



December 12, 2024

Ms. Marie Clarner, Chair
Town of North Attleborough Planning Board
43 Washington Street
North Attleborough, MA 02760

Via: Email to mclarner@nattleboro.com

Reference: Application of Plan Approval
Kelley Boulevard Smart Growth Overlay District (KBSGOD)
582 Kelley Boulevard
North Attleborough, Massachusetts
B+T Project No. 2241.92

Dear Ms. Clarner and Members of the Planning Board:

Beals and Thomas, Inc. is pleased to assist the Town of North Attleborough Planning Board (the Board) with the review of the Application for Plan Review for the proposed development at 582 Kelley Boulevard (the Site) within the KBSGOD. We understand that MCP 582 Kelley LLC (the Applicant) proposes to construct a Chapter 40R multi-family housing development comprised of 304 units (the Project). The Project includes six (6) 4-story buildings; 489 parking spaces; a detached clubhouse with centralized courtyard and pool; and, associated site improvements including landscaping, utility connections and a stormwater management system.

We received the following documentation, which served as the basis for our review:

- *582 Kelley Boulevard Application for Plan Approval*, dated September 24, 2024, prepared by Blatman, Bobrowski, Haverty & Silverstein, LLC (6 pages)
- *Form KBSGOD - Application for Plan Approval*, not dated, prepared by the Applicant (2 pages)
- *Drainage Report for Marcus Partners Proposed "Residential Development, 582 Boulevard, North Attleborough, Massachusetts, Bristol County*, dated September 19, 2024, revised through November 21, 2024 (208 pages)
- *Architectural Plans - 582 Kelley Boulevard North Attleborough Schematic Design Set*, dated September 18, 2024, prepared by Axiom Architecture, PA (27 sheets)
- *Propose Site Plan Documents for Marus Partners Proposed Residential Development, Location of Site: 582 Kelley Boulevard, Town of North Attleborough, Bristol County, Massachusetts, Map #35, Lot #3*, dated September 18, 2024, revised through November 25, 2024, prepared by Bohler Engineering (45 sheets)

Corporate Office

144 Turnpike Road
Southborough, MA 01772

bealsandthomas.com T 508.366.0560 F 508.366.4391

Regional Office

32 Court Street
Plymouth, MA 02360

- *Structural Soil Design Regulations, Proposed Residential Development, 582 Kelley Boulevard, North Attleborough, Bristol County, Massachusetts, Whitestone Project No.: GM2118635.002, dated September 18, 2024, prepared by Whitestone Associates, Inc. (1 page)*
- *EX-1 Building Height Exhibit, dated September 17, 2024, prepared by Bohler Engineering (1 sheet)*
- *Site Layout Comparison, dated September 27, 2024, prepared by Bohler Engineering (1 page)*
- *Landscape Plan, not dated, prepared by Bohler Engineering (1 sheet)*
- *Circulation Diagram, not dated, prepared by Bohler Engineering (1 sheet)*

We have reviewed the documentation submitted by the Applicant with respect to the Zoning of the North Attleborough Bylaws (the Zoning Bylaw), specifically Chapter 290-9 - KBSGOD; the Stormwater Management and Land Disturbance Regulations (the Regulations); the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Regulations and Handbook (the Handbook); and generally accepted engineering practice.

We note for the Board's information that this Project occurs within jurisdiction of the MA Wetlands Protection Act and implementing regulations and will therefore be subject to a Notice of Intent filing with the Conservation Commission. The Conservation Commission is also the Stormwater Authority relative to implementation of the Regulations.

Project Summary

The Site is within the KBSGOD Zoning District and is identified as Map 35, Lot 3. It is also within the Aquifer Protection Overlay District. The Site is approximately ±13.7 acres and has frontage on Kelley Boulevard (Route 152) and George Leven Drive. The Site was previously developed as an outdoor recreational facility that included a driving range, mini-golf course and batting cages. The Site is bounded to the north by the Plainville municipal boundary and commercial uses; to the east and south by commercial and industrial uses on Kelley Boulevard and George Leven, respectively; and to the west by vegetated open space. The Site is generally flat with minimal topographic relief. The Site is encumbered by the buffer zones of wetland resource areas from the west.

The Project is proposed to be comprised of 304 residential units, 25% of which will be designated to be affordable. The Project includes six (6) 4-story buildings comprised of 152 one-bedroom units, 131 two-bedroom units, and 21 three-bedroom unit. The Project will be served by 480 parking spaces, comprised of 47 detached garage stalls and 433 surface parking spaces. The Project includes a detached clubhouse with centralized courtyard; a pool with a pool house building; and, associated site improvements including landscaping, utility connections and a stormwater management system. The Project will have access driveways from both Kelley Boulevard and George Leven Drive.

The Project is proposed to be serviced by municipal water and sewer originating from Kelley Boulevard and electric utility service from George Leven Drive. The stormwater management system is comprised of a combination of surface and subsurface infiltrative best management practices (BMPs).



Google Earth aerial image of Site and surroundings

Site Visit

We visited the Site on Wednesday, December 10, 2024, to familiarize ourselves with the property and adjacent area, and to evaluate the existing conditions with regard to the proposed development. Photographs are included herein that present conditions at the Site and to provide context for our comments.



Location of proposed access drive at Kelley Boulevard.



Kelley Boulevard at access drive viewed to the north.



Kelley Boulevard at access drive viewed to the south.



Proposed location of access drive at George Leven Drive.



George Leven Drive at access drive viewed to the west.



George Leven Drive at access drive viewed to the east.



Observed characterization of exiting driving range.



Observed existing batting cage structure to be removed.

Waiver Comments

1. Section 7.1(5)(a) of the Regulations requires a minimum roadway width of 24-ft. The Applicant is requesting a waiver to have 22-ft wide access driveways. B+T does not take exception to the waiver, however emergency response access should be a consideration. Accordingly, we request that the Applicant meet with North Attleborough Fire Department personnel relative to the adequacy of the emergency access provided.
2. Section 7.3(6)(e) of the Regulations requires structural soil to be placed under parking areas. The Applicant is requesting a waiver from this requirement as structural soils are more typical in landscape applications and support root growth. The Applicant proposes to use a subbase more typical to support asphalt pavement. B+T does not take exception to the waiver being requested, provided the Applicant demonstrates suitability of the proposed pavement design is based on the recommendation of a geotechnical engineer.
3. §290-9G(1) of the Bylaws requires a minimum rear yard setback of 115-ft. As proposed, Building 3 has a 100-ft setback to the rear property line. B+T does not take exception to the waiver being requested from a technical standpoint. However, we defer to the Board on the appropriateness of the waiver being requested.
4. §290-9G(1) of the Bylaws requires a minimum rear yard setback of 140-ft for accessory structures. Within their zoning analysis table, the Applicant indicates they are seeking relief from this requirement. It is unclear on the plans where this relief is being requested. We request that the Applicant clarify the intent of the waiver being requested.

General Comments

5. §290-7D(2)(j) of the Bylaws restricts lots within the Aquifer Protection District to be rendered more than 15% impervious. As proposed, the Project would render the lot approximately 58% impervious. The referenced section of the Bylaw further stipulates that the allowable impervious coverage can be exceeded if a system of artificial recharge of groundwater as described in §290-7E(1) is employed. The proposed stormwater management system for the Project appears compliant with the requirements of §290-7E(1). We note this for the benefit of the Board and clarity of the Administrative Record.
6. §290-7E(4) of the Bylaws stipulates that the Board can require a Development Impact Statement (DIS) in accordance with §290-30 of the Bylaws for construction activities within the Aquifer Protection District. A DIS has not been provided. We defer to the Board relative to the need for the referenced documentation by the Applicant.
7. §290-I(4) of the Bylaws stipulates requirements for phased development. Given the scale of the Project, a phased approach may be implemented; however, it is not addressed in the documentation provided. We request that the Applicant clarify the intent for the anticipated Project schedule and if a phasing approach will be implemented.

8. §290-19C of the Bylaws requires that parking spaces have dimensions 10-ft x 20-ft. The Applicant is proposing 9-ft x 18-ft parking spaces. We request that the Applicant clarify the design intent for the parking spaces provided and document compliance with the referenced section of the Bylaws or request a formal waiver from the required design standard.
9. §290-25 of the Bylaws stipulates requirements for signage. The Applicant appears to be proposing a monument sign at the George Leven access driveway, but the not Kelley Boulevard access driveway. A detail for the sign has not been provided. We request that the Applicant clarify the design intent for the signage and document compliance with the referenced section of the Bylaw.
10. The Project is proposed to be served by municipal water distribution and wastewater collection services from Kelley Boulevard. Considering the sizable increase in demand through changing the Site use from an outdoor recreation center to a multi-family complex comprised of approximately 477 bedrooms, we request that the Applicant coordinate with North Attleborough DPW staff to determine and document for the Board that there is adequate capacity in each system to serve the Project.
11. The Applicant has not provided a swept path analysis for larger emergency response vehicles including unarticulated fire trucks. We request that the Applicant provided the referenced analysis and defer to North Attleborough Fire Department personnel relative to the adequacy of the emergency access provided.
12. The Applicant has provided a photometric lighting plan for the Project. Throughout the perimeter of the Project, de minimis light trespass would occur over the property line. Given the non-residential nature of the area we do not consider the minimal light trespass to be a critical concern. However, we note the referenced design condition for the benefit of the Board and defer to the Board whether the on-site lighting coverage should be restricted to the property line.
13. As noted herein, given the Site's proximity to adjacent wetland resource areas, the Applicant will need to file a Notice of Intent (NOI) with the Conservation Commission. We note that the entirety of the western-most parking area is within the 100-ft buffer zone. We note this for the benefit of the Board and defer to the future NOI review process.
14. The Project does not appear to provide any loading or delivery areas. With over 300 units, there will likely be a high volume of expected truck traffic associated with move in/out activities and deliveries (Amazon, FedEx, etc.). Though not required by zoning for a residential use, we request that the Applicant evaluate providing accommodations for loading areas for delivery vehicles.

15. There appears to be an abutter encroachment on the Site. The property owner at 93 George Leven Drive (Map 35 Lot 218) appears to be occupying and maintaining vehicle storage over the property line. There does not appear to be reference to any resolution of this matter within the plan set. We request that the Applicant provide an update to the Board relative to the coordination and resolution of the noted encroachment with the respective property owner.
16. The revised plan set provided does not include the existing conditions plans that were included in the initial submission. The existing conditions plans should be incorporated into the final plan set for clarity of the Administrative Record.

Stormwater Comments

17. Section 7A of the Regulations requires a Land Disturbance Permit for projects subject to the Regulations. We request that the Applicant submit a Land Disturbance Permit Application in accordance with the referenced Regulations.
18. Section 8.B.3(c)ii. of the Regulations requires that the stormwater design include profiles for drainage trunk lines. The Project design includes multiple drainage pipe runs and profiles have not been provided. We request that the Applicant document compliance with the referenced section of the Regulations.
19. Section 8.B.4.b. of the Regulations and Standard #3 of the Handbook require that the stormwater management plan include BMP drawdown (time to empty) calculations. We acknowledge the drawdown calculation provided; however, the bottom area associated with Pond P2.1 is inconsistent with the plans. We request that the Applicant revise the calculation accordingly.
20. Section 8.B.4.c. of the Regulations and Standard 2 of the Handbook require documentation that demonstrates that the post-development peak runoff rates and volumes of stormwater are less than or equal to pre-development rates. As designed, the stormwater management system appears to adhere to this requirement; however, not all the values noted in summary Tables 1.1 and 1.2 are consistent with the modeling provided. Specifically, these include design point DP 4 peak runoff rates during the 25-yr and 100-yr design storms, and volumes for the 10-yr and 100-yr storm events. We request that the Applicant address the noted inconsistencies.
21. Section 8.B.4.d. of the Regulations requires that the stormwater management plan shall at a minimum include hydraulic calculations to size drainage pipes, swales and culverts. These calculations do not appear to have been provided in the Hydraulic/ Hydrologic Report. We request that the Applicant document compliance with the referenced section of the Regulations.
22. Section 8.E.12. of the Regulations requires that the stormwater management system pipes be sized to accommodate the 25-year storm event and maintain velocities between 2.5 and 10 feet per second using the Rational Method. Drainage pipe sizing calculations do not appear to be provided in the stormwater report. We request that the Applicant document compliance with the referenced section of the Regulations.

23. Section 8.E.18. of the Regulations stipulates that catch basins adjacent to curbing shall be built with a granite curb inlet as required by the Department of Public Works. We request that the Applicant document compliance with the referenced section of the Regulations.
24. Section 9 of the Regulations and Standard 8 of the Handbook require construction period pollution prevention and erosion and sedimentation controls. Being over one acre of disturbance, the Project will be subject to the requirements of an EPA NPDES General Permit. This permitting requires the development of a Stormwater Pollution Prevention Plan (SWPPP). The Applicant intends to use the SWPPP to comply with the requirements of referenced standards. The Applicant indicated that a SWPPP will be provided prior to construction. We request that the Applicant prepare a draft SWPPP for review prior to approval to satisfy the above requirements, and as a potential condition of approval, we recommend that a final compliant SWPPP be provided for review prior to construction.
25. Section 10.B.3 of the Regulations includes stipulations for the required Stormwater Management Agreement. A management agreement does not appear to have been provided with the Applicant's documentation. We request that the Applicant document compliance with the referenced section of the Regulations.
26. Standard #10 of the Handbook requires that Illicit Discharge Statement be provided. We acknowledge the Illicit Discharge Statement provided; however, it is not signed by the Applicant or landowner. We request that the Applicant document compliance with the referenced standard of the Handbook.
27. The modeling of the AG Infiltration Basin (Pond 1.10) is unclear. The elevation of 198.65-ft for the riprap spillway in the modeling cannot be confirmed on the plans. We request that the Applicant clarify the design intent for Pond 1.10 and revise the documentation as may be applicable.
28. The modeling of western bioretention area (Pond 1.12) is inconsistent with the plans. The diameter, length and inverts of the primary outlet pipe do not appear to correlate. The underdrain diameter is modeled at 6"; however, it is depicted as 4" on the plans, and furthermore the lengths and inverts noted cannot be confirmed on the plans. We request that the Applicant clarify the design intent for Pond 1.12 and revise the documentation as may be applicable.
29. The modeling of the Stormtrap system (Pond 1.13) is inconsistent with the plans and details. The primary outlet pipe location, length, diameter and invert cannot be confirmed on the plans. The unit layout also appear to be inconsistent with the details provided. We request that the Applicant clarify the design intent for Pond 1.13 and revise the documentation as may be applicable.
30. The modeling of eastern bioretention area (Pond 1.14) is inconsistent with the plans. The length of the undrain does not appear to correlate. We request that the Applicant clarify the design intent for Pond 1.12 and revise the documentation as may be applicable.

Ms. Marie Clarner, Chair
Town of North Attleborough Planning Board
December 12, 2024
Page 12

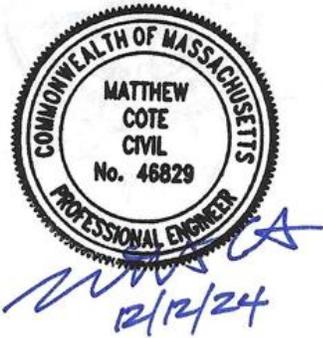
In summary, we request that Applicant prepare narrative responses and supplemental documentation for the Board in response to the comments contained herein.

B+T is available to attend a Planning Board public hearing, upon request, to present the results of our review and be available for discussion regarding the comments herein.

We appreciate the opportunity to assist the North Attleborough Planning Board with the review of the proposed Project. Please do not hesitate to contact our office with any questions.

Sincerely,

BEALS AND THOMAS, INC.



Matthew Cote, PE, SITES AP, ENV SP
Senior Civil Engineer

cc: Gil Hilario, Town Planner (via email to gilhilario@nattleboro.com)
Lori Kaufman, Administrative Assistant (via email to lkaufman@nattleboro.com)

MC/ejl/mac/224192LT001