



Kaitlyn Baptista  
kbaptista@danhilllaw.com  
(617) 494-1500

March 15, 2018

**BY ELECTRONIC MAIL: [mjop@wellesleyma.gov](mailto:mjop@wellesleyma.gov)**

Wellesley Zoning Board of Appeals  
Wellesley Town Hall  
525 Washington Street  
Wellesley, MA 02482

Re: Application for Comprehensive Permit – Wellesley Crossing (Delanson Circle)

Dear Members of the Board:

As you may recall, this firm represents neighbors and abutters, known as the College Heights Association, to the proposed 90-unit development on land located at 1-8 Delanson Circle (the “Project” and the “Project Site”), which is the subject of a pending comprehensive permit application. Enclosed for the Board’s consideration, please find a comment letter from the College Heights Association’s engineer, Sean Reardon of Tetra Tech, regarding the Applicant’s revised plans and drainage analysis.

Thank you for your continued diligence in reviewing this application.

Very truly yours,

A handwritten signature in black ink that reads "Kaitlyn Baptista".

Kaitlyn Baptista

Encs.

cc: Sean Reardon  
Clients



March 14, 2018

Daniel C. Hill, Esq.  
Hill Law  
6 Beacon Street, Suite 600  
Boston, MA 02108

**Re: Wellesley Square Residences – Chapter 40B Application  
Delanson Circle  
Wellesley, Massachusetts  
Revised Plans and Drainage Analysis (March 2018)**

Dear Mr. Hill:

The following are updated comments generated from our review of revised plans and corresponding drainage analysis for the above-referenced project (Project).

The following is a list of specific documents reviewed:

- *Proposed Comprehensive Permit Development - Wellesley Square Residences, Delanson Circle Wellesley, Massachusetts* by McKenzie Engineering Group dated November 16, 2017 (Rev 2 dated March 1, 2018) hereinafter referred to as "Revised Site Plans".
- *Preliminary Hydrologic Analysis for: Comprehensive Permit Development Wellesley Square Residences, Wellesley, MA* by McKenzie Engineering Group dated November 30, 2017 (Revised March 5, 2018) hereinafter referred to as the "Drainage Report".
- *Wellesley Square Residences, 8 Delanson Circle Wellesley, MA 02482 ZBA Submission #3 by EMBARC Architecture/Design Studio* dated March 8, 2018 hereinafter referred to as "Revised Architectural Plans".

Our comments are organized below by Project submittal. Comments from our February 14, 2018 letter have been updated to reflect the March submittals and those that have been substantially addressed or are no longer applicable are shown in "gray" type. Comments in "black" type remain outstanding.

## Comments

### ***-Updates to February 14, 2018 Comment Letter***

#### Project Plans

1. Prior comment has been addressed
2. The Plans provide more reasonable offsets from abutting properties to construct the work without trespass. Revised Site Plans still indicate a proposed retaining wall along the majority of the site's northern boundary with an approximate 4-foot offset to the property line. Landscape plans now show a cast-in-place wall with footings which extend toward the property line. The 4-foot offset to the property line will not likely allow adequate space to construct footings without undermining finish grade at the adjacent property.
3. The Revised Site Plans now indicate a 16-foot wide Fire Lane. NFPA regulations require Fire Lanes to be a minimum of 20 feet in width or as otherwise approved by the local Fire Chief. In our opinion the dead-end 16-foot Fire Lane still does not provide adequate accommodation for emergency vehicles since it does not meet NFPA requirements and does not provide adequate maneuvering or turn-around space for an emergency vehicle.

4. The Revised Site Plans provide more space for staging of construction materials or equipment, however that space is very limited and still does not appear adequate to prevent impacts on local roads. We recommend the Applicant be required to provide a clear Construction Management Plan identifying proposed construction phasing and addressing critical components of construction such as contractor parking, construction trailer location, crane location (if needed), construction laydown area, construction materials delivery, snow storage and temporary stormwater controls. The proposed density leaves little or no space for normal construction operations and construction activity is likely to spill onto neighboring streets creating potential risks to public safety.
5. The Roof Plan (page A106) suggests mechanical units will be located on the roof of the proposed building however the units are only partially reflected on the Site Section (A200) and not shown on building elevations. We still recommend the Applicant provide a clear description of anticipated building mechanical systems and location of all exterior noise/emissions generating mechanical units. We still suggest the ZBA request the Applicant to provide an analysis of how sound is likely to travel from the proposed lawn/ pergola area toward Oakencroft Road to determine if the shape of the building is likely to amplify noise and direct it toward nearby residences.
6. There is still no provision for removal/storage of snow. Applicant should indicate where snow will be stored. Snow should not be stored in areas designated for stormwater control and should not be moved to the adjacent public/private right-of-way.
7. The Landscape Site Plan (page L-1) suggests the large tree on abutting property north of the project will be maintained. Given the extent of excavation required for site improvements we request the Applicant provide an arborist's evaluation of the viability of trees scheduled to remain. All trees on abutting properties whose root protection zones reach into the Project site should be surveyed and marked on the site plans, and the Applicant should be required to prepare a tree protection plan showing how these trees will be protected from construction, excavation, and grading. The Project still proposes removal of trees located near the property boundary, which loss will impact nearby residences on Hollis Street. We still recommend the ZBA request the Applicant provide pre- and post-development renderings of views into the site from adjacent homes including any anticipated tree removal necessary to complete the work and proposed landscape mitigation.
8. Prior comment has been addressed. Suggest any decision include a condition requiring the loading/refuse area include an overhead door as shown on the Architectural Plans.

#### Stormwater Management

9. The analysis evaluates cumulative stormwater impacts at the confluence of Linden and Hollis Street. Discharges to Hollis and Linden Streets should be evaluated independently to confirm no increase in runoff to either street.
10. Revisions to grading along the Project's northwest boundary appear to address our prior concern for accumulation along this edge only if the top of retaining wall is flush with finish grade as depicted on Drawing L-2. Suggest any decision include a condition requiring wall to be constructed in a manner that does not impede runoff from adjacent sites.
11. Prior comment has been addressed.
12. Drainage analysis should include an evaluation of available capacity in the existing 12-inch drain in Linden Street to confirm no increased flooding will occur in downstream or upstream areas. If drainage infrastructure capacity is exceeded water can pool in gutter line creating a potentially unsafe condition for vehicles, bikes, and/or pedestrians.
13. Soil test pit data has been provided, but we question the assumed infiltrative capacity of the Site – see Comments 16 and 26, and “new comments” below.
14. Comment no longer applicable; see new comments on revised submittal below.

#### DPW Comment Letter

15. We agree with Comment 1. The Applicant should be required to document available capacity in the local water distribution and wastewater collection systems to safely accommodate the significant proposed increase in flow expected from the Project.

16. We agree with Comment 2. Additional information has been submitted; however, several test pits indicate refusal/ledge at relatively shallow depths while test pits conducted in infiltration areas were not advanced to refusal. There is still considerable risk that ledge could be located just below the bottom of the infiltration systems preventing them from performing as modeled. We recommend the Applicant be required to document test pits within infiltration systems to at least 4 feet below the bottom of the infiltration system.
17. We agree with Comment 3. Constructability is still a concern given reasons cited.
18. We generally agree with Comment 4. It appears the proposed building has been raised to avoid ledge but ledge/rock removal may still be needed. Applicant should indicate proposed methods for removal, such as blasting or pneumatic hammering. If blasting is proposed, the Town maintains strict control of any proposed blasting through state mandated blasting permits issued by the local Fire Chief. Regardless of the ZBA's decision, adequate controls and insurance requirements exist through implementation of normal blasting control plans and permits. If pneumatic hammering is proposed, we highly recommend the ZBA condition any decision with strict limits on hours and duration of activities since hammering can be an extreme nuisance.
19. We agree with Comment 5. The Applicant should describe how snow will be managed and provide an evaluation of potential light impacts to surrounding property. Analysis should include an assessment of light sources from upper levels of the building given the buildings proposed location so close to the road and abutting properties. We also recommend the applicant provide a nighttime rendering of the proposed building for the purposes of assessing how light generated from unit windows will be perceived at street level and from the surrounding neighborhood.

#### Waiver List

20. Retaining Walls – Given the space typically required to safely construct walls without impact to abutting property, we recommend the ZBA maintain the minimum setback requirements for retaining walls.

#### **- New Comments (March 2018 Submittals)**

#### Project Plans

21. Parking is proposed along the 16-foot Fire Lane which does not provide adequate aisle width for access to 90-degree parking stalls. The aisle is 2 feet narrower than parking stall depth and is confined by a retaining wall. Typically, a 24-foot aisle is provided for 90-degree stalls.
22. Retaining wall adjacent to stormwater management pond should be designed to resist potential build-up of hydrostatic forces or the pond should be constructed with an impervious bottom.
23. See comments on Fire Lane above.
24. The Plans indicate finish grade of the garage floor is six (6) feet higher than previously proposed. This will increase the height of the building relative to its surroundings but is not reflected clearly on the building elevations. We request the Applicant label the elevation of the top of cornice and top of roof-top mechanical enclosure.
25. The South Elevation shows the existing residence at 134 Linden, which is very helpful. We request the other elevations show adjacent homes (on both sides) as well.
26. We request the Applicant prepare a shadow analysis of existing conditions to compare to results provided in the Revised Architectural Plans

#### Stormwater Management

27. The drainage design and modeling were professionally done and provide a reasonable approximation of expected performance. However, performance may be fundamentally impacted if there is inadequate separation to ledge, which has been confirmed on site.

28. The design includes proprietary water quality units to meet the 80% TSS removal performance standard but does not include any other pretreatment to extend the viability of the underground infiltration systems. Even though the system treats predominantly roof runoff, there are some contributing at-grade paved areas. We recommend the Applicant be required to install an isolator row ahead of each infiltration system to increase system viability and ease of maintenance.
29. Infiltration system P-3 appears to conflict with foundations for the retaining wall at the Linden Street entrance.
30. The Applicant should confirm the soil conditions for pond P-1. Test-pit #4 was excavated to elevation 165.6', however the bottom elevation of pond P-1 is 165.5. It should also be noted that refusal was encountered in adjacent test pits #3 and #5.
31. The Applicant should provide a test pit and confirm the exfiltration rate for pond P-2. The drawdown calculations exfiltration rate is 2.41 in/hr while the HydroCAD analysis exfiltration rate is 1.02 in/hr. The nearest test pit (TP-2) is approximately 20 feet away and indicates refusal near the bottom of the proposed infiltration system.
32. The analysis includes permeable pavers with low runoff curve numbers while the permeable paver detail suggests a normal solid paver with sand joints. Given the tendency of joints to clog and the steep grade of the Fire Lane we recommend a more open paver system with permeable openings or the modeling analysis should reflect a higher runoff curve number.
33. Permeable pavers are proposed for the Fire Lane. The detail on sheet C-4 includes a 4-inch perforated pipe for overflow; however, it is unclear where the overflow pipe discharges to since the pipe is not shown on sheet C-2.
34. The Applicant should include the proposed sidewalk area along Hollis Street in the HydroCAD analysis to confirm that there is no increase in peak flows.
35. The trench drain located at the Hollis Street exit will overtop during the 100-year storm event. The trench drain has a rim elevation of 158.7 and the 100-year peak elevation for Pond P-2 is 159.3.
36. The trench drain located at the garage entrance/exit will overtop during the 100-year storm event. The trench drain has a rim elevation of 159.9 and the 100-year peak elevation for Pond P-3 is 159.94.

We are happy to discuss any of our comments at your request. Please don't hesitate to contact us with any questions, or if you require additional information.

Very truly yours,



Sean P. Reardon, P.E.,  
Vice President

P:\125280\143-125280-18002 WELLESLEY 40B REVIEW\DOCS\HILL-WELLESLEY-COMMENT LETTER(2012-03-14).DOCX