O&M Plan		The manufacturer's O&M instructions for the stormceptor (or CDS unit) and subsurface chamber system should be included in the O&M plan. Please revise. Please confirm if stormceptor or CDS unit is being proposed and revise as needed.	O&M Has been revised as requested.	MW	1/28/2025
	<b>New Comments 2/3/2025</b>					
105	C-4A		Please add a label for IB-1 OCS.	The OCS for IB-1 is now labelled on sheet C-4A.	MW	4/17/2025
106	C-4A		It is recommended to avoid designing pipes with slopes less than 0.5%. For example the pipe from POS-4 to PFES-7 is 0.25%. Please consider revising.	The pipe run has been revised to have a slope of 0.5%.	MW	4/17/2025
107	C-4A		Subsurface System 2 is discharging to the sidewalk on the west side of the road. How will this work? Is this proposed to flow over the sidewalk? Please redirect outfall away from the sidewalk.	The outlet pipe for Subsurface System 2 will now cross Roadway A and discharge to Design Point 5.	JT	4/25/2025
108	C-4A		The runoff model and peak rate table should include runoff to 2 decimal places. Please revise.	The runoff model and peak rate tables have been revised to include 2 decimal places.	JT	4/25/2025
109	C-5A		The proposed 18" culvert is shown crossing the proposed sewer line and are potentially in conflict. Please verify that there are no conflicts when upsizing existing culvert.	There are no pipe conflicts from upsizing the existing culvert.	MW	4/17/2025
110	D-4		For Subsurface System Outlet Structures, cover for weirs ranges from 1.21' to 0.7'. Please verify that these rim and weir elevation configurations are constructable.	All rim and weir configurations have been updated to have a minimum 2' separation for ease of construction.	MW	4/17/2025
111	D-4		For IB-1, the main outlet is only 1" in diameter and for the subsurface systems the main outlet is only 1.5" in diameter, this is very small and prone to clogging. Will peak rates still be met if orifice is clogged? We recommend a 4" minimum orifice. Please revise.	The low-flow orifices do not provide meaningful peak-rate attenuation, and are proposed for the sake of water quality volume and groundwater recharge values. We believe that the proposed trash rack in combination with adequate pre-treatment will prevent the orifices from clogging, however should the orifices clog, the pond/subsurface systems ability to handle peak flows will not be inhibited.		
111A	D-4		Will peak rates and volumes still be met if the 1.5" outlet is clogged?			
112	D-4		Why is the area around PCB-26 separate from the forebay it discharges to? Why not make the forebay larger and incorporate this area? This would prevent the risk of stormwater overtopping the area around PCB-26 in all directions. Please consider revising.	The area around PCB-26 is separate from the sediment forebay it discharges to in order to obtain the required 44% pre-treatment for the infiltration basin.	JT	4/25/2025



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113	HydroCAD/D-4		IB-1 the outlet invert does not match the plans (137.65 vs 137.50). The 12" horizontal orifice does not match the plans (141.90 vs 140.90). The vertical orifice does not match the plans (138.70 vs 139.40). IB-1 outlet structure detail inverts do not match the plan inverts/orifice on D-4 for POS-1. Please revise to be consistent.	Revisions have been made to the plan to accurately reflect the HydroCAD calculations.	MW	4/23/2025
114	HydroCAD/D-4		SS-1 the outlet invert does not match the plans (130.76 vs 131.26). HydroCAD shows a 4' weir but the structure is 5', is there a notch in the weir? This should be shown on the plans. Please revise to be consistent.	4' Weirs have been updated to be 5'.	JT	4/25/2025
115	HydroCAD		Please verify that seasonal snow storage and proposed playground on subsurface systems 2 and 4 does not cause any issues with maintenance or any issues with the PCB-27 and PCB-28 respectively.	Plans have been revised to specify no snow storage on top of the proposed catch basins.	JT	4/25/2025
116	Watershed Plans		The watershed boundaries are no longer shown in proposed plan. Please show the boundaries.	Watershed boundaries now correctly appear in the revised plans.	MW	4/23/2025
117	O&M Plan		Please include isolator rows in the O&M plan. Please revise.	The O&M has been updated to include isolator rows.	JT	4/25/2025
117A	O&M Plan	MA Stormwater Handbook V2 CH2	Add subsurface structures to the mosquito control plan as well. Please revise.			
118	O&M Plan		The typical conveyance trench should be included in the O&M. If this system clogs and is not maintained the stormwater system will not operate as designed. Please revise to include in the O&M.	The O&M has been updated to include the typical conveyance trench.	JT	4/25/2025
118A	O&M Plan	MA Stormwater Handbook V2 CH2	Use language from V2C2 Infiltration Trenches as this is the most comparable surface material. Include language about remove seedlings before they are firmly established. Include checking outlet pipe (in PDMH-22) to determine if it is clogged. Inspect trench after the first several rainfall events and after all major storms. Please revise.			
119	Mounding Analysis		The mounding analysis for IB-1 shows the bottom area of 9,900 sf but the hydrocad model and recharge calcs show 10,182 sf. Please revise for consistency.	The Hantush groundwater mounding program requires a length and width input for mounding analysis, which does not always perfectly line up with the proposed square footage as basins are curvilinear. The model has been updated to show a 91'x112' (Previously 90'x110') basin, bringing the analyzed square footage up to 10,192-SF.	JT	4/25/2025
120	Mounding Analysis		The mounding analysis for IB-1 shows 3 feet separation to seasonal high groundwater but the plans show 2 feet separation to seasonal high groundwater. Based on the mounding analysis, IB-1 will mound in the basin bottom after 72 hours. The design needs to be revised so, the basin can fully drain within 72 hours. Also, the HydroCAD model is using an exfiltrate rate for peak rate attenuation and based on the mounding analysis the basin will not infiltrate as modeled due to the mounding into the basin. The exfiltrate rate should be revised in HydroCAD based on the results of the mounding analysis. Please revise.	Plans and mounding calculations have been revised to show 2.9' of separation. Groundwater recharge calculations assume no groundwater mounding, and have been performed in accordance with the static method. The groundwater mounding model is analyzed based on the horizontal and vertical hydraulic conductivity values used in the drainage analysis. In both cases, it is shown that the basin fully drains within 72 hours. Groundwater mounding analysis is performed separately from recharge and peak rate analyses. Volume 3 Chapter 1 Page 28 of the Stormwater Handbook address the requirements for a groundwater mounding analysis. Our analysis conforms to the requirements provided.		
120A	Mounding Analysis		The exfiltration rate should be revised to reflect the infiltration rate calculated in the mounding analysis. Since the mounding analysis shows that it mounds up into the system the infiltration rate is impacted. Since this rate is being used for peak rate attenuation the exfiltration rate should be revised to what was calculated in the mounding analysis. This is part of the purpose for performing a mounding analysis. Please revise the exfiltration rates in HydroCAD for all systems that mound into the bottom of the system.			



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121	Mounding Analysis		The mounding analysis for SS-3 shows 3 feet separation to groundwater but the plans show 2.9 feet separation to groundwater. Based on the mounding analysis for SS-3 the water will mound in the subsurface system. The mound will leave the bottom of the subsurface system between 1 to 2 days but the recharge calcs note it will fully drain within 2.6 hours. The HydroCAD model is using an exfiltrate rate for peak rate attenuation and based on the mounding analysis the basin will not infiltrate as modeled due to the mounding into the system. The exfiltrate rate should be revised in HydroCAD based on the results of the mounding analysis. Please revise.	Mounding calculations have been corrected to show 2.9' of separation. Groundwater recharge calculations assume no groundwater mounding, and have been performed in accordance with the static method. The groundwater mounding model is analyzed based on the horizontal and vertical hydraulic conductivity values used in the drainage analysis. In both cases, it is shown that the basin fully drains within 72 hours. Groundwater mounding analysis is performed separately from recharge and peak rate analyses. Volume 3 Chapter 1 Page 28 of the Stormwater Handbook address the requirements for a groundwater mounding analysis. Our analysis conforms to the requirements provided.		
121A	Mounding Analysis		See comment 120A.			
	New Comments 4/25/2025					
122	D-4		There is a note to install the Subsurface System 1 with a liner, but there are no details for how to install it, please include a detail for how this will be installed. The Applicant should confirm buoyancy calculations have been performed to confirm chambers can resist uplift force. The outlet structure has a 0.5" low flow orifice. This is very small and prone to clogging. If this orifice clogs the subsurface system will not be able to fully drain. We recommend a 4" minimum orifice. Please revise.			
123	D-4/SW Report		For infiltration basin 2, 1. There is only a forebay for pretreatment and therefore does not meet the 44% pretreatment requirement. Please revise. 2. The water quality volume calculation shows there is no impervious area going to IB-2 but there is impervious area discharging to IB-2. Please revise. 3. There is no maintenance access to IB-2. Please provide. 4. There is 2.5' separation to SHGW but no mounding analysis was performed. Please provide.			
124	C-4A		Please revise PCB-33 to include rim.			
125		HydroCAD	In HydroCAD SS-2 shows two separate primary outlets a pipe and a sharp crested rectangular weir but the plans only show one outlet. Please revise.			
126		HydroCAD	In HydroCAD for SS-2, SS-3, and SS-4 there is a sharp crested rectangular weir and a sharp crested vee/trap weir but only one weir is detailed. If there is an opening in the weir it should be modeled as an orifice and a rectangular sharp crested weir. Please revise.			
127		Mounding Analysis	There are two mounding analysis that are labeled as SS-3. Please clarify.			
Con Com Review						
	SITE PLAN					
128	C-1		Please add the date when the wetlands were delineated.	The date when the wetlands were delineated is now shown on sheet C-1.	EN	10/29/24
128A	C-1	MA Wetland Protection Act	The wetlands were delineated in 2015. Per MA Wetland Protection Act, wetland flags are only valid for three years. Therefore, the wetland flags need to be reflagged. Please provide updated flagging and buffer zones.	The site is subject to an ongoing Order of Conditions associated with DEP#145-1050. The latest extension, granting coverage through July 21, 2026, is provided for review.		



Open Comments  
Defer to Board  
Conditions of Approval

PROJECT NAME Murphy's Farm PEER REVIEW  
DATE 6/7/2024  
UPDATED: 4/25/2025  
PROJECT NO. 24016.0106

### Peer Review Comment Form

NO.	SHEET NO.	SECTION	GREEN'S COMMENT	Applicant's RESPONSE	CONFIRMED BY	DATE
128B	C-1	MA Wetland Protection Act	Based on the workshop meeting on 3/12/2025, we defer to the Conservation Commission if the wetlands need to be reflagged.			
129	C-2A/C-2B	Zoning Bylaw 2.4.5.B.17/Town of Dracut Wetland Regulations 5.1.4.2.6	Mass mapper has identified streams within the property and these are not identified on the plans. Please update the plans to include labels for existing streams. Please add associated buffers.	All resource areas were delineated and are shown based on Order of Resource Area Delineation associated with DEP#145-1005, and Order of Conditions associated with DEP#145-1050.	MW	10/31/2024
130	C-2A/C-2B	Zoning Bylaw 2.4.5.B.17 / MA Wetlands Protection Act/ Subdivision Regulations 6.4.2.13	The location of areas subject to flooding shall be shown on a plan. There are wetlands onsite that appear to not have an outlet. Please identify if any of the wetlands are isolated land subject to flooding (ILSF) and provide back up calculations. The extend of the ILSF shall be shown on the plans.	Drainage calculations for wetland series B & C (Design point 6) show that the requisite runoff volume is not generated in any of the design storms. As such, wetland series B&C are not ILSF. The remaining internal wetlands have outlets.	JT	11/12/2024
131	C-2A/C-2B	Town of Dracut Wetland Regulations 5.1.4.1.2/5.1.4.1.3	For new construction the Town Wetland Regulations do not allow any disturbance within 25 feet of a resource area and no new buildings, retaining walls, or impervious surfaces within 50 feet of a resource area. The proposed project does not show the 25 foot and 50 foot buffer zones. These should be added to the plans and the plans should be revised as needed to meet the regulations.	A waiver is requested for disturbance within the 25-Ft Buffer, and construction of new buildings and impervious surfaces within the 50-Ft buffer. These buffers are now shown on the plans.	JT	4/1/2025
131A	C-2A/C-2B	Town of Dracut Wetland Regulations 5.1.4.1.2/5.1.4.1.3	The buffers are shown, but the labels are missing. Please provide labels to the buffer zones. We defer to the Board for approval of the waiver request.	Labels for the 25-, 50-, and 100-Ft buffer are now properly shown on the provided plans.	MW	4/1/2025
131B	C-2A/C-2B	Town of Dracut Wetland Regulations 5.1.4.1.2/5.1.4.1.3	Based on the workshop meeting on 3/12/2025, buildings shall be moved outside the 50ft buffer zone. We defer to the Conservation Commission for waiver approval for work within the 25 ft buffer zones.	No buildings are now proposed within the 50-Ft buffer zone.	MW	4/1/2025
131C	C-2A/C-2B	Town of Dracut Wetland Regulations 5.1.4.1.2/5.1.4.1.3	Buildings have been relocated out of the 50' buffer zone but disturbance still occurs within the 25 foot buffer zone. We defer to the Board for the waiver required to disturb within the wetland's 25' buffer zone.			
132	C-2A	MA Wetland Protection Act	Vernal pool has been moved from wetland A to east of wetland C. Please explain why this was moved. Also, it appears that the vernal pool CVP-4937 that was moved is missing wetland flags. Please show the wetland flags on the plans.	Wetland flags for CVP-4937 are now provided. The location of the vernal pool was adjusted while reviewing the certified vernal pool report. The report has a written description of the vernal pool's location as being 250-Ft off the Cul-De-Sac of Poppy Lane, which placed it in wetland series 'A', however the report also had the lat/long of the pool. The pool is now shown based on the provided lat/long in the report, placing it west of wetland C.		
132A	C-2A	MA Wetland Protection Act	The wetland flags for CVP-4937 are not shown on C-2A. Please show them on the existing conditions plans.			
133	C-3A/3B		Please provide more information on snow removal and storage process. How will snow be stored in the proposed playgrounds? What is being installed for the proposed playgrounds?	The proposed playgrounds will be seasonal, allowing for snow storage as required. Final plans for playground equipment will be provided prior to construction.		
133A	C-3A/3B		There shall be no snow storage within wetland buffer zones. Please move snow storage to be outside of the wetland buffer zone.	MA DEP 310 CMR 10.00 does not have provisions preventing snow storage within the wetland buffer.		
133B	C-3A/3B		Due to sanding, salting, and other pollutants in the roadway, snow storage can cause adverse effect on wetlands. It is recommended that snow storage should be located outside wetland buffer zones. We defer to the Conservation Commission if snow storage within the buffer is acceptable.			
134	C-4A	Town of Dracut Wetland Regulations 5.1.4.2.5	Per Town of Dracut Wetland Regulations stormwater discharge to vernal pools are not permitted. The proposed project has stormwater from the site discharging to vernal pools. We defer to the conservation commission if this is acceptable.	A waiver is requested to Town of Dracut Wetland Regulations 5.1.4.2.5		
134A	C-4A	Town of Dracut Wetland Regulations 5.1.4.2.5	The plans have been revised to eliminate stormwater bmp discharge to vernal pools. The stormwater discharge to the vernal pools is now only grass area. We defer to the Conservation Commission if this is waiver is acceptable.			



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**Peer Review Comment Form**

NO.	SHEET NO.	SECTION	GREEN'S COMMENT	Applicant's RESPONSE	CONFIRMED BY	DATE
135	C-4A	MA Wetland Protection Act	Work is being performed within the 100 ft buffer zone (Vernal Habitat Zone). The drainage area to the vernal pools is reduced from 2.34 acres to 1.17 acres. Please explain how the project will have no adverse impact to the vernal pools.	Pre and post drainage analysis of the watershed areas contributing to Design Point 6 (Vernal pools 4116, 4116, and 4937) for the 2-Year storm show that no runoff from the contributing watershed area reaches the vernal pools due to the high infiltration capacity of the underlying soils as well as the cover type. Provided groundwater mounding analysis for Subsurface System 3 shows that the groundwater mound will not affect the vernal pools. It is likely that the lifecycle of the vernal pools is maintained through the fluctuations of seasonal high water associated with vernal pool season. Infiltration BMPs provided on-site are sized to meet the required recharge volume to approximate the annual recharge from pre-development conditions based on soil type in accordance with Standard 3 of the MA Stormwater Handbook. We believe that the proposed project will not impact the vernal pools.	JT	4/1/2025
136	C-4A		How will erosion or undermining of the culvert connecting wetlands A and J be prevented?	The inlet/outlet of the proposed culvert is proposed as a flared end structure with crushed stone. Additionally, Infiltration Basin 1 and Subsurface System 3 now tie into a manhole located approximately 1/3 of the way across the culvert. Flow into the beginning of the culvert will consist solely of overland flow from grass and woods.		
136A	C-4A		Crushed stone is only shown at PFES-13, please revise to show by PFES-12 as well.			
	<b>Stormwater Report</b>					
137	Rainfall Data	Town of Dracut Stormwater Management Rules and Regulations 7.G.9	Based on the workshop meeting on 3/12/2025, the Town would like the Applicant to use the NRCC Extreme Rainfall data (Cornell method) rainfall data. Please revise.	Drainage calculations have been revised to use the NRCC Extreme Rainfall data (Cornell) as opposed to NOAA 14.	JT	4/1/2025
138	Water Quality	Town of Dracut Stormwater Management Rules and Regulations 7.D.1	Based on the workshop meeting on 3/12/2025, please provide water quality calculations meeting the 1" times the total post construction impervious area. Please confirm the 90% TSS and 60% TP removal for the project is met for the project.	EPA Performance curves for the proposed infiltration basins and subsurface infiltration systems are provided for review.	JT	4/1/2025
	<b>NOI Application</b>					
139	Page 2		From the latest plans, there appears to be seventeen multi-family dwellings within the 100' wetland buffers, but the narrative states that there are fifteen. Please update to match latest design.	The building layout is revised; (13) buildings are proposed within the 100 ft. Buffer Zone. Please see the updated narrative.	MW	4/1/2025
140	wpa form		Box 3a should be checked on sheet 6 of the wpa for since the project is inland resource area only. Please revise.	Revised	MW	4/1/2025
141	Wetland Data Forms	MassDEP Bordering Vegetated Wetland Determination Form	The wetland data forms are missing in the NOI submission. Please provide.	The wetland boundary is valid under the existing Order of Conditions, DEP File No. 145-1050. The permit is valid until 7-21-26.	JT	4/1/2025