

February 8, 2024

Mr. Peter Matchak, Town Planner/Director
Town of Ashland
101 Main Street
Ashland, MA 01721

RE: 3rd Peer Review - Site Plan Review & Special Permit, Mixed Use Development
9-49 Homer Avenue (Assessor's Map 14, Lots 352, 353, and 354)

Dear Mr. Matchak:

GCG Associates, Inc. has reviewed the following information for the proposed Mixed Use Development Site Plan at 9-49 Homer Avenue in Ashland, MA. GCG's latest comments in "**Bold Red**"

Documents:

1. Response to comment letter, prepared by Engineering Alliance, Inc., (EAI) dated September December 21, 2023.
2. Drainage Calculations and Stormwater Management Plan, prepared by EAI, dated April 22, 2021, last revised December 21, 2023.
3. Traffic Trip Generation Assessment Memorandum, prepared by MDM Transportation Consultants, Inc. (MDM), dated December 12, 2023.
4. Environmental Screen reports for 9-25, 35-37, and 47-49 Homer Avenue, prepared by EDR, dated January 09, 2019.
5. Letter to Needham Bank, prepared by PVC Environmental Risk Strategies, dated February 05, 2019.
6. Memorandum to Ashland Planning Board, prepared by Planning Office and Planning Board, dated November 1, 2023, revised January 19, 2024.

Plan References:

1. "Proposed Mixed Use Development, 9-49 Homer Avenue, (Tax Map 14, Lots 352-354) Ashland, Massachusetts 01721" plan set, 1. prepared by Engineering Alliance, Inc. (EAI), dated June 17, 2022, last revised 12/21/2023, consists of 7 sheets (Civil Set) as following:
 - C-0 Coversheet
 - C-1 Existing Conditions Plan
 - C-2 Erosion Control and Demolition Plan
 - C-3 Site Layout Plan
 - C-4 Grading, Drainage & Utilities Plan
 - D-1 Construction Details I
 - D-2 Construction Details II
2. Lower-Level Parking Plan, prepared by Bourque Design, dated Nov. 30, 2023, and Jan. 25, 2024

This Site Plan application requires a Stormwater Management Permit (SMP) per Chapter 247-6 A, B, and C with Ashland Conservation Commission, and compliance with Chapter 343 Stormwater Management. The property is in the Ashland Downtown District Sub-Area 'C,' (ADD-C). This development is in the Floodplain Zone 'X' (outside of 0.02% chance) per FIRM map number 25017C0514F, map revised July 7, 2014. There is no wetland resource identified within 200 feet of the site. The proposed site area and limit of work is below (39,658+/-s.f.) the 1-acre threshold and does not require a NPDES Construction General Permit

Based upon our review of the above information, we offer the following comments with respect to compliance with Town of Ashland Zoning Bylaw, Stormwater Management requirements and Massachusetts Stormwater Handbook (MSH). The numerical section of the regulations is referenced at the beginning of each comment unless it is a general comment.

GENERAL COMMENTS:

This is a re-development project. The site consists of 39,658+/- s.f. (0.910 acres), Assessors Map 14, Lots 352, 353, and 354 combined), per existing conditions plan. This development consists of three lots. Lot 352 (9-25 Homer Avenue) consists of 17,507+/-s.f. with two commercial buildings (9-11 Homer Avenue) and (19-25 Homer Avenue) and paved parking area, site was built in 1968. Lot 353 (35 & 37 Homer Avenue) consists of 12,104+/-s.f. with a two-family residential dwelling building and a detached 3 bays garage, site was built in 1840. Lot 354 (47 & 49 Homer Avenue) consists of 10,047+/-s.f. with a two-family residential dwelling and a detached commercial garage (5 Alden Street), site was built in 1900.

All three lots are in the Ashland Downtown District Sub-Area 'C' (ADD-C) Zoning District and will be combined into a single lot. The proposed Mixed Residential and Commercial/Business use is permitted by right per Section 8.5.5 with note #1 of the Notes on Ashland Downtown District Table of Uses of the zoning Bylaw.

SITE PLAN SET (Civil Plan)

C-0 Cover Sheet

1. No comments.

C-1 – Existing Conditions Plan

1. The Lot Number shown on the easterly lot should be #354. [Resolved.](#)
2. Existing utility pole(s) and overhead wire/cable utilities should be shown on the plan. [Resolved.](#)
3. Existing drainage, gas, sewer, and water pipe sizes should be specified on the plan. [Resolved.](#)
4. Existing Hydrant (one at the Main Street and Homer Avenue intersection and another one at the Homer Avenue and Alden Street intersection) should be shown on the plan. [Resolved.](#)
5. Plan shown an existing catch basin in front of the existing garage on Lot 353, the catch basin invert is 1.59' lower than the drainage manhole invert on Homer Avenue. It is unlikely that the Homer Avenue drainage system drains to the site catch basin. Applicant should investigate the onsite drainage system and show on the plan. [Resolved.](#)
6. There are existing catch basins and drainage manholes at the Alden Street intersection and on Alden Street south of the project site should be shown on the plan. Additional contour or grading on Alden Street to determine erosion control requirements during construction within Alden Street right-of-way. [An existing catch basin was observed through Google Streetview at the](#)

southwestern Homer Avenue/Alden Street intersection, (near Lot 354's northeasterly lot corner). Two drainage manholes were also observed on the southern edge of Homer Avenue/Alden Street intersection. **Resolved.**

7. Upstream sewer manhole and invert should be shown on plan. The added SMH invert elevation has demonstrated the sewer line flows eastward; the applicant should provide additional data to show how the proposed sewer connection invert was determined. The downstream sewer main crossing at the Alden Street intersection does not have a SMH. Applicant should verify if there is any paved SMH at the intersection. Even though the existing sewer invert is not critical in this situation, GCG recommends performing a test pit to verify the existing sewer pipe invert prior to start of construction. **Resolved.**
8. Show existing water, sewer, and gas services for each building. **Resolved.**

C-2 – Erosion Control and Demolition Plan

1. Show existing utility poles. The proposed construction entrance appeared to be in the middle of the pole. **Resolved.**
2. Add silt-sack to existing catch basins on Homer Street and Alden Street (show all catch basins near the site as required on C-1 comment #5. Proposed utilities trench and sidewalk replacement are in the public street right-of-way. Catch basins should be protected. **Locate the missing catch basin at the Homer Avenue/Alden Street southwest intersection corner and install temporary silt sack during construction. Resolved.**
3. Existing water, sewer, and gas services for each building should be shown on the plan, show existing utilities services to remain and protected for 9-11 Homer Avenue to retain, and utilities services to be removed, abandoned, or capped. **Resolved.**

C-3 – Site Layout Plan (Comments based on this plan sheet and updated May 4, 2023, First Floor Plan)

1. Site Layout Plan should be updated with the May 4, 2023, First Floor Plan as listed in Plan References #5 above. The emergency access path surface material should be identified on the plan. Surface finish and maintenance should meet the Fire Department requirements.
 - a.) The proposed paver walkway in the emergency vehicle access path was stated as pervious paver in the report and should be designed accordingly. However, a large portion of the walkway and grass area are on top of the garage roof. The plan also called out paver walk and reinforced lawn to meet H2O loading. Design detail should be provided. **Resolved.**
 - b.) The Fire Department has requested this emergency access or fire lane to be maintained at all times and not grass. The proposed reinforced lawn portion of the access way should require the fire department's approval. If approved, GCG recommends expanding the gravel base reinforcement toward to the building corner to match the emergency vehicle maneuvering path. **Resolved.**
 - c.) The proposed walkway outside units 1 & 2 should have a minimum width of 4 feet, (ADA/AAB Section 22.2). **Unit #2 exterior walkway width remains 3 feet wide, 4 feet minimum width required, per ADA/AAB requirements. The walkway outside of the southwest building corner still measured 3.5' wide and should be revised. Resolved.**
 - d.) The Alden Street sidewalk replacement should be equipped with a wheelchair ramp at the Homer Avenue intersection to match the existing crosswalk. **The proposed wheelchair ramp appeared to align with the existing crosswalk (not shown on plan). Crosswalk stripping disturbed during construction should be re-stripped by the applicant. Resolved.**
2. Plan should identify snow storage area on site, to define the excessive snow, which would require removal off site for disposal by the property owner as specified on the O&M plan. **The proposed snow storage area should be accomplished with a revised landscape plan. The**

applicant should clarify the intent of the proposed seating area (located at the east side of 9-11 Homer Avenue, building to remain) shown on the Architectural ground floor plan. This seating area is separated by a row of planting and intended to serve 9-11 Homer Avenue with a proposed side door. The applicant should clarify how snow be carried to this storage area. Furthermore, if this seating area is intended to serve restaurant uses, which would require additional parking spaces at 1 space per 4 seats. (Section 5.1.2). **The landscape plan called for a row of 10 H.M. Eddie yews (Mature height 18-20 feet) are proposed between the proposed loading and seating area, snow storage would be restricted. Excessive snow to be removed off site at the owner's expense. Resolved.**

3. Land Usage Table – Chapter 282 Section 8.5.6 Dimensional Standards –minimum front yard setback in ADD-C should be 8 feet. The existing commercial building (9-11) proposed to retain has no front yard setback, this is an existing non-conforming condition, which may require a variance. Minimum rear yard setback – 12 feet required. The existing conforming 0 feet common wall side yard for building 9-11 will become a non-conforming 0 feet rear yard as the three lots merged to a single lot with double frontage on Homer Avenue and Alden Street, all side lot lines become rear lot lines. Which also requires variance approval. **The existing building (9-11 Homer Avenue) is a part of this site plan special permit (SPSP) application and under the Planning Board's jurisdiction. This existing non-conforming structure would require Board approval. The memorandum prepared by Attorney Morris did not mention the legal existing non-conforming building setback issues. Planning Board approval of the existing non-conforming front yard setback for the existing building to remain is required. Board approval required.**
4. Land Usage Table – Chapter 282 Section 8.5.6 Dimensional Standards. Proposed new commercial space #1's northeasterly corner and commercial space #2's northwesterly corner, are within the 8 feet front yard setback (6.5+/- feet as shown) and should be addressed. None of the calculations accounted for the 9-11 Homer Avenue to retain floor areas. Maximum FAR and parking requirements should be revised. **The existing building (9-11 Homer Avenue) is a part of this site plan special permit application and has no front yard setback. Which is an existing non-conforming condition and requires Board approval. However, the proposed new building should comply with the 8 feet front yard setback requirements. The proposed new building's front yard setback along Homer Avenue and Alden Street have been specified to be 8.0' exact, which meets the zoning requirements. (Also see comment #3 above.) Resolved.**
5. 282-5.4.2.3 – Buffering between Residential and Nonresidential uses. A minimum of 6 feet wide landscape area is required. 5.5 feet proposed along 220 to 228 Main Street and 3 feet proposed at the 236 Main Street northeasterly lot corner. **Resolved.**
6. 282-5.6.- Corner Clearance - Existing parking layout on Homer Avenue should be shown on the plan, the existing curb opening has insufficient safety sight distance from the Homer Avenue east bound traffic, where a 25 MPH speed limit sign is mounded on the utility pole in front of building 9-11. (Appeared to lower the speed limit in front of the blind driveway/curb opening). The proposed new curb opening is 30+/- feet closer to the intersection section and exacerbates the situations. Provide driveway intersection sight distance analysis. **The plan should show the available intersection safety sight distance from the proposed driveway location. GCG estimated approximately 90+/- feet available. A sight distance should be provided to meet the stopping distance for the 85-percentile vehicle travel speed measured on-site. The existing curb opening does not meet the safety sight distance standards, and the proposed new driveway will further reduce the safety sight distance by 28 feet. This development as presented will worsen the hazardous conditions at the proposed driveway intersection. Where additional traffic trips generated from this development will be concentrated at this curb opening. The proposed loop detector with illuminated "Vehicle Exiting Ahead" warning sign transfers the responsibility/liability to the Homer Avenue eastbound drivers and this warning sign is non-enforceable. GCG recommends relocating the driveway entrance further away from the Homer Avenue and Main Street intersection and seeking recommendation from Professional Traffic Consultants. The site plan has been revised with a "one way in" from Homer Avenue and a "one way out" exit onto Alden Street. Resolved.**

7. The existing commercial building (9-11 Homer Avenue) to remain should have parking spaces provided on-site. Parking spaces calculations should be based on the proposed new (8,550 s.f. commercial floor areas per May 5, 2023 Memorandum) and the existing (to retain) commercial floor (3,980+/- s.f., based on building footprint, actual leasable floor space to be verified by the applicant) areas combined, and the 29 proposed new dwelling units, totaled approximately 127.6 spaces required, and reduced by 56.25% (282-8.5.13), a minimum of 72 parking spaces should be required. Insufficient parking should require Section 5.1.2 waiver. There is public parking available in the downtown district for the Board to consider. Parking requirements should be based on the building's leasable floor area and/or per dwelling unit. The existing 3,980 s.f. retail building should have required parking spaces provided on-site; parking spaces should be calculated based on Section 8.5.13. A minimum of 8 parking spaces is required for the commercial building (9-11 Homer Avenue) to remain per Attorney Morris' Memorandum. Which stated that the required parking spaces will be provided across the street at #20 Homer Avenue. GCG concurs with the memorandum that it is feasible with the shared parking arrangement with #20 Homer Avenue property. However, the surplus parking spaces status should be verified and approved by the Building Inspector. Legal instruments should be provided (or required under the approval conditions) to assign the number of required parking spaces to be shared and restricted by the two properties. Furthermore, the ADA/AAB compliance with the shared parking space across the street should be determined by the Building Inspector. Addressed by other in the Town.
8. Surface parking layout – GCG concurs with the Fire Department comments dated May 2, 2023. The parking space #17 shown on the May 4, 2023, First Floor Plan is within the Fire Truck (39.5 feet box truck template used on the Vehicle Turning Figure Plan) exit path. GCG recommends using the (BUS-40, 8.5' wide by 40.5' length) vehicle path to analysis the turning path for emergency vehicles access. The BUS-40 dimensions are most comparable to the Fire Engine. The Vehicle Turning Path analysis should include the turning path through Homer Avenue and Alden Street with all existing and proposed utility pole shown. Vehicle turning path should show the front wheels, rear wheels, and overhang tracks. Furthermore, the Fire Department had requested the parking spots #1 & #2 be designated as emergency vehicle parking only. Homer Avenue turning path should be analysis to assure the emergency parking spaces (spots 1 & 2) cleared for the vehicle turning path. The Alden Street exit should also be analysis to allow emergency vehicles to turn within the Alden Street roadway. Parking spot #10 does not meet the 9'W x 20'L standard parking stall dimensions. (Total surface parking provided 19 spaces including spot #10). GCG recommends showing the building columns to match the Architectural Ground Floor plan. Column locations may affect the parking spaces dimensions. The two parallel parking stalls were designated as pickup/drop-off areas, which should not count as parking spaces. The reduced single parking stall (9' x 18', dimension shortened to save an existing 17" Elm tree), requires Board approval. The total surface parking provided should be 20 spaces, including the reduced length space and handicap accessible spaces). The Parking Calculations table stated 41 below grade spaces, the Architectural plan showed 38 garage parking spaces only. Therefore, the total provided parking (surface and below grade) was counted 58 spaces only. The required parking spaces should be recalculated with the proposed dwelling units, existing to remain and proposed commercial floor area. The applicant should clarify the discrepancy between the latest Architectural floor plans set, which shown 30 proposed dwelling units, and the 29 units stated in the parking calculations table. The proposed seating area at the eastern side of 9-11 Homer Avenue shown on the Architectural plan appeared to be isolated for the 9-11 building uses including, addition parking spaces would be required if the seating area services the restaurant use. GCG concurs with the required 60 parking spaces calculations for the new building uses. However, there are only combine (surface and surface) 59 parking spaces provided on-site. (The 38 subsurface parking spaces had already included the 2 accessible spaces.) And not meeting the minimum parking requirements. **Potential permit condition.**
9. Section 5.1.7.1 – Provide hours of operation for the commercial uses to assess parking demand and adequate shared parking spaces. 8.5.13. - Applicant should demonstrate feasibility of

shared parking spaces for the two uses and provide a shared parking agreement/plan. The hours of operation for commercial use should be determined based on the shared parking requirements. Commercial uses should be restricted in the approval conditions to ensure sufficient parking spaces provided for the mix-use shared parking schedules. **The operation hours (Commercial uses) should be restricted to avoid conflicts with the residential uses. Potential permit condition.**

10. 282-5.2 Loading area required. Section 5.2.6 – Loading Bay(s), not be less than twelve feet in width, sixty-five feet in length, and fourteen feet in height for commercial uses should be provided. **Section 282-5.2- Loading area waiver should be requested, off business hours should be specified. A 9'x20' loading area (5.2.6 - 12'W x 65'L x 14'H loading size is required) at the Homer Avenue entrance without screening, visible from public street (5.2.5) has been proposed at the Homer Avenue entrance within the front yard setback. A waiver for Section 5.2 has been requested, for consideration, a typical UPS shipping box truck is 26 feet length. Board waiver required.**
11. Section 5.3.12 – No sign proposed, signs should comply with 5.3.12. **Section 5.3.12 should be stated as part of the approval conditions. Recommended approval conditions.**
12. Proposed sidewalks replacement within the Homer Avenue and Alden Street should be laid out with the existing and proposed relocated utility poles shown. Minimum ADA/AAB sidewalk passage width - Sidewalks should have a minimum width of 4-feet (excluding curb) with a minimum of (5' x 5') passing spaces every 200 feet or provide a minimum 5-feet wide sidewalk (excluding curb) without passing spaces. The minimum passage clearance at the utility pole should not be less than 36". Show wheelchair ramps at all driveway crossings and assessable paths. **The proposed Alden Street limit of sidewalk replacement is ended in the middle of an existing garage concrete ramp. The end of the replacement sidewalk should be equipped with a wheelchair ramp to match the Alden Street existing pavement. The response letter stated that the proposed sidewalk along Homer Avenue will be a minimum of 5-feet and widen in most areas. GCG measured two sections of the Homer Avenue sidewalk to be 4 feet wide. GCG recommends calling out the sidewalk width to 5-feet minimum width, where the proposed sidewalk width extended onto the site should be accomplished with a sidewalk easement granted to the Town to release the applicant's liability over the public sidewalk. The plan has called out a proposed 5' wide sidewalk with easement. The Alden Street exit sidewalk through driveway should be specified (or shown like the Homer Avenue sidewalk through driveway entrance). GCG recommends replacing the 2' curb corner with radius curb or transition curb ramp. As shown, the Homer Avenue entrance would not fit a SU30 vehicle turning without encroaching the loading area or riding over the curb corner. Resolved.**
13. The proposed residential trash and recycling room is approximately 240 s.f. in the lower level. And the commercial trash room is approximately 80 s.f. on the ground floor. The existing dumpster serving 9-11 Homer Avenue's commercial uses had been eliminated, new trash arrangement for the commercial building (9-11) to remain should be provided. Applicant should provide trash/recycle volume sizing for the proposed uses (residential and commercial) and clarify how the roll-off containers (per May 5, 2023, Memorandum) being transported from the lower level for pickup. **The applicant responded that "The building at 9-11 Homer Avenue will be equipped with trash totes that will be collected by a private contractor." The applicant should clarify the trash pickup locations for the 9-11 building and the new building and pickup schedule. GCG recommends restricting trash pick-up locations along Homer Avenue and Alden Street. On-site trash pick-up locations should be screened. Potential permit condition.**
14. The Lower-Level Parking Layout full size plan should be provided as part of the Civil plan set, the parking plan should be reviewed and certified by the Civil Engineer. Based on the Architectural Lower-Level Parking Plan dated April 13, 2023, 41 parking spaces were proposed in the lower level. However, none of the lower-level spaces meet the standard 9' x 20' dimension. The proposed standard spaces are 8.5+/- feet wide by 16.5+/- feet length with 22+/- feet aisle. The proposed compact spaces are 7.5+/- feet wide by 15+/- feet length with 21+/- feet aisle. As presented, vehicles maneuverability at the bottom of the ramp is questionable. A standard vehicle would not be able to make the turns (in and out) per vehicle tracking template.

GCG recommends showing building columns on this plan and demonstrating vehicle maneuvering with vehicle turning path. The parking layout is substantially undersized per industrial standards. The no parking area between the two proposed handicap accessible spaces should be eight feet in width suitable for van access. (As shown the total parking space does not meet the minimum parking spaces requirements.) The commercial portion of the development required 39 parking spaces (reduced with the 56.25% allowance in the ADD). Therefore, the lower-level parking should be shared with the commercial and residential users with no restrictions. **The revised architectural plan counted 38 parking spaces only versus the 41 below grade spaces called out on the Parking Calculations table. GCG recommends widening the handicap parking spaces for handicap van accessible. The proposed parking spaces on-site should be 59 spaces. Addition shared parking spaces at 20 Homer Avenue should be shown or specified on the plan. Not addressed. Proposed 60 parking spaces for the new site development resolved. Proposed shared parking spaces at 20 Homer Avenue should be addressed.**

15. GCG recommends adding EV charging spaces. **EV charging spaces demand and regulations are still evolving and is not a requirement. GCG recommends the applicant to consider pre-wiring the surface garage and surface parking area. Not addressed. Not required.**
16. One Way layout –
 - a.) MUTCD Section B.10.01 - the proposed R1-1 'Stop' sign shall be installed on the right-hand side of the approached vehicle to which it applied. **Resolved.**
 - b.) The plan should show a sidewalk through the driveway at the Alden Street exit, the R1-1 stop sign should be installed in advance of the sidewalk crossing. **Resolved.**
 - c.) MUTCD Section 2B.37.02 - R5-1 'Do Not Enter' signs should be installed at both sides of the Alden Street exit driveway, rotated to facing the northbound and southbound Alden Street approaching traffic. **Resolved.**
 - d.) Proposed R3-26, (U and Left Turns) per MUTCD, at the subsurface garage exit should be replaced with R3-5 (Left Turn Arrow with ONLY wording sign). An additional R3-5 sign, or R3-1 (No Right Turn Arrow sign) should be installed at the right-hand side of the garage south exit lane, (southerly ground level building column.) and the landscape island on the east side of the three 90-degree angle parking spaces facing the garage southern exit. **Resolved.**
 - e.) R5-1 signs should be installed at the subsurface garage southern exit, facing the driveway. An additional set of R5-1 signs should be installed next to the transformer and on the southerly building column facing the three 90-degree angle parking spaces. **Resolved.**
 - f.) R-6-1 or R6-2 'One Way' signs should be installed in front of the angle parking areas and along the driveway to warn the "one way" status. **Resolved.**
 - g.) Applicant should design the one-way traffic signage for the surface and subsurface parking levels according to the MUTCD requirements. **Architectural plan should address the traffic signage concerns.**
17. A wheelchair ramp should be provided at the concrete sidewalk ended at the handicap no parking stripping. **Resolved.**

C-4 – Grading, Drainage & Utility Plan.

1. Plan should be updated with the emergency vehicle access path as shown on the May 4, 2023, First Floor Plan). **Resolved.**
2. Show 9-11 Homer Avenue commercial building's (to be retained) sewer, water, and gas services. Show proposed utilities upgrade or existing services to be protected. **Resolved.**
3. The proposed close of existing curb cut in front of lots 353 and 354 would create a depression on Homer Avenue and potential icy hazardous conditions during the winter months, the existing spot grades shown a 5+/- inches dip at the existing northeast curb opening gutter and should be addressed. **The proposed spot grade will not resolve the ponding issues, there is an existing**

hump (elevation 185.10) approximately 20 feet east of the proposed spot grade 184.72. GCG recommends locating the existing catch basin at the southwest intersection corner and determine the existing rim grade and remove the hump between the catch basin rim and the existing high point 185.94 near the catch basin in front of the existing commercial building. The grading plan called for adjusting existing catch basin (at the Homer Avenue and Alden Street southwestern intersection corner) rim to 184.50, which is 0.25 feet lower than the existing rim grade. Where is adjacent to the proposed Homer Avenue sawcut line. Regarding is required. The saw-cut line has been relocated approximately 4+/- feet eastward. The abrupt 0.25 drop of the existing catch basin rim grade will create a 4' long 6+/-% ramp on Homer Avenue, where the existing roadway is at 1.5+/- longitudinal slope. GCG recommends relocating the saw-cut line to the eastside of the Alden Street intersection. **Resolved.**

4. Spot grades should be provided at all accessible parking spaces and access paths to assure the maximum cross slope not to exceed 2% in any direction. **Resolved.**
5. Specify spot grades at all proposed crosswalks and wheelchair ramps. **Show re-construct of wheelchair ramp at the Alden Street crosswalk. The installation of the sidewalk and granite curb would require a Road Opening Permit through Ashland DPW. The existing crosswalk stripping (not shown on the plan) would most likely be disturbed and should be restored (re-stripped) by the contractor. Detail provided. Resolved.**
6. Show downstream sewer manhole invert to establish the sewer connection invert grade. The proposed lower-level garage slab grade at 174.60 is lower than the proposed sewer connection invert. A 2" force main has been called out on the plan and referenced to a lower-level parking and plumbing plan, (not included in the package). Since the garage entrance is covered by the building roof. There should not be any surface runoff drains down to the underground garage with proper grading. The runoff water should be limited to vehicles dripping and winter snow carried into the garage. The Applicant should consult with the building department to conform with the necessary of a pump station. The proposed 2" sewer force main should comply with Chapter 326. Force main should be Class 52, cement-lined, tar coated ductile iron pipe per 326-19. A lower-level parking layout should demonstrate the accessibility of the pump station maintenance vehicles. **Based on the soil test pit (PT-1) data, the drive under garage slab is 4.9' below the ESHGW. The building design should address any potential seepage issues. Pumping/discharging grounding to sewer line is prohibited. The response stated that "The applicant is aware of the ground water issue and will design the garage accordingly without pumping/discharging the groundwater." The subsurface garage is partially underneath a green roof and there is 10 feet away from the proposed 117'+/-L. x 26'+/-W. x 3'+/-D. subsurface infiltration system. The subsurface garage would require green roof leak proof and drainage infiltration system seepage proof designs, any leakage into the underground garage will automatically enter the interior gas trap and trigger the 2" sewer force main and discharge to the sewer service. Stormwater discharges onto municipal sewer system would cause major environmental impacts (diluting wastewater/sewage treatment process and by-passing treatment facility during major storm events) and is prohibited by the EPA's MS4 permit. GCG recommends adding approval conditions to prohibit pumping and discharge groundwater and stormwater to the sewer service. GCG recommended imposing the watertight garage/basement requirements as part of the approval conditions.**
7. A hydrant (show existing and proposed new) should be located or installed near the proposed mechanical room (normally within 100 feet, applicant should verify the minimum distance with the Ashland Fire Department). **The mechanical room shown on the architectural plan was located at the northerly new building corner, which is approximately 250 from the nearest hydrant, Fire Department approval is required. Proposed fire department connection at the easterly building corner adjacent to Alden Street, subject to Building and Fire Departments approval. Building and Fire Departments approval required. Resolved.**
8. Show natural gas services connection, where applicable. **Building will not provide natural gas services, resolved.**
9. Show existing utility poles, show proposed underground electric, telephone, cable, and any other underground utilities connections. **The plan should show conceptual underground**

electrical route and cable lines with an estimated transformer location and specify all utilities be underground. **Resolved.**

10. Call out sewer service pipe size (6" minimum) and slope between proposed SMH to sewer main connection. **Show building sewer service invert. Sewer invert provided. However, the interior gas trap/force main connection shall not intercept any groundwater and drainage seepage. And being part of the approval conditions. The subsurface garage drains, and force main should be maintained and monitored as part of the operation and maintenance plan. Ashland Sewer Division may consider requiring a discharge flow meter to be installed. Statement.**
11. Drainage overflow connection to the Homer Avenue drainpipe, (works within the public street right-of-way should comply with Chapter 344 – Subdivision of Land standards), should be equipped with a new drainage manhole. 344-23. B. (4) - Drainpipe within the street right-of-way should be RCP (reinforced concrete pipe), Minimum cover for drains. shall be twenty-four (24) inches. Piping with less than thirty-six (36) inches of cover shall be laid with reinforced concrete Class V pipe. **The proposed drainage appeared to be enlarged, revised drainage calculations should be provided for review and verify drainage system as shown. See Stormwater Report comments below.**
12. The proposed infiltration chambers system is a Shallow UIC Class V Injection Well and required to register to MassDEP prior to start of construction and comply with the MassDEP's standards design guidelines. **Resolved.**
13. Infiltration Chambers system should be setback 10-feet minimum from foundation wall. **Resolved.**
14. Revise General Utility Notes, multiple notes referenced to the City of Melrose, all sewer system should comply with Ashland Chapter 326 and all water system should comply with Ashland Chapter 334. **Resolved.**
15. Plan called for removing the existing drain line on Homer Avenue. GCG recommends abandoning the drainpipe in place with bricks and mortar cap if existing pipe is in good condition, or filled the pipe with floatable fill and capped if pipe is in poor condition, to avoid pavement patching and disturbing the road gravel base. **Resolved.**
16. **Re-direct emergency access surface runoff away from 15 Alden Street building. The existing drainage flow path appeared to be ponding in the gravel area and overflowing toward the existing catch basin in front of the garage. The proposed exit driveway grading appeared to be lower than the garage ceiling. The proposed garage slab grade at 174.60, with 12 feet height per garage ramp profile. The top of garage ceiling slab grade should be 186.60 plus green roof and/or driveway thickness. Which would create a steep grade approaching the Alden Street curb exit. GCG recommends providing an updated architectural plan or an architectural statement to support whether such changes are achievable at the building permit phase.**
17. **Subsurface chambers infiltration system not meeting the 2 feet separation to ESHGW requirements, see Stormwater Report comments below. The 6" stone layer below the infiltration chambers has been removed. The Cultec's manufacturer detail sheet specified a minimum of 6" crushed stone layer underneath the chambers is required. GCG recommends providing Cultec's approval of the chambers system without the base stone layer. See additional stormwater comments below.**
18. **Verify spot grades shown on the parking area on top of the garage wall, it appeared lower than the garage ceiling. Provide architectural statement to support whether such changes are achievable.**
19. **The proposed driveway curb opening at Alden Street is located at the south side of the high point at elevation 184.73+/-, hence, the driveway runoff would drain southward to the existing catch basin located in front of #15 Alden Street driveway and altered the drainage pattern. The applicant should analysis the impacts of the altered drainage path. A new catch basin has been proposed to connect to an infiltration trench, infiltration system should meet the 10 feet property setback requirement. (MSH Vol.2, Ch. 1, Pg. 32 Table 2.3). The proposed infiltration trench consists of perforated pipe and is classified as a Class V injection well. The trench should meet the 20 feet building foundation setback per MassDEP Standard Design Guidelines for Shallow UIC Class V Injection Wells. Infiltration trench removed.**

typographical error at the proposed drainage manhole invert at the southerly lot corner, the invert should be 182.15 instead of 183.15.

D-1 – Construction Details

1. Section 326-14 - Typical Trench Section should specify 24" selected borrow above the sewer pipe. Sewer pipe material should conform with Chapter 326-15. Detail moved to sheet D-1, resolved.
2. Cultec Recharge 330XL HD Chamber "Typical Cross Section" shown 24" stone below chamber, which should be 6". This detail called for a minimum of 10" gravel between the pavement and the 6" crushed stone layer on top of chambers. Based on the grading plan, the chambers near the catch basin inlet will have less than 6" gravel between the pavement and stone layer. (Pavement finish grade elevation at 185.57, top of stone layer elevation at 184.80, minus 0.29 feet pavement thickness, the gravel layer thickness becomes 0.478' (5.74"). Furthermore, the bottom of the infiltration system stone is proposed at 181.26, the ESHGW at elevation 179.5 (TP-1), the available separation is 1.76 feet, which does not meet the minimum of 2 feet separation requirements. **The 6" stone layer underneath the infiltration chambers has been eliminated. The crushed stone layer does provide structural support for the chambers in addition to storm water storage. Manufacturer recommendations should be provided. Provide manufacturer support of the chambers without crushed stone support. Resolved.**

D-2 – Construction Details

1. Dewatering detail should be provided and comply with MassDEP - Activities and Use Limitation (AUL) requirements. Resolved.
2. Add Hydrant detail and should comply with Section 334-56 – Hydrant and valve should "Open Left". The proposed Fire Department connection location should be reviewed by the Fire Department. Fire Department approval required.
3. Add Precast Concrete Drain Manhole structure (for the overflow drainpipe connection within the street right-of-way), bottom should be equipped with cement concrete or brick table/invert like the one shown on MassDOT Construction Standard details drawing number E202.4.0. The concrete structure should be equipped with a standard H-20 rated top cone or flat slab. Specify drainage manhole frame and grate similar to the SMH detail. Update Lebaron Foundry to EJ model number. Details remain referenced to Lebaron Foundry models. Called out to meet Town of Ashland Standards. Resolved.
4. Provide pervious paver (H20 rated) and reinforced lawn (H20 rated) details. The access path must be designed to support fire engines and associated emergency vehicles loading. Design shall be certified by a Massachusetts Registered Professional Structural Engineer. The structural support (beam/girder) thickness will affect the driveway grading and potentially changing the drainage watershed area. Detail drawing added. Resolved.
5. Green roof design over the subsurface garage and first floor commercial area should comply with building code requirements and should be designed with an overflow bypass during cold climate conditions. The green roof thickness and driveway over the garage roof. Green roof cross-section would affect the surface driveway finish grade and should be coordinated with the architectural design to assure achievable.
6. Drainage Outlet Control Structure detail should be provided, a standard drainage structure with a specified baffle wall to create a control should be sufficient. The outlet control structure concrete top slab, frame and cover, brick mortar bed should be shown on the detail, weir invert to bottom of slab clearance should be specified to provide sufficient opening to handle the design storm events. The proposed top of weir elevation at 184.00, with outlet structure rim grate at 186.00. The typical drain manhole top slab thickness shown an 8" thick concrete top, a standard Ashland frame and cover should be 8" height. And the frame and cover should be set in mortar bed and brick course to provide adjustment. The bottom of the concrete slab would be below the 100-year peak elevation. (Peak elevation

is expected to be higher, see stormwater report comments below). **Call out minimum 0.9 feet (bottom of concrete slab not be lower than 184.90) opening above top of the weir. Resolved.**

Autoturn figure Plan

1. Proposed granite curb corners at the driveway entrance with 2 feet radius are too tight and forced the right turn entrance vehicle and right turn exit vehicle to encroach the oncoming traffic lane. GCG recommends widening the intersection curve radius to keep vehicles within its traffic lane. Provide standard passenger car (AASHTO 7.0' wide x 19.0 length) turning maneuvering path analysis to size the turning radius. **This plan should demonstrate vehicle turning path at the Homer Avenue entrance without encroaching onto the loading area. It appeared that if the loading area is occupied, a single unit 30 feet (SU30) long westbound truck would not be able to turn in to the driveway without riding over the curb corner. The applicant should consider replacing the curb corners (both ingress and egress intersections) with radial curbs suitable for truck traffic. Resolved.**

Architectural Plan Set

1. Show North arrow on all plan views. The North arrow was shown on plan sheet 4 and 5 only. **Resolved.**
2. Plan scale appeared to be 1" = 20', scale bar's 30 feet label should be 32. **Resolved.**

Lower-Level Parking Plan

1. Lower-Level Parking full size plan should be provided. Vehicles maneuverability is questionable. Parking stall dimensions do not meet industrial standards. (See Civil Plan C-3 comments above.
 - a.) The proposed 3-story building is smaller than the below grade garage. The southern building wall is on top of the below grade garage driveway. The plan should show all building support columns in the lower garage layout. **Resolved.**
 - b.) The proposed subsurface parking spaces were 9' x 18', which is 2-foot shorter than a standard parking stall, waiver should be required. The proposed 9' x 18' stall with 24' wide aisle is acceptable. However, the columns may further reduce the stall and aisle dimensions. **Waiver requested; Board approval required.**
 - c.) The proposed finish grade between the garage slab and first floor finish is 12 feet. Maximum ramp slope should be calculated. The Plan should show the ramp slope details with transition slopes at the top and bottom of the ramp. The American Institute of Architects (AIA) recommends 16% for the straight ramp less than 65 feet in length with 8% transition slope for 10 feet at the top and bottom of the ramp (Ramsey/Sleeper Architectural Graphic Standards, Eighth Edition, AIA.) **The ramp profile shown a 70 feet length ramp, AIA recommends 12% for straight ramp greater than 65 feet in length with 6% transition slope (Blend) for 8 feet length at the top and bottom of the ramp. 20% slope straight ramp with 10% blend were proposed. Technically, the garage ramp is within the building structure and under the Building Department jurisdiction and should be approved by the Building Inspector. Building department approval required.**
 - d.) GCG recommends widening the handicap accessible parking spaces to fit van accessible parking. **No van accessible space was provided in the subsurface parking level, 2 standard accessible provided. The combined surface and subsurface parking areas meet the minimum handicap van accessible space requirements. The ADA/AAB compliance requirements are under the Building Inspector's jurisdiction and require Building Department approval. Building department approval required.**
 - e.) Provide Autoturn/Vehicle Tracking analysis for the subsurface garage right turn exit to ramp path and from garage door to Homer Avenue right turn path. **Layout revised to one way layout, resolved.**

- f.) The overhang with columns supports building layout created multiple compound curves with steep slope ramp at the garage entrance with poor safety sight distance at the Homer Avenue and driveway intersection. GCG recommends requiring a site Traffic Impact Analysis (TIA) report prepared by a Massachusetts registered Professional Traffic Operation Engineer (PTOE) consultant. **The applicant should design the site traffic signage for both parking levels (surface and subsurface) according to the MUTCD requirements and certified by a Massachusetts registered PTOE. Architectural plan update required.**

First Floor Plan.

1. See Civil Plan C-3 comments above. The revised plan shows 2 commercial units and two residential units. **No response required.**
2. GCG recommends adding EV charging spaces. Revised plan not submitted. **Recommended, but not mandatory.**

Second Floor Plan.

1. The revised second floor plan shows 15 dwelling units, with units #1 and #2 appearing to be 2-story, which should be called out on the plan. **Resolved.**

Third Floor Plan.

1. The revised third floor plan also shows 15 dwelling units, with units #1 and #2 appearing to be 2-story, which should be called out on the plan. There should be 13 units on the third floor. All three floors combined proposed 30 dwelling units. Parking spaces calculations were based on 29 units. **Resolved.**

Landscape Plan

1. A formal landscape plan (like the Ground Floor Planting Plan and Green Roof Landscape Plan presented in the Planning Board meeting) should be provided, plan should be updated to match the latest site layout and demonstrate compliance with Sections 5.4, 5.4.1.2; 5.4.2.3; 5.4.3.1; and 5.4.4.3. **Revised plan not submitted. The applicant should clarify the Type 2 and Type 3 Paving details, which were proposed along the Homer Avenue seating and patio areas. The plan should also specify the proposed seating area next to the building (9-11 Homer Avenue) paving detail, which should be pervious surface. Not addressed. Resolved.**

9.4.4.8 - Site Lighting Layout, Photometric & Schedules

1. Photometric data (plan) and lighting plan and schedules should be provided. **Revised plan not submitted. No updated lighting Plan provided.**
2. Provide hours of operation for the outdoor lighting. **Not addressed. Not addressed. Possible permit condition.**

9.4.6.9 & 9.4.8 - Site Traffic – Vehicle Trip Analysis

1. The proposed new driveway curb opening with the existing 9-11 commercial building to remain created a hazardous with limited safety sight distance intersection. GCG recommends a Traffic Impact Analysis (TIA) be performed to analysis the proposed driveway location, intersection safety sight distance, shared parking demand, and traffic trap generations for the uses. **The proposed driveway curb opening created a hazardous condition, GCG recommends providing a TIA study. Addressed by changing to one way around the building.**
2. TIAS should include vehicle accessibility analysis for the internal lower level (under buildings) parking layout. **Revised plan not submitted.**

Stormwater Report

1. Chapter 247-6, this project requires a Stormwater Management Permit under 247-6 A, B, and C. Hence, should comply with Chapter 343. [Statement, no response required.](#)
2. The applicant should investigate the function of existing drainage catch basin structure on site, (in front of the 3 bays garage building on Lot 353). [Catch basin to be removed, resolved.](#)
3. Building 9-11 (to retain) has a flat roof system, existing roof runoff discharge location(s) should be included in the study. [Show existing 9-11 flat roof down spout location on plan and show proposed grading to assure discharge to the intended catch basin. Resolved.](#)
4. On-site soil test pits should be performed to determine soil drainage classes and estimated seasonal high ground water (ESHGW) and restricted layer elevations. The proposed infiltration system should meet the minimum separations between the bottom of the system to the ESHGW and restricted layer. [Test pit TP-1 indicated ESHGW at elevation 179.5, the proposed infiltration system does not meet the minimum two feet separation requirements, the minimum bottom of stone elevation should be 181.50 and 181.26 was proposed. If the bottom of system to be raised to 181.50, the minimum cover over the chambers would not meet the manufacturer's requirements. Additional test pits should be performed within the proposed infiltration system. Possible condition. Resolved.](#)
5. The pre-development and post-development HydroCAD studies appeared to be based on the NOAA Atlas 14 precipitation data as preferred by the Ashland Conservation Commission. [Statement only, Ashland's stormwater management regulations were based on MassDEP Stormwater Regulations, which was based on \(Technical Paper\) TP-40 rain fall data. The Ashland Conservation Commission has recently requested to utilize NOAA Atlas 14 rain fall data and this project's study meets the Conservation Commission requirements. No response required.](#)
6. The pre-development watershed EWS-1 should include the large gravel area between Lot 353 and 354, where appeared to be collecting surface runoff and possible providing limited exfiltration, per July 2022 Google Street View and the existing edge of pavement line shown on the existing conditions plan. There appeared to be some additional lawn areas (good condition with greater than 75% grass coverage) around building #35 and building 47-49. Which should be accounted for the pre-development runoff peak rate and volume for all four study storm events. The gravel surface also affects the groundwater recharge volume and re-development status of this site. Any additional impervious areas should be treated as new developments. The existing gravel surface may have a high CN value similar to pavement surface. However, compliance with the TSS removal and nutrient removal treatments and recharge volume are required. [The applicant should verify the existing/pre-development impervious areas used in the HydroCAD calculations. The 9-11 Homer Avenue's 3,980 S.F. \(square feet\) roof area appeared to be included in the 10,709 S.F. roofs area already. GCG measured all six existing roof areas \(excluding the covered walkway in front of the commercial building\) during the first round of review and concurred with the 10,699 S.F. used in the original HydroCAD report. GCG also measured approximately 11,800+/- S.F. of existing pavement area \(including the covered concrete walkway\), which is much smaller than the 15,011 S.F. used in the report. The discrepancy of the existing impervious areas was rather significant in a 39,658 S.F. watershed and should be revisited. The Existing Conditions peak flow rate and volume should be recalculated accordingly. Resolved.](#)
7. The post-development PWS-1B should be updated with the emergency vehicle access path and any associated new impervious areas. Which affects the overall impervious areas, ground water recharge volume and 65% Rule and treatment requirements under 343-8.1.6. [The lawn and reinforced lawn and walkway should be modeled as impervious surface, which provides no groundwater recharge and TSS removal credit unless it was designed to retain the required water quality volume, \(MSH Vol. 2, Ch. 2, Pg. 112\). Revise grading to direct emergency access path runoff away from 15 Alden Street building. Re-grade driveway and green roof areas at the south side of the proposed building according to the subsurface garage ceiling, adjust high point](#)

and watershed boundary as needed. Green roof on top of the garage should have a CN value of 86, (MSH, Vol. 2, Ch. 2, Pg. 114). **Resolved.**

8. Update total impervious area and provide treatments to meet 343-8. Provide total TSS and phosphorus (TP) calculations. The proposed CDS unit qualified for 50% TSS removal credit, but the TP removal would most likely require retaining 1-inch times the total site post-development impervious area volume to meet Section 343-8 requirements. The proposed CDS unit by Contech Engineered Solutions, Inc. was approved by the New Jersey Department of Environmental Protection (NJDEP), dated January 9, 2015, for 50% TSS removal credit, the rating was also acceptable by the MassDEP. The current MSH (January 2008) does not provide any nutrients removal credit for Proprietary Separators like the proposed CDS unit. The MSH stated that insufficient data for removal efficiencies. Other acceptable evaluations would be the EPA Region 1's BMP Accounting and Tracking Tool or other BMP performance evaluation tool provided by EPA Region 1. Total impervious area should be based on the subsurface garage footprint, (green roof over the subsurface garage and commercial space is considered impervious area), paved parking area outside the garage footprint, and the proposed walkway and the existing 9-11 Homer Avenue roof should also be included in the project impervious area. GCG scaled the total impervious area approximately 33,400+/-S.F. The applicant should update the groundwater recharge and water quantity volume calculations accordingly. The proposed infiltration volume below the out weir appeared to meet the requirements. However, updated calculations should be provided by the applicant. Green roof, second floor CN value should use 86. The HydroCAD report Pond 1P – Cultec 330XL HD system chambers invert should be 181.76, storage sump should be between elevation 184.00 to 181.76. (calculations used storage between 181.26 to 184.00). **Resolved.**
9. Existing Homer Avenue drainpipe size should be identified and check for available capacity to handle the overflow connection. The existing 12" drainpipe on Homer Avenue is most likely under sized. Typical public roadway drainage systems were designed for 10- to 25-year events only. If the project outflow is controlled to below the pre-development conditions, no adverse impacts should be expected. The latest plan shows exit driveway drains southward to an existing catch basin in front of 15 Alden Street driveway, existing drainage pattern altered. The proposed 150 feet infiltration trench does not meet the 10 feet property line and 20 feet building foundation setback. **Resolved.**
10. Inlet grate and drainpipe capacity and velocity calculations should be provided. Chapter 343, Section 7.6.16.c).7) & 8) require Culvert Capacities and Flow be included in the hydraulic design calculations. GCG is aware of the small inflow pavement area and does not anticipate any catch basin inlet capacity and velocity issues. However, the two proposed 8" roof drain should be sized with capacity to handle the flow. GCG rough estimated the two 8" roof drain would require a minimum of 1.3% pipe slope to handle the roof runoff during the 100-year storm design event. The applicant should size and specify the minimum pipe slope on plan. **Mechanical engineers should verify the roof drain sized to handle the roof runoff.**
11. Water Quality Unit sizing calculations should be provided. **Resolved.**
12. Operation and Maintenance plan, GCG recommends catch basin grates and sump be inspected at least 4 times per year and cleaned four times per year or whenever the sediment deposit is greater than or equal to one half the depth from the bottom of the invert of the lowest pipe in the basin. **Resolved.**
13. Additional Operation and Maintenance for the roof drain inlet should be specified, roof drain gutter and leader should be inspected and cleaned at a minimum twice per year. **Resolved.**
14. Operation and Maintenance plan should include a signature block, annual operation budget and sample O&M log. **Resolved.**
15. An illicit discharge statement for the site should be provided. **Resolved.**
16. The latest architectural plan did not show roof coverage over the three walkway/lawn areas along Homer Avenue, these areas combined total of 560+/- square feet are over the surface garage and considered impervious area and drains directly to Homer Avenue. The applicant should clarify the discrepancy of the post-development PWS-1A watershed boundary and the architectural roof layout. These areas were called out with Type 3 Paving surface on the

architectural plan, detail for the Type 3 Paving surface should be provided. **Not Addressed. Resolved.**

Summary

The proposed driveway intersection at Homer Avenue has insufficient safety sight distance and should be addressed. The lower-level parking layout vehicles maneuverability is questionable. The lack of parking spaces should be further analysis by a traffic impact study. The drainage mitigation method is relatively sound but needs to be updated to address the site layout changes. **There are miscounted parking spaces provided on site, additional two parking spaces are required.** Grading along the southerly portion of the site appeared lower than the subsurface garage roof and driveway runoff drains to the south end of Alden Street and the proposed 3" grade different on Homer Avenue should be addressed. **The proposed 150 feet infiltration trench does not meet setback requirements and should be revised. Resolved.**

Additional Planning Board Concerns.

- 1. GCG reviewed the EDR Environmental Screen reports for 9-25, 35-37, and 47-49 Homer Avenue, dated January 09, 2019. These reports show no major concerns regarding ground contamination on the project site. GCG concurs with the information provided that there is no known indication of soil contamination on site.**
- 2. The proposed sidewalk through the driveway entrance as shown was based on the MassDOT construction standards drawing number E 107.8.0 which meets the ADA/AAB requirements and pedestrians' safety measures.**
- 3. There are some concerns about the possibility of blasting on site in relation to construction. GCG recommends blasting not being utilized on this site during construction, due to the close proximity to the developed abutters and next to the MBTA railroad. The contractor should consider hoe ramming or similar mechanical options for ledge removal. Furthermore, this site is adjacent to the Massachusetts Bay Transportation Authority (MBTA) railroad, any blasting would require a BMTA permit and comply with the MBTA's Blasting Specifications under the Railroad Operations Directorate Section VIII.**
- 4. GCG reviewed the Traffic Trip Generation Assessment Memorandum, prepared by MDM dated Dec. 12, 2023. The assessment stated there will be an additional 400+ (Annual Average Daily Traffic) AADT trips generated from these 29 residential units and 8,550 s.f. new commercial spaces development. Based on the MassDOT 2021 and 2022 AADT traffic counts on Homer Avenue, at 4,387 and 4,081 trips, respectively. The proposed development will generate approximately 10% additional AADT on Holmer Avenue. The post-development traffic trips would still be under 5,000 ADT, which is considered moderate to low traffic volumes for Homer Avenue as a local collector street. In comparison with the Main Street and Chestnut Street traffic trips in the vicinity, both streets are at their 7,000 AADT trips in 2022. Alden Street's AADT traffic count indicated 1,154 trips, based on 200 AADT trips exiting the site, the total 1,354 AADT would still be considered low traffic volume (less than 1,500 ADT) for a Local Street. Therefore, the proposed development on 9-94 Homer Avenue should not have any major adverse impacts on the traffic system.**

If you have any questions regarding this matter, please contact our office.

Respectfully submitted,
GCG ASSOCIATES, INC.

Michael J. Carter

Michael J. Carter, P.E.
Project Manager