

August 3, 2023

Mr. Michael McKnight, Chair, Wrentham Planning Board  
c/o Wrentham Planning Department  
Town Hall  
79 South Street  
Wrentham, MA 02093

Via: Email to [planning@wrentham.ma.us](mailto:planning@wrentham.ma.us); and First-Class Mail

Reference: Site Plan & Special Permit Review  
10 Commerce Boulevard  
Wrentham, Massachusetts  
B+T Project No. 1399.142

Dear Mr. McKnight and Members of the Board:

Beals and Thomas, Inc. is pleased to assist the Town of Wrentham Planning Board with the review of the proposed convenience store and fuel filling station development (the Project) located at 10 Commerce Boulevard in Wrentham, Massachusetts (the Site). We understand the Applicant, Edgewood Development Co., LLC, proposes the development a 4,500 square foot convenience store with associated fuel filling pumps, paved access driveway and parking areas, site lighting, landscaping, and utility connections including a stormwater management system.

We received the following documentation on which served as the basis for our review:

- *Town of Wrentham Planning Board Application for Special Permit/Site Plan Approval*, dated June 16, 2023, prepared by the Applicant (10 pages including attachments)
- *Town of Wrentham Planning Board Earth Removal Application*, not dated, prepared by Bay Colony Group, Inc. (1 page)
- *Project Narrative, Re: 10 Commerce Boulevard*, dated June 15, 2023, prepared by Bay Colony Group, Inc. (4 pages)
- *Community and Environmental Assessment, 10 Commerce Boulevard, Wrentham, MA*, dated June 6, 2023, prepared by Bay Colony Group, Inc. (33 pages)
- *Site Development Plan of Land, 10 Commerce Boulevard, Wrentham, MA*, dated April 19, 2023, prepared by Bay Colony Group, Inc. (22 sheets)
- *Stormwater Management Plan "10 Commerce Boulevard", Wrentham, MA*, dated April 2023, prepared by Bay Colony Group, Inc. (261 pages)

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We have reviewed the documentation submitted by the Applicant with respect to the requirements of the Town of Wrentham Zoning By-Laws as amended through November 14, 2016 (the By-Law) (which was in place at the time of the original subdivision submission) in particular, Article 7 (Site Plan), Town of Wrentham Stormwater Management By-Law (the Stormwater By-Law), Town of Wrentham Stormwater Management Regulations (the Regulations), the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Regulations and Handbook (the Handbook); and, generally accepted engineering practice.

### **Project Summary**

The Site is being reviewed as part of the Commercial-Industrial District 2 (C-2) Zoning District and is identified as Map O-6, Block 4, Lot 6. The Project site is approximately  $\pm 2.6$  acres and has frontage on Commerce Boulevard and Washington Street (Rt. 1). Access is provided from a single curb cut from Commerce Boulevard. The Site is currently undeveloped, was previously disturbed and is largely paved. The Site is bounded by Rt. 1 to the west, Commerce Boulevard to the north, and other commercial/industrial uses to the east and south. The Site is relatively flat but is elevated from the existing elevation of Commerce Boulevard and the entertainment complex to the east.

The Project consists of the proposed development a 4,500 square foot convenience store with associated fuel filling pumps, paved access driveway and parking areas, site lighting, landscaping, and utility connections including a stormwater management system. The Project is proposed to be serviced by municipal water service and an on-site sewage disposal system. Access to the Project is proposed to be from two new curb cuts from Commerce Boulevard.



*Google Earth aerial image of site and surroundings.*

**Site Visit:**

We visited the Site on Wednesday, August 2, 2023 to familiarize ourselves with the property and adjacent area, and to evaluate the existing conditions with regard to the proposed development. Photographs are included herein that present conditions at the Site and to provide context for our comments.



*Observed existing on-site conditions.*



*Location of proposed eastern site driveway at Commerce Boulevard.*





*Location of proposed western site driveway at Commerce Boulevard.*



*Observed existing conditions of stormwater Basin C3.*



*Observed existing curb cut and sidewalk terminus.*



*Observed on-site electrical box and exposed conduit.*

**General Comments:**

1. Chapter 390-6.1 of the By-Law stipulates dimensional requirements. For the C-2 zoning district the front setback is 100-ft and the side/rear setbacks are 50-ft. Chapter 6.1.9 of the By-Law further stipulates that sites within the C-2 zoning district that adjoin to Rt. 1 can reduce the referenced setbacks to 50-ft and 25-ft, respectively by means of a Special Permit. The Applicant is requesting a waiver from the setback requirements and proposes to use the reduced setbacks referenced herein to accommodate the proposed parking layout. B+T does not take any exception to the waiver being requested; however, defers to the Board on the appropriateness of the waiver being requested.
2. Chapter 390-6.4.B(9) of the By-Law stipulates requirements for parking area landscaping and shading requirements. Though a formal Form R – Waiver Request Form has not been provided, the Applicant is requesting a waiver from the referenced sections of the By-Law. The Applicant is proposing a shading percentage of 26% versus the 50% required. Though the Applicant has proposed trees around the perimeter of the paved surface, there does appear to be more opportunities to provide additional shading though it does appear the 50% requirement is likely not achievable. We request that the Applicant submit a formal waiver request to document the need for relief for consideration by the Board.
3. Chapter 390-7.4.g.2 of the By-Law requires the location of size or proposed utilities. The development is proposed with a single 2-in water service. We request that the Applicant confirm this infrastructure is adequate to serve both domestic and fire service requirements.
4. Chapter 390-7.4.h of the By-Law requires the submission of plans prepared by a registered Architect including building elevations, etc. The Applicant has provided architectural information; however, the plans are not stamped by an Architect. We request that the Applicant submit compliant plans.
5. Chapter 390-18.5.d of the By-Law stipulates the dimensional requirements for signage. Though a formal Form R – Waiver Request Form has not been provided, the Applicant has indicated they would like to request a waiver from this requirement. A proposed signage package has not been provided. We request that the Applicant submit a formal waiver request to document the need for relief for consideration by the Board.
6. The Applicant has not provided a swept path analysis for emergency response vehicles. We request that the Applicant provide a swept path analysis for the Project and defer to Wrentham Fire Department personnel on the adequacy of the emergency access provided.

7. A site preparation plan has not been provided. As noted herein, the site is currently largely paved with some existing vegetation along the southern property line. The limits of existing pavement removal or tree clearing have not been depicted. The landscape renderings appear to depict that all proposed non-impervious surfaces will be maintained as lawn. Considering the proximity to the building on the abutting property, it appears all the natural screening is proposed to be removed. We request that the Applicant clarify the intended site preparation proposed and if the addition of landscape screening may be applicable.
8. As observed on August 2<sup>nd</sup>, existing electrical infrastructure including conduit at existing grade encumber the northwest portion of the Site. We request that the Applicant address how this infrastructure will either be removed and abandoned or maintained and modified in the proposed condition.
9. The existing curb cut to the Site appears to be abandoned in the proposed condition. It is unclear if it will be closed with curb and the sidewalk extended to the abutting lot. We request that the Applicant clarify the design intent for the existing curb cut in the final condition. If curb is to be installed, an accessible sidewalk ramp should be incorporated to terminate the sidewalk to roadway grades.
10. The lighting design proposed exhibits minimal trespass of light over the property line to the south. Considering the de minimis nature of the trespass and the non-residential classification of the abutting property, we consider the lighting design to be adequate.
11. We acknowledge the *SWPPP & Snow Storage Plan* provided by the Applicant. The plan references Project phasing. Given its relatively limited size, we presume the Project will be executed in a single phase. We request that the Applicant clarify the intended phasing of the Project and revise the referenced plan accordingly.
12. The Project includes a proposed on-site sanitary waste disposal soil absorption system. Details of the system have not been provided within the Applicant's submission. We defer review and approval of the proposed system to the Wrentham Board of Health review process.



**Stormwater Comments:**

13. Section 6.B(1) of the Stormwater By-Law requires a signed Stormwater Permit application form from the Applicant. The referenced application does not appear to be included with the Applicant's documentation provided to B+T and we understand the Applicant is coordinating with Town staff to provide this information.
14. Section 7.D(1) of the Stormwater By-Law requires the contact information that is typically incorporated into the SWPPP be provided. A draft SWPPP (in accordance with Section 8 of the Stormwater By-Law) for this Project has been submitted; however, the Applicant indicates a final iteration will be provided prior to construction with all the required information once the contract has been awarded. As a potential condition of approval, we recommend that a compliant SWPPP be provided prior to construction.
15. Section 7.D(2)(d)v of the Stormwater By-Law requires calculations for all temporary stormwater management best management practices (BMPs). We request that the Applicant provide the referenced calculations.
16. Section 7.D(2)(e) of the Stormwater By-Law requires schedules for construction and earth movement. The referenced documentation does not appear to be provided. We request that the Applicant provide the documentation in compliance with the noted section of the Stormwater By-Law.
17. Section 7.D(3)(c)ii of the Stormwater By-Law stipulates that design plans include profiles of drainage trunk lines. We request that the Applicant provide documentation in compliance with the noted section of the Stormwater By-Law.
18. Section 7.D(4)(a) of the Stormwater By-Law stipulates that hydrologic calculations be provided for 2, 10, 25 and 100-year 24-hour storm events. The Applicant has provided analysis for a 50-year storm event and not a 25-year storm event. We request that the Applicant provide the hydrologic calculations for the required 25-year storm event.
19. Section 7.4(D)(4)(c) of the Stormwater By-Law requires water quality calculations including total suspended solids (TSS) and Total Phosphorus (TP). TP removal calculations have not been provided. We request that the Applicant provide calculations for the TP removals as proposed.



20. Section 7.4(G)(7) of the Stormwater By-Law stipulates that all groundcover types shall be assumed to be in “good” condition. Within the pre- and post- development analysis, curve numbers (CN) associated with “fair” ground cover types are utilized. We request that the Applicant revise the modeling analysis accordingly.
21. Section 7.4(G)(10) of the Stormwater By-Law requires that BMPs and stormwater management system components be evaluated and designed in the accordance with Resilient Massachusetts Action Team (RMAT) Climate Resilience Design Standards and Guidelines. We request that the Applicant document compliance with the referenced section of the Stormwater By-Law.
22. Section 7.4(G)(12) of the Stormwater By-Law limits Rawls rates to be as described in the Handbook. Understanding that previous off-site components of the overall stormwater management system were previously reviewed and approved under the Board of Health review process, design assumptions for Basin C3 and infiltration systems A and B utilize Rawls rates well in excess of the prescribed infiltration rates in the current modeling. Stormwater runoff flows from the Project are proposed to enter Basin C3. We request that the Applicant clarify the Rawls rate used in the analysis of off-site stormwater management elements.
23. Section 7.4(G)(13) of the Stormwater By-Law requires that the stormwater management system be designed to accommodate a 25-year storm event. We acknowledge the calculations provided but is unclear what storm event was used in the analysis, and as noted herein, a 25-year storm event analysis has not been provided. Velocities are observed in some pipes above 10 ft/s and could introduce scour concerns. We request that the Applicant revise the referenced calculations accordingly.
24. Section 7.4(G)(16) of the Stormwater By-Law requires stormwater basins accommodate the 100-yr storm event with 1-ft of freeboard. Understanding that previous off-site components of the overall stormwater management system were previously reviewed and approved under the Board of Health review process, Basin C3 does not exhibit the 1-ft of freeboard within the current modeling. We request that the Applicant clarify the freeboard provided for the off-site stormwater management elements.
25. Section 7.4(G)(18) of the Stormwater By-Law requires all drainage infrastructure has a minimum diameter of 12-in. The outlet from the subsurface infiltration system is proposed as 8-in. We request that the Applicant revise the design accordingly.

26. Standard 3 of the Handbook requires a 2-ft vertical separation from the bottom of infiltrative best management practices to the estimate seasonal high groundwater elevation. Understanding that previous off-site components of the overall stormwater management system were previously reviewed and approved under the Board of Health review process, Basin C3 does not exhibit the required separation to groundwater in the current modeling. We request that the Applicant clarify the design of this infrastructure.
27. Standard 10 of the Handbook requires an illicit discharge statement from the Applicant. The DEP Stormwater Report Checklist provided indicates the intent to provide an executed statement prior to construction. We request that a fully executed illicit discharge statement be provided by the Applicant prior to construction.
28. It does not appear that the existing stormwater management system is being operated and maintained in accordance with standard practice. Basin C3 was observed to be overgrown and the inlets/outlets were not visible. Catch basins within the roadway were observed without standard outlet protection hoods. With the stormwater runoff from the proposed Project being tributary to this infrastructure, as potential condition of approval, we recommend that the existing on-site system be inspected and cleaned prior to construction to ensure it is in compliance with previous approvals and the assumed design intent.
29. The modeling of the on-site subsurface infiltration system is inconsistent with the plans. The diameter, slope, length, and inverts of the outlet pipe modeled do not appear to correlate with the plans. We request that the Applicant revise the documentation accordingly.
30. The plans include an area drain detail. It does not appear any are included in the design. We request the Applicant clarify the design intent for the referenced detail.

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B+T is available to attend the next Planning Board public hearing, upon request, to present the results of our review and be available for discussion regarding the comments listed herein.

We appreciate the opportunity to assist the Wrentham Planning Board with the review of the proposed project. Please do not hesitate to contact our office with any questions.

Very truly yours,

BEALS AND THOMAS, INC.



Matthew Cote, PE  
Senior Civil Engineer

MC/ggp/aak/1399142LT001

cc: Bill Buckley, Bay Colony Group (via email to [billbuckley@baycolonygroup.com](mailto:billbuckley@baycolonygroup.com))