

03/02/2023

Mr. Mathew Heins  
Pembroke Planning Board  
Pembroke Town Hall  
100 Center Street  
Pembroke, MA 02359

Re: Response to Site Plan Review Comments

Dear Mr. Heins,

On behalf of B&M 35 Hanover, LLC (Applicant) EBI Consulting (EBI) is in receipt of Site Plan Review Comments by Merrill Engineers and Land Surveyors (Merrill) dated February 22, 2023, regarding the Ancillary Storage Project located at 29 Winter Street Pembroke MA.

This letter outlines below the comments prepared by Merrill followed by EBI's response to each comment. Be advised that the comment numbering below correlates to the comments issued by Merrill. Please note that EBI's responses are shown in **BOLD** following each comment.

## **ZONING BYLAWS**

### **Section IV. Use and Dimensional Regulations**

- 5.D.1. The existing passage and utility easement on the westerly end of the site and the existing drainage easement running from Winter Street through the property should be provided on the plans.

**EBI Response (03/02/2023): The easements mentioned in the comment above will be shown on the revised site plans.**

- 5.D.2. *The properties total frontage should be provided on the plans.*

**EBI Response (03/02/2023): The total frontage for the property will be shown on the revised site plans.**

### **Section V. Special Provisions, Standards and Procedures**

1. Signs: No project signage is shown on the site plans. Should signage be proposed, information regarding the location, height, size, color, etc. should be submitted to the Planning Board for review.

**EBI Response (03/02/2023): Should the applicant choose to add a sign at the project area, the applicant will submit the proposed sign to the Pembroke Planning Board for review and approval.**

- 4.B. Access: The Planning Board should determine if two (2) additional driveways is appropriate. The current office building is supported by two existing access drives. The property also supports the driveway access to the Pembroke Hospital with the existing Passage and Utility easement within the westerly portion of the site. It should be noted that the property benefits from over 1,000 linear feet of frontage along Winter Street.

**EBI Response (03/02/2023):** The two (2) additional driveways are required to provide better vehicular maneuverability especially for the delivery trucks and emergency vehicle. The driveway allows the delivery vehicles to enter the site and park in the loading area without blocking Winter Street traffic. Emergency vehicles can exit the site without having to back out. A turning study for delivery vehicles and emergency vehicle will be provided with the revised site plans.

- 4.C. Loading: Please provide additional information on the type of vehicles anticipated for deliveries etc. including site circulation and turning movements.

**EBI Response (03/02/2023):** A turning study depicting the anticipated delivery vehicles will be provided with the revised site plans.

- 7F. Procedure: The approved site plans shall be recorded with the Plymouth County Registry of Deeds within 30 days of the expiration of the appeal period. Proper recording information should be provided on the plans meeting recording requirements

**EBI Response (03/02/2023):** The site plans will be revised to meet Registry of Deeds standards and will be recorded with the Plymouth County Registry of Deeds as required.

## **RULES AND REGULATIONS GOVERNING SITE PLAN APPROVAL**

### **Summary of Requested Waivers**

The following waivers have been requested:

- 5.1.2 A three (3) foot wide landscape strip along the foundation walls.
- 5.6.2 Curbing shall not be bituminous concrete.
- 5.9.9 A minimum of 50% of the building's street façade contain windows.
- 6.0. Development Impact Statement requirement.

### **Section IV. Site Plan Content**

- 4.3 It appears that the property owner has changed since the existing survey was completed. The property owner information should be updated on the Existing Conditions plan. The existing conditions plan should include the entire property boundaries.

**EBI Response (03/02/2023):** The property owner information will be updated on the existing conditions survey and will be submitted with the revised site plans.

- 4.4 It appears that the zoning boundary between the Industrial A and Residence A potentially follows the southerly property line and should be clarified and shown on the plans.

**EBI Response (03/02/2023):** The zoning boundaries referenced above will be added on the revised site plans.

- 4.5 The signature block is provided on the Cover Sheet. Please add the required compliance and notice of approval statements.

**EBI Response (03/02/2023):** The Cover Sheet will be updated to include the required compliance and notice of approval statements.



- 4.6 A Preliminary Landscape Plan has been prepared by Jay Mill Landscape Architecture. The Planning Board should consider if they would like the plan stamped by the Landscape Architect.

**EBI Response (03/02/2023): Comment noted.**

- 4.8 The proposed utility services are shown on the plans. No information is provided for the existing water main within Winter Street. The size and material of the existing water main to be connected to should be specified. The electric, telecom and gas services will be coordinated with the utility companies.

**EBI Response (03/02/2023): The existing water main size and material will be provided on the revised site plans.**

- 4.9 A Zoning Table is presented on sheet C-4 of the plans as required. Although not changing, the site's frontage should be added to the plans and the zoning table.

**EBI Response (03/02/2023): The site frontage will be added on the zoning table.**

- 4.10 The elevations of the proposed storage building have been provided. The building materials and colors have not been submitted as required. A floor plan would be helpful to understand the layout/components of the storage building.

**EBI Response (03/02/2023): The floor plan, revised elevations, material, and exterior color are being developed and will be provided to the planning board members at the hearing.**

- 4.11 The parking area provides one (1) accessible van parking space on the easterly side of the proposed storage building. Based on the total number of parking spaces (6) proposed, one (1) accessible space is required. Parking space sizing, locations and loading areas via overhead door locations are provided.

**EBI Response (03/02/2023): No response required.**

- 4.12 The sight triangles for the driveways should be shown to demonstrate adequate sight distance is provided.

**EBI Response (03/02/2023): The sight triangles for both driveways demonstrating adequate site distance will be provided on the revised site plans.**

- 4.15 A waiver has been requested for the submittal of a Development Impact Statement. The Planning Board should determine if it is acceptable.

**EBI Response (03/02/2023): Comment noted.**

- 4.16 Please provide a PLS stamp on the Existing Conditions plan as required.

**EBI Response (03/02/2023): A PLS stamp on the existing conditions plan will be provided along with the revised site plans.**

- 4.19 We recommend the Site Plan be reviewed with the Fire Department relative to access

and fire protection requirements.

**EBI Response (03/02/2023): A fire apparatus circulation study will be provided to the Fire Department for review and comments.**

A Soil Erosion and Sediment Control Plan and details are provided. We would recommend noting that the infiltration basin area not be utilized for temporary sediment and be protected from heavy construction traffic so as not to compromise the soil conditions.

**EBI Response (03/02/2023): A note stating that “the infiltration basin shall be utilized as a temporary sediment basin, and shall be protected from heavy construction traffic” will be added on the Erosion and Sedimentation Control Plan.**

- 4.20 No signage is proposed on the site plan. Should signage be proposed, information regarding the location, height, size, color, etc. should be submitted to the Planning Board for review.

**EBI Response (03/02/2023): Should the applicant choose to add a sign at the project area, the applicant will submit the proposed sign to the Pembroke Planning Board for review and approval.**

- 4.22 A Traffic Impact Study has not been submitted as required. A waiver could be considered.

**EBI Response (03/02/2023): EBI would like to formally request a waiver for the Traffic Impact Study.**

## **Section V. Requirements**

- 5.1 A Landscaping Plan and Details are provided on sheets L100 of the plans and prepared by a Landscape Architect. The Planning Board should determine if this plan is satisfactory and if the plan should be stamped by the Landscape Architect.

A natural buffer is being maintained along the southerly property line varying in depth. It appears that this abutting property is located within the Residence A zoning district and would require a minimum 50 ft buffer. The project provides greater than 50 ft natural buffer along the property line except for approximately 60 feet where a minimum of 30 feet is provided. The abutting property is fully vegetated along the common property line with the Hospital setback over approximately 200 ft.

**EBI Response (03/02/2023): No response required.**

- 5.2 A Site Lighting Plan, photometric, has been provided. The Site Lighting Plan proposes a light pole along the parking spaces on the west side of the building and four (4) wall mount lights on the building. The Site Plan does not show the light pole location. This should be added to the Site Plan.

**EBI Response (03/02/2023): The light pole will be shown on the revised site plans.**

5.3 Stormwater Management Design Calculations indicate that the overall stormwater management system will attenuate the post development stormwater flows to a level not exceeding the existing conditions. We offer the following comments regarding the drainage design and analysis:

- The stormwater management system consists of catch basins, a pretreatment unit and an infiltration basin with an outlet towards the onsite wetland area.
- The test pit information provided on the plans should include the date, who performed the tests and whether mottling was observed. It is noted that the test pit indicate sandy loam as the soil conditions and the hydroCad analysis uses a higher infiltration rate of 2.41 in/hour which is consistent with loamy sand. The infiltration rate should be adjusted to 1.02 in/hour consistent with sandy loam material.

**EBI Response (03/02/2023): The date and name of person that performed the soil testing will be added on the revised site plans. The infiltration rate will be revised to 1.02 in/hr. A revised Stormwater management report will be issued.**

- The infiltration basin is located over an existing drain line within an existing drainage easement. Additional information should be provided to confirm that the basin is allowed within the easement. Also, additional notations should be provided to have the contractor locate and protect the existing drain line and to ensure no conflicts with the basin construction.

**EBI Response (03/02/2023): EBI and the applicant will do further research to confirm if the proposed infiltration basin is allowed within the drainage easement. A note stating “the contractor shall locate and protect the existing drain line during construction and ensure no conflicts with the infiltration basin will occur” will be added on the revised site plans.**

- The test pits within the infiltration basin indicate fill material. A note should be added to the plans indicating that all unsuitable material within the basin shall be removed and replaced as necessary.

**EBI Response (03/02/2023): A note indicating that all unsuitable material within the infiltration basin will be added on the revised site plans.**

- The infiltration basin berm is proposed at approximately 5 feet wide. Infiltration basins should be provided with a 15 ft access berm per Mass DEP Stormwater Standards. It is recommended that the emergency spillway be shifted so that it is not located over the outlet pipe.

**EBI Response (03/02/2023): The berm will be revised to 15', and the emergency spillway will be moved away from the discharge pipe.**

- We recommend that the Pipe Sizing calculations be run for the 100-year storm to

evaluate the surcharge through the system and ensure all stormwater will discharge to the proposed infiltration basin as intended and not overflow towards the street or building.

**EBI Response (03/02/2023): The pipe sizing calculations will be revised for the 100-year storm even, and will be provided on the revised Stormwater Management Report.**

- The closed drainage calculations should be updated, there appears to be some additional information within the table not part of the project.

**EBI Response (03/02/2023): The closed drainage calculations will be updated and will be provided on the revised Stormwater Management Report.**

- The Checklist for Stormwater Report stamped by the Registered Professional Engineer is included in the Stormwater Management Design Calculations

**EBI Response (03/02/2023): No response required.**

It is general practice to design sites to comply with Massachusetts DEP Stormwater Management Regulations. The following section describes the 10 Standards for compliance with Stormwater Management Regulations and the status of the submittal relative to each standard.

*Standard 1 – Untreated Stormwater*

Rip rap pad sizing calculations should be provided for the basin inlets and outlet including stone sizing calculations. The Flared End Section with Rip Rap detail does not provide dimensions or stone sizing.

**EBI Response (03/02/2023): Rip-Rap pad sizing calculations will be provided on the revised Stormwater Management Report.**

*Standard 2 – Post Development Peak Discharge Rates*

As shown in the Drainage Report submitted by the design engineer this Standard appears to be met. We have requested some revisions to the model regarding the infiltration rate used in the calculations. These updates should be addressed.

**EBI Response (03/02/2023): The infiltration system will perform as indented even with the reduced infiltration rate. The revised Stormwater Management Report will be provided.**

*Standard 3 – Recharge to Groundwater*

The recharge calculations should be updated to be consistent with HSG B, sandy loam soil conditions as indicated on the soil test pits. Please verify the correct impervious surface area used within the calculations. There appears to be different areas within the calculations. It is assumed with these corrections; the project could meet this standard.

**EBI Response (03/02/2023): Revised recharge volume calculations will be**

**provided on the revised Stormwater Management Report.**

**Standard 4 – 80% Total Suspended Solids (TSS) Removal**

The water quality calculations should be verified as the impervious area differs from the HydroCad analysis. It appears that the TSS calculations have been overestimated with a TSS removal rate of 97%. The ADS Barracuda Max information indicates the unit is approved for 50% TSS removal rate. This rate should be used within the TSS calculations. With these corrections, this standard can be met.

**EBI Response (03/02/2023): Revised TSS calculations will be provided on the revised Stormwater Management Report.**

**Standard 5 – Higher Potential Pollutant Loads**

This project is not considered a source of higher pollutant loads. This standard is not applicable.

**EBI Response (03/02/2023): No response required.**

**Standard 6 – Protection of Critical Areas**

Based on information presented on MassGIS and the Town of Pembroke GIS web page, the project site is not in a Critical Area.

**EBI Response (03/02/2023): No response required.**

**Standard 7 – Redevelopment Projects**

This project is not considered a redevelopment project. This standard is not applicable.

**EBI Response (03/02/2023): No response required.**

**Standard 8 – Erosion/Sediment Control**

An Erosion Control Plan including details has been provided. This standard has been met. It has been indicated that the project will require to file for a Construction General Permit (CGP) with the US EPA and implement a Stormwater Pollution Prevention Plan (SWPPP). We recommend a copy of the CGP and SWPPP be provided to the Town prior to the start of construction.

**EBI Response (03/02/2023): A copy of the CGP and SWPPP will be provided to the Town of Pembroke prior to the start of construction activities.**

**Standard 9 – Operation and Maintenance Plan**

An Operation and Maintenance Plan has been provided as required. This standard has been met. Please review and correct Town references and phone numbers within both O&M plans.

**EBI Response (03/02/2023): Both O&M plans will be revised and included with the revised Stormwater Management Report**

**Construction Phase Operations and Maintenance Plan**

It is not recommended to use the proposed infiltration basin area as a temporary sedimentation basin per Mass DEP Stormwater Standards.



**EBI Response (03/02/2023): Comment noted.**

Long Term Operations and Maintenance Plan

The public awareness section should be revised to address the specific site conditions, or the Applicant should clarify the storage building uses.

**EBI Response (03/02/2023): The above referenced section will be revised to be site specific.**

The ADA Barracuda WQU section should be updated to site specific information.

**EBI Response (03/02/2023): The above referenced section will be revised to be site specific.**

The O&M plan references retaining walls but there are no retaining walls proposed. Information on the rip rap slope maintenance should be included.

**EBI Response (03/02/2023): A retaining wall will be added instead of the rip rap armored slope. It was requested by the Conservation Commission during the RDA process.**

Standard 10 – Illicit Discharges

An “Illicit Discharge Compliance Statement” meeting the requirements specified in the Stormwater Management Regulations has been submitted but is not signed. To meet this standard, we recommend providing a signed statement.

**EBI Response (03/02/2023): A signed Illicit discharge statement will be provided on the revised Stormwater Management Report.**

- 5.4 The Regulations state that each site shall have only one curb cut per street frontage unless deemed necessary for emergency access or to enhance the site. The design proposes the use of two additional driveway curb cuts for site access and circulation to the storage building. The Planning Board should consider if the proposed curb cuts are acceptable. As previously noted, the property benefits from greater than 1,000 ft in frontage.

**EBI Response (03/02/2023): The two (2) additional driveways are required to provide better vehicular maneuverability especially for the delivery trucks and emergency vehicle. The driveway allows the delivery vehicles to enter the site and park in the loading area without blocking Winter Street traffic. Emergency vehicles can exit the site without having to back out. A turning study for delivery vehicles and emergency vehicle will be provided with the revised site plans**

- 5.5 Please confirm the need for a dumpster near the storage building or how waste management will be handled.

**EBI Response (03/02/2023): The existing waste and recycling dumpsters on site will be utilized by the ancillary storage building too.**

- 5.6.2 A waiver has been requested to use cape cod berm as curbing.



**EBI Response (03/02/2023): Comment noted.**

- 5.6.4 Please verify if bollards shall be installed along the building sides exposed to vehicle access.

**EBI Response (03/02/2023): Bollards are not being proposed for this project.**

#### **Section VI. Development Impact Statement**

A waiver has been requested for the submittal of a Development Impact Statement. The Planning Board should determine if it is acceptable.

**EBI Response (03/02/2023): Comment noted.**

#### **ADDITIONAL COMMENTS**

1. There is no mention of floor drains in the plans or documents although it is understood that the Building Code requires a floor drain where any vehicular access through an overhead door is allowed. This should be confirmed and floor drains and a tight tank with an alarm system should be incorporated as needed.

**EBI Response (03/02/2023): MEP plans for the storage building will be submitted to the building department prior to the issuance of the building permit. All Building Code requirements this building will be met.**

2. Please provide a sidewalk ramp detail for the driveway entrance conditions meeting ADA compliance.

3.

**EBI Response (03/02/2023): The sidewalk ADA ramp detail will be provided on the revised site plans.**

4. Please provide a fence detail or additional information for the 4 ft high fall protection fence.

**EBI Response (03/02/2023): The fence detail will be provided on the revised site plans.**

5. It appears the westerly driveway is steeply graded, greater than 10% along the sidewalk. The 106 contour could be adjusted to reduce this grade.

6.

**EBI Response (03/02/2023): Driveway grades will be adjusted to soften the slopes on the revised site plans.**

7. The northeast corner of the parking area is less than 1% grade towards CB#3. Could this corner be raised slightly to maintain a minimum 1% grade across the driveway?

**EBI Response (03/02/2023): The grades at the area of concern will be revised.**



# EBI Consulting

21 B Street  
Burlington, MA 01803  
(781) 273-2500  
[www.ebiconsulting.com](http://www.ebiconsulting.com)

Should you have any questions please do not hesitate to contact Alfons Koka at (508) 730-9515 or at [akoka@ebiconsulting.com](mailto:akoka@ebiconsulting.com).

Sincerely

**EBI Consulting**

Alfons Koka P.E

Senior Civil Engineer

Cc: B&M 35 Hanover, LLC  
File