



Open Comments
Defer to Board
Conditions of Approval

PROJECT NAME Murphy's Farm PEER REVIEW
DATE 6/7/2024
UPDATED: 4/25/2025
PROJECT NO. 24016.0106

Peer Review Comment Form

NO.	SHEET NO.	SECTION	GREEN'S COMMENT	Applicant's RESPONSE	CONFIRMED BY	DATE
ZBA Review						
	APPLICATION					
1	4	Subdivision Regulations 6.2.1.5	The Applicant requests waivers for if the submission does not meet regulations. The Applicant shall provide a list of waivers that are applicable to the specific project. The Applicant shall provide explanation stating what is being provided and why a waiver is being requested for each waiver.	A full list of waivers is now provided		
1A	4	Subdivision Regulations 6.2.1.5	A list of waivers was not submitted. Please provide.	The Substantive Waiver Request is now provided for review.		
1B		Subdivision Regulations 6.2.1.5	An outline of Principal Substantive Waiver Request has been provided. This outline states that formal waiver request will be provided at a future date. Therefore, this comment remains open until the formal waiver request is provided.	A final set of formal waiver requests will be provided prior to the close of the Board's public hearing.		
	SITE PLAN					
6	C-1	Zoning Bylaw 2.4.12	The site landscaping shall be 20% of the total impervious surface of the project. Please provide the required and provided on the plans.	A waiver to Zoning Bylaw 2.4.12 is requested.		
6A	C-1	Zoning Bylaw 2.4.12	We defer to the Board for waiver approval.			
13	C-3A/3B	Subdivision Regulations 7.4.3	There shall be at least two means of egress for each subdivision except for a cul de sac. While there are two means of egress to the site, the houses off of roadway "D" only has one means of egress and they are not part of a cul de sac. We defer to the Board if this is acceptable.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
14	C-3A/3B	Zoning Bylaw 2.4.5.B.8	The cover sheet has a table of required minimum setbacks but it does not state the minimum setbacks provided. The plans also do not show the setbacks for the buildings. Please provide setback distances for the buildings and update the table to indicate what is being provided.	The Land Use Table on sheet C-1 has been updated to provide the minimum setbacks provided.		
14A	C-3A/3B	Zoning Bylaw 2.4.5.B.8	The minimum rear setback provided is missing. Please update plans to include rear setback provided or explain why it is N/A.	As disclosed in the substantive waiver request, it is unclear under the Zoning Bylaw if the project lot contains a rear lot line, and which boundary might constitute a rear lot line.		
14B	C-3A/3B	Zoning Bylaw 2.4.5.B.8	We defer to the Board for the waiver request.			
15	C-3A/3B/D-3	Zoning Bylaw 2.4.5.B.9/2.4.11/Subdivision Regulations 6.4.8 #15	The location, size, and type of all signs and exterior lighting shall be shown on the plans. There are details for stop signs but the stop signs are not shown on the plans. Please show where stop signs will be located on the plans. There are lights shown but no details or photometric plans for the lighting. Please provide lighting details conforming to dark sky compliance.	A waiver is requested for Zoning Bylaw 2.4.5.B.9. The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
15A	C-3A/3B/D-3	Zoning Bylaw 2.4.5.B.9/2.4.11/Subdivision Regulations 6.4.8 #15	We defer to the Board for waiver approval.			
18	C-3A/3B	Subdivision Regulations 7.6.5.1	Has the project been reviewed by the fire department? Location of hydrants will need to be coordinated with the fire department. Please provide turning movements showing how a fire truck will maneuver through the site and turn around in the cul de sacs.	Project is undergoing review by the fire department to confirm adequacy of hydrant locations and internal movements of a fire truck.		
18A	C-3A/3B	Subdivision Regulations 7.6.5.1	The fire truck turning movements overlap the curb and parking stall lines in some locations. Please revise as needed to make sure the fire truck can maneuver within the roadway limits. We recommend that approval from the Fire Department be made a condition of approval.	The provided fire truck turning movement has been revised to make these corrections.		
18B	C-3A/3B	Subdivision Regulations 7.6.5.1	The turning movements still overlap with the curb at some locations such as in front of #1C and between #10D and #8D. Please revise as needed to make sure fire truck can maneuver within the roadway limits. A fire hydrant was moved in front of Building #18B behind a parking space. This is also the case for the fire hydrant in front of building #4A. Verify that these will be accessible for fire department use. We recommend that approval from the Fire Department be made a condition of approval.	The Applicant has been in contact with the local Fire Department, who has signed off on the proposed design.		



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18C	C-3A/3B	Subdivision Regulations 7.6.5.1	We recommend revising the turning movements to be completely within the curb limits. Although if the Fire Department is ok with this then this comment can be closed. We did not receive the Fire Department approval letter and defer to the Board to confirm.			
19	C-4A		Has the project been coordinated with the gas company for work within the ROW? It appears there is proposed work within the easement including a light pole, a proposed tree, etc. Also, is there an existing gas line within the easement? Please show all existing utilities on the plans.	No coordination has occurred yet with the gas company, however coordination will occur prior to any land disturbance within the easement.		
19A	C-4A		We recommend that approval from the gas company be made a condition of approval.			
32	C-5A/5B/5C	Subdivision Regulations 6.4.5 #1	The plans are at scale 1":60' horizontal and 1":12' vertical scales. The Subdivision regulations require 1"=40' horizontal and 1"=4' vertical. We defer to the board if this is acceptable.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
33	C-5A/5B/5C	Zoning Bylaw 2.4.5.B.6/Subdivision Regulations 6.4.5 #2	Please add bearings and distances of all tangents along proposed roadway centerline and the right-of-way. Please add radii, length and central angle of all curves and points of intersection of all tangents with tangent lengths. Please add stationing every 25' in vertical curves, frontages, and lot numbers.	A waiver is requested for Zoning Bylaw 2.4.5.B.6. The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
33A	C-5A/5B/5C	Zoning Bylaw 2.4.5.B.6/Subdivision Regulations 6.4.5 #2	We defer to the Board for waiver approval.			
34	C-5A/5B/5C	Subdivision Regulations 6.4.5 #3	Please provide labels for sight distances on vertical curves. Please show all underground utilities in the profile and provide vertical clearances.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
34A	C-5A/5B/5C	Subdivision Regulations 6.4.5 #3	We defer to the Board for waiver approval.			
35	C-5A/5B/5C	Subdivision Regulations 7.4.8	Are the proposed street names "Roadway X"? If not, add proposed street names to the plans.	Street names to be provided prior to final plan authorization.		
35A	C-5A/5B/5C	Subdivision Regulations 7.4.8	Street names have not been provided. Please provide.	Street names will be provided at the time of plan approval. During design/permitting, we believe that 'Roadway X' with all buildings on that street being numbered #X, provides more clarity during discussion		
35B	C-5A/5B/5C	Subdivision Regulations 7.4.8	We recommend street names be provided prior to final approval. We defer to the Board for Street Name approval.			
36	C-5A/5B/5C	Subdivision Regulations 7.6.2	The minimum grade of the roadway should be 1.5%. Please revise.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
36A	C-5A/5B/5C	Subdivision Regulations 7.6.2	We defer to the Board for waiver approval.			
37	C-5A/5B/5C	Subdivision Regulations 7.6.2	Once the horizontal alignment data is added, confirm the minimum centerline radius and maximum curb return/pavement junction radius are met.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
37A	C-5A/5B/5C	Subdivision Regulations 7.6.2	We defer to the Board for waiver approval.			
39	C-5A/5B/5C	Subdivision Regulations 6.4.5.3.vi-xi	All existing and proposed utilities shall be shown on the profile sheets, including proposed drainage, water, electric, telephone, cable, and gas. Please label vertical clearances between any crossing utilities. Please revise.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		



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39A	C-5A/5B/5C	Subdivision Regulations 6.4.5.3.vi-xi	It is recommended to provide this information to confirm there are no utility conflicts. We defer to the Board for waiver approval.			
58		Subdivision Regulations 6.3.1.7/6.4.7	Please provide landscape plans for proposed landscaping.	The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
58A		Subdivision Regulations 6.3.1.7/6.4.7	We defer to the Board for waiver approval.			
	Stormwater Report					
59		Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.B.2.e.	The site shall be designed to ensure post development peak volumes do not exceed predevelopment peak volumes. Please provide a table showing the pre vs post peak volumes.	A waiver has been requested for Stormwater Rules and Regulations 7.B.2.e. The project is proposed under 40B and is not a subdivision, and is not subject to Subdivision regulations.		
59A		Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.B.2.e.	We defer to the Board for waiver approval.			
59B		Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.B.2.e.	Based on the workshop meeting on 3/12/2025, there is a concern the wetlands do not have capacity for the drainage discharging to them. The project shall ensure post development peak volumes do not exceed predevelopment peak volumes. Please provide a table showing the pre vs post peak volumes.	The Drainage Narrative has been revised to show volumes as well as peak rates. The waiver for volumes is requested for the 2- and 10-year design storm events for DP-5. The increased volumes are "de minimus", and are due to grading restrictions in the vicinity of PWP-5G. Infiltration is not feasible, and as such post-volumes cannot meet existing volumes for these storm events.		
59C		Subdivision Regulations 7.15.4/Stormwater Rules and Regulations 7.B.2.e.	We defer to the Board for waiver approval.			
73	Existing Conditions Watershed Plan		EWA-5B discharges to a wetland that has a 12" culvert discharging to another wetland. This wetland should be a separate discharge point. The pre and post peak rates and volumes should be compared for this wetland. Please revise.	The wetland is wholly contained to the site and modeled as a pond to account for the culvert discharge. We do not see the need to separate the subcatchments to determine the off-site runoff.		
73A	Existing Conditions Watershed Plan		Based on the workshop meeting on 3/12/2025, EWA-5B discharges to a wetland series J but the HydroCAD model shows it discharging to wetland series A. The pond for wetland series J has been removed from the existing conditions. The wetland series J is still modeled as a pond under proposed conditions. Wetland series J should be modeled as its own discharge point and not modeled as a pond under existing and proposed conditions. The pre and post peak rates and volumes should be compared for these wetlands. Please revise.	Wetland series 'J' was modeled as a pond to ensure that the proposed culvert was sized sufficiently. Wetland series 'J' is now modeled as a reach with the proposed pipe. A reduction in peak rate and volume of runoff directed towards wetland "J" is proposed.		
73B	Existing Conditions Watershed Plan		If the Wetland Series J pipe is to be modelled in proposed conditions then, the existing Wetland Series J pipe should be modelled under existing conditions. Please revise.			
	New Comments 11/13/2024					
82B	C-4A		15" HDPE pipe connecting POS-4 to PDMH-26 is conflicting with PSMH-3. Please revise and consider angle of crossing utilities for constructability, the more parallel the more likely utilities can't be supported during construction.			
	New Comments 2/3/2025					
111	D-4		For IB-1, the main outlet is only 1" in diameter and for the subsurface systems the main outlet is only 1.5" in diameter, this is very small and prone to clogging. Will peak rates still be met if orifice is clogged? We recommend a 4" minimum orifice. Please revise.	The low-flow orifices do not provide meaningful peak-rate attenuation, and are proposed for the sake of water quality volume and groundwater recharge values. We believe that the proposed trash rack in combination with adequate pre-treatment will prevent the orifices from clogging, however should the orifices clog, the pond/subsurface systems ability to handle peak flows will not be inhibited.		



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111A	D-4		Will peak rates and volumes still be met if the 1.5" outlet is clogged?			
117A	O&M Plan	MA Stormwater Handbook V2 CH2	Add subsurface structures to the mosquito control plan as well. Please revise.			
118A	O&M Plan	MA Stormwater Handbook V2 CH2	Use language from V2C2 Infiltration Trenches as this is the most comparable surface material. Include language about remove seedlings before they are firmly established. Include checking outlet pipe (in PDMH-22) to determine if it is clogged. Inspect trench after the first several rainfall events and after all major storms. Please revise.			
120	Mounding Analysis		The mounding analysis for IB-1 shows 3 feet separation to seasonal high groundwater but the plans show 2 feet separation to seasonal high groundwater. Based on the mounding analysis, IB-1 will mound in the basin bottom after 72 hours. The design needs to be revised so, the basin can fully drain within 72 hours. Also, the HydroCAD model is using an exfiltrate rate for peak rate attenuation and based on the mounding analysis the basin will not infiltrate as modeled due to the mounding into the basin. The exfiltrate rate should be revised in HydroCAD based on the results of the mounding analysis. Please revise.	Plans and mounding calculations have been revised to show 2.9' of separation. Groundwater recharge calculations assume no groundwater mounding, and have been performed in accordance with the static method. The groundwater mounding model is analyzed based on the horizontal and vertical hydraulic conductivity values used in the drainage analysis. In both cases, it is shown that the basin fully drains within 72 hours. Groundwater mounding analysis is performed separately from recharge and peak rate analyses. Volume 3 Chapter 1 Page 28 of the Stormwater Handbook address the requirements for a groundwater mounding analysis. Our analysis conforms to the requirements provided.		
120A	Mounding Analysis		The exfiltration rate should be revised to reflect the infiltration rate calculated in the mounding analysis. Since the mounding analysis shows that it mounds up into the system the infiltration rate is impacted. Since this rate is being used for peak rate attenuation the exfiltration rate should be revised to what was calculated in the mounding analysis. This is part of the purpose for performing a mounding analysis. Please revise the exfiltration rates in HydroCAD for all systems that mound into the bottom of the system.			
121	Mounding Analysis		The mounding analysis for SS-3 shows 3 feet separation to groundwater but the plans show 2.9 feet separation to groundwater. Based on the mounding analysis for SS-3 the water will mound in the subsurface system. The mound will leave the bottom of the subsurface system between 1 to 2 days but the recharge calcs note it will fully drain within 2.6 hours. The HydroCAD model is using an exfiltrate rate for peak rate attenuation and based on the mounding analysis the basin will not infiltrate as modeled due to the mounding into the system. The exfiltrate rate should be revised in HydroCAD based on the results of the mounding analysis. Please revise.	Mounding calculations have been corrected to show 2.9' of separation. Groundwater recharge calculations assume no groundwater mounding, and have been performed in accordance with the static method. The groundwater mounding model is analyzed based on the horizontal and vertical hydraulic conductivity values used in the drainage analysis. In both cases, it is shown that the basin fully drains within 72 hours. Groundwater mounding analysis is performed separately from recharge and peak rate analyses. Volume 3 Chapter 1 Page 28 of the Stormwater Handbook address the requirements for a groundwater mounding analysis. Our analysis conforms to the requirements provided.		
121A	Mounding Analysis		See comment 120A.			
	New Comments 4/25/2025					
122	D-4		There is a note to install the Subsurface System 1 with a liner, but there are no details for how to install it, please include a detail for how this will be installed. The Applicant should confirm buoyancy calculations have been performed to confirm chambers can resist uplift force. The outlet structure has a 0.5" low flow orifice. This is very small and prone to clogging. If this orifice clogs the subsurface system will not be able to fully drain. We recommend a 4" minimum orifice. Please revise.			



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123	D-4/SW Report		<p>For infiltration basin 2,</p> <ol style="list-style-type: none"> 1. There is only a forebay for pretreatment and therefore does not meet the 44% pretreatment requirement. Please revise. 2. The water quality volume calculation shows there is no impervious area going to IB-2 but there is impervious area discharging to IB-2. Please revise. 3. There is no maintenance access to IB-2. Please provide. 4. There is 2.5' separation to SHGW but no mounding analysis was performed. Please provide. 			
124	C-4A		Please revise PCB-33 to include rim.			
125		HydroCAD	In HydroCAD SS-2 shows two separate primary outlets a pipe and a sharp crested rectangular weir but the plans only show one outlet. Please revise.			
126		HydroCAD	In HydroCAD for SS-2, SS-3, and SS-4 there is a sharp crested rectangular weir and a sharp crested vee/trap weir but only one weir is detailed. If there is an opening in the weir it should be modeled as an orifice and a rectangular sharp crested weir. Please revise.			
127		Mounding Analysis	There are two mounding analysis that are labeled as SS-3. Please clarify.			
Con Com Review						
	SITE PLAN					
128A	C-1	MA Wetland Protection Act	The wetlands were delineated in 2015. Per MA Wetland Protection Act, wetland flags are only valid for three years. Therefore, the wetland flags need to be reflagged. Please provide updated flagging and buffer zones.	The site is subject to an ongoing Order of Conditions associated with DEP#145-1050. The latest extension, granting coverage through July 21, 2026, is provided for review.		
128B	C-1	MA Wetland Protection Act	Based on the workshop meeting on 3/12/2025, we defer to the Conservation Commission if the wetlands need to be reflagged.			
131C	C-2A/C-2B	Town of Dracut Wetland Regulations 5.1.4.1.2/5.1.4.1.3	Buildings have been relocated out of the 50' buffer zone but disturbance still occurs within the 25 foot buffer zone. We defer to the Board for the waiver required to disturb within the wetland's 25' buffer zone.			
132	C-2A	MA Wetland Protection Act	Vernal pool has been moved from wetland A to east of wetland C. Please explain why this was moved. Also, it appears that the vernal pool CVP-4937 that was moved is missing wetland flags. Please show the wetland flags on the plans.	Wetland flags for CVP-4937 are now provided. The location of the vernal pool was adjusted while reviewing the certified vernal pool report. The report has a written description of the vernal pool's location as being 250-Ft off of the Cul-De-Sac of Poppy Lane, which placed it in wetland series 'A', however the report also had the lat/long of the pool. The pool is now shown based on the provided lat/long in the report, placing it west of wetland C.		
132A	C-2A	MA Wetland Protection Act	The wetland flags for CVP-4937 are not shown on C-2A. Please show them on the existing conditions plans.			
133	C-3A/3B		Please provide more information on snow removal and storage process. How will snow be stored in the proposed playgrounds? What is being installed for the proposed playgrounds?	The proposed playgrounds will be seasonal, allowing for snow storage as required. Final plans for playground equipment will be provided prior to construction.		
133A	C-3A/3B		There shall be no snow storage within wetland buffer zones. Please move snow storage to be outside of the wetland buffer zone.	MA DEP 310 CMR 10.00 does not have provisions preventing snow storage within the wetland buffer.		
133B	C-3A/3B		Due to sanding, salting, and other pollutants in the roadway, snow storage can cause adverse effect on wetlands. It is recommended that snow storage should be located outside wetland buffer zones. We defer to the Conservation Commission if snow storage within the buffer is acceptable.			



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134	C-4A	Town of Dracut Wetland Regulations 5.1.4.2.5	Per Town of Dracut Wetland Regulations stormwater discharge to vernal pools are not permitted. The proposed project has stormwater from the site discharging to vernal pools. We defer to the conservation commission if this is acceptable.	A waiver is requested to Town of Dracut Wetland Regulations 5.1.4.2.5		
134A	C-4A	Town of Dracut Wetland Regulations 5.1.4.2.5	The plans have been revised to eliminate stormwater bmp discharge to vernal pools. The stormwater discharge to the vernal pools is now only grass area. We defer to the Conservation Commission if this is waiver is acceptable.			
136	C-4A		How will erosion or undermining of the culvert connecting wetlands A and J be prevented?	The inlet/outlet of the proposed culvert is proposed as a flared end structure with crushed stone. Additionally, Infiltration Basin 1 and Subsurface System 3 now tie into a manhole located approximately 1/3 of the way across the culvert. Flow into the beginning of the culvert will consist solely of overland flow from grass and woods.		
136A	C-4A		Crushed stone is only shown at PFES-13, please revise to show by PFES-12 as well.			