

February 27, 2023

Pembroke Planning Board  
Town Hall  
100 Center Street  
Pembroke, MA 02359

Attn: Matthew Heins, Planning Board Assistant

**Re: Site Plan Review  
108 Old Church Street  
Pembroke, Massachusetts**

Dear Mr. Heins:

Bohler is in receipt of a comment letter from Merrill Engineers and Land Surveyors dated February 17, 2023. On behalf of the Applicant, SDG Development LLC, Bohler offers the following responses. For clarity, the original comments are in **italics**, while our responses are directly below in **bold** type.

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

*Comment 5A.D.1 "Lot Sizes: All uses require at least 80,000 sf of area. In addition, at least 70,000 sf of said area shall be exclusive of any and all easements, cranberry bogs, wetlands, flood plains and watershed areas." The Planning Board should consider whether the wetland as defined as an area subject to flooding would need to be excluded. Likewise, the utility and access easement running through the site should be evaluated.*

*The lot area and frontage are noted in the Zoning Analysis Table and a note stating "proposed property line via the Planning Board ANR Process" is on the plans. The final lot line, lot area and frontage should be confirmed and provided on the plan.*

**Response: The existing Utility & Access Easement within the proposed lot will be removed / extinguished. Additionally, the Lot Area, exclusive of the wetland area, has been indicated within the Zoning Analysis Table and is greater than 70,000sf of land. The final lot area and lot frontages have been confirmed and provided within the Zoning Analysis Table.**

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

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

**Response: Signage will be permitted separately by the Applicant with the Planning Board.**

*Comment 4.B. Access: The Planning Board should determine if three driveways is appropriate.*

**Response:** No response required. It should be noted that Old Church Street is a private ROW and a dead-end street.

*Comment 4.F. 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.*

**Response:** The plans have been formatted in anticipation of being recorded.

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

*Comment 4.6 Information and location of the benchmark(s) used for this project have not been presented on the plans as required. This information should be added.*

**Response:** Benchmark information has been added to the ALTA/NSPS Land Title Survey as well as Sheet C-401.

*Comment 4.8 The proposed utility services are shown on the plans. The existing utilities are shown as approximate. The size and material of the existing water main to be connected to should be specified. The proposed 6" sewer service connection at the existing sewer manhole should be reviewed to verify no conflict with the existing 8" main.*

**Response:** The water main information has been shown based on available record information from the Town. A note has also been added indicating that the size, material & location of this main shall be verified prior to construction. The proposed sewer service connection has been eliminated as a new septic system will be placed within the rear of the site based on the soil testing that was witnessed by the Pembroke Board of Health on February 1<sup>st</sup>, 2023.

*Comment 4.9 A Zoning Table is presented on sheet C-301 of the plans as required.*

**Response:** No response required.

*Comment 4.10 The elevation and façade treatment of the proposed storage facility have been provided. The building materials and colors have not been submitted as required. The floor plans and the site plan building footprint appear to not match; this should be addressed by the Applicant.*

**Response:** The Applicant will discuss the building façade treatment, including the materials and colors, at the upcoming Planning Board meeting. The building footprint shown on the site plans has been revised to match the floor plans.

*Comment 4.11 The parking area provides one (1) accessible van parking space on the southerly side of the proposed building. Based on the total number of parking spaces (21)*

*proposed, one (1) accessible space is required. Parking space sizing, locations and loading areas are provided.*

**Response:** **No response required.**

*Comment 4.12 A breakdown of the building lot coverage and percentage of paved (impervious) area used for parking, loading, access within the property and percent of open space should be provided.*

**Response:** **A footnote has been added to the Zoning Analysis Table on sheet C-301 with a breakdown of the coverages indicated above.**

*Comment 4.13 The sight triangles for the driveways should be shown to demonstrated adequate sight distance is provided as indicated in the Traffic Study.*

**Response:** **A Sight Line Exhibit will be prepared by the Traffic Consultant, VHB, showing the adequate sight lines at the driveways as indicated within the Traffic Study.**

*Comment 4.15 A Development Impact Statement has been submitted as required. The Planning Board should determine if it is acceptable.*

**Response:** **No response required.**

*Comment 4.16 The design plans have been stamped and signed by a registered Professional Engineer and by a registered Professional Land Surveyor as required. It is understood that an ANR Plan will be presented to the Planning Board to create the subject property. The proposed property boundary information has not been presented on the plans and should be added.*

**Response:** **Proposed property boundary information has been added to the site plans.**

*Comment 4.18 The proposed building location including total square footage is shown on the plans but no dimensions either on the site plans or floor plans are provided and should be added.*

**Response:** **Building dimensions have been added to the site plans.**

*Comment 4.19 We recommend the Site Plan be reviewed with the Fire Department. Clarification of the nearest fire hydrant should be provided. A fire flow test may help determine the adequacy of the existing water main to support the development.*

*An old septic system was discovered during the soil testing on site as indicated in the soil logs provided. Clarification on abandonment of the system should be provided.*

*A Soil Erosion and Sediment Control Plan and details are provided. Although, no surface stormwater basins are proposed, we would recommend noting that the*

*subsurface infiltration chamber system not be utilized for temporary sediment traps and be protected from heavy construction traffic so as not to compromise the soil conditions.*

**Response:** The applicant has communicated with the Fire Department and is awaiting feedback to verify they are ok with fire access as well as hydrant locations. The nearest hydrant has been shown and labeled on the site plan near the Lowe's driveway. The applicant is agreeable towards adding additional hydrants, should those be requested by Fire.

Notes have been added about the abandonment of the existing septic system in accordance with local BOH regulations.

A note was added to the Soil Erosion and Sediment Control Plan stating, "Subsurface infiltration chamber system not to be utilized for temporary sediment traps and to be protected from heavy construction traffic so as not to compromise the soil conditions."

*Comment 4.20* No sign location is shown 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.

**Response:** Signage will be permitted separately by the Applicant with the Planning Board.

*Comment 4.22* A Traffic Impact Study has been submitted as required.

**Response:** No response required.

## **Section V. Requirements**

*Comment 5.1* A Landscaping Plan and Details are provided on sheets C-701 and C-702 of the plans and prepared by a Registered Landscape Architect as required. The Planning Board should determine if this plan is satisfactory.

**Response:** No response required.

*Comment 5.2* The location of the proposed lighting is presented on sheet C-301 of the plans and a photometric plan, sheet C-703 has been provided. The lighting fixtures are proposed to be shielded and pole mounted at 25 ft height and wall pack lighting mounted at 10 ft height. The regulations state that light pole heights shall not exceed 20 feet. The proposed light pole height is 25 ft greater than the maximum allowed, although the Lighting Plan does illustrate illumination levels are reduced to zero at the property lines to abutting properties.

**Response:** The Lighting Plan has been revised to have site lights mounted at a height of 20 ft. Illumination levels continue to be zero at abutting property lines.

## Comment 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 is proposed to discharge into the onsite wetland area which outlets to the existing closed drainage system within Old Church Street. We recommend that the maintenance of this existing outlet be included in the Operation and Maintenance Plan.*

**Response: Maintenance of the wetland area outlet to the existing drainage system within Old Church Street has been added to the Operation and Maintenance plan.**

- We recommend that the post subcatchment #5 be reviewed. It seems the westerly driveway entrance is included in the subcatchment area but it drains towards Old Church Street and not to the infiltration system on site.*

**Response: Due to site elevation constraints, it is not feasible to capture the entire driveway area runoff and direct it towards the underground infiltration system. However, this area has been revised to include a curb break at the base of the driveway that has a rip-rap apron channeling the water to the wetland. This curb break will capture and convey the stormwater within the driveway portion of subcatchment PR-#4 to the wetlands as modeled rather than Old Church Street. This area is modeled as part of subcatchment PR-#4, which flows directly to the wetlands, thus, no revisions to the model is required.**

- It is noted on Test Pit 7 that a 4" PVC sewer force main was discovered approximately 5 ft below grade. This test pit is located within the utility and access easement. Further information should be provided to address the existing force main.*

**Response: Notes have been added to sheet C-201 indicating that the contractor shall investigate whether this 4" force main is active, and if so, to determine the terminus ends of such line then relocate and coordinate such work with the applicant and engineer. If found to be inactive, then the line will be abandoned/removed as necessary.**

- 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 subsurface chamber system as intended and not overflow towards Old Church Street or the building.*

**Response: Pipe Sizing calculations have been updated to accommodate the 100-year storm rather than the 25-year storm.**

- We recommend more than one inspection port be provided. The inspection port locations should be labeled on the site plan.*

**Response: Thirteen (13) inspection ports have been added**

- We recommend that the Outlet Control Structure detail include the 4" orifice as modeled in the drainage study.*

**Response: This detail has been updated**

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

**Response: 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*

*Comment*                      Standard 1 – Untreated Stormwater  
*Rip rap pad sizing calculations have been provided. Stone sizing should also be provided.*

**Response:**                      **The previously submitted Rip Rap Sizing Calculations use “modified” as the rip rap type. Modified rip rap type is 5-inch (125 mm) diameter rip rap. The Flared End Section with Rip Rap Apron detail on sheet C-902 has been revised to specify the rip rap stone size.**

*Comment*                      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 additional information regarding the sub-catchment areas used in the calculations.*

**Response:**                      **Per previous response to comment 5.3, the southwesterly driveway has been revised to include a curb break to direct water towards the wetland rather than Old Church Street to be consistent with the site modeling.**

*Comment*                      Standard 3 – Recharge to Groundwater  
*As shown in the Drainage Report submitted, this standard is met.*

**Response:**                      **No response required.**

*Comment*                      Standard 4 – 80% Total Suspended Solids (TSS) Removal  
*TSS calculations have been submitted demonstrating that a TSS removal rate of 85% is proposed. The DEP Stormwater Management Regulations requires a removal rate of 80% and this standard has been met.*

**Response:**                      **No response required.**

*Comment*                      Standard 5 – Higher Potential Pollutant Loads  
*This project is not considered a source of higher pollutant loads. This standard is not applicable.*

**Response:**                      **No response required.**

*Comment*                      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.*

**Response:**                      **No response required.**

*Comment*                      Standard 7 – Redevelopment Projects  
*This project is not considered a redevelopment project. This standard is not applicable.*

**Response:**                      **No response required.**

Comment	<p><u>Standard 8 – Erosion/Sediment Control</u> <i>Soil Erosion &amp; Sediment Control Plan including details have been provided. This standard has been met. 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.</i></p>
Response:	<p><b>The Applicant can provide a copy of the CGP and SWPPP prior to the start of construction.</b></p>
Comment	<p><u>Standard 9 – Operation and Maintenance Plan</u> <i>An Operation and Maintenance Plan has been provided as required. This standard has been met.</i></p>
Response:	<p><b>No response required.</b></p>
Comment	<p><u>Standard 10 – Illicit Discharges</u> <i>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</i></p>
Response:	<p><b>A signed Illicit Discharge Statement is included in the updated Stormwater Operation and Maintenance Plan.</b></p>
Comment 5.4	<p><i>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 three driveway curb cuts for site access and circulation. The Planning Board should consider if three curb cuts are acceptable.</i></p>
Response:	<p><b>No response required. It should be noted that Old Church Street is a private ROW and a dead-end street.</b></p>
Comment 5.5	<p><i>A dumpster area has been provided with an enclosure for screening. We recommend a detail of the enclosure be provided. We recommend if other utility services such as HVAC units or generators are being proposed that they are shown on the plan and properly screened from public view.</i></p>
Response:	<p><b>A trash enclosure detail has been added to sheet C-903. All mechanical units (HVAC, etc.) will be located on the roof and screened from view.</b></p>
Comment 5.6.3	<p><i>Please clarify if the electric and telephone connection will be underground as required.</i></p>
Response:	<p><b>Callouts have been added to indicate underground connections.</b></p>
Comment 5.7.6	<p><i>No leveling area pitching away from the street has been provided. Due to the site constraints, this may not be feasible, and a waiver should be requested.</i></p>
Response:	<p><b>The applicant respectfully requests a waiver from this requirement due to the site constraints.</b></p>



## Section VI. Development Impact Statement

*A Development Impact Statement has been submitted as required. The Planning Board should determine if it is acceptable*

**Response:**                    **No response needed.**

## ADDITIONAL COMMENTS

*Comment 1                    A portion of the proposed fence between the two front driveway entrances is located within the Old Church Street right of way. It should be confirmed that the fence can be proposed within the way.*

**Response:**                    **The fence has been relocated to be within the limits of the subject property and outside of the Old Church Street ROW.**

*Comment 2                    The plans should be reviewed by the Pembroke Fire Department relative to access and fire protection.*

**Response:**                    **The applicant has communicated with the Fire Department and is awaiting feedback.**

*Comment 3                    If it is determined that an onsite septic system is required, the design of the proposed septic system will need to be reviewed and approved by the Pembroke Board of Health.*

**Response:**                    **Witnessed soil testing was conducted with the Pembroke Board of Health on February 1, 2023 and an area suitable for an onsite septic system was established. The applicant will be preparing Septic System Plans for the BOH's review & approval.**

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 me at (508) 480-9900.

Sincerely,

**Bohler**



Nick Dewhurst



Randy Miron

Cc:     David Williams, SDG Development LLC