

**TABLE OF OUTSTANDING ISSUES**  
**GOODRIDGE BROOK ESTATES 40B PROPOSAL**  
**February 27, 2019**

**SECTION I: UNRESOLVED ENVIRONMENTAL PROTECTION CONCERNS**

<b>1.0 Environmental Protection</b>				
	<b>Topic</b>	<b>Issue</b>	<b>Applicable Regulation(s)</b>	<b>Action Item(s)</b>
<b>1.1</b>	<b>The Project's environmental impacts have not been fully evaluated</b>	<p>1. Per MassWildlife Letter, Goodridge Brook is an "exceptional wild trout stream that supports a very abundant population of Eastern Brook Trout." MassWildlife has "legitimate concerns regarding potential impacts of [the Project]" on this fish habitat. Streams on-site and next to Project property line flow into adjacent Goodridge Brook, a registered Coldwater Fishery.</p> <p>2. Per ZBA's Peer Review Engineer (F. Hamwey) of 2/16/19: Conservation Commission has recommended full environmental analysis be performed (vernal pools, endangered species, wildlife, etc.)</p> <ul style="list-style-type: none"> <li>• Vernal pools in close proximity to site suggests these may be on-site, as well. These are Outstanding Resource Waters (ORW) that must be protected from stormwater pollution.</li> </ul>	<p><b>321 CMR 5.00, Coldwater Fish Resources</b></p> <p><b>Town of Lancaster By-Law on Environmental Site Review</b></p> <p><b>See, Comment Letters from Patrick Garner, Sean Reardon, P.E., Adam Kautza, PhD, and Conservation Commission Chair Nathan Stevens.</b></p> <p><b>Refer to comments made by Conservation Commission Vice-Chair, Tom Christopher at last ZBA hearing.</b></p>	<p><b>1. ZBA should <u>deny</u> waiver from environmental analysis requirement of Subdivision Rules and Regulations, Section 301-8(D), and <u>require</u> Developer to undertake the necessary study per the scope set forth in the regulation, which shall include a wildlife habitat evaluation given the proximity of known vernal pools and Eastern Brook Trout habitat.</b></p> <p><b>Environmental study shall be supervised by Town Conservation Agent, and reviewed by Agent and made available to the public during the ZBA's public hearing.</b></p>

1.2	<b>Wetland Bylaw and Regulations – 200-foot Buffer to Streams – Developer’s Request for Waiver</b>	<p>1. A large portion of the Project’s buildings, roadways and associated infrastructure is within the buffer zones to important wetland resource areas, including within 200 feet of streams on the Project Site.</p> <p>2. Patrick Garner (1/21/19 Letter): “[the Project] design is environmentally insensitive and will result, if approved as submitted, in numerous adverse impacts to wetlands, and other fragile resources.”</p> <p>3. The Town’s Wetland Protection Rules and Regs., s. 306-8, provide:</p> <p>“The applicant for a permit shall have the burden of proving by a preponderance of the credible evidence that the work proposed in the permit application will not have unacceptable significant or cumulative effect upon the resource area values protected by this bylaw. Failure to provide adequate evidence to the Conservation Commission supporting this burden shall be sufficient cause for the Commission to deny a permit or grant a permit with conditions.”</p>	<p><b>Lancaster Wetlands Bylaw, Section 215-6(F) – work within 200 feet of an intermittent or perennial stream:</b></p> <p>“no permit issued hereunder shall permit any activities unless the applicant, in addition to meeting the otherwise applicable requirements of this bylaw, has proved by a preponderance of the evidence that 1) there is no practicable alternative to the proposed project with less adverse effects, and that 2) such activities, including proposed mitigation measures, will have no significant adverse impact on the areas or values protected by this bylaw.</p>	<p><b>If Developer does not consent to perform the Environmental Analysis study under Section 301-8(d), then the ZBA should <u>deny</u> the waivers requested from the buffer zone requirements in the Wetlands Bylaw, to protect the interests protected by the Bylaw.</b></p>
1.3	<b>Wetland Bylaw and Regulations – 25-foot “no touch” buffer to all wetlands –</b>	<p>1. The plan shows grading and other sitework within five and 10-feet of wetlands in numerous locations.</p>	<p><b>Wetlands Bylaw, Section 215-2(A) (creating 25-foot no-touch buffer to wetland resource areas).</b></p>	<p><b><u>Deny</u> the requested waiver to do work within the 25-foot “no touch” buffer, and <u>require</u> all Project-related work to be conducted outside of this buffer area.</b></p>

	<b>Developer's Request for Waiver</b>	<p>2. Patrick Garner (1/21/19 Letter): "This project, as submitted, would eliminate a majority of the existing upland habitat. The purpose of the Commission's restriction on the first 25-feet of buffer zone is to protect the values and functions of the wetland resources.... Altering existing vegetation within the "no-build" zone creates multiple physical changes that directly impact adjacent BVW. Those changes include temperature fluctuations, surface runoff alterations and increased opportunities for invasive plants to impact BVW."</p>		
1.4	<b>Stormwater Drainage Design Deficiencies</b>	<p>1. Tetra Tech (2-26-19 Letter): Developer's stormwater report does not fully document or demonstrate the Project's compliance with the Massachusetts Stormwater Management Standards or the Town of Lancaster Stormwater Management Rules and Regulations.</p> <ul style="list-style-type: none"> <li>• Developer's drainage analysis fails to account for roughly five acres on Bestway of New England property, which flows onto Project Site – needs to be accounted for in Developer's stormwater modeling.</li> <li>• Under proposed conditions an earthen berm appears to be proposed along the western boundary of the Project Site, thus</li> </ul>	<p><b>MA Stormwater Management Standards</b></p> <p><b>Lancaster Stormwater Management Rules and Regulations</b></p>	<p><b>ZBA should order Developer to respond to Tetra Tech critique dated 2/26/19, and update its stormwater modeling accordingly.</b></p>

		<p>changing the off-site runoff patterns and increasing the potential for increased ponding and/or flooding on the Bestway of New England property (creating a “dam” that will cause runoff to back-up on Bestway property). This directly conflicts with the applicant’s statement that existing uncaptured off-site runoff not associated with the Project will continue to flow overland without change.</p> <ul style="list-style-type: none"><li>• On-site soils investigation documentation to determine groundwater elevations and confirm soil classifications is missing from stormwater report. This information is critical as it is the basis for many of the Project’s design decisions and calculations.</li><li>• NRCS and Hydrologic Soil Group Mapping for the subject parcel indicates the presence of “HSG A soils” along the southern property boundary. This precludes the Applicant from the “maximum extent practicable” option under Mass. Stormwater Standard 3 since the site is not comprised solely of C and D soils. The need to meet this standard may result in larger stormwater basin footprints and/or reconfiguration of the proposed drainage systems.</li></ul>		
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## SECTION II: UNRESOLVED PUBLIC HEALTH & SAFETY CONCERNS

### 2.0 Compliance with State Fire Safety Code

- The Project's extreme density, adjacent wetlands and single-access roadways raise serious questions concerning adequacy of access for fire department apparatus.
- ZBA should demand demonstration of strict compliance with State Fire Code during the public hearing.

	Topic	Issue	Applicable Regulation(s)/Guidance	Action Item(s)
2.1	<b>Fire Department Access: Road Width and Maneuverability</b>	<p>1. Fire apparatus access road plans must include swept path analysis, demonstrating that fire department apparatus can successfully negotiate the proposed roads. <b>527 CMR §18.1.1.3.</b> Use of the opposite travel lane is prohibited in the design of all new fire apparatus access roads. <b>527 CMR §18.2.3.4.8.</b></p> <p>2. For fire department access roads, the minimum permitted inside turning radius is 25 ft. <b>527 CMR §18.2.3.4.1.</b></p> <p>3. Dead-end fire department access roads in excess of 150 ft. must be provided with provisions for the fire apparatus to turn around. <b>527 CMR §18.2.3.4.4.</b> The turnaround must meet all minimum dimensions, including turning radii. <u>The access roads serving two of the apartment buildings have dead-end that exceed 150 feet without an adequate turnaround.</u></p>	<p><b>State Fire Code:</b> MA 527 CMR 1.00 based upon NFPA 1 – 2015</p> <p><b>(See, Sections cited under "Issue" column)</b></p>	<p><b>Order Developer to provide written summary of Project's Compliance with Fire Code, for review by ZBA and other interested parties.</b></p> <ul style="list-style-type: none"> <li>• Developer should provide Auto-Turn analysis within Project's roadways to prove that all fire apparatus can navigate the roadways in compliance with the Code.</li> <li>• Developer should provide evidence that inside turning radius of all roads is at least 25 feet.</li> <li>• Developer should modify design of Apartment component to provide required turnaround area.</li> </ul>

2.2	<b>Fire Department Access: Single Access Roads</b>	<p>The length of the access road serving the apartment component is over 1,000 feet. Should this road be temporarily blocked in the event of an emergency, there is no way to enter or escape from an emergency situation.</p> <p>The Fire Code states that: “More than one fire department access road shall be provided when it is determined by the AHJ that access by a single road could be impaired by vehicular congestion, condition of terrain, climatic conditions, or other factors that could limit access.” <b>527 CMR §18.2.3.3.</b></p>	<p><b>State Fire Code:</b> MA 527 CMR 1.00 based upon NFPA 1 – 2015</p> <p><b>(See, Sections cited under “Issue” column)</b></p>	<p><b>Require secondary access road for apartment project, and require compliance with Fire Code sections governing dead-end turnarounds.</b></p>
2.3	<b>Burn-Rated Materials</b>	<ul style="list-style-type: none"> <li>• Building materials must meet appropriate burn rating for single-family homes that do not meet side setback bylaws.</li> <li>• Distance can dictate higher rated burn-related materials. Example: Fiber cement siding, hardy plank or other cementitious siding can prevent spreading in high density residential</li> <li>• Are houses on reduced lots sold with vinyl or other combustible siding that quickly burns and reveals highly flammable wood structure?</li> </ul>	<p><b>Mass Fire Code:</b> MA 527 CMR 1.00 based upon NFPA 1 - 2015</p>	<p><b>ZBA should require Developer to document that materials meet burn rating as a condition of waiving setback bylaws.</b></p>

### 3.0 Compatibility of High-Density Housing Adjacent to Existing EPA Tier II Industrial Operator (Bestway of New England)

- Apartments and related outdoor services (sidewalks, parking, playground, and bus shelter) are currently proposed in close proximity to Bestway property line. The property line is where Bestway has located many of its uses – trailer truck check-in, forklift garage, industrial kiln... Additionally, the freight rail passes at rear of both sites, with service at Bestway, again very close to Goodridge.
- Air emissions, dust, noise, etc. (below) should be assessed and examined as relates to residential safety given immediate proximity (unlike other residential development further away, i.e. Eagle Ridge and Jones Crossing).
- Federal and State regulations apply

	Topic	Issue	Applicable Regulation(s)/Guidance	Action Item(s)
3.1	Exposure of high-density housing project to adjacent diesel particulate emissions	<p>Bestway burned 30,870 gallons of diesel fuel on its site in 2017 for its kiln and fork-lift trucks (2018 data is similar). Flatbed trailer trucks add to these emissions.</p> <ul style="list-style-type: none"><li>• Goodridge 40B Project site is downwind from diesel emissions – kiln, forklift trucks, trailer trucks:</li><li>• Industrial kiln powered by a boiler with the capacity to burn 30 gallons of diesel fuel per hour (see plate on boiler)</li><li>• Industrial kiln exhaust is emitted ~40 feet from property line</li><li>• 12 diesel forklifts operating 14 hrs/day in peak season</li><li>• 40 flatbed trailer trucks per day, often queued for loading waiting on property line</li><li>• Multiple diesel locomotive deliveries per week</li></ul>	<p><i>Code of Federal Regulations:</i> 40 CFR 6 – Air Quality 40 CFR 51 – Air Quality 40 CFR 93 – Air Quality</p> <p><i>HUD Policy Memo:</i> <a href="http://www.hudexchange.info/environmental-review/air-quality/">www.hudexchange.info/environmental-review/air-quality/</a></p> <p><i>Mass DEP:</i> Threshold exposure limits for air toxins: <a href="https://www.mass.gov/service-details/massdep-ambient-air-toxics-guidelines">https://www.mass.gov/service-details/massdep-ambient-air-toxics-guidelines</a></p>	<p><b>Order data collection and modeling of air pollution levels on Project Site.</b></p> <ul style="list-style-type: none"><li>• Diesel particulate (Nitrogen Oxides (NOx), formaldehyde) levels should be measured between March – November, per Weston &amp; Sampson.</li><li>• Data collection and analysis should be monitored and reviewed by independent consultant retained by Town (i.e, W&amp;S).</li><li>• Analysis and modeling should follow air-dispersion modeling protocol approved by Mass DEP</li><li>• All monitoring and analysis is at applicant expense, not Town's.</li></ul>



3.2	<b>Exposure of high-density housing project to adjacent chemical dust</b>	<p>Bestway operation generates a significant quantity of high dust clouds from forklifts and truck traffic on hard packed dirt surface.</p> <p>Chemicals from lumber processing are seeping into the ground as per photos, and thus into the dust particulate which blows upwards and travels to adjacent property.</p> <p>Dust alone is a regulated air quality concern.</p>	Same as Section 1.1 above.	<p><b>Order data collection and modeling of dust levels, and measure for toxicity) on Project Site during peak season (March – November 2019).</b></p> <ul style="list-style-type: none"> <li>• Data collection and analysis should be monitored and reviewed by independent consultant retained by Town (i.e., W&amp;S).</li> <li>• Collect samples at property line and nearest sensitive receptors (proposed playground, bus stop, first apartment building, parking lot)</li> <li>• Follow air-dispersion modeling protocol approved by Mass DEP</li> <li>• All monitoring and analysis is at applicant expense, not Town's.</li> </ul>
3.3	<b>Exposure of high-density housing project to adjacent industrial uses generating excessive noise</b>	<p>The proposed high-density housing development abuts pre-existing High Noise Level from normal industrial operations. (Bestway's 18-acre lumber treating &amp; processing operation).</p> <p>Bestway noise sources:</p> <ul style="list-style-type: none"> <li>• 12 large-capacity diesel forklifts</li> <li>• Average of 40 trailer trucks on site per day</li> <li>• Freight train serving Bestway facility passing both Bestway and proposed housing site multiple</li> </ul>	<p><i>HUD Policy Memo</i> (high noise must be evaluated for incompatibility with affordable housing):  <a href="http://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/">www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/</a></p> <p><i>Code of Federal Regulations:</i>  24 CFR B – Noise Abatement and Control</p> <p>SuDoc Class Number:  AE 2.106/3:24</p> <p>Contained within:</p>	<p><b>Order sound data collection (decibels) and modeling on property boundary during peak season (March – November 2019).</b></p> <ul style="list-style-type: none"> <li>• If quantified noise level is within acceptable range for mitigation, specified by Federal and State regulations cited, then determine means of mitigation (project adjustments, sound barrier, etc.).</li> <li>• If not within acceptable mitigation range, project must</li> </ul>

		<p>times per day, including whistle for adjacent intersections</p> <ul style="list-style-type: none"> <li>• Freight train stops at Bestway to unload and re-load 3 freight cars</li> <li>• Coupling and recoupling of freight cars is a 30-40 minute, high-noise process</li> <li>• Deforestation of 45-acre Goodridge parcel will eliminate natural sound buffer. No noise mitigation proposed by 40B Developer.</li> </ul>	<p>Title 24 - Housing and Urban Development Part 51 - ENVIRONMENTAL CRITERIA AND STANDARDS Subpart B - Noise Abatement and Control Subtitle A - Office of the Secretary, Department of Housing and Urban Development</p> <p><i>MassDEP:</i> Noise Pollution Policy Interpretation <a href="https://www.mass.gov/files/documents/2018/01/31/noise-interpretation.pdf">https://www.mass.gov/files/documents/2018/01/31/noise-interpretation.pdf</a></p>	<p>be redesigned to meet acceptable thresholds with or without mitigation.</p>
3.4	Other Public Safety Concerns with Proximity of Bestway Facility to Project	<p><b>A. <u>Conflagration</u></b></p> <p><b>Bestway stores 1,750 gallons of flammable material</b> (stated in last annual report to EPA) in its industrial kiln and garage, both adjacent to the Project, near the property line.</p> <p>Project apartment building is 36 feet from property line. Playground and bus stop are within 200 feet.</p> <p><b>B. <u>Pressurized Chemical Tank</u></b></p> <p>Bestway's wood pressure treating operation used a tank approximately 9 feet tall ("submarine") with 125,000 psi, filled with a chemical bath and lumber,</p>	<p><i>HUD Policy:</i> high concentrations of stored flammable materials must be evaluated for incompatibility with affordable housing.</p> <p><i>HUD Policy Memo:</i> <a href="http://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities/">www.hudexchange.info/environmental-review/explosive-and-flammable-facilities/</a></p> <p><i>Federal Regulations:</i> 24 CFR C - Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature</p> <p>SuDoc Class Number:</p>	<p><b>ZBA should obtain, during its public hearing, independent analysis (i.e., W&amp;S) of the compatibility of high-density residential housing adjacent to these uses, and potential public safety and health impacts.</b></p>

		<p>which points directly at Project Site (perpendicular to housing development). In the event of malfunction, an explosion would send a “missile” of <b>hazardous chemical contents and lumber</b> an estimated 250 feet - directly into Project Site.</p>	<p>AE 2.106/3:24</p> <p>Contained within:  Title 24 - Housing and Urban Development  Part 51 - ENVIRONMENTAL CRITERIA AND STANDARDS  Subpart C - Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature  Subtitle A - Office of the Secretary, Department of Housing and Urban Development</p>	
<b>4.0 Municipal Water System Capacity &amp; Pressure</b>				
	<b>Topic</b>	<b>Issue</b>	<b>Applicable Regulation(s)/Guidance</b>	<b>Action Item(s)</b>
<b>4.1</b>	<b>Comprehensive Water System Capacity Analysis</b>	<p>Town has been over its Water Management Act (WMA) withdrawal limit from DEP 8 of last 10 years.</p> <p>The Project will push water use over the town’s withdrawal limit, further straining an existing problem. A number of questions remain outstanding:</p> <ul style="list-style-type: none"> <li>Is there adequate service pressure for domestic and fire flow needs? There are reports of low pressure in the neighborhood, justifying the need for a comprehensive water pressure study.</li> <li>Should the Town provide a water main loop from Deershorn Road to</li> </ul>	<p><b>Mass DEP PWS 21470000</b></p> <p>MWA average daily limit is 0.530 MGa/Day</p>	<p><b>ZBA should order Developer to perform comprehensive water study that covers the following issues:</b></p> <ol style="list-style-type: none"> <li>Measure existing flow pressure in neighborhood over an appropriate period of time, and evaluate impact of Project’s water usage on existing flow.</li> <li>Propose contingency plan for future MWA permit adjustments required by the Project’s water usage, and potential pressure deterioration caused by</li> </ol>

		<p>Sterling Road – is this needed for good service for existing neighbors and future Goodridge customers and should it be paid for by applicant?</p> <ul style="list-style-type: none"> <li>• Will there be sufficient water capacity for this Project and a revitalized AUC Campus when it comes back on-line?</li> <li>• Why does the second H&amp;W Report provide two conflicting water use estimates, one of which suggests that the Project will cause an exceedance of the WMA permit?</li> </ul>		<p>Project's water usage (including responsibility for costs).</p> <ol style="list-style-type: none"> <li>3. Incorporate water demand from AUC property into future use projections.</li> <li>4. Reconcile apparent conflict in H&amp;W water usage estimates.</li> </ol>
<b>5.0 Status of Sewer Connection Approval / Municipal Sewer System Capacity</b>				
	<b>Topic</b>	<b>Issue</b>	<b>Applicable Regulation(s)/Guidance</b>	<b>Action Item(s)</b>
5.1	<b>Sewer Connection Permit has an I/I Requirement</b>	<p><b>Lancaster Sewer District Commission (LSDC)</b></p> <p>Based on total bedroom count X 110 gpd, Project exceeds 15,000 gpd and thus needs to comply with 4:1 I/I removal per two state regulations and ACO. LSDC has stated that it cannot grant a connection permit for the Project. Developer is proposing I/I removal in Clinton, which would require an Intermunicipal Agreement between Lancaster and Clinton.</p> <ul style="list-style-type: none"> <li>• See Resident Tom Frain, Esq.'s letter of February 2019: legal precedent for private sovereignty of local sewer district</li> </ul>	<p><b>314 CMR 7.05(c)(4)</b></p> <p><b>314 CMR 12.04</b></p> <p><b>Administrative Consent Order</b></p>	<p><b>LSDC needs to consider both state regulations and ACO in order to issue written sewer permit decision.</b></p>

5.2	Capacity	<ul style="list-style-type: none"> <li>• Is there adequate <b>sewer plant capacity</b> to handle additional flows? Any issues with an Inter-Municipal Agreement (IMA) with Clinton?</li> <li>• Is there adequate <b>flow capacity</b> in the system (pipe sizes, etc.)?</li> <li>• Is there adequate <b>permit capacity</b>?</li> <li>• Letter from Resident David Ross, PE, cites from GBE plans that existing Sterling Road sewer pipe needs to be re-laid deeper due to grade, causing interruption in service during construction for an unspecified period of time. <b>What is the plan for Eagle Ridge residents and businesses on Sterling Road?</b></li> </ul>		
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### SECTION III: CONFLICT WITH STATE ECONOMIC DEVELOPMENT GRANT

#### 6.0 MassWorks Infrastructure Grant for Industrial Expansion on Sterling Road Awarded in 2015 and Implemented in 2016

- Commonwealth invested nearly \$1M to stimulate industrial economic growth on Sterling Road in 2015-2016, predicated on expansion and job creation by abutting industrial users.
- This 152-unit residential project is only viable because of this industrial sewer extension project paid for by private industrial businesses and MassWorks.
- Adding 152 new housing units adjacent to the industrial district will threaten the viability of the industrial district, thwarting the economic policy objective of the grant, and cannibalizing the Town's economic tax base (taxes paid by industrial users are generally net positive).
- Siting high-density housing adjacent to industrial operations reduces location desirability for existing businesses' choice to (a) stay on-site and (b) complete pre-planned on-site expansion, as reported by business owners on public record to ZBA, such as Stainless Steel Coatings, Inc. (video) and Bestway of New England (letter), both on 1/24/19.

	Topic	Issue	Applicable Regulation(s)/Guidance	Action Item(s)
6.1	<b>Compatibility of 152-unit Project with adjacent industrial users and \$1M state grant</b>	<p>1. \$980K MassWorks grant's stated purpose is to support the on-site expansion of long-time existing businesses (previously on septic) and their quantified job creation.</p> <ul style="list-style-type: none"> <li>Existing businesses proceeded to invest \$45K for sewer extension together with the MassWorks Award</li> <li>1 company has already paid for and completed significant expansions prior to announcement of 200-unit 40B (James Monroe Wire &amp; Cable)</li> <li>1 active, additional expansion is now on hold pending 40B permit decision (Stainless Steel Coatings). Future of other industrial sites, including development sites, now in flux with decreased value for industrial operations</li> </ul> <p>2. MassWorks grant was predicated on Stainless Steel Coatings' expansion and associated job creation; abandonment of that expansion plan (and new site selection elsewhere) could present legal problems for Town and potential liability under MassWorks contract.</p>		<p><b>1. The ZBA should obtain legal opinion on Town's liability to re-pay \$1M state grant should industrial business move, or shelve expansion plans that were promised in exchange for the grant award.</b></p> <p><b>2. The ZBA should confirm that sewer main constructed for industrial users has sufficient capacity to handle new Project flows in addition to planner industrial user flows.</b></p>

## SECTION IV: OUTSTANDING ENGINEERING CONCERNS

7.0 Outstanding Engineering Fundamentals				
	Topic	Issue	Applicable Regulation(s)/Guidance	Action Item(s)
7.1	Town's Peer Review Engineer has Flagged Outstanding Concerns Needing Resolution as Part of 40B Comprehensive Permit Process	<ul style="list-style-type: none"><li>• Applicant has marked a large number of the Peer Review Engineer's outstanding concerns with a "double asterisk."</li><li>• Peer Review Engineer states in last two correspondences to ZBA:</li><li>• "The applicant is asking for the comments that are double asterisked (**) to be a condition in the decision and/or addressed prior to submitting an application for a Building Permit. Comments that are not fully addressed prior to the ZBA's decision will probably require a large number of extensive revisions to the plans. These revisions would have to be reviewed and the re-opening of the ZBA's public hearing process is a strong possibility."</li><li>• "It is recommended that technical design comments not be conditioned, and the conditions be limited to only approvals from the Conservation Commission, state and federal permits."</li></ul>		ZBA should require all outstanding engineering concerns in the Hamwey Letter to be resolved <u>prior</u> to issuing a Comprehensive Permit.

7.2	<b>Elevator Requirement</b>	<ul style="list-style-type: none"> <li>• Need immediate clarity on elevator requirement – yes or no</li> </ul>		<b>ZBA needs an independent, definitive answer on elevator requirement. If elevator(s) are required, Developer needs to incorporate this immediately into building plans.</b>
7.3	<b>Traffic Peer Review (Vanasse, 9/26/18)</b>	<p>Outstanding Traffic-Related Concerns:</p> <ul style="list-style-type: none"> <li>• Traffic study does not include analysis of considerable trailer truck traffic due to existing industry on Sterling Road.</li> <li>• Children should not wait for bus on Sterling Road. Bus should enter development to collect children.</li> <li>• Goodridge apartments' single entrance/exit is extremely close to Bestway's single. entrance/exit (40 flatbed trucks per day)</li> <li>• Developer should construct sidewalk along Sterling Road frontage to connect the two projects – developer has refused.</li> <li>• Developer should add sight triangles to plans to ensure perpetual clearing for adequate sight distances – while respecting Scenic Road legislation.</li> <li>• No documented auto-turn analysis provided for fire trucks, school buses, and delivery trucks.</li> </ul>		<b>ZBA should order Developer to either address Outstanding Issues, and if the Developer doesn't comply, impose appropriate conditions on the Comprehensive Permit to address them.</b>



		<ul style="list-style-type: none"> <li>• No secondary means of access for 96-unit Multi-Family project &amp; 56 houses.</li> <li>• Road C should be aligned with the ROW opposite it on Sterling Road.</li> <li>• See discussion of “turnarounds” for fire trucks, above.</li> <li>• No details on loading/moving trucks/trash trucks at Multi-Family project. When trash truck stops for removal at dumpsters, access to the Multi-Family development blocked.</li> </ul>		
<b>7.4</b>	<b>Reduced Driveway Size at Single Family Houses</b>	<ul style="list-style-type: none"> <li>• Issue of parking for gatherings at single family houses due to short driveways. Parking in street further obstructs the already narrow road, and does not allow for required emergency vehicle lane. This is a significant public safety hazard and will require towing – but not fast enough in event of an emergency.</li> </ul>		<b>Either increase road width or provide additional parking elsewhere within walking distance of single family homes</b>