

March 24, 2023

Zoning Board of Appeals
Town of Foxborough
70 Elm St. Foxborough, MA 02035

Re: **Walnut Street Affordable Housing Comprehensive Permit Application**

Dear Members of the Board,

Our office has received formal comments issued by various Town departments and your peer review consultant. The comments were provided relative to a Comprehensive Permit Application for a 200-unit age-restricted residential development proposed along Walnut Street. We have received the following comment letters:

- Letter to the Zoning Board of Appeals from TEC, Inc. from David J. Nader, Project Manager and Samuel W. Gregorio, Senior Traffic Engineer dated March 2, 2023.
- E-mail to the Zoning Board of Appeals from the Conservation Commission from Jane Pierce, Conservation Agent dated January 31, 2023
- Memorandum to the Zoning Board of Appeals from Chris Gallagher, Director of Public Works, dated February 9, 2023
- E-mail to the Zoning Board of Appeals from Matthew Brennan, Director of Public Health dated February 14, 2023
- Letter to the Zoning Board of Appeals from Paige Duncan, AICP, Director of Land Use and Economic Development dated February 16, 2023.
- Letter to the Zoning Board of Appeals from the Foxborough Planning Board from Kevin Weinfeld, Chairman dated February 15, 2023
- Letter to the Zoning Board of Appeals from the Foxborough Housing Authority from Gregory P. Spier, Chairperson dated February 15, 2023
- Memorandum to the Zoning Board of Appeals from the Foxborough Police Department from Michael A. Grace, Chief of Police dated February 15, 2023

Our submission materials have been revised as described below to address each review comment and are included with the submission of this response letter. The review comments from the documents referenced above have been reproduced below, followed by our response to each comment in bold.

Review comments from TEC dated March 2, 2023

Site Plan Review

1. *TEC has noted that the Applicant has requested a blanket waiver from any and all Town of Foxborough local By-Laws, Regulations, and approvals, however it appears the Applicant meets the majority of State Regulations and general engineering best practices.*

Response: WSE Acknowledged

2. *As the project is within 100 feet of a flagged resource area, and in some areas directly impacting the resource area, it will require a Notice of Intent filing. Additionally, TEC recommends showing the respective buffer zone(s) and impacts for the existing wetlands throughout the site.*

Response: WSE Acknowledged. An NOI, dated February 15, 2023 provided by Bay Colony Group, Inc., has been formally filed with the Foxborough Conservation Commission and MADEP. Jurisdictional buffer zones have been provided on the plan set.

3. *The Applicant calls for fifteen (15) proposed visitors parking spots in the surface parking but proposes seventeen (17) visitor parking spots within the site plans. The Applicant should be consistent with what is shown in parking counts and what is shown on the plan.*

Response: Sheets C102 and C103 have been revised to show the correct number of (15) proposed visitors parking spaces.

4. *According to the Site Plan (Buildings Two and Three), the Applicant calls for a proposed light fixture where nothing is proposed. On the Utility Plan (Building One), the Applicant calls for a proposed transformer where nothing is proposed.*

Response: The callout leaders on these referenced plans have been adjusted to the correct locations.

5. *The Site Plans currently show two gas lines through the parking lot. The Applicant should confirm if two gas lines are proposed or if the 2nd line was drawn in error.*

Response: The second gas line drawn in error has been removed from the plans.

6. *The Applicant should provide turning templates showing the ability of emergency vehicles to access, circulate, and egress the site through the circulation pattern without leaving the paved surface. This includes the largest Town of Foxborough fire apparatus.*

Response: A fire truck turning analysis, sheet C112, has been added to the plan set demonstrating that the Town of Foxborough ladder truck (dimensions provided by the Fire Department) can navigate safely through the site as designed.

7. *TEC recommends the Applicant should coordinate with the Town of Foxborough Fire Department and Highway Department for preferred locations of fire lanes (if needed), confirmation of hydrant locations, and sign requirements for fire lanes within the site.*

Response: The Fire Department and Highway Department reviewed our initial site design during a technical review meeting with town staff on July 20, 2022 and provided guidance on fire lanes and access throughout the site. The current proposal incorporated all comments received during that meeting.

8. *TEC recommends adding spot grades to the Grading and Drainage Plan for each wheelchair ramp and along walkways to clarify the design satisfies both ADA regulations and the provided details.*

Response: Spot grades for ADA curb ramps have been provided to demonstrate ADA compliance. Slopes along walkways have been added to the grading plan to show that there shall be no walkways with longitudinal slopes exceeding 5%. All walkways will have a maximum cross slopes of 2% per the sidewalk detail provided.

9. *The Applicant should confirm the accessible curb ramp type west of Building 3 (between AD- 4 and AD-6) is applicable to the construction detail provided and meets ADA/AAB grading and slope requirements to/from the building doorway.*

Response: The accessible curb ramp type in this location is applicable to the construction detail provided and meets ADA/AAB grading and slope requirements to the building doorway per the spot grades provided on sheet C107.

10. *The sidewalk spur on the northwest corner of Building Three is noted to "Transition to Flush." The plans should be revised to show construction details for this spur, and/or the addition of an accessible ramp, to guarantee compliance with ADA/AAB. The Applicant should confirm construction details for all proposed accessible transition styles are provided.*

Response: Sheet C107 has been revised to add an ADA curb ramp to this sidewalk spur. A detail of this ramp type has been provided on sheet C504.

11. *The Applicant should confirm EV charging stations and associated subsurface infrastructure doesn't conflict with proposed utilities. The plans as shown presents the possibility of conflicts. The Applicant should provide information on required subsurface infrastructure which will be needed regardless of finalized manufacturer and/or brand chosen.*

Response: The final location of the EV charging stations and associated infrastructure will be detailed and coordinated as the design advances toward a Building Permit submission. Initial proposed locations are based on desired proximity to buildings and associated entrances. All potential conflicts will be vetted out prior to filing for a Building Permit.

12. *The Grading and Drainage Plan (Building One) shows potential runoff flowing to Walnut Street from the main entrance. TEC suggests revising the plans to limit runoff flowing off-site, treatment for this runoff, or an explanation on how this runoff meets requirements for de minimus flow as described in the Stormwater Handbook.*

Response: A de minimus discharge calculation has been provided as Attachment F.6 in the revised Stormwater and Utility Report. The flow from this portion of the site access drive is less than 1 CFS and meets the criteria to be considered a de minimus discharge.

13. *According to the Drainage Schedule, AD-10 and AD-11 have a proposed rim elevation significantly higher than the surrounding landscape area. TEC recommends altering the plan to ensure that runoff flows into the designated drainage structure.*

Response: The rim elevations of these structures have been revised in the Drainage Schedule to reflect proper flow patterns.

14. *While FE-9, FE-10, FE-11, and FE-12 are shown on the Grading and Drainage Plan with inverts, TEC recommends adding these drainage structures to the Drainage Schedule.*

Response: These flared end structures as noted have been added to the Drainage Schedule with their respective inverts.

15. *According to the Drainage Schedule, P-10 has a slope of 0.4%. The industry standard typically has a minimum drainage slope of 0.5%. TEC recommends revising P-10 to meet this minimum.*

Response: The slope of P-10 has been revised to 0.5% as requested.

16. *The Applicant should submit pipe sizing calculations to confirm adequate capacity for the proposed infrastructure.*

Response: Capacity calculations using Hydraflow Storm Sewers software have been provided in Attachment F.7 of the revised Stormwater and Utility Report. Resulting pipe size increases and slopes have been updated on the revised plans.

17. *Within the Site Plans (Buildings Two and Three), the Applicant proposes two maintenance sheds along the southeast landscape of site. In the Materials Plan (South), the Applicant also calls for a dumpster in the same area. TEC recommends the Applicant show where the dumpster will be located in respect to the maintenance sheds.*

Response: A dumpster was mislabeled in this area on the Materials Plan (South). The label has been corrected to call out the two proposed maintenance sheds.

18. *According to the Materials Plan (South), specs are mentioned regarding the dumpster and the trash totes. TEC recommends including these specifications within the plan set.*

Response: See response above. The dumpster callout was a mislabel.

19. *TEC suggests proposing adequate signage regarding the “secondary emergency access only” driveway.*

Response: A sign indicating “Secondary Emergency Access Only” has been added to the site plan.

20. *Do Not Enter (R5-1) signage is identified on the sign summary within Sheet C504 and back-to-back with the stop sign adjacent to the circular driveway on the southeast corner of Building One. TEC notes that if the 20’ secondary emergency access aisle is meant to be closed to traffic, or allowable for one-way flow based on the width, notations should be added to the plan for their locations along this aisle. All R5-1 signs should be reduced to 30”x30” per the Manual on Uniform Traffic Control Devices (MUTCD).*

Response: The secondary emergency access off of Walnut Street has a gate that will remain closed to the general public. The final gate style will be coordinated with the Fire and Police Departments prior to a Building Permit application. The 20’-wide portion of the site access loop has proposed signage and a fire lane per the Foxborough Fire Department comments on 7/20/22. This section of driveway is intended to be suitable for 2-way traffic. The sign summary has been revised to designate all R5-1 signs as 30”x30” as requested.

21. The 'One Way' (R6-1) signs should be reduced to 36"x12" per MUTCD.

Response: The sign summary has been revised to designate the one-way (R6-1) sign as 36"x12".

22. The Permanent Traffic Sign Summary on Sheet C504 should be expanded to include parking-related signage.

Response: Site specific signage and way-finding signage will be provided with the Building Permit application. The final locations of visitor parking, EV stations, etc. may be adjusted after a Comprehensive Permit approval.

23. The minimum height from finished grade to the bottom of traffic sign in the Accessible Sign and Post Detail (Sheet C504) should be 7-feet. This should be consistent with all other signage on-site where the sign is in or abuts sidewalk or walkway areas.

Response: Per 521CMR 23.6.4: "Such signs shall be permanently located at a height of not less than five feet, nor more than eight feet to the top of the sign." The accessible sign and post detail on sheet C504 has been updated to reflect these dimensions.

24. The Planting Plan (Sheet L130) should be revised to include sight triangles along Walnut Street to/from the site driveway to indicate areas of clearing and/or no planting to maintain sight lines based on the recommendations and values identified in the Traffic Impact Assessment (TIA).

Response: The sight triangles based on the Traffic Impact Assessment have been added to Sheet L130 and the tree clearing line has been updated to maintain adequate sight lines. No plantings are proposed within the sight triangles.

Stormwater Management Review

1. Standard 1 states that no new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.

The Applicant appears to be compliant with Standard 1

Response: WSE Acknowledged

2. Standard 2 requires that stormwater management systems must be designed so that post-development peak discharge rates and volumes do not exceed pre-development peak discharge rates and volume.

The Applicant includes a Stormwater Discharge Summary Table comparing the pre and post development post discharge rates. While the pre-development rates are decreased in the post condition, the pre-development peak discharge for Analysis Point A rates contrast from what is shown in the HydroCAD report. The Applicant should revise the stormwater report to confirm that the Stormwater Discharge Summary Table and HydroCAD report are consistent.

3. Standard 3 requires that the annual recharge from the post-development site should approximate the annual recharge rate from pre-development or existing site conditions, based on soil types.

The Applicant has provided Recharge Volume Calculations, and appears to be compliant with Standard 3.

Response: WSE Acknowledged

4. *Standard 4 requires that the stormwater system must be designed to remove 80% of the average annual load of Total Suspended Solids (TSS).*

The Applicant has provided treatment train TSS calculations sheets. It appears the Applicant has designed a stormwater management system that removes at least 85% of the TSS and therefore compliant with Standard 4.

While MA Stormwater Standard 4 has been met, it should be noted Section 10.3.g(2) of the Foxborough Stormwater Management Regulations was not met, as it requires 90% removal of TSS for New Developments. As noted above, the Applicant has requested a blanket waiver from all local requirements.

Response: WSE Acknowledged

5. *Standard 5 is related to projects with a Land Use of Higher Potential Pollutant Loads (LUHPPL).*

The proposed project is not considered a LUHPPL; therefore Standard 5 is not applicable.

Response: WSE Acknowledged

6. *Standard 6 is related to projects with stormwater discharging into a critical area, a Zone II or an Interim Wellhead Protection Area of a public water supply.*

The Applicant stated that the proposed project will not discharge into a critical area, Zone II, or an Interim Wellhead Protection Area of a public water supply. TEC suggests including a graphic in the report to confirm.

Response: A graphic showing that the proposed site will not discharge to a critical area has been added in the Locus Map section of the revised Stormwater and Utility Report.

7. *Standard 7 is related to projects considered Redevelopment. A redevelopment project is required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2, Standard 3, and the pretreatment and structural best management practice requirements of Standards 4, 5, and 6. Existing stormwater discharges shall comply with Standard 1 only to the maximum extent practicable. A redevelopment project shall also comply with all other requirements of the Stormwater Management Standards and improve existing conditions.*

The proposed project is not considered a redevelopment.

Response: WSE Acknowledged

8. *Standard 8 requires a Construction Period Pollution Prevention Plan (CPPP) and Erosion and Sedimentation Control Plan to be implemented to prevent impacts during disturbance and construction activities.*

No CPPP or Erosion and Sediment Control Plan has been submitted to satisfy Standard 8. However, the Applicant stated that a Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan will be incorporated into the final stormwater report. TEC recommends the final stormwater report be reviewed prior to the issuance of a building permit.

Response: A Construction Pollution Prevention Plan and Sediment Control Plan has been added to the revised Stormwater and Utility Report as Attachment H.

9. *Standard 9 requires an Operation and Maintenance (O&M) Plan to be provided.*

No O&M plan has been submitted to satisfy Standard 9. However, the Applicant stated that an operations and maintenance plan will be incorporated into the final stormwater report. TEC recommends the final stormwater report be reviewed prior to the issuance of a building permit.

Response: An Operation and Maintenance Plan has been added to the revised Stormwater and Utility Report as Attachment I.

10. *Standard 10 Prohibits all illicit discharges to the stormwater management system.*

No Illicit Discharge Statement has been provided to satisfy Standard 10. However, the Applicant stated that an illicit discharge compliance statement will be incorporated into the final stormwater report. TEC recommends the final stormwater report be reviewed prior to the issuance of a building permit.

Response: An Illicit Discharge Compliance Statement has been added to the revised Stormwater and Utility Report as Attachment J.

11. *Additional Comments:*

- a. *According to the Drainage Schedule, it appears that the outlet control structures have elevation and specifications that are called out and not consistent with the stormwater report. The Applicant should revise accordingly.*

Response: The Drainage Schedule and HydroCAD reports have been revised to have outlet control structures with elevations that are consistent.

- b. *It appears the sediment forebay for IB1 is undersized, with approximately 8,650 SF more impervious area flowing to it than shown in the sizing calculation.*

Response: The calculation sheet for sediment forebay IB-1 has been updated to reflect that adequate pre-treatment volume has been provided as designed.

- c. *The Applicant may want to consider adding a drainage structure within landscaped area to the south of the site to capture offsite runoff.*

Response: Runoff directed to our project site from offsite properties to the south were analyzed. It was determined that the projected runoff could be captured and conveyed by the proposed structures (CB-1 and CB-2). We will perform another calculation prior to a Building Permit

submission to confirm the inlet capacity of each catch basin. Double inlets will be provided if the calculated CFS to each inlet exceeds 2.0 fps for the 10-year storm event.

Traffic Impact Assessment

1. *The traffic study area includes two (2) intersections in the vicinity of the site. Based upon the size, scope, and location of the development, TEC finds that the study area as provided in the TIA is sufficient to capture the effects of the project on surrounding roadways based on TIA guidelines set forth by MassDOT. This includes an evaluation of intersections in which the site generated trips increase the peak hour traffic volume by more than 5 percent and/or by more than 100 vehicles per hour per MassDOT's TIA Guidelines (Section 3.1.C).*

Response: Comment acknowledged.

2. *The Applicant has provided traffic data collection during the weekday morning and weekday evening peak periods, as well as concurrent daily traffic counts. These June 2022 counts were conducted when schools were in regular session and subsequent to MassDOT's revised guidance on traffic volumes post-COVID. No adjustment to the counts was made to reflect seasonal fluctuation as June represents a month greater than the average-month conditions.*

Response: Comment acknowledged.

3. *In the Seasonal Traffic Adjustment section, the 2019 MassDOT's weekday seasonal and axle correction factors is referenced in the Appendix as TEC's. The typographical error, however, does not affect the results reported in the TIA.*

Response: The typographic error has been corrected. See copy of updated Traffic Impact Assessment.

4. *The TIA notes the use of the previous "3 years" of crash data available from MassDOT's IMPACT portal; however, five-years of data has been given including the most recent four years of complete data (2017 through 2020). Note that crash rates should only be calculated using years of complete data based on recent discussions with the MassDOT Traffic Safety and Engineering Section and should also not include those years of COVID-effect (2020 or 2021). Although the overall data for these COVID years can be included and analyzed for geometric and driver deficiencies, calculated crash values such as crash rate should be revised to only include 2019 and prior years.*

Response: The calculated crash rates have been updated to only include 2017-2019 data. See copy of updated Traffic Impact Assessment.

5. *The TIA did not provide a date for which the sight distances dates along Walnut Street were observed and measured. The vegetation along the east and west side of Walnut Street typically grows thick and near the edge of pavement during the summer months and therefore the intersection sight distance as reported in the TIA may be less than described. TEC does not believe that this will affect the overall exceeding of the minimum requirements; however, TEC does recommend that the Applicant commit to maintaining vegetation clearing within the public*

right-of-way and along the project's property line to ensure minimum / desired sight lines are met beyond the opening of the project.

Response: The sight distance measurements were performed on June 24, 2022 when the summer vegetation had been established. The site plans have been updated to include the intersection sight lines and note the areas where the Applicant will commit to clearing vegetation to maintain sight lines.

6. *The TIA did not provide support materials related to the Yearly Traffic Growth of 1.8% per year as provided by TEC; however, TEC is in agreement with this rate to provided consistency with the Commercial Street / Walnut Street Improvements Functional Design Report (FDR) as completed in 2021.*

Response: The original TIA included a copy of an email in the Traffic Growth Section of the Appendix between Weston & Sampson, Liz Oltman of TEC, and Paige Duncan with the Town of Foxborough confirming that MassDOT had approved the use of 1.8% to be appropriate for this project.

7. *The TIA does not identify specific developments by others that may affect traffic volumes through the study area within the No-Build and Build conditions. The Applicant should provide a summary of other developments, if warranted, or identify that discussions with the Town have resulted in no developments which will result in increased traffic impacts.*

Response: The original TIA included a copy of an email in the Traffic Growth Section of the Appendix from Paige Duncan with the Town of Foxborough confirming the Town was not aware of any others development projects in the area.

8. *TEC reviewed the Institute of Transportation Engineers (ITE) publication, Trip Generation, 11th Edition for the estimated site generated traffic and confirmed the peak hour generation as noted in the TIA. The TIA utilizes the trip generation calculations for 'Peak Hour of the Generator' as opposed to 'Peak Hour of the Adjacent Street' which results in a conservative estimate for overall generation of trips and impact along the study area. TEC does not oppose the trip calculations as the trips difference are not significant and more conservative.*

Response: Comment acknowledged.

9. *The trip generation calculations for the site are reported as less than described in the Commercial Street / Walnut Street Improvements FDR as the site characteristics have changed. Therefore, the impact of the site would be less than as reported in the FDR and the overall traffic signal design.*

Response: Comment acknowledged.

10. *TEC reviewed the Analysis Results Table and noted a few typographical errors. These errors do not affect the results reported in the Traffic Study; However, the Applicant should correct them. Commercial Street (Route 140) at Walnut Street, 2026 No-Build for AM Peak the Queue length for Westbound Lane. Commercial Street (Route 140) at Walnut Street, 2033 Build for AM Peak the V/C ratio for the Eastbound right movement. North High Street at Walnut Street, 2033 with signal the V/C ratio for the southbound lane.*

Response: Weston & Sampson has reviewed the noted typographical errors and notes the following:

- We agree that the queue length for the westbound lane at the intersection of Commercial Street (Route 140) at Walnut Street under the 2026 No-Build AM peak hour was incorrectly stated as 75ft instead of 100 ft. This has been corrected. See copy of updated Traffic Impact Assessment.
- We agree that the v/c ratio for the eastbound right turn movement at the intersection of Commercial Street (Route 140) at Walnut Street under the 2033 AM peak hour was rounded to 0.70 when the value should have been represented as 0.68. This has been corrected. See copy of updated Traffic Impact Assessment.
- We do not agree that there is a typographical error for the v/c ratio for the southbound lane at the intersection of Commercial Street (Route 140) at Walnut Street under the 2033 Build with Signal AM peak hour. The value shown in the table was 0.09 and the value in the Synchro analysis is 0.087, which when rounded to two decimal places to be consistent with the rest of the data is the 0.09 reported. Therefore, no change is required. See copy of updated Traffic Impact Assessment.

11. *The results of the capacity analysis depicted in Table 8 and Table 9 are missing information related to projected 95th percentile queuing for unsignalized intersections and 50th/95th percentile queuing for signalized intersections. The Applicant should add this to the table.*

Response: The 95th percentile queue values are provided for all of the appropriate movements in Tables 8 & 9. The only values not provided are for the northbound and southbound Commercial Street (Route 140) approaches which are not under stop sign or signal control in the 2033 No-Build or 2033 Build conditions. Therefore, there is no queue value provided for the Proposed Driveway under the 2033 No-Build condition because it does not currently exist. The 50th percentile queues have been provided in addition to the 95th percentile queues in Tables 8 & 9 under the 2033 Build & Signal condition as requested.

12. *Note that the traffic volumes at the intersection of Route 140 / Walnut Street are shown significantly less than the volumes previously collected in February 2020 as included in the Functional Design Report (FDR) for the Route 140 / Walnut Street improvements. Overall, the operations shown in the FDR with the elevated trip generation projections for the site still show operations of an improved nature over existing signalized conditions.*

Response: Comment acknowledged.

13. *The TIA provides no documentation of how the trip distribution percentages were evaluated. At a minimum, the Applicant should provide a listing of documents reviewed to confirm the utilization of this trip distribution. In addition, as an Affordable Housing Property development with peak hour analysis, the Applicant should seek to evaluate the trip distribution based on the most recent US Census Journey-to-Work data that is publicly available.*

Response: Given that the proposed use is an age-restricted (55+) community it was determined that the site distribution would not follow US Census Journey-to-Work data since a

fair portion of the proposed population of the facility was anticipated to be of retirement age and no longer traveling to work. Therefore, the Trip Distribution was calculated based on existing distribution observed at the intersection of Commercial Street (Route 140) and Walnut Street as this was believed to be a much better representation of the existing travel patterns of the adjoining neighborhood to travel to offsite employment, retail, and recreational endeavors.

14. *TEC concurs with the operational findings of the TIA that the introduction of additional traffic along Walnut Street and the surrounding street network as a result of the project will have a negligible impact on operations. The proposed traffic signal improvement at Walnut Street and Commercial Street (Route 140) will significantly improve traffic operations at the intersection.*

Response: Comment acknowledged.

Review comments from the Conservation Commission dated January 21, 2023

1. *The wetlands line for DEP 157-618 was approved and an ORAD was issued in 2022.*

Response: WSE Acknowledged

2. *A State (only, since this is a 40B project) Notice of Intent needs to be filed for any alterations that are proposed within 100' feet of the approved wetlands line.*

Response: WSE Acknowledged. An NOI dated February 15, 2023 provided by Bay Colony Group, Inc. has been formally filed with the Conservation Commission.

3. *The erosion controls should be located in the place as the limit of work line, in the 100' buffer zone.*

Response: Erosion Controls are proposed within the limit of work line and locations are shown on Sheets C100 and C101.

4. *It appears that some alterations have been proposed within 25' of the wetlands. Although this area is only a buffer zone under the State's wetlands laws. I respectfully request that a 25' limit of work buffer as observed near wetlands as was requested during the Commission's 7/11/22 ANRAD hearing.*

Response: A 10' no disturbance buffer from the wetlands has been provided. All proposed impervious surfaces are located 25' or more away from the isolated non-jurisdictional wetland. Proposed clearing and grading within 25' of this wetland area is required to supplement screening with continuous evergreens and establish finish grades along the access drive. The disturbed area will be restored with vegetation. Additionally, the proposed areas of disturbance and pavement all drain away from the wetland area ensuring no degradation of the resource area would result from the proposed project.

Review comments from the Department of Public Works dated February 9, 2023

Sewer Comments

1. *The E-one systems should be dual pumps. This will allow for maintenance or replacement without having to stop flow for the building while being worked on.*

Response: The pump specified for each building is a minimum of a dual pump.

2. *The 2,000-gallon septic tank in line between the building and pump allows for some storage capacity, but not sure if it's enough to not have a dual pump setup for each building. Typically, design capacity for pump chambers require at least 24-hour storage.*

Response: The 2000-gallon septic tanks have been increased to 5000-gallons. They are sized and intended to handle potential trash and unsuitable materials upstream of the grinder pumps. They are not needed or intended to provide 24-hour storage.

3. *The sewer system (including pumps and tanks) should be on an annual cleaning and inspection program.*

Response: A facility-wide operations and maintenance plan will be provided to the Town prior to application for occupancy of the first unit.

4. *The generator for the sewer system should have an O&M plan and be followed to ensure it works when it is needed.*

Response: Same response above.

5. *The E-one pump systems should have audible and visual alarms.*

Response: WSE acknowledged. These standard features will be provided with the E-one pump systems.

6. *200 One Bedroom Units = 20,000 gallons per day (gpd). There is a one-time sewer capacity fee of \$864,200 to guarantee flow to the MFN Regional sewer treatment plant. Foxborough Sewer Regulations does not have a senior housing flow rate; this could be discussed with the Commission if the applicant has data to support lower flows for this type of housing.*

Response: WSE acknowledged

Water Comments

1. *Water Connection Fees*
 - a. *2 – 8" connections on Walnut St @ \$3,500 each = \$7,000*
 - b. *3 – 4" domestic services @ \$2,850 each = \$8,500*
 - c. *3 – 6" fire services @ \$3,500 each = \$10,500*
 - d. *Total Water Fees = \$26,000*

Response: WSE Acknowledged. Water connection fees will be paid at the appropriate time.

2. *Domestic services should have a three-way gate system – one on the service, and two on either side of the connection to the 8" internal main.*

Response: Additional gate valves have been added to Sheets C104 and C105 as requested.

3. *The water main on Walnut St is Asbestos Cement pipe and has recently had multiple breaks due to its age and pipe material. It is not currently on a capital list for replacement, however, the department is aware of our aging infrastructure. The proponent should consider replacing the section of water main on Walnut St between the two 8" connections.*

Response: 247-LF of new ductile iron water main was added to replace the section of existing 8-inch water line between the two proposed 8" water connection points for our project. The existing 8-inch line will be abandoned in place. See Sheet C104.

4. *Interior fire hydrants will be charged a private hydrant fee. Current fee is \$60/year per hydrant.*

Response: WSE Acknowledged. This operating expense will be added to the operating budget of the facility.

General Comments

1. *All utilities and infrastructure interior to project and up to their respective connections on Walnut Street (including water, sewer, stormwater, etc.) shall be privately owned and maintained.*

Response: WSE Acknowledged.

2. *Each building should be equipped with a generator – Residents struggle at the other two FHA properties during storms because there is no backup power. At a minimum the backup power should be able to maintain HVAC and lighting throughout the units, and the community rooms.*

Response: An 80-kW generator is proposed for each of the three buildings. This size generator can maintain power to the sewer pump stations and emergency lighting. Generator back-up will also be provided for lighting and HVAC within the community room located in Building One.

3. *If existing mature trees exist where new plantings are proposed, it may be beneficial to maintain the existing vegetation, although I understand the idea of evergreens for screening against the North High St. residential properties.*

Response: Plantings are only shown in areas where tree clearing is proposed to accommodate the proposed site layout, grading, and screening enhancement. Existing vegetation is proposed to remain where possible.

4. *The drainage swale on Walnut St should be protected with a guardrail or the proponent should look to install a pipe in place of the swale that can be buried and the area brought to grade.*

Response: A closed pipe system is not a viable option along this swale. It would ultimately have to discharge into the MADOT drainage system along Rt. 140 if proposed. In our experience, MADOT strongly discourages any new direct connections into their drainage infrastructure. Additionally, this swale is currently delineated as a wetland. Any proposed filling may require additional permitting and could be restricted by local or state regulations. Given that the swale has been maintained in its current state with no known reported incidents, we feel it can remain

as such. The TIA and associated peer review comments acknowledge that the proposed project will not adversely affect the current traffic volume or safety along Walnut Street.

Comments from the Town of Foxborough Health Department dated February 14, 2023

Response: WSE Acknowledges all comments and statements

Letter from the Director of Land Use and Economic Development dated February 16, 2023

Response: WSE Acknowledges all comments and statements

Letter from the Town of Foxborough Planning Board dated February 16, 2023

Response: WSE Acknowledges all comments and statements

Letter from the Foxborough Housing Authority dated February 15, 2023

Response: WSE Acknowledges all comments and statements

Comments from the Town of Foxborough Police Department dated February 15, 2023

Response: WSE Acknowledges all comments and statements

We feel that our responses and revised materials have adequately addressed all comments issued to date. If you have any further questions or require any additional information, please feel free to contact me at (978) 935-3795 or johnson.jesse@wseinc.com.

Sincerely,
WESTON & SAMPSON ENGINEERS, INC.



Jesse Johnson, P.E.
Team Leader

CC: WSJV Group