

March 19, 2024

Mr. William F. O'Connell, Jr.  
Bellingham Planning Board  
Municipal Center  
10 Mechanic Street  
Bellingham, MA 02019

**RE: Zoning/Civil Engineering & Landscape Technical Review  
Proposed Condominium Development  
North Street and Blackstone Street, Bellingham**

Dear Mr. O'Connell,

This letter is to advise that we have reviewed the materials submitted for the proposed condominium development project located at North Street and Blackstone Street in Bellingham, Massachusetts. The submission includes the following documents:

1. Response letter prepared by Guerriere & Halnon, Inc., dated November February 20, 2024;
2. Plans entitled "Development Plan and Special Permit, North Street & Blackstone Street, Bellingham, Massachusetts" prepared by Guerriere & Halnon, Inc., revised through February 8, 2024; and
3. Report entitled "Stormwater Report, North Street & Blackstone Street," prepared by Guerriere & Halnon, Inc., revised through February 13, 2024.

These documents have been reviewed for conformance with the following Bylaws and Regulations:

- Bellingham Zoning Bylaws including dimensional requirements and parking requirements;
- Massachusetts Department of Environmental Protection Stormwater Management Standards;
- Town of Bellingham Subdivision Rules and Regulations (§ 245-13 Stormwater Management);
- Town of Bellingham Planning Board Procedural Rules (Section Seven: Post-Construction Stormwater Management Plan for New Developments and Redevelopments); and
- Bellingham Wetland Regulations (§ 247-33 Stormwater Compliance).

Environmental Partners Group, LLC (EP) have prepared a zoning/civil engineering and landscape design review and a traffic review of the project. This letter only includes the zoning/civil engineering and landscape design review of the project. For the traffic review, refer to the traffic review letter prepared by EP.

## Background

The proposed project includes the construction of a 15-unit multifamily residential development to be located on a portion of a larger development parcel that fronts along North Street and

Blackstone Street. The overall Project site encompasses approximately 20.83± acres of undeveloped land that is bounded by areas of open and wooded space to the north; Blackstone Street and a residential property to the south; areas of open and wooded space and low-lying wetland areas to the east; and North Street and a residential property to the west. The portion of the overall site that will contain the project consists of 5.36± acres of land that fronts along Blackstone Street. Proposed work also includes the construction of site driveways, a stormwater management system, and site utilities (including a private sewer system). A Bordering Vegetated Wetland (BVW) exists in the easterly portion of the property.

## Comments

Our comments note missing items and noncompliance with various standards as outlined below.

### Bellingham Zoning Bylaws

1. § 240-17. B. (1) (b) requires plans to include proper seals of registration. The Landscaping Plan does not include a stamp by a registered landscape architect.

**Guerriere & Halnon, Inc. (GH) Response:** On behalf of the Applicant, we respectfully request a waiver to Zoning Bylaw § 240-17. B. (1) (b) to allow Guerriere & Halnon, Inc. to utilize our in-house site designer with more than 25 years landscape design experience for similar projects. The landscape design requirements are not outside our designer's area of expertise and the intent of the landscaping requirements will remain consistent with the Zoning Bylaws.

**EP Response (3/6/2024):** Acknowledged. We defer to the Planning Board regarding this waiver request.

2. § 240-17. B. (2) requires building floor plans and architectural elevations be submitted. EP has not received any building floor plans and architectural elevations.

**GH Response (2/20/24):** These materials were submitted with the original application on February 9, 2023 and emailed to EP on January 30, 2024. Hard copies are also included in this submittal.

**EP Response (3/6/2024):** Item closed.

3. § 240-17. B. (3) requires a narrative describing the project. The application package did not include a project narrative with the information required in § 240-17. B. (3).

**GH Response (2/20/24):** These materials were submitted with the original application on February 9, 2023 and emailed to EP on January 30, 2024. Hard copies were also included in this submittal.

**EP Response (3/6/2024):** Item closed.

4. § 240-54. A. requires that finished grades slope continuously downward for at least 10 feet in all directions from the foundation of any dwellings that have a basement or cellar. The Applicant should provide more grading detail, such as spot elevations, at each townhouse to ensure conformance to this requirement.

**GH Response (2/20/24):** Finished grade slopes and additional grading detail have been added to Sheet 6 – Grading and Drainage plan.

**EP Response (3/6/2024):** Item closed.

5. § 240-545. B. requires that Applicants submit certain technical analyses, including acoustic analysis, air quality modeling, identification of toxic or hazardous materials, etc., as reasonably necessary for the Special Permit Granting Authority to make a decision. EP has not received the above analyses at this time, and defer to the Planning Board whether they are necessary.

**GH Response (2/20/24):** These materials were submitted with the original application on February 9, 2023 and emailed to EP on January 30, 2024. Hard copies are also included in this submittal.

**EP Response (3/6/2024):** The submitted project narrative indicates that the project will not result in negative impacts pertaining to noise, air quality, hazardous materials, or vibrations. No technical analyses on these topics have been provided at this time; the Applicant should provide such analyses if required by the Planning Board.

6. § 240-63 requires one bicycle parking space for every 20 off-street automobile spaces required. The Site Plans do not show any bicycle parking spaces or bicycle rack construction details.

**GH Response (2/20/24):** The proposed project is a townhouse development with driveways and garages for each unit and <20 off-street parking spaces associated with the common mailbox area. Therefore, no bicycle parking is proposed.

**EP Response (3/6/2024):** Acknowledged; we defer to the Planning Board whether or not bicycle parking spaces should be provided with this project.

#### Massachusetts Stormwater Management Standards

##### **7. *Standard 1: No new untreated discharges to wetlands***

As stated in the Stormwater Report, the majority of post-development stormwater runoff generated on the property will be conveyed through deep sump hooded catch basins and sediment forebays, prior to discharge to an infiltration basin. Ultimately, runoff is discharged to the existing wetlands to the east. Stormwater is treated prior to discharge, and all discharges include rip rap pads to prevent erosion.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024):** Item closed.

##### **8. *Standard 2: Peak rate attenuation***

The Stormwater Report provides tables that compare peak rates and volumes of runoff between pre-development and post-development conditions at the design point for the 2-, 10-, 25-, and 100-year storm events. We have the following comments on the stormwater design that may impact this analysis:

- a. The time of concentration (Tc) calculation for section D-E should be identical in the pre-development and post-development HydroCAD analyses since it is outside the limit of proposed work. The Tc for this section is 10.0 minutes in the pre-development analysis, and 14.1 minutes in the post-development analysis.

**GH Response (2/20/24):** The TC calculation for section D-E of the EX-1 subcatchment has been revised to 14.1 minutes for consistency with the corresponding Tc segment in proposed subcatchment PR-2.

**EP Response (3/6/2024): Item closed.**

- b. Time Tc calculation for subcatchment PR3 in the post-development analysis should not be greater than the Tc calculation for subcatchment EX-2 in the pre-development analysis. These two Tc represent the same general flow path, and development should not result in a greater Tc. The flow segment D-E in Subcatchment PR3 should not have a woodland ground cover.

**GH Response (2/20/24):** The Tc calculations for subcatchments EX-2 and PR-3 have been revised, and the time of concentration for subcatchment PR3 is now longer than that of EX-2. The groundcover of Tc segment D-E for subcatchment PR-3 has been revised to remove the woodland ground cover and is now modeled as short grass pasture.

**EP Response (3/6/2024):** The time of concentrations now match. **Item closed.**

- c. The post-development peak rate of discharge for AP1 is incorrectly listed in Table 1A in the Stormwater Report. The post-development peak rate of discharge for AP1 is 0.02 cfs, which is greater than the pre-development peak rate of discharge (0.00 cfs).

**GH Response (2/20/24):** The proposed roadside swale has been revised and now includes a 15" tall stone check dam. The ponding behind this check dam has been modeled in HydroCAD and the post-development peak discharge rate to AP-1 during the 10 year storm is now 0.00, consistent with the requirements of Standard 2.

**EP Response (3/6/2024): Item closed.**

- d. Pond 2P is modeled with an exfiltration rate of 8.41 inches per hour, which is not consistent with the Rawls Rates noted in the Massachusetts Stormwater Management Standards.

**GH Response (2/20/24):** The recharge rate for Pond 2P has been revised to 8.27 in/hr, the Rawls Rate for Sand. Test pits within the footprint of the basin identify the underlying parent material (C layer) as sand.

**EP Response (3/6/2024): Item closed.**

- e. Pond 1E, the "Existing Depression" is modeled with an exfiltration rate of 2.41 inches per hour. Based on the test pit logs, this should be modeled with an exfiltration rate of 8.27 inches per hour corresponding to sand.

**GH Response (2/20/24):** The NRCS mapped soil type for the existing depression (Pond 1E) indicates A soils which includes both sand and loamy sand. While test pits within and adjacent to the existing depression (Pond 1E) identify the parent material (C-layer) as Sand, the logged top and subsoil layers are sandy loam, ranging from 24"-36" in thickness, with thick grass pasture ground cover. Due to the presence of this restrictive layer above the rapidly infiltrating sand, the Rawl's rate for Loamy Sand of 2.41 in/hr was chosen as a conservative estimate of the infiltrative capacity of the existing soil profile, rather than the 1.02 in/hr rawls rate appropriate for Sandy Loam.

For the proposed pond, the restrictive top and subsoil layers will be removed to expose the sand C-Layer beneath, and a 4" 50%/50% Loam/Sand mix placed to facilitate the rapid recharge of stormwater. This basin configuration allows for infiltration directly to the Sand layer, and justifies the use of the Sand Rawl's rate of 8.27 in/hr.

**EP Response (3/6/2024):** Item remains open. As discussed during our coordination call with the applicant's engineer on February 2, 2024, we recommend using the same infiltration rate for both the pre-development and post-development HydroCAD analyses. Since the parent material (C-layer) is sand, we recommend using the infiltration rate for sand. Additionally, consistent with Comment #19 below, the basin side slopes and bottom shall be provided with four inches of loam, seeded at the rate of two pounds Red Top, 15 pounds Creeping Red Fescue and 20 pounds Tall Fescue per acre.

- f. For some of the time of concentration sheet flow calculations, the Applicant uses "Woods: Dense underbrush" as the surface description in HydroCAD. The woods on-site are not dense, and therefore a more appropriate surface description should be used.

**GH Response (2/20/24):** All sheet flow Tc calculations specifying "Woods: Dense underbrush" as the surface description have been revised to instead specify "Woods: Light Underbrush" in both the existing and proposed stormwater models.

**EP Response (3/6/2024):** Item closed.

### **9. Standard 3: Recharge**

The proposed project and submitted materials comply with Standard 3. The provided recharge volume exceeds the required recharge volume, and the infiltration basin is proposed to drawdown within the 72-hour maximum.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024):** Item closed.

### **10. Standard 4: Water Quality**

The proposed project and submitted materials comply with Standard 4. The provided water quality volume exceeds the required water quality volume (1.0" over the impervious area) and proposed best management practices (BMPs) remove total suspended solids (TSS) consistent with the requirements of Standard 4.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024):** Item closed.

### **11. Standard 5: Land use with higher potential pollutant loads (LUHPPL)**

The proposed project is not considered a LUHPPL and therefore Standard 5 does not apply.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024):** Item closed.

## **12. Standard 6: Critical areas**

The project site does not discharge to or near a critical area and therefore Standard 6 does not apply.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024):** Item closed.

## **13. Standard 7: Redevelopment**

The project is a new development project and therefore subject to full compliance with the Stormwater Management Standards.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024):** Item closed.

## **14. Standard 8: Construction period pollution prevention and erosion and sedimentation control**

- a. The proposed project will disturb greater than one (1) acre of land and discharge into a municipal system and is therefore subject to the filing of a National Pollutant Discharge Elimination System (NPDES) Stormwater Construction General Permit (CGP). The Stormwater Report includes a high-level 3-page Storm Water Pollution Prevention Plan (SWPPP), however, a draft SWPPP consistent with the NPDES CGP requirements was not provided. We recommend the Planning Board require the final SWPPP be submitted for review and approval prior to the commencement of construction.

**GH Response (2/20/24):** The proposed project will not discharge into a municipal system, but will be disturbing greater than (1) acre of land. Therefore a SWPPP will be prepared and submitted prior to commencing construction activities.

**EP Response (3/6/2024):** Acknowledged; we recommend the Planning Board include submission of a SWPPP prior to commencing any construction activities as a condition should this project receive approval.

- b. No construction detail was included for the temporary stockpile areas. We recommend surrounding the entire stockpile areas with erosion control barriers.

**GH Response (2/20/24):** The plans have been revised to depict the entirety of the proposed stockpile areas surrounded with erosion control barriers.

**EP Response (3/6/2024):** Item closed.

## **15. Standard 9: Operation and maintenance plan (O&M plan)**

The Stormwater Report contains a Long-term Operation & Maintenance Plan consistent with the requirements of Standard 9.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024): Item closed.**

**16. Standard 10: Prohibition of illicit discharges**

A signed illicit discharge statement is provided in the Stormwater Report.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024): Item closed.**

[Bellingham Subdivision Regulations \(§ 245-13 Stormwater Management\)](#)

17. Per § 245-13. B. (1), all drains shall have a minimum of three-foot cover, except where reinforced concrete pipe is used and there should be minimum cover of two feet. Some of the proposed pipes have less than two feet of cover. The Stormwater report states that all pipes with less than three feet of cover shall be Class V. We recommend the plans show the locations where Class V pipes will be included.

**GH Response (2/20/24):** The plans have been revised to specify that Class V RCP pipe shall be used throughout the site. All pipes provide a minimum of 2' of cover, with the exception of the pipes exiting CBCI-2A, CBCI-2B, and HW-3 at the site's entrance, which provide >1.5' of cover. The American Concrete Pipe Association's LRFD Fill Height Tables for Concrete Pipe, developed in accordance with AASHTO specifications, specify that for 12" pipes, the minimum fill height is 1' for class IV and higher RCP. To provide the minimum 2' required by the town bylaws, the road grading at the site entrance would need to be raised by 6" and create a undesirable 'hump' when entering the site. Accordingly, On behalf of the Applicant, we respectfully request a waiver compliance from § 245-13.B.(1) to allow 1.5' of cover over the 12" class V RCP located at the site entrance.

**EP Response (3/6/2024):** Acknowledged; the project, as designed, provides less than 1.5 feet of cover when accounting for pipe thickness. In order to provide two feet of cover over the pipe the location of the catch basins will need to move further up the driveway which would result in additional stormwater being discharged directly onto Blackstone Street. Conversely, the Planning Board could grant a waiver request to allow for a minimum of 1.5-feet of cover over 12" class V RCP. We feel that 1.5 feet of cover over a Class V pipe will provide adequate protection for the pipe. The Applicant should add a note on the plans indicating class V pipe to be used on the project at the appropriate pipe runs.

18. Per § 245-13. C. (4), all drain manholes shall have a one-foot sump below the lowest pipe. The provided construction detail only shows a 6" sump.

**GH Response (2/20/24):** The proposed drain manhole detail has been revised to match the required one-foot sump specifications of § 245-13.C.(4).

**EP Response (3/6/2024): Item closed.**

19. Per § 245-13. D. (2) (f), The basin side slopes and bottom shall be provided with four inches of loam, seeded at the rate of two pounds Red Top, 15 pounds Creeping Red Fescue and 20 pounds Tall Fescue per acre. The construction detail of the basin in the Site Plans is not consistent with this requirement.

**GH Response (2/20/24):** The Infiltration Basin detail has been revised to match the required specifications of § 245-13D.(2)(f).

**EP Response (3/6/2024):** The infiltration basin detail should show the ground cover in the basin. As stated above, EP feels the 8.27 in/hour infiltration rate will be attained with loam and seed. Comment #7e above states the applicant intends to leave the bottom as sand. The applicant should resolve this discrepancy and include the appropriate detail.

20. Per § 245-13. F. (3), all roadside swales shall be constructed with a geotextile placed on shaped soil, 6" of ½" crushed stone, another layer of geotextile, and four inches of sandy loam. The swale along the site's frontage east of the driveway should be revised to comply with the requirements of § 245-13. F. (3).

**GH Response (2/20/24):** The roadside swale detail has been revised to match the required specifications of § 245-13.F.(3).

**EP Response (3/6/2024):** Item closed.

[Bellingham Planning Board Procedural Rules \(§ 7.0 Post Construction Stormwater Management Plan for New Development and Redevelopments\)](#)

21. Per § 7.8.1, the Applicant is required to submit a complete copy of the SWPPP per the NPDES General Permit (including the signed Notice of Intent and approval letter). EP has not received a draft SWPPP at this time.

**GH Response (2/20/24):** On behalf of the Applicant, we respectfully request a waiver of strict compliance from the Bellingham Procedural Rules document last revised November 2016. The proposed design is consistent with the intent of the Procedural Rules and the requirements noted under Comments 21 and 22 are covered within the Bellingham Zoning Bylaws and Massachusetts Stormwater Management Standards.

**EP Response (3/6/2024):** As stated above, the project will require the preparation of a Stormwater Pollution Prevention Plan consistent with the NPDES Construction General Permit. This is a requirement of EPA's Construction General Permit.

22. Per § 7.8.1 (N), a description of provisions for phasing a project is required where 40,000 square feet of contiguous area or greater is to be disturbed. The project proposes to disturb more than 40,000 square feet of area, and we have not received a description of phased construction.

**GH Response (2/20/24):** On behalf of the Applicant, we respectfully request a waiver of strict compliance from the Bellingham Procedural Rules document last revised November 2016. The proposed design is consistent with the intent of the Procedural Rules and the requirements noted under Comments 21 and 22 are covered within the Bellingham Zoning Bylaws and Massachusetts Stormwater Management Standards.

**EP Response (3/6/2024):** Acknowledged; we defer to the Planning Board regarding this waiver request. No description of project phasing has been submitted.



### Bellingham Wetland Regulations (§ 247-33 Stormwater Compliance)

23. Per § 247-33 (B) (6), surface basins shall be sized assuming frozen ground conditions within the basins (no infiltration) during a 25-year storm event. The Applicant provided a HydroCAD report with this analysis, however, the design of the infiltration basin in this analysis is inconsistent with the plans and other HydroCAD reports. While the Applicant correctly removed infiltration as an outlet in the 25-year frozen model, they also changed the elevation of the spillway. The design of the basin in HydroCAD should match the other analyses with the exception of infiltration.

**GH Response (2/20/24):** The HydroCAD Infiltration Basin model has been revised such that the design is consistent between frozen and non-frozen conditions and matches the inverts specified on the plans.

**EP Response (3/6/2024):** Item closed.

### General Comments

24. The Site Plans do not include any accessible parking spaces. The Applicant should revise the plans to include accessible parking spaces consistent with ADA and AAB requirements.

**GH Response (2/20/24):** On behalf of the Applicant, we respectfully defer to the Planning Board for further discussion. The proposed project is a residential development with individual driveways and garages for each unit.

**EP Response (3/6/2024):** Acknowledged; we recommend including one accessible parking space in the visitor lot consistent with ADA and AAB requirements.

25. Portions of the proposed swale along the site's frontage east of the proposed driveway is sloped at less than 1%. We recommend maintaining a minimum 1% slope for all swales.

**GH Response (2/20/24):** The design and grading for the proposed roadside swale has been revised to provide the recommended minimum slope of 1%.

**EP Response (3/6/2024):** Item closed.

26. The proposed electrical conduit the Utility Plan does not show any connections to existing infrastructure. The Applicant should provide more information regarding the proposed electrical utilities.

**GH Response (2/20/24):** Utility connections will be determined by the utility company prior to the construction as they require approved plans to commence their design.

**EP Response (3/6/2024):** We recommend that the Applicant engage the utility company to confirm the viability of the proposed utility connection. As discussed during our coordination call with the applicant's engineer on February 2, 2024, we also recommend that the Applicant seek a will-serve letter from the utility company.

27. The project shows a dead end water main. We recommend the applicant coordinate with the Department of Public Works to discuss whether the proposed water main arrangement—and hydrant locations—is acceptable.

**GH Response (2/20/24):** the Applicant retained KD Tapping & Testing LLC to conduct a flow test on August 29, 2023 and the results were previously provided to EP in email correspondence dated January 30, 2023. Copies are attached for your review. The proposed hydrant locations were coordinated directly with the Fire Chief and are proposed within the acceptable locations.

**EP Response (3/6/2024):** On our February 2, 2024 conference call with the Applicant, we recommended a looped water main rather than a dead end. However, we defer to the Bellingham Department of Public Works. The Applicant indicated that they had already coordinated this with the Department of Public Works, who approved the dead end main due to the acceptable pressure test results. We ultimately defer to the Department of Public Works.

#### Landscape Design

28. Per § 240-17. B. (1) (f) of the Bellingham Zoning Bylaws, the plans shall show "*existing and proposed topography, at a minimum contour interval of two feet, and vegetation, indicating areas of retained vegetation and identifying the location of significant trees, historic features, and unique natural land features.*" Significant trees, historic features, and unique natural land features (or lack thereof) have not been identified on the plan.

**GH Response (2/20/24):** No significant trees, historic features or unique natural land features are present within the project area.

**EP Response (3/6/2024):** The Applicant has indicated that there are no significant trees, historic features or unique natural land features are present within the project. We are satisfied with this response. No further action is required. **Item closed.**

29. Per § 240-17. B. (1) (l) of the Bellingham Zoning Bylaws, the plans should include "*location and description of proposed open space and recreation areas.*" A description of proposed open space and recreation areas has not been provided.

**GH Response (2/20/24):** Not applicable. The proposed project is a Townhouse Development and approximately 12+ acres out of the 20+ acre parcel will be a conservation restricted easement. The applicant is currently working with Conservation Commission and NHESP separately on a Conservation Management Plan.

**EP Response (3/6/2024):** The Applicant has indicated that this section is not applicable to this project. The bylaw clearly requires a description of proposed open space and recreation areas. We acknowledge that the Applicant is working with the Conservation Commission and NHESP on a Conservation Management Plan. We recommend the Applicant supply the documentation as required.

30. Per § 240-17. B. (3) of the Bellingham Zoning Bylaws, the following shall be submitted for development plan approval:

*"A narrative describing the project, including:*

- B.3.e “Proposed methods of screening the premises and parking from abutting property and the street.”
- B3.i. “A discussion of how the project conforms with the Bellingham Master Plan.”

The narrative has not been provided.

**GH Response (2/20/24):** These materials were submitted with the original application on February 9, 2023 and emailed to EP on January 30, 2024. Hard copies are also included in this submittal.

**EP Response (3/6/2024):** The narrative received on January 30 does not address proposed screening methods in writing, nor does it address the Bellingham Master Plan.

31. Per § 240-17. B. (7) of the Bellingham Zoning Bylaws, the following shall be submitted for development plan approval: *“Evaluation of impact on landscape. The applicant shall submit an explanation, with sketches as needed, of design features intended to integrate the proposed new buildings, structures and plantings into the existing landscape to preserve and enhance existing aesthetic assets of the site, to screen objectionable features from neighbors and public areas.”*  
This narrative has not been provided.

**GH Response (2/20/24):** These materials were submitted with the original application on February 9, 2023 and emailed to EP on January 30, 2024. Hard copies are also included in this submittal.

**EP Response (3/6/2024):** The narrative received on January 30 does not provide a written evaluation of the impact on the landscape.

32. The quantity, locations, and size of tree plantings along the Blackstone Street frontage complies with the zoning bylaw. No shrubs are proposed. Red Maple and Red Oak and species are native to the area. Green Giant Arbovitae is a hybrid cultivar of Western Redcedar, which is not native to New England. While this tree is fast-growing and an effective screen, we recommend a conifer that is native to the area that is also consistent with the existing vegetation surrounding the site.

**GH Response (2/20/24):** The proposed development is residential. Landscaping has been provided in accordance with residential requirements and additional plantings have been added where possible.

**EP Response (3/6/2024):** See response to Comment 33 below.

33. A mix of deciduous (shade) trees and coniferous (evergreen) trees will achieve a more natural appearance along Blackstone Street as opposed to a monoculture of Arbovitae.

**GH Response (2/20/24):** Abutting residences requested deer resistant landscaping which is why Arbovitae’s were selected. Applicant defers to the Planning Board for further discussion.

**EP Response (3/6/2024):** We contend that the proposed plantings result in a monoculture, and the palette should be diversified to include a variety of conifers (mostly native). It is true that the Green Giant Arbovitae are deer resistant. Having a variety of species will blend in with the surrounding landscape and will be a more stable plant community in the long run. Recommend species include:

Abies, Ilex opaca, Tsuga, Picea pungens, Picea glauca, Pinus nigra, Pinus resinosa, Pseudotsuga menziesii.

34. A 2.5" caliper tree should be 12-14' height and not 4' height as listed in the plant schedule. For coniferous trees, height (rather than caliper) should be provided.

**GH Response (2/20/24):** Plans have been adjusted accordingly

**EP Response (3/6/2024):** The plans have been revised. No further action is required. **Item closed.**

35. With the exception of areas of tree removal at the southeast corner of the site, and west of the proposed driveway, the extent of removal of existing vegetation is limited to removal of grass areas. Does the proposed work impact any significant trees, historic features, and unique natural land features?

**GH Response (2/20/24):** No significant trees, historic features or unique natural land features are present within the project area.

**EP Response (3/6/2024):** The Applicant has indicated that there will be no impacts. No further action is required. **Item closed.**

36. Can the large stormwater basin be re-shaped and the surrounding area regraded to avoid tree removal? What is the purpose of small area of tree removal to the west of the driveway?

**GH Response (2/20/24):** Siting of the stormwater infrastructure was specific to discussions and coordination with the Town of Bellingham and abutters. Therefore, at this time, revisions to the stormwater basin are not being proposed. Applicant defers to the Board for further discussion.

**EP Response (3/6/2024):** The Applicant has indicated the reasons for the shape of the basin. No further action is required. **Item closed.**

37. Will the landscaping be irrigated? If so, show limits of irrigation and source of water.

**GH Response (2/20/24):** No irrigation is proposed.

**EP Response (3/6/2024):** The Applicant has indicated that there will be no irrigation. No further action is required. **Item closed.**

38. What type of vegetation will be provided on the side slopes and at the bottom of the stormwater basins?

**GH Response (2/20/24):** In accordance with Zoning Bylaw associated with residential developments, § 245-13(D)(f) the basin side slopes and bottom shall be provided with four inches of loam, seeded at the rate of two pounds Red Top, 15 pounds Creeping Red Fescue and 20 pounds Tall Fescue per acre. Plans have been updated accordingly.

**EP Response (3/6/2024):** The plans have been revised to include the landscape treatments. No further action is required. **Item closed.**

39. The proposed pole mounted lights are 18-19' from the ground to top of the fixture. In our opinion, this is a very large scale fixture for a small residential development. We recommend the Applicant explore a fixture more scaled for a residential development.

**GH Response (2/20/24):** Lighting has been updated.

**EP Response (3/6/2024):** The plans have been revised to indicate a 10' tall light pole. No further action is required. **Item closed.**

40. The lighting levels at the ground are appropriate.

**GH Response (2/20/24):** No further action required.

**EP Response (3/6/2024):** **Item closed.**

41. The Applicant should confirm whether the luminaires are Dark Sky compliant.

**GH Response (2/20/24):** Luminaires are Dark Sky compliant.

**EP Response (3/6/2024):** The Applicant has indicated that the fixtures are Dark Sky compliant. No further action is required. **Item closed.**

42. On Sheet 11 of the submitted Site Plans, there is lack of clarity on the plan symbols and legend symbols, making an evaluation of the plan difficult.

**GH Response (2/20/24):** No further action required. Plan symbols and legend symbols on the 24x26 plan set were legible on the plans provided.

**EP Response (3/6/2024):** No further action is required. **Item closed.**

43. On Sheet 11 of the submitted Site Plans, there are large spaces of mulch between plantings. We recommend the Board carefully consider whether the foundation plantings as shown are adequate. In addition, in our opinion, basic landscape design principles are not being followed.

**GH Response (2/20/24):** Applicant respectfully defers to the Board for further discussion.

**EP Response (3/6/2024):** We contend that the foundation plantings, with Azaleas spaced at 8 feet on center, and Daylilies at 4 feet on center, are insufficient and will result in larger areas of unplanted mulch beds. We suggest either shrinking the plant beds, or provide a greater density of plantings, including groundcovers to reduce the amount of mulch.

44. Tree planting pits should receive a maximum 3" deep mulch bed, not 4" as shown on the construction detail on Sheet 13 of the Site Plans. Mulch should have a 0" depth where the root ball meets the flare of the tree trunk. Do not mound soil under tree and shrub root balls.

**GH Response (2/20/24):** Planting details have been updated accordingly.

**EP Response (3/6/2024):** The detail graphic has been revised. We suggest adding a note to the detail "do not pile mulch against shrub and tree trunks".

Our review is based on the information that has been provided. As noted above, additional review will be required to verify comments that have been incorporated into the revised submission.

We appreciate the opportunity to be able to assist you with this important project. Please feel free to contact me at (617) 595-5180 or [sdt@envpartners.com](mailto:sdt@envpartners.com) with any questions or comments.

Very Truly Yours,



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