
TOWN PLANNER QUESTIONS, COMMENTS AND RECOMMENDATIONS

Proposed Development:	Singletary Arms Residential Development 115 West Main Street/ 4 Burbank Street
Applicant:	Douglas Backman
Application Submitted:	September 3, 2020
Public Hearing Scheduled:	September 28, 2020

Project Description: The Applicant seeks an Adaptive Reuse Special Permit, a Multi-family Special Permit, Site Plan Review, and a Post-construction Stormwater Management Permit for the construction of mixed use development consisting of 197 multi-family dwellings (100 efficiency, 70 1-bedroom and 27 2-bedroom dwelling units), a 2,400 square foot restaurant space, and a 7,500 square foot office space on 12.5 acres of land. A total of 330 parking spaces are proposed in a combination of underground parking garages and surface parking. The property is located within the Bramanville District and will be served by both public sewer and water. Note that preliminary plans were submitted for pre-application review.

Issues/Comments:

Comments are based on the site plan dated August 6, 2020. Comments dated October 22nd are based on the site plan revised October 16, 2020. Comments dated December 9th are based on the site plan last revised November 30, 2020. Comments dated January 20th are based on the site plan last revised January 11, 2021. Comments dated February 18th are based on the site plan last revised February 15, 2021.

1. The Existing Conditions Plan prepared by Farnsworth Engineering Associates, Inc. should be stamped by a registered professional land surveyor. In conformance with Zoning Bylaws, Section 12.44(a), the plan shall be drawn to NAD 83/NAVD 88 datum and include at least three property boundary markers, remotely separated, with Massachusetts Grid Plane Coordinates. Please revise the plan accordingly.

October 22nd Comment: This comment was not addressed. An updated survey was not provided with the updated submittal.

December 9th Comment: This comment is now addressed. The survey is now stamped, drawn to NAD 83/NAVD 88 datum, and includes several boundary markers with MA Grid Plane Coordinates. Also, a second sheet was added that depicts the entirety of 115 West Main Street as requested by the Planning Board.

2. Please modify the site plan title block so that it specifies all parcels included within the proposed development (i.e. 115 West Main Street, 119 West Main Street, 3 Burbank Street, and 4 Burbank Street). Assessor's Map/lot information should be provided for each parcel.

October 22nd Comment: This comment is partially addressed. The plan was updated to include all property addresses within the title block, however the Assessor's Map/lot information does not appear on the updated plans.

December 9th Comment: This comment is fully addressed in the Plan modification. The Assessor's Map/lot information appears on Sheet C-4.

3. In accordance with Zoning Bylaws, Section 12.44(a), please modify the site plan as follows:
- Delineate the location and type of curbing proposed using line work, symbology and/or text;

October 22nd Comment: This comment is addressed by plan modifications.

- Delineate sidewalks along West Main Street and Burbank Street as well as their connection to the walkways within the proposed development;

October 22nd Comment: This comment is largely addressed. Note that the sidewalk along the parking lot with 14 spaces, adjacent to the easternmost project egress, should connect to the sidewalk along the Burbank Street frontage. The plan should be adjusted accordingly.

December 9th Comment: This comment is now addressed in full in the updated Plan set.

- Include five signature lines for Planning Board approval;

October 22nd Comment: This comment is partially addressed. Note that our new alternate, Francis Desimone will be voting on this project since Mat Ashmankas recused himself.

December 9th Comment: This comment is now addressed by Plan modifications.

- Delineate yard setbacks (a.k.a building envelope) for all parcels;

October 22nd Comment: This comment is partially addressed by plan modifications. The building envelope is shown, but it erroneously identifies the front setback as 25'. Since the Mill will contain a mixture of residential/commercial uses, the minimum front setback is 0'. The minimum front setback for the other parcels that contain exclusively residential uses is 18'. Please adjust the front setbacks accordingly.

December 9th Comment: This comment is partially addressed. A note on Sheet C-4 specifies that there is 0' front setback along the mill building only otherwise 18'', however the Zoning Table on Sheet C-4 still specifies a front yard setback of 25' at the parking lot locations and the front setback lines are still drawn to 25'. The Applicant should correct these inconsistencies as the location of the front setback line has parking and landscaping ramifications.

January 20th Comment: A revised Sheet C-4 was forwarded to the Board via email on January 20th. The December 9th comment regarding specifying the correct front setback on the plan is now addressed. However, since the two apartment buildings exceed the maximum front setback requirement of 25', the Applicant will either have to submit a variance request for Board of Appeals consideration or file a Plan of Land with the Worcester Registry of Deeds combining 4 Burbank Street and 115 West Main Street together. If the lots are combined, the front setback violation on 4 Burbank Street will be resolved because the mill building is a pre-existing building that complies with the setback requirement for a mixed use building (18' maximum setback). I recommend combining these parcels as a Condition of Approval prior to construction activities. A copy of the recorded plan of land should be filed with the Planning Board.

February 18th Comment: *The Applicant agreed to combine the lots as a way of addressing this comment. This shall be made a Condition of Approval as specified above.*

- Include floodplain information on Sheet C-4;

October 22nd Comment: *This comment is addressed by plan modifications. Floodplain information is depicted on Sheets C-3 and C-4.*

- Depict limit of disturbance.

October 22nd Comment: *This comment is addressed by plan modifications. The limit of disturbance is depicted on Sheet C-32.*

4. A photometric plan was submitted in accordance with Zoning Bylaws, Section 12.44(a) demonstrating that lighting will be adequate at driveway, parking lot and walkway locations. However, there is some spillover of lighting onto the abutting residential properties N/F owned by James Dugan Trust, GBW, LLC, and Michael Arrell that could be viewed as a nuisance. Shields could be used to eliminate spillover. Also, please provide cut sheets depicting the style of lighting.

October 22nd Comment: *This comment is not addressed.*

December 10th Comment: *This comment is addressed. The Applicant included a note on Sheet SL-1 stating that "Light shields will be used to eliminate spillover onto adjacent properties" and cut sheets were provided for the various lighting types.*

5. Zoning Bylaws, Section 12.44(a) and (e) requires scaled building elevation/façade plans for all proposed buildings. Please provide elevation drawings for the Hose House and the proposed 2-story garage. The use of the second floor of the garage should be specified (i.e. office, apartment). Note that single family homes (i.e apartment over a two car garage) is not a permitted use in the Bramanville Village District. Also, in conformance with Zoning Bylaws, Section 33, the garage should be situated such that it does not require backing directly onto West Main Street- a significant safety hazard given the volume and speed of traffic in that location.

October 22nd Comment: *This comment is not addressed.*

December 9th Comment: *This comment is addressed. The proposed 2-story garage was eliminated and the Applicant has agreed to donate the historic Hose House to the Town of Millbury for use as a museum. In that case, the Town will be responsible for any renovations to the building.*

6. The elevation drawings for Building #2 depict that the lobby/entrance will face south, towards the back of the project and away from the view of the development from Burbank Street, the Steelcraft Mill and Building #1. It appears that there will be no formal entrance on the north side and that the prevailing view will be of the parking garage. I understand that existing grades are driving this orientation of Building #2, however the view of Building #2 along the north elevation could be made more attractive and welcoming using architectural features and possibly an awning to denote an entrance. Note that Zoning Bylaws, Section 12.45(v)(2)(a) states that "all buildings shall have a principal façade and entry (with operable doors) facing a street or open space. Building may have more than one principal façade

and/or entry. I recommend that the architect make design improvements to the north façade of Building #2 so as to conform with this provision.

October 22nd Comment: This comment is not addressed.

December 9th Comment: This comment is addressed by modifications to the elevation drawings. A principal doorway is now depicted on both the north and south elevations of both buildings. Note that due to a typo, the north/south elevations of both buildings should be reversed (north elevation is marked south and vice versa).

February 18th Comment: I noticed that the unit mix for all three buildings as shown on the original (dated 9/10/20) and updated (dated 12/09/20) elevation and floor plans total 199 units- 99 studio units, 70 1 bedroom units, and 30 2 bedroom units. This does not match the parking calculation box on Sheet C-4. Please adjust the unit mix for Building #1 to reflect 25 studios, not 27. There appears to be a typo in the calculation for total studio units in the building.

Response: The unit mix has been adjusted down to 180, which includes 77 studio, 73 1-bedroom, 30 2-bedroom, 2400 sf restaurant, and 4000 sf of commercial space. The architect has delivered the revised elevations and floor plans.

7. Zoning Bylaws, Section 12.45(v)(2)(f) states that flat roofs are allowed on multi-story buildings in the Bramanville Village District if they have a decorative cornice or parapet. Although a parapet is depicted, it is not decorative. Please modify the elevation drawing to comply with this requirement or submit a written waiver request.

October 22nd Comment: This comment is not addressed.

December 9th Comment: This comment is addressed by modifications to the elevation drawings. Also, modifications were made to the windows/doorway configuration, colors, and foundation treatment in an effort to address comments received from abutters and Board members. Personally, I like all of the design changes, but prefer beige or gray siding to the white siding proposed. Also, the Applicant should specify the building finish materials for the façade. Note that vinyl siding is not permitted per Zoning Bylaws Section 12.45(v)(2)(b).

January 20th Comment: The December 9th comment is not addressed.

February 18th Comment: In letter dated February 8, 2021, DBVW Architects stated that the proposed exterior finish materials include a combination of painted Fiber-Cement siding, brick veneer, cast stone veneer and architecturally-finished concrete. These materials comply with Zoning Bylaws, Section 12.45(v)(2)(b) and are therefore acceptable. This comment is now addressed.

8. Four snow storage areas are depicted on the site plan, which seems inadequate for the scale and extent of this development. Either the Applicant should depict additional snow storage areas (i.e. in the area of the 8-space parking lot on West Main Street) and/or I recommend a Condition of Approval requiring all snow to be removed from the site once designated snow storage areas are full. Storage areas shall be considered full once designated snow piles reach 8' in height and/or sight lines are obstructed.

October 22nd Comment: This comment is partially addressed. Additional snow storage areas are depicted, but three of them are within the parking lot along the West Main Street frontage. This would eliminate use of these 8 parking spaces during much of the winter.

December 9th Comment: This comment is addressed by plan modifications. I still recommend the Condition of Approval regarding snow pile heights as specified above.

9. Please provide a detail of dumpster enclosures. For aesthetic reasons, I strongly recommend stockade or vinyl fencing in lieu of chain link fencing with privacy slats.

October 22nd Comment: This comment is addressed by plan modifications.

10. Please submit information on the location, structural design and dimensions of all signage in conformance with Zoning Bylaws, Section 12.44(a), Section 12.45(v)(3) and Section 34.

October 22nd Comment: This comment is not addressed.

December 9th Comment: An 8'x4' development complex/freestanding sign is proposed for the project, which is shown on Sheet C-26.1. Note that Zoning Bylaws, Section 33, Table 34.6.01 does not allow freestanding signs within the Bramanville Village District. Therefore a variance from the Board of Appeals is necessary. As for the proposed sign, the Applicant should specify whether the sign will be lit (exterior lighting is required by Zoning Bylaws, Section 12.4(v)(3)(b)). I also recommend that the Applicant reconsider the sign material- concrete block- in favor of a material consistent with the historic character of the mill building (see Zoning Bylaws, Section 12.45(v)(3)(c)).

January 20th Comment: In response to my comments, the design engineer stated that the proposed sign will be modified to comply with Zoning Bylaws. I recommend a Condition of Approval requiring submission of the materials, structural design and lighting of the proposed sign for Planning Board review and approval prior to issuance of a building permit.

11. Zoning Bylaws, Section 33.3 states that no off-street parking area shall be maintained within 10 feet of a street line and that parking shall not require backing onto a public way. Section 12.45(n) states that parking shall not be located within the public right-of-way or within required setbacks. The site plan depicts at least 12 parking spaces within 10' of the street line along the Burbank Street frontage. Of these, 10 are angled parking spaces in front of the mill building that will require backing onto the public way (Burbank Street). The Applicant should either modify the plan to conform with these requirements or submit written waiver requests for Planning Board consideration.

Note that the crash statistics included within the Traffic Assessment Report prepared by Nitsch Engineering identified 9 crashes that have been reported at the intersection of West Main Street and Burbank Street between 2017 and 2019 (see comment #28). This exceeds the average number of accidents for an unsignalized intersection at both the county and state levels. Four of these were angle crashes. This lends credence to the argument that the angled parking is unsafe and will likely become more unsafe with the addition of several hundred additional vehicle trips resulting from this project. In my opinion, the 10 angled parking spaces along Burbank Street should be eliminated.

October 22nd Comment: This comment is partially addressed by plan modifications. Per my suggestion, the angled parking spaces in front of the Steelcraft Mill were eliminated in favor

of 7 parallel parking spaces that are still within 10' of the street line. The other parking spaces within 10' of the street line were eliminated.

Note that the plan should be modified to eliminate parking spaces immediately adjacent to the crosswalk on Burbank Street in accordance with MADOT requirements.

December 9th Comment: The on-street parking spaces immediately adjacent to the crosswalk on Burbank Street were eliminated (5 parallel parking spaces remain) in favor of what appears to be a landscaped island, although it is not reflected on the Landscape Plan (Sheet L-1) so it is unclear what the final surface treatment for this area will be and if curbing is proposed to protect the island from the adjacent parking and roadway. The Applicant may want to consider transforming the island into a rain garden or bioswale that will capture and infiltrate any overflow runoff from Burbank Street and the adjacent sidewalk.

January 20th Comment: This comment is not addressed by the modified plan. Note that in a response letter from the design engineer, he suggests delaying the decision on additional stormwater mitigation measures (i.e. rain garden) along Burbank Street until after the Town cleans the catch basins on Burbank Street. This comment does not answer my question as to what is proposed for the area adjacent to the crosswalk.

February 18th Comment: The revised plan depicts a landscaped area that will be planted with 46 juniper bushes. This comment is addressed.

12. I am confused about the configuration of the parking lot proposed along the West Main Street frontage. The line work and proposed striping seems to identify 12 parking spaces, but the text specifies 8 parking spaces. Please clarify the configuration. Also, for safety reasons, access to the parking lot should be restricted using a combination of landscaping and curb. Street trees and low level plantings should be installed within the landscaped areas in between the parking lot and West Main Street in compliance with Zoning Bylaws, Section 12.45(k).

October 22nd Comment: This comment is partially addressed by plan modifications. The line work was clarified on much of the plan, but the landscaping sheets (Sheet L-1 to L-4) were not updated to reflect the new configuration.

December 9th Comment: This comment is addressed. The landscaping plan shows street trees complimented by juniper bushes.

13. Sheets C-26 and C-27 contain details for various curb treatments- vertical granite curb, sloped granite curb and haunched concrete curb. Please use line work and symbology/text to denote the location of the various curb treatments. Note that Zoning Bylaws, Section 12.45(o) requires concrete curb and gutters to be installed around the perimeter of all driveways and parking areas. Vertical granite curb is required along the radii of driveways where they intersect a public way and where sidewalks abut buildings.

October 22nd Comment: This comment is partially addressed by plan modifications. The plan and details now only reference concrete curb, however, as noted above, vertical granite curb is required along the radii of driveways where they intersect a public way and where sidewalks abut buildings. Please modify the plan accordingly.

December 9th Comment: The plans were modified again so that 6" vertical asphalt berm is depicted adjacent to all driveways instead of concrete curb (See Sheet C-26). The Applicant should submit a waiver request for Planning Board consideration since concrete curb is required. I recommend that the Planning Board deny the grant of this waiver requests for aesthetic and maintenance reasons. Berm is typically destroyed by snow plows within 1 or 2 seasons.

January 21st Comment: The December 9th comment is not addressed. The Plan was neither modified nor a written waiver request submitted.

February 18th Comment: The December 9th comment is still not addressed. So as to avoid confusion, I recommend that the Planning Board clarify in the decision that vertical concrete curb is required around the perimeter of all parking lots and driveways, except along the radii of driveways intersecting Burbank Street and West Main Street. Vertical granite curb is required in these locations.

Response: The vertical curb detail has been added, and the rolled asphalt curb detail removed. The vertical concrete curb will be used within the parking areas, and the granite curb will be used along the street and at the driveway entrances.

14. I recommend replacing the existing bituminous sidewalk along the Applicant's frontage on the west side of Burbank Street, which is in poor condition, with new concrete sidewalk and vertical granite curb (see Zoning Bylaws, Section 12.45(v)(4)(b) and (f)). If the Planning Board allows the Applicant to keep the angled parking, I strongly recommend placement of a concrete sidewalk with vertical granite curb between the face of the mill building and the vertical parking on Burbank Street. This will provide a safe location for pedestrians to walk versus within the street gutter line behind the angle parking spaces. Requiring pedestrians to walk unprotected along the gutter line of Burbank Street where angled parking exists along both sides of Burbank Street will be extremely dangerous.

October 22nd Comment: This comment is partially addressed by plan modifications. The plan now depicts granite curb adjacent to new concrete sidewalk along Burbank Street, however the plan shows no curb where parallel parking spaces abut the sidewalk. For the safety of pedestrians within the sidewalk, vertical granite curb with a 6" reveal is required where walkways abut parking spaces. An ADA-compliant ramp with required buffering (i.e. striping or landscaped bumpout) from parking spaces is required at ADA ramp/crosswalk locations.

Also please clarify the line work/text to show that vertical granite curb will be along the radii of driveways where they intersect the public way.

December 9th Comment: This comment is now addressed. Notes on Sheet C-4.1 state that vertical granite curb will be installed where sidewalks abut parallel parking spaces and along driveway curb radii. It is unclear if vertical granite curb will abut landscaped areas where adjacent to Burbank Street (it should). The Applicant should clarify.

15. Zoning Bylaws, Section 12.45(q) requires parking lots with 19 or more spaces to provide interior landscaping covering not less than 5% of the total area of the parking lot and 1 shade tree for every 5 parking spaces. The Applicant should revise the site plan to comply with

this requirement or submit a written waiver request. If said written waiver request is submitted, I recommend that the Planning Board waive the interior landscaping component of the requirement but require the equivalent number of shade trees for 213 parking spaces (excludes 117 parking spaces beneath buildings). Since 43 trees would be required and more shade, ornamental and evergreen trees are proposed as currently shown on the landscape plan, the Applicant has met this requirement.

October 22nd Comment: The Applicant submitted a written waiver request from the interior landscaping requirement. See letter from Douglas Backman dated October 6th.

16. The Adaptive Reuse Overlay District allows flexibility with parking however new structures are required to adhere to Zoning Bylaws, Section 33 which requires a minimum of 2 parking spaces for efficiency and 1-bedroom units and 3 parking spaces for 2-bedroom units. Under Section 33:

100 efficiency units – 200 parking spaces
70 1-bedroom units – 140 parking spaces
27 2-bedroom units – 81 parking spaces

TOTAL PARKING REQUIREMENT FOR 197 UNITS = 421 PARKING SPACES

Parking requirements for the 2,400 square foot restaurant space and 7,500 square foot office space are 65 spaces.

This proposal depicts 330 off-street parking spaces, which is a reduction of 156 spaces from strict interpretation of Section 33. It is important to note that the Adaptive Reuse Bylaw (Section 28.7(1)) allows flexibility in the total number of parking spaces required for reuse of the historic mill building and Hose House. It also allows a 50% reduction in the number of parking spaces where hours of operation differ between commercial/residential units. Lastly, it is important to note that 20 of these units (10% of the total number of multi-family units) will be restricted to low or moderate income persons in accordance with Zoning Bylaws Section 28.7(5). Low and moderate income households are likely to have fewer cars.

Given the likelihood that couples will not live in efficiency units, I recommend that the Planning Board reduce the total number of parking spaces allocated to all efficiency units to 100 spaces. I similarly recommend reducing required parking for affordable 1 and 2 bedroom units by 13 spaces- allocating 1 parking space for 1 bedroom apartments, and 2 parking spaces to 2 bedroom apartments. This will yield the following reduced number of required parking spaces:

100 efficiency units – 100 parking spaces
70 1-bedroom units – 133 parking spaces
27 2-bedroom units – 75 parking spaces
50% reduction in commercial spaces for differing hours of operation – 33 parking spaces

TOTAL UPDATED PARKING REQUIREMENT FOR 197 UNITS & COMMERCIAL USES= 341 PARKING SPACES

TOTAL PARKING SPACES PROVIDED= 330

DIFFERENTIAL= 11 parking spaces (21 parking spaces if the angled parking along the Burbank Street frontage is eliminated)

The Planning Board should determine whether they are amenable to the parking plan, or whether the total number of units should be reduced to ensure that parking will be adequate. To help the Planning Board make this decision, I recommend that the Applicant supply information relative to the average occupancy rates of efficiency, 1-bedroom and 2-bedroom garden-style apartment buildings in similarly-size communities within the region. The Applicant may want to approach the Cordis Mills development on Canal Street and Cobblestone Village on Howe Avenue for their occupancy statistics. I suspect that the research will demonstrate that the proposed parking plan is adequate and appropriate for the development.

October 22nd Comment: The Applicant submitted a written waiver request from the strict interpretation of Zoning Bylaws, Section 33 (see letter from Douglas Backman dated October 6th). He requests that the Planning Board provide relief such that 1 parking space is required for efficiency dwellings (80), 1.5 parking spaces is required for 1 bedroom units (87 units x 1.5 spaces= 131 spaces), and 2 parking spaces are required for 2 bedroom units (30 units x 2 spaces= 60 spaces). A total of 331 parking spaces would be provided throughout the site and via parallel parking to service residential units and commercial uses. I believe that this parking configuration is adequate for the proposed development, however I strongly recommend that the Applicant provide the analysis of the Cordis Mills and Cobblestone Village developments to support their argument that the parking will be adequate.

December 9th Comment: The Applicant has once again modified the mix of units and per unit parking allocation in an effort to appease the Planning Board while maintaining the same overall number of dwelling units. The current configuration is as follows:

*80 efficiency units at 1 space each= 80 spaces
87 1 bedroom units at 1.5 spaces each= 131 spaces
30 2 bedroom units at 2.5 spaces each= 75 spaces
Commercial parking spaces at 50% reduction due to different hours of operation from residential use = 39 spaces
TOTAL BY CALCULATION= 325
TOTAL PROVIDED= 329*

I reiterate my support for the reduction in the parking requirement to 1.5 space/1 bedroom unit and 2.5 spaces/2 bedroom units. It is important for the Planning Board to recognize that it is highly unlikely that all 1 bedroom units will have 2 occupants/cars and that all 2 bedroom units will have 3 occupants/cars. It is also highly unlikely that all units will be occupied and that all occupants will be home at the same time. Occupants are likely to work different shifts, shop at different times, and spend time away from home for a variety of different reasons. It is also likely that the greatest time of residential occupancy will be late at night when the businesses will be closed and their 39 parking spaces will be vacant. In my opinion, it would be a mistake to force the developer to construct more parking than is necessary in this environmentally-sensitive area.

Recognizing the Planning Board concerns about parking availability, I recommend that the Applicant be required to install signage at the 5 parallel spaces and within the parking lot on Burbank Street specifying that the parking is for Singletary Arms only. This could be specified as a Condition of Approval.

17. Please specify the size of efficiency, 1-bedroom and 2-bedroom units on the floor plan.

October 22nd Comment: The Applicant submitted a written response to my Review Letter #1. In that, the Applicant stated that efficiency units will be 541 square feet, 1 bedroom units will be 710 square feet, and 2 bedroom units will be 1100 square feet. Given the small size of the units, I reiterate my opinion that the parking space waiver request is appropriate.

18. As mentioned above, Zoning Bylaws, Section 28.7(5) requires that 10% of the total number of dwelling units within the Adaptive Reuse development must be affordable to low or moderate income persons for a period of 30 years. I recommend requiring this as a Condition of Approval and stipulating submission of the units to the MA Department of Housing and Community Development under the Local Initiative Program (LIP) so that they can be properly included on Millbury's Subsidized Units Inventory.

October 22nd Comment: This comment is not addressed.

December 9th Comment: In written response to my second comment letter, the design engineer stated that the Applicant has agreed to 10% affordable housing for the units in the mill only. I appreciate the Applicant's generosity with regards to gifting ownership of the Hose House to the Town, but perhaps the Applicant would consider making 4 of the units in the new buildings affordable. This would add a total of 10 affordable units to Millbury's Subsidized Housing Inventory versus 6 units within the mill building only.

January 20th Comment: The December 9th comment is not addressed. The Planning Board should negotiate this with the developer if additional affordable units are desired.

Response: The developer will address this request with the board.

19. I recommend including a Condition of Approval that specifies that, prior to construction activities, the Applicant shall submit retaining wall designs prepared and stamped by a structural engineer for Planning Board and Building Inspector review and approval.

October 22nd Comment: In written response to my Review Letter #1, the Applicant agreed to this recommended Condition of Approval.

20. How does the Applicant propose to mitigate storm water flow from the parking lots on West Main Street and at 3 Burbank Street?

October 22nd Comment: In written response to my Review Letter #1, the Applicant proposed installing porous pavers over an underdrain system.

21. What is the purpose of the existing New England Power easement?

October 22nd Comment: In written response to my Review Letter #1, the Applicant stated that the easement is a "remnant of the survey". I am not clear what that means, but Sheet C-11 shows relocation of the easement. Comment should be received from National Grid as to whether they are amenable to the relocation.

22. The Typical Pavement Cross Section detail on Sheet C-26 shows 6" minimum compacted gravel base, 4" bituminous base and 2" top course. The Subdivision Rules and Regulations, Section 7.2 specifies 5" compacted dense graded gravel base, 10" processed gravel subbase, 2

½” binder and 1 ½” top course. I defer to Stantec as to whether the proposed alternative configuration is adequate to service the proposed development.

October 22nd Comment: The Typical Pavement Detail on Sheet C-26 was modified to reflect the design standard in our Subdivision Regulations. This comment is addressed.

23. Please clarify the location and extent of porous pavers in parking areas/driveways by using hatch marks or similar.

October 22nd Comment: This comment is not adequately addressed. Sheet C-4.1 includes labels indicating the square footage of porous pavers, but the extent is not graphically depicted. Therefore, I can't tell if whole parking lots will have porous pavers or only portions of parking lots. Please clarify.

December 9th Comment: This comment is addressed by the Plan modifications. The extent of porous pavers is now clearly depicted.

24. Please modify the text on Sheet C-32 to specify that “areas to be planted shall be loamed with not less than 6” compacted depth of good quality loam and seeded with turf grass seed in accordance with good planting practice” in accordance with Zoning Bylaws, Section 12.45(f).

October 22nd Comment: This comment is not addressed. The Erosion Control Notes that previously appeared on Sheet C-32 are now missing in their entirety. This sheet should be included.

December 9th Comment: This comment is now addressed. Sheet C-32 is included and includes the note suggested above.

25. Please provide an erosion control plan that depicts the limit of disturbance and location of the measures identified on Sheets C-32 and C-33. I recommend the use of silt sacks in catch basins until such time as the ground is stabilized.

October 22nd Comment: This comment is partially addressed. The plan now shows where erosion control measures will be installed, but the notes sheet is now missing (see Comment #24). Also, the detail showing silt sacks within catch basins does not appear on the revised plan.

The Environmental Impact Assessment discusses the extent of land disturbance and changes to elevation. Please include details of measures to temporarily stabilize the slopes during the course of construction.

December 9th Comment: These comments are now addressed by the modified plan.

26. During a Technical Review Committee held in March 2020, the following comments were made by members but do not appear to be addressed:

- The Fire Chief requested an increase in the fire lane width from 16’ to 20’. That change was not made on the modified plan;

October 22nd Comment: This comment is addressed by plan modifications.

- Sewer capacity along West Main Street is a problem as there is a water blockage located somewhere along its length. This will need to be addressed by the Applicant as a Condition of Approval;

October 22nd Comment: In response to my September 15th comments, the Applicant states that they will address this issue with the Sewer Commission. Comment should be provided by the Sewer Commission as to appropriate language for this Condition of Approval.

- The existing 8” water main that goes into the mill building should be abandoned. A new smaller water main should be extended to the property to service the development. 1 meter is ideal.

October 22nd Comment: This comment appears to be addressed by plan modifications. Comment should be provided by Aquarion Water Company as to whether they satisfied with the new configuration.

27. Given the significant and likely impacts on the traffic flow along West Main Street, Burbank Street, and the intersection of the two, the submitted traffic study is wholly inadequate and non-compliant with Zoning Bylaws, Section 12.44(f)(1). The submitted traffic count data was compiled in June 2017- 3 years ago- along Singletary Road in Sutton (0.6 miles southwest of the study intersection) and along West Main Street west of the its intersection with Sutton Road. Unlike the subject area, both of these locations are very rural in character. Traffic counts taken at these locations will not capture traffic originating from high density residential development within Bramanville Village, the new Stratford Village development located on Burbank Street (49 townhouse units nearing completion), Brierly Pond Village located on Beach Street (199 townhouse units), and traffic associated with the Village Knoll liquor/convenience store located across the street from 115 West Main Street, nor the recently completed Route 146 interchange project approximately ½ mile from the subject intersection. The Applicant should gather current average daily and peak hour volumes, average and peak speeds, sight distance information, and levels of service for all intersections and streets likely to be affected by development that are within 1,000 feet of the project boundaries. Intersections to be studied should include: intersection of West Main Street/High Street/Burbank Street, intersection of West Main Street and Beach Street and the intersection of West Main Street and Sutton Road.

October 22nd Comment: I understand that an updated traffic study is being prepared and will be submitted in the near future.

December 9th Comment: The updated traffic study was submitted in compliance with our requirements. Five intersections were studied. In addition to the intersection of West Main Street/High Street/Burbank Street and the intersection of West Main Street/Beach Street, the intersections of West Main Street/Rhodes Street, West Main Street/Gould Street, and Burbank Street/Stratford Village Way were studied. The Stratford Village intersection was added to the study so that the Towns of Millbury and Sutton could understand the current and potential impact of traffic on Sutton roadways and intersections. The updated traffic study includes a number of recommendations and identifies problem areas. Please reference Stantec comments regarding the updated traffic study. Stantec A number of questions remain warranting further study. Modifications to the intersection of West Main Street/Burbank Street/High Street are likely to be needed to address traffic impacts from this proposed project.

January 20th Comment: The Traffic Study was updated again and additional traffic counts were taken at the intersection of Burbank Street and Wheelock Street in Sutton in response to requests from the Sutton Planning Board and Sutton Town Planner. The revised report includes a number of recommendations for improving the intersection of West Main/High/Burbank Streets, however those improvements are not reflected on the updated Site Plan. The Site Plan should be updated to reflect those improvements and it should be vetted during the public hearing so that municipal staff, abutters and other interested parties can provide comment. Impacts to the Village Knoll and their customer base are particularly significant.

February 18th Comment: The site plan was revised to be more in line with the Nitsch Engineering traffic study recommendations (see Sheet C-4.2 and C-4.3), although the identified scale on Sheet C-4.2 is incorrect. I am concerned about the narrow 12' lane width adjacent to the angled parking on Burbank Street. It does not seem as though there is sufficient space for cars to back up in this location although it's difficult to judge given the incorrect scale. Also, I call the Planning Board's attention to the Stantec traffic review letter dated February 17, 2021 and enclosed recommended Condition of Approval. I recommend that the Planning Board incorporate the suggested language as a Condition of Approval.

Response: The scale has been revised, and the developer agrees with requirements of the conditions as stated.

28. According to the Traffic Assessment Report, 9 crashes occurred within the intersection of West Main Street/Burbank Street/High Street (crash rate of 1.05) between 2017 and 2019, which is nearly double the statewide (0.57) and District 3 (0.61) averages for an unsignalized intersection. Interestingly, the Traffic Assessment Report makes no recommendations for improving this already dangerous intersection despite their proposal to add several hundred vehicle trips. Without improvements, I am concerned about the public safety ramifications of the proposed development. I strongly recommend that Nitsch Engineering reexamine the intersection and devise recommendations for improving public safety.

October 22nd Comment: I understand that an updated traffic study is being prepared and will be submitted in the near future. Note that the updated plans eliminate the angled parking in favor of parallel parking.

December 9th Comment: For some unidentified reason, the updated traffic study identified 7 crashes within the intersection of West Main Street/Burbank Street/High Street between 2017 and 2019, which decreased the crash rate. I have reached out to the Millbury Police Chief to verify the total number of crashes at the intersection within that time frame and await response. Regardless, the intersection is not safe in its current configuration and should be improved. The updated traffic study includes a few recommendations, including installation of a traffic light or HAWK signal to help pedestrians safely cross West Main Street. I defer to Stantec as to which facility is most appropriate and if other options exist. I also think that all corners of the intersection where sidewalks are present should contain ADA-compliant crosswalks/ramps installed by the Applicant as part of this approval.

January 20th Comment: Please see comment #27 above (January 20th comment). No explanation was provided for the change in crash totals between the original and subsequent versions of the traffic report. The submitted intersection improvement plan (Sheet C-4.2) does not include the recommendations in the revised Traffic Impact Study prepared by Nitsch Engineering, Inc. dated January 18, 2021, especially the exclusive left turn lane and sidewalk/ramp improvements. As stated above, the Site Plan should be updated to reflect those improvements and it should be vetted during the public hearing so that municipal staff, abutters and other interested parties can provide comment.

February 18th Comment: Please see comment #27 above (February 18th comment). The revised plan more closely adheres to the Nitsch Engineering recommendations. I call the Planning Board's attention to the Stantec traffic review letter dated February 17, 2021 and enclosed recommended Condition of Approval. I recommend that the Planning Board incorporate the suggested language as a Condition of Approval. Also, the Applicant should submit proof that property owners whose land will be impacted from construction of the intersection improvements are in support of the changes and willing to grant a temporary construction easement.

Response: The developer agrees with requirements of the conditions as stated.

29. Burbank Street is currently in poor condition. Given the volume of traffic associated with the construction and occupancy of the development, I recommend a Condition of Approval requiring the Applicant to mill and pave, from curb-to-curb, that portion of Burbank Street that extends from its intersection with West Main Street to the western egress serving building #2. These improvements should be coordinated with and under the direction of the DPW Director/Supervisor.

October 22nd Comment: This comment is not addressed. The extent of mill and overlay for Burbank Street is not depicted on Sheet C-4.1 despite the Applicant's assertion to the contrary.

December 9th Comment: This comment is now addressed. The extent of the mill and overlay is depicted on Sheet C-3.

30. The Engineering Reports for both the water distribution and sanitary sewer systems do not identify the firm that prepared them. Please modify to include this information. To clarify, the water distribution system is owned by Aquarion Water Company, not the Town of Millbury as was stated in the Engineering Report.

October 22nd Comment: This comment is addressed. The updated engineering reports were submitted with the updated Development Impact Statement.

31. The site plan (Sheet C-4) depicts areas of impact to the 100' inner riparian zone (totaling 14,414 s.f.). How does the Applicant propose to mitigate impacts to this protected area? Note that impacts to wetlands, areas protected by the Rivers Protection Act and the floodplain should be discussed in the Development Impact Statement under the Environmental Impact Assessment (Zoning Bylaws, Section 12.44(f)(2) and Section 28.3(3)(b)). Please provide a narrative description of the potential impacts and measures used to mitigate those impacts.

October 22nd Comment: This comment is addressed. The updated Development Impact Statement includes this narrative.

32. In accordance with Millbury Municipal Code, Chapter 13.15.080, please provide Operation and Maintenance Plans for all stormwater facilities and BMPs.

October 22nd Comment: This comment is addressed. The Operation & Maintenance Plan was submitted with the updated Development Impact Statement.

ADDITIONAL COMMENTS:

33. *Please clarify the proposed improvements along the Burbank Street frontage in front of the Village Knoll. Does the proposed design eliminate the 5 parallel parking spaces in front of the Village Knoll? If the spaces will remain, please denote striping and physical separation between walkway/crosswalk and parking. Also, please denote the location of the Village Knoll's parking lot egress on the plan set and safe, ADA-complaint crossing from the walkway in front of the Village Knoll to the walkway along Burbank Street.*

December 9th Comment: The updated plan provides some clarity to this area. Note that if the sidewalk abutting the Village Knoll were raised with vertical granite curb with a 6" reveal, the guard rail between the angled parking lot and sidewalk could be eliminated. The new sidewalk should be rounded around the corner and connect to the ADA-compliant ramp at the crosswalk location. A bumpout will likely be necessary to separate pedestrians in the crosswalk from cars in the parking lot. These changes would improve the aesthetics and safety of the area.

January 20th Comment: This comment is partially addressed by the Plan modifications. Sheet C-4.2 shows that the area previously used for parallel parking will be raised with granite curb with 6" reveal and new concrete sidewalk installed. This will permanently eliminate all parallel parking in front of the Village Knoll. Note that the Applicant is proposing improvements to land N/F owned by Vijay Shilpa, Inc. (Village Knoll property). Please provide written proof that the property owner is aware of and amenable to the proposed modifications and willing to grant a temporary construction easement so that this work may proceed on his property. I have the following concerns about the design:

- *the curb line in front of the Village Knoll is not rounded as suggested above and typical of intersections.*
- *the ADA ramps at Burbank Street/West Main Street intersection may not be in accordance with MassDOT and MA AAB requirements with regards to their placement and orientation.*
- *Nitsch Engineering's recommendations regarding an exclusive left turn lane, box and crosshatch pavement markings and signage is not reflected on Sheet C-4.1.*
- *Nitsch Engineering's recommendations regarding signage on Burbank Street are not shown on the Site Plan.*
- *Crosswalk, ramp and sidewalk improvements are not depicted at the crossing at the corner of Burbank Street, West Main Street and High Street. A HAWK signal should be provided in this location (Nitsch Engineering recommendation).*

These comments should be addressed while the public hearing is still open as they will impact abutters, especially the Village Knoll and their customers.

February 18th Comment: The Site Plan has been modified to include a conceptual traffic mitigation plan that addresses some of these comments and comments from the January

25th session of the public hearing. Comment from the owners of the Village Knoll and St. Charles Hotel have not yet been received. I recommend making submission of a fully engineered and surveyed intersection plan for Planning Board consideration as a Condition of Approval. Given that this will impact a major intersection within the Town, the plan should be vetted at a public hearing with comments sought by affected properties owners and the DWP, Fire Department and Police Department.

Response: The developer agrees with requirements of the conditions as stated. The developer has been in contact with the owner of the village knoll and is awaiting written approval for the proposed improvements.

34. *Please adjust the radius of the intersection of West Main Street and Burbank Street, in front of the Steelcraft Mill, so that it is smooth.*

December 9th Comment: This comment is not addressed. The corner comes to an awkward point where the vertical granite curb ends briefly before it picks up again adjacent to the parallel parking. The curb line of the intersection should be rounded and vertical granite curb should be continuous along the extent of the bumpout. Since pavers shift over time, it is preferable that a 5' wide ADA-compliant concrete walkway traverse the brick paver area, connecting the ramps and other sections of concrete sidewalk together. I strongly recommend maintaining the pavers elsewhere as the pavers will complement the historic mill nicely.

January 20th Comment: This comment is fully addressed by the plan modifications.

35. *Throughout the area of Burbank Street and West Main Street that is impacted by the proposed development, vertical granite curb shall be installed/reset to provide a minimum 6" reveal.*

December 9th Comment: This comment is addressed per clarifying comments on Sheet C-4.1.

36. *Given the ecologically sensitive nature of the site and predominant use of porous pavers, an alternative to road salt should be mandated for use on the site.*

37. *Drainage along Burbank Street is wholly inadequate. Under the current condition, storm water flows off the slope of Burbank Street and pools on Burbank Street along the project's frontage. A large area of silt and sand has collected in this area to denote the location of the lowest point. The Applicant should include enhancing storm water mitigation in this area through addition of at least one catch basin at the low point and/or regrading such that the water flows into the existing catch basin in front of the Steelcraft building. Note that an existing catch basin along the Steelcraft mill frontage does not appear on the plan.*

December 9th Comment: This comment is not addressed. No additional stormwater mitigation is depicted. As mentioned above, the Applicant may want to consider converting the presumed landscaped area closest to the base of the Burbank Street slope (southeast of the crosswalk at the parallel parking) into a rain garden or bioswale to capture any flow that bypasses the catch basin and flows across the adjacent sidewalk or roadway.

January 20th Comment: The above comment is not addressed by plan modifications. The design engineer's response to my comments received on January 20th requests that a decision regarding the presumed landscaped area be delayed until the catch basins have been cleaned by the Town. Keith Caruso, DPW Supervisor, confirmed to me that the catch basins are

regularly cleaned. I have asked him to provide comment as to the adequacy of the existing stormwater infrastructure along the project frontage on Burbank Street for the January 25th session of the public hearing.

February 18th Comment: *The design engineer stated that the roadway will be graded such that all flow will be diverted to the three drainage inlets (see comment on Sheet C-3 regarding milling and repaving of Burbank Street). Also, the area adjacent to the crosswalk will be landscaped. The decrease in the amount of impervious surface in this area coupled with repaving will likely enhance the functioning of the existing stormwater system. Note that, to date, comment from the DPW Supervisor has not been received as to the adequacy of the proposed improvements.*

38. *The Standard Concrete Curb & Gutter Detail on Sheet C-26 depicts 4" gravel course consisting of 3/4" crushed limestone. Section 6.13 of our Subdivision Rules & Regulations requires 8" compacted thickness of binding gravel of the same specifications as that to be used for gravel base of roadway.*

December 9th Comment: *This comment is partially addressed. The Standard Concrete Curb & Gutter Detail on Sheet C-26 now shows 8" level course consisting of 3/4" clean crushed limestone. I defer to Stantec as to whether limestone is an adequate substitute for the typical gravel base. Also, the Concrete Sidewalk Type II detail still shows 5" base. This should be corrected so that the two details are consistent.*

January 20th Comment: *The above comment is not addressed by plan modifications.*

February 18th Comment: *The above comment is not addressed by plan modifications. I recommend modification of the plan so that it complies with the Subdivision Regulations sidewalk specifications as a Condition of Approval.*

Response: *Both the vertical curb detail and the sidewalk detail have been revised, and the rolled asphalt curb detail removed.*

39. *In prior conversations with the Fire Chief, I have learned of the Fire Department's desire to transform the Hose House as a museum. Would the Applicant consider gifting this property to the Town for this purpose?*

December 9th Comment: *In follow up conversations with the Applicant, he has informed me of his willingness to donate the Hose House property to the Town. I recommend a Condition of Approval that cements this conveyance and submission of an ANR for Planning Board review and approval.*

40. *To minimize confusion, all sheets within the Site Plan should identify applicable revision dates in chronological order within the revision block.*

February 18th Comment: *This comment is addressed by the Plan modifications.*