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July 3, 2025

Jasmine Farinacci, Director
Planning & Economic Development
Town of Ashland
101 Main Street
Ashland, MA 01721

RE: Peer Review - Site Plan Review & Site Alternation Special Permit, and Stormwater Management Permit for Site Plan at 240 & 260 Pleasant Street (Assessor's Map 13, Lots 108 and 109)

Dear Ms. Farinacci:

GCG Associates, Inc. has reviewed the following information for the proposed Site Plan at 240 & 260 Pleasant Street in Ashland, MA.

Documents:

1. Application for Planning Board Approval/Permit for 240 & 260 Pleasant Street, Ashland, MA., prepared by Land Design Collaborative (LDC), representing Metrowest Facilities LLC. (Owner and Applicant).
2. Planning Board Cover Letter and Project Narrative, prepared by LDC, dated February 10, 2025
3. Application for a Stormwater Management Permit, dated January 22, 2025.
4. Stormwater Management Report, prepared by LDC, dated January 2025.
5. Planning Board Cover Letter – Revised Documents, prepared by LDC, dated June 17, 2025.
6. Conservation Commission Cover Letter – Revised Documents, prepared by LDC, dated June 17, 2025.
7. Stormwater Management Report – Addendum I, prepared by LDC, Dated March 2025.

Plan References:

1. 24-0281 Design Review Renderings (7 sheets, rendering views from Pleasant Street).
2. 24-0281 Plan View Rendering, Active Recreation & Ancillary Parking Illustrative, 240 & 260 Pleasant Street, Ashland, MA, Prepared by LDC, dated 02/24/2025.
3. "Site Plan, Pursuant to Section 9.4 Site Plan Review & Section 5.3 Site Alternation Special Permit for 240 & 260 Pleasant Street, Ashland, MA 01721, prepared by LDC, dated February 5, 2025, last revised June 9, 2025, consists of 13 sheets (Civil Set) as following:

    1. Title Sheet
    2. Existing Conditions Plan of Land (prepared by RealMapInfo LLC, dated 10/25/2024, Stamped by Surveyor)

3. C-001 – General Notes & Legend
4. V-101 – Existing Conditions Plan (Compiled)
5. C-201 – Site Preparation and Erosion & Sediment Control Plan
6. C-202 – Layout, Material & Planting Plan
7. C-203 - Grading, Drainage Plan
8. C-204 – Utility Plan
9. C-401 – Details
10. C-402 – Details
11. EX-101 - Vehicle Maneuvering Exhibit
12. EX-202 Public View Photo Exhibit
13. SL-101 Photometrics Plan (By Others)

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 Industrial District (I) and Ashland Downtown District Sub-Area 'A', (ADD-A), and Solar Overlay District. This development is in the Other Areas Zone 'X' (Areas determined to be outside the 0.2% annual chance floodplain per FIRM map number 25017C0513F, map revised July 7, 2014. There is an off-site Bordering Vegetated Wetland (BVW) resource area shown on the south side of the MBTA track (Boston & Albany Railroad property) on the Existing Conditions Plan (Compiled), sheet V-101. The southeastern portion of this development site is in the 100-foot buffer zone associated with the BVW. However, no work is being proposed within the 100-foot buffer area. The proposed work limit is above the 1-acre threshold and requires a NPDES Construction General Permit.

The Application for Planning Board Approval/Permit form stated that the site is in the Groundwater Protection Overly District, this development site is not in the Groundwater Protection Overly District. However, the site is in the Groundwater Use Restriction Sector (Chapter 316, Groundwater Use Restriction). This site is affected by the Nyanza Chemical Waste Dump Superfund Site, and groundwater use is restricted under Chapter 316.

Based upon our review of the above information, we offer the following comments with respect to compliance with the 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 and new development project. The site consists of two lots (Assessors Map 14, Lot 108 – 240 Pleasant Street, consists of 38,402+/- s.f. (0.882+/- acres) and Lot 109 – 260 Pleasant Street, consists of 43,563+/- s.f. (1.00+/- acre). This application calls for merging the two parcels to a single lot with a combined 81,965+/- s.f. (1.88+/- acres). The project site abuts Map 13, Lot 110 - (280 Pleasant Street, MetroWest Christian Academy), which is under the same ownership with an existing shared exit driveway to Pleasant Street. This project has proposed utilizing and modifying the shared driveway as the site access through Pleasant Street. Chapter 282, Section 6.3.5.3 requires appropriate legal devices to address the maintenance, repair, snow removal, and liability of the common driveway. Furthermore, there is an existing fenced concrete pad crossing the property line between Lots 109 and 110 for dumpsters storage. Since these separate lots are under the same ownership, easement and encroachment are not applicable.

The proposed recreational soccer field use is closely matches with the “Outdoor commercial recreation” use as shown on the Section 3.0 Table of Principle Use Regulations table and is permitted as of right in the Industrial Zoning District.

SITE PLAN SET (Civil Plan)

Sheet Title

1. The Sheet Index shows duplicate sheet number C-001 for the Existing Conditions Plan of Land, which is a stand alone plan sheet 1 of 1, prepared by RealMapInfo LLC., which should be clarified.

Sheet 1 of 1 – Existing Conditions Plan of Land (by RealMapInfo LLC., dated 10/25/2024)

No comment.

C-001 – General Notes and Legend

No comment

V-101 – Existing Conditions Plan (Compiled)

2. The Existing Conditions Plan shows the site slope pitching from west to east with an entrenched (depression at contour 190) gravel surface parking lot, there are multiple openings (spill over low points) between contour 200 on site. GCG recommends providing additional spot grades to identify the existing drainage flow path and ponding elevations. Low point spot grade (between the two contours 200) should be provided at the northeastern corner of the gravel parking lot toward the Pleasant Street catch basins. A spot grade at the southeast gravel parking lot corner (between the two contours 200) toward the southeasterly 199 contour should be provided to determine the runoff overflow direction of the gravel parking area. A spot grade at the boundary of sub-catchments E2S and E3S should be provided (between the two contours 200) to determine the ponding situation in sub-catchment E2S. Provide low point spot elevation at each depression. There appears to be depression at the western side of sub-catchment E3S, which should be identified with spot grades.
3. Based on Google Street View’s historic images, the shared driveway did not exist in 2013, and the connection was installed between 2013 and 2017. There were parking spaces (per pavement marking line) striped in front of the driveway connection shown on the years 2017, 2019 and 2022 images. Therefore, the numbers of parking spaces at 280 Pleasant Street have changed recently.

C-201 – Site Preparation and Erosion & Sediment Control Plan

4. The existing grading (spot grades) at the project site’s northeasterly lot corner along Pleasant Street should be provided to determine site overflow toward the Pleasant Street catch basins. Provide silt sack catch basin protection as necessary.
5. Erosion control wattle or similar device should be provided at the northeast lot corner and along the southeastern property line between the 200 contours.

6. Precautions should be shown at the proposed drainage swales for temporary sediment basin; bottom of the temporary sediment basin should at least 1 foot above the proposed drainage swale finish grade.

C-202 – Layout, Materials & Planting Plan

7. Parking Requirements table, the Existing Facility address shown on the table appeared to be transposed, the existing 57 spaces appeared to be at #280 Pleasant Street and the 30 spaces were for #260. Applicant should verify the existing parking spaces in #280 facility. GCG counted 166+/- parking spaces through the Google satellite image. The proposed common driveway and no parking stripping in front of the proposed walkway would impact the number of parking spaces on #280 Pleasant Street and should be specified.
8. Chapter 282, Section 5.1.1 – Off-street parking must be provided on paved surface. The proposed crushed stone and gravel surface does not meet ADA/AAB accessibility requirements. The wheelchair accessible path is bound by the hot mix asphalt parking spaces and walkway only.
9. The proposed gravel parking lot with crushed stone course over compacted gravel does not meet the infiltration BMP pretreatment requirements.
10. The parking requirements table showed 49 parking spaces provided on the development site. GCG counted 47 spaces provided, the center parking rows were mislabeled 10 spaces per row, which should be 9 spaces per row.
11. Chapter 164-2 – the proposed 47 spaces is within the 40-100 parking spaces range, Section 164-2 requires a minimum of 3 handicap accessible parking spaces, (two proposed).
12. Chapter 164-3 – Handicap space should be equipped with an above ground sign with white lettering against a blue background stated “Handicap parking: Special plate required. Unauthorized vehicles may be removed at owner’s expense”. The handicap parking space dimensions should comply with the current ADA/AAB requirements, which exceeded Section 164-3’s dimension requirements.
13. Section 5.1.2 – Schedule of Parking Area Requirements: The proposed use is not specified in the 5.1.2 Schedule of Parking Area Requirements table, and it would be treated as “Others”, which requires individually determined by the Building Inspector upon advisory report of the Planning Board where required in compliance with Section 9.4, Site Plan Review.
14. The plan labeled 21 spaces along #280’s eastern property line. GCG counted 17 spaces with the proposed layout. The parking spaces reduction on #280 should be addressed.
15. Section 5.2, Loading Requirements – this proposed development would not require any loading area. The loading requirements should be determined by the Building Inspector. See comment number 12 above.
16. Section 5.3.8. - the proposed standalone sign should not be placed within the required 30’ side yard setback as shown.
17. Snow storage areas should be specified on the plan; no snow storage should be placed within the drainage swale area.
18. GCG recommends providing rendering for the proposed 20-foot-high soccer backstop system (especially along Pleasant Street frontage) for the Board to evaluate the visual impact of Pleasant Street.

19. The applicant should clarify the function of the bituminous concrete pad at the northeastern corner of the gravel parking lot. If it is a dumpster pad, it should be enclosed.
20. Section 5.4.3.1 – the development site is facing residential uses across Pleasant Street. The plan shows utilizing the existing vegetation along the site frontage for screening. Existing trees along the frontage were not identified (shown tree line only). The plan has specified to require the owner, contractor and project landscape architect to evaluate the vegetative screening from the public way, following the removal of trees and shrubs with the limit of work area. GCG recommends including the Planning Board or its representative to evaluate the vegetative screening at the time. Based on 5.4.3.1's requirement of 1 tree per 30 feet linear feet of street frontage, a minimum of 11 trees are required for the 325+/- linear feet of road frontage.

C-203 – Grading & Drainage Plan

21. GCG recommends replacing the two beehive grates between the gravel parking lot and the synthetic turf field with flat grate flush with the finish grade to eliminate any tripping hazard.
22. The proposed gravel parking requires a waiver with Chapter 5.1.1. The proposed gravel parking surface consists of 4" of ¾" crushed stone over 8" of compacted gravel base, as shown on the Compacted Gravel Parking Surface detail (plan sheet C-401). GCG does not recommend installing the crushed stone on top of the compacted gravel. The crushed stone layer (which is utilized to provide surface runoff storage volume) should be installed below the gravel surface and protected with filter fabric. The gavel surface should be modeled as impervious surface to size the thickness of the crushed stone course to provide runoff volume storage for exfiltration. The 4" crushed stone surface as proposed would create water ponding in the surface with potential frozen conditions during cold weather, the crushed stone would deteriorate under the traffic load and difficult to maintain.
23. The poured in place texture rubber play area detail and material should be specified on the plan. Rubber surfaces should be permeable and equipped with a double washed crushed stone layer underneath to allow surface runoff storage and exfiltration.
24. Synthetic Turf specifications should be specified on the plan and shall be permeable. Synthetic Turf should be equipped with a crushed stone course underneath to provide surface runoff storage for exfiltration.
25. Rubber surface and synthetic turf should be maintained to retain their permeability property. Gravel parking surface runoff flow toward the rubber and synthetic turf surface should be avoided.
26. A proposed spot grade should be added between the two (200) contours at the southwest corner of the proposed playground.
27. The proposed contour 199 at the south side of the AD-04 should be connected, (contour 199 is needed between proposed contour 198 and proposed spot grade 199.9).
28. The proposed drainage swale and crush stone storage are infiltration (provided exfiltration) BMPs and should be relocated outside the 10 feet property line setback. Massachusetts Stormwater Handbook (MSH), Table RR, Vol. 1, Ch. 1, Pg. 8.
29. The drainage swale should be equipped with an emergency spillway.
30. Panel drain (sizes and locations) to be installed underneath the synthetic turf should be shown on the plan. (See Synthetic Turf section, sheet C-402).

C-204 – Utility Plan

31. The plan should state that the site is in the Groundwater Use Restriction Sector, and no irrigation well should be allowed.
32. AD-01 and AD-02 are next to the parking lot and most likely be utilized as walking path, GCG recommends replacing these two inlet grates with flat grates and set at the finish grade.

C-401 – Details

33. Compact Gravel Parking Surface detail, the surface table stated bituminous concrete should be revised to gravel parking surface. GCG recommends installing the crushed stone reservoir course underneath the gravel surface with filter fabric protection.
34. The Flush Bit. Conc. Curb (BCC) Type - 3 Transition calls for 2” reveal with the gravel parking lot, which is considered a tripping hazard, GCG recommends beveling the gravel surface to match the top of curb.
35. Additional details for the drain swale and area drain installation should be provided. The drain swale is proposed with loam and seed finished. (per plan sheet C-202). The proposed NDS drain is only 7.3” depth (rim to invert/bottom) and 6” diameter with 6” crushed stone beneath, (0.39 +/-c.f. of crushed stone per drain). There is no drain connecting the area drains. The function of the area drain would be very limited.

C-402 – Details

36. The finish stone and base stone courses shown underneath the synthetic turf should be specified, aggregate size or gradation should be called out on the detail. The 1” x 12” panel drain spaces, and quantity should be labeled or show on the site plan.

EX-101 – Vehicle Maneuvering Exhibit

37. The emergency vehicle maneuvering paths appeared to be adequate. Driveway intersection safety sight line distance should be shown on the plan. There appears to be sufficient sight distance at the intersection.

EX-102 – Public View Photo Exhibit

38. GCG recommends showing rendering with the proposed 20’ height barrier net system combo and 25’ height lighting on pole along Pleasant Street for evaluation.

SL-101 – Photometric Plan

39. The plan shows 7 lights (3 type A and 4 type B) on the luminaire location table. However, the plan shows 6 lighting locations only, (2 LP-1 and 4 LP-2). The four LP-2 light fixtures are located at the four corners of the soccer field with 25 feet mounting heigh on pole. The parking lot light fixtures have mounting height of 20’. There is no specific mounting height for the lighting fixtures. However, for reference comparison, Section 8.6.10.7, which specified outdoor lighting fixture is limited to 15’ mounting height in Wildwood District.
40. Hours of operation (lighting system) should be specified.

41. There are luminaire spillovers onto the adjacent abutters and Pleasant Street. However, there are existing streetlight mounting on utility poles on the northern side of Pleasant Street.

9.4.8 - Site Traffic – Vehicle Trip Analysis

42. An estimated number of traffic trips associated with the proposed use should be provided.

Stormwater Report

Pre-development – Existing Hydrology:

1. The Existing Hydrology (G2) watershed map shows E1S's flow path to the gravel parking lot (depression) surrounded by contour 199, with an overflow opening at the northeasterly lot corner between the two 200-contours (the spillway invert elevation should be identified. As shown, this sub-catchment acts as an infiltration basin and overflows northeastward to the existing catch basin in Pleasant Street. The E1S pre-development conditions should be modeled as pond routing as an infiltration basin and this sub-catchment does not discharge to E1L. There is a second overflow path between the sub-catchments E1S and E3S, near the southeasterly gravel parking lot corner. The overflow invert should be identified. GCG concurs with the CN 96 value used for the 10,168 s.f. gravel parking lot surface, (based on gravel road w/o right-of-way). However, the post-development's 16,210 s.f. gravel parking surface was modeled with CN 76 (gravel roads w/ right-of-way). These are the actual measurements of the parking lots, CN 96 should be used.
2. Sub-catchment E2S should also be modeled as an infiltration basin (pond model), the overflow (spillway) invert elevation should be identified. Since E2S's outflow discharges sub-catchment E3S, the applicant should consider merging the sub-catchments to one.
3. Sub-catchment E4S utilized 765 s.f. of brush surface CN 30. However, based on the Google Street View image, the landscape island at the driveway entrance is mulched. GCG recommends using CN 39 (>75% grass cover, good, HSG 'A') for the mulched surface.
4. Sub-catchments E1S and E4S should be summed to discharge to Pleasant Street.

Post-development – Proposed Hydrology:

5. Sub-catchment Crush Stone, (the proposed gravel parking lot/driveway requires a waiver with Section 5.1.1), assuming waiver granted. The gravel roads surface CN value should be 96 (76 used), matching the Existing Hydrology condition, see comment #1 above.
6. Sub-catchment P1S utilized >75% Grass cover, Good, HSG 'A' for the synthetic turf field, the applicant should provide synthetic turf and Rubber surface material specifications to support the permeability rate with maintenance requirements. MassDEP classified artificial turf and compacted gravel as impervious surface and should be modeled accordingly. (Although poured in place rubber surface was not specified by MassDEP, GCG recommend modeling the rubber surface as porous pavement, (impervious surface) per MSH Vol.3, Ch.1, Pg. 15. Water Quality Volume and Required Recharge Volume per MSH Standards 3 and 4 should be applied to all compacted gravel, synthetic turf and rubber surface.
7. Sub-catchment P4S brush coverage should be mulched surface with CN 39.

8. Pond P1P, GCG recommends adding an additional surface area at elevation 198.7 in the stage storage table. There is an intent of retaining the stormwater runoff outside the soccer field, per spot grades shown along the field edge. GCG recommends modeling the synthetic turf as impervious area and sizing a stone course underneath the synthetic turf for runoff storage. An emergency spillway weir should be sized based on brimful conditions, (MSH Vol. 2, Ch. 2, Pg. 91), equipped with erosion armor protection, riprap or level spreader type design.
9. Pond P2P and GCG disagree with the pond modeling in this application. The gravel parking lot consists of 16,210 s.f. of surface area with exfiltration. However, the calculations shown 0.0 cfs discard rate through exfiltration. Based on the 16,210 s.f. surface area and 1.020 in/hr. exfiltration rate, a 0.38 cfs, exfiltration/discarded rate should be achieved. GCG recommends installing the stone course underneath the gravel surface for runoff storage, which provides a more suitable walking surface and provide filtering for the surface runoff.
10. Operation and Maintenance (O&M) plan should include a signature block, annual operation budget.
11. O&M should include maintenance of the gravel drive/parking lot, play area rubber safety surface, and synthetic turf, all these surfaces require maintenances to maintain permeable for the system to work properly.
12. A signed illicit discharge statement for the site should be provided.

Summary

The proposed gravel parking surface requires a waiver with Section 5.1.1. Stone storage should be below the gravel to properly model the stone storage infiltration system. The gravel surface parking lot, synthetic turf, and rubber surface should be treated as impervious surface to size stone storage reservoir for treatment and infiltration.

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

Please call with any questions.

Respectfully Submitted,
GCG ASSOCIATES, INC.

Michael J. Carter

Michael J. Carter, P.E.