



Open Comments  
Defer to Board  
Conditions of Approval

PROJECT NAME Task 7 - Beaver Brook Mill  
DATE 8/21/2025  
UPDATED: 10/16/2025  
PROJECT NO. 24016.07

### Peer Review Comment Form

NO.	SHEET NO.	SECTION	GREEN'S COMMENT	Applicant's RESPONSE	CONFIRMED BY	DATE
2003 Special Permit & 2005 Special Permit Amendment						
1		Town of Dracut Zoning Bylaws - 2.3.8	The 2003 & 2005 Special permits are over 20 years old, please verify that exceptions to bylaws listed in this permit are still accepted by the Town of Dracut Zoning Board. Specifically there is a waiver requested for the proposed parking referring to previous special permits. We defer to the Board.	A waiver request for a reduction to the parking requirements that is currently proposed has been submitted to the Planning Board along with a shared parking analysis prepared by Desman, Inc. in support of that request.		
1A		Town of Dracut Zoning Bylaws - 2.3.8	We defer to the board.			
CIVIL PLANS						
2		Town of Dracut Zoning Bylaws - 2.3.12.D	Please provide Building Elevation Plans stamped by a Registered Professional Engineer. Please include all elements required for section 2.3.12.D.	While we recognize that the zoning bylaw says that the elevation plans shall be stamped by an engineer, those plans are more appropriately stamped by a licensed Architect. Updated plans stamped by the architect will be included in the plan set prior to submitting the plans to the town for endorsement.		
2A		Town of Dracut Zoning Bylaws - 2.3.12.D	We recommend this be made a condition of approval.			
3		Town of Dracut Zoning Bylaws - 2.4.5.B	Site plans should show the owner's signature, please revise. Per the zoning district map, this property is within the I-1 and Mill Districts, but plans only show I-1 boundaries, please revise to include Mill District boundary. Please show pipe size and material for existing water and wastewater.	We have added a space for the owner's signature to the Overview Plan. Following conditional approval of the project, we will have the owner sign the sheet prior to submitting the plans to the town for endorsement.		
3A		Town of Dracut Zoning Bylaws - 2.4.5.B	We recommend this be made a condition of approval.			
4	4 - OVERVIEW PLAN	Town of Dracut Wetland Regulations 5.1.4.1.2	Work is being performed within 25 feet of Beaver Brook. We defer to the conservation commission for work performed within the buffer zones.	A Notice of Intent has been submitted to the Dracut Conservation Commission and is currently under review.		
4A	4 - OVERVIEW PLAN	Town of Dracut Wetland Regulations 5.1.4.1.2	We defer to the Conservation Commission for work performed within the buffer zones.			
5	5 - SITE PLAN (1 OF 4)		There are several light poles shown in parking spaces. This reduces the parking space size. Please move outside of parking spaces if feasible.	We have moved the proposed light poles outside of the parking spaces where feasible. In those locations where they still remain, they are placed towards the front end of the space and along the painted parking line to minimize any loss of parking width.	MW	10/16/2025
6	5 - SITE PLAN (1 OF 4)	Town of Dracut Wetland Regulations 5.1.2	Please clarify the cantilevered composite deck elevation relative to the FEMA flood elevation. How much freeboard is provided?	The support structure below the cantilevered deck will be approximately one foot above the top of the existing retaining wall. The top of the retaining wall ranges from 2.9' to 6.8' above the 100-year flood elevation.	JT	10/16/2025
7	5 - SITE PLAN (1 OF 4)		Please indicate proposed surface materials for areas around BLDG-F.	We have revised the plans to indicate the surface materials around Building F, which are primarily either concrete sidewalk, paver patio, loam and seed, or landscaping.	JT	10/16/2025
8	5 - SITE PLAN (1 OF 4)		It appears there are no accessible parking spaces near BLDG-A. There should be accessible parking spaces for each building.	We have reviewed the locations of the accessible parking spaces and now provide spaces in appropriate locations for each building.	MW	10/16/2025
9	6 - SITE PLAN (2 OF 4)		Snow storage should not be located upgradient of beaver brook and within the buffer zone. Snow storage should be located so, when it melts it is directed to treatment BMPs. Please revise.	We have revised the designated snow storage areas to be away from Beaver Brook and upgradient of the stormwater treatment BMPs.	MW	10/16/2025
10	8 - SITE PLAN (4 OF 4)		Please show handrails for the stairs west of BLDG-E.	The plans have been revised to add handrails to the stairs west off Building E.	MW	10/16/2025
11	9-12 - GRADING & DRAINAGE PLANS		There are several drainage pipes that are less than 4' long, which may cause construction issues. Please consider revising.	We have revised the drainage layout to provide longer pipe lengths where easily feasible.	JT	10/16/2025
12	9-12 - GRADING & DRAINAGE PLANS		There are some inconsistencies about drainage pipe information. For example, the pipe between DMH-10 and DMH-9 is lower than 100' based on the drainage structure information on the right side of the sheet but the utility crossing callout shows it being 101.5.	We have reviewed and revised all drainage pipe information to eliminate any discrepancies.	MW	10/6/2025

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13	9 - GRADING & DRAINAGE PLAN (1 OF 4)		Please provide detail for "First Defense Unit". Please verify that this structure can accommodate the four pipes shown. Please specify the model to be proposed.	Details for the First Defense units have been added to the plans. The structure is able to accommodate four pipe connections. The proposed models are both the FD-4HC and FD-5HC which are 4' and 5' inside diameter structures respectively.	MW	10/6/2025
14	9 - GRADING & DRAINAGE PLAN (1 OF 4)		There is a large drainage area going through DMH-1 "First Defense Unit, please verify it can handle the flow from large storm events while being online. If it does not have capacity, a bypass manhole maybe required.	The design has been revised to utilize two hydrodynamic particle separators to reduce the required treatment area. Calculations are provided in the revised Stormwater Management Report.	MW	10/6/2025
15	10 - GRADING & DRAINAGE PLAN (2 OF 4)		Please verify where the pipe from DMH-9 outlets to. Similarly where is the 6" PVC pipe coming from for DMH-1.	The pipe configuration shown on the Existing Conditions Plan reflects all available information and field measured pipe sizes. Prior to construction, additional exploratory investigations will be made to determine where and how these pipes connect. Final plans showing this information will be submitted to the town prior to building permit application.		
15A	10 - GRADING & DRAINAGE PLAN (2 OF 4)		Based on the profile it is assuming that DMH-10(FD) discharges to DMH-1 but it has a negative slope (sloping up to DMH-1 instead of down). The drainage should be revised to provide positive slope (sloping down to DMH-1). Please revise.	We recently received record plans for the site from a 2002 expansion project which included proposed drainage work at the rear of the parking lot. According to those plans, there are several sections of underground infiltrator (presumably chambers) including the run between DMH-10 and DMH-1. The revised plans illustrate the location of the existing infiltrators and modifications to the connections to/from the proposed drainage in that area.		
16	10 - GRADING & DRAINAGE PLAN (2 OF 4)		Existing sewer manhole cover is located in a transition section of the a speed table, which will not be constructable. Please move speed table so that covers are not located within them. Existing sewer manhole at south-east corner of the property is located within a sidewalk transition, please revise.	The speed table has been moved as requested. The location of the curb ramp in the proposed sidewalk has been moved away from the sewer manhole.	MW	10/6/2025
17	10 - GRADING & DRAINAGE PLAN (2 OF 4)		DMH-15 and other DMHs are proposed to be installed on existing 12" HDPE. Will these be doghouse manholes or will new pipes be installed to tie into existing line. Please revise to show pipes, notes, and details necessary to make these connections.	The current plan set is for permitting only. Prior to construction, final plans will be submitted to the town detailing the intended construction methods at these locations.		
17A	10 - GRADING & DRAINAGE PLAN (2 OF 4)		We defer to the Board if these details should be provided now or will be a condition of approval to be provided later.			
18	10 - GRADING & DRAINAGE PLAN (2 OF 4)	Town of Dracut Stormwater Management Rules and Regulations Section 7. B.3.c.ii.	Please provide profiles of drainage trunklines.	Drainage trunkline profiles have been added to the plan set.		
18A	10 - GRADING & DRAINAGE PLAN (2 OF 4)	Town of Dracut Stormwater Management Rules and Regulations Section 7. B.3.c.ii.	Profiles show multiple utility conflicts between the proposed drainage and the existing utilities. These existing utilities do not appear to be proposed to be relocated. Please clarify.	The locations and elevations of existing utilities shown on the profile are based on available record information and industry standard depths of installation per utility, however, we acknowledge the high level of uncertainty due to the historic nature of the site. A note has been added to the profile sheet indicating that any utilities which are in conflict with the proposed drainage installation shall be relocated. Notes on the General Notes sheet direct the contractor to verify existing utilities prior to construction and notify the engineer of any discrepancies.		
19		Town of Dracut Zoning Bylaws - 5.3.4.D.4 (Application) & 5.3.4 (Affordable Dwelling Units)	Please indicate location of affordable dwelling units on the floor plans. Please also verify that the minimum units are provided.	A plan showing preliminary locations for the affordable units has been prepared by the architect and is included in the set of revised plans (Sheet AFF). As stated on Sheet A0.1, there are 47 existing units, 7 of which are affordable, and 126 new units are proposed, 19 of which will be affordable.	MW	10/6/2025
20		Town of Dracut Zoning Bylaws - 5.3.4.G-K (Application)	Please provide narrative reports and information as described in these sections to the Town if the applicant has not done so already.	A narrative has been prepared addressing Town of Dracut Zoning Bylaws - 5.3.4.G-K (Application) and is included with this response.	MW	10/6/2025
21		Town of Dracut Zoning Bylaws - 5.3.3.F (Standards)	Please verify that pedestrian crossings and walkways are to be textured. If not, please consider town preferences as well.	In accordance with Section 5.3.3.F (Standards), all walkways/pedestrian walkways are concrete, a different material than the vehicular travel ways (bituminous concrete). All pedestrian crossings within the public right-of-way are proposed as painted, MUTCD and ADA compliant crosswalks. Pedestrian crossings within the project site are now proposed as textured bituminous concrete.	MW	10/6/2025
22		Town of Dracut Zoning Bylaws - 5.3.3.K (Standards)	Please verify that the maximum number of dwelling units is within the limits set by the Zoning Board.	The maximum number of dwelling units is established by the Planning Board and will be done in conjunction with their issuance of a Special Permit approval.		
22A		Town of Dracut Zoning Bylaws - 5.3.3.K (Standards)	We defer to the board for the approval of number of units.			
23		Town of Dracut Zoning Bylaws - 5.3.3.O (Standards)	Please verify that the Dracut Fire Department has received and approved a plan as outlined in this section.	The plans have been submitted to the Dracut Fire Department for review and comment.		
23A		Town of Dracut Zoning Bylaws - 5.3.3.O (Standards)	We recommend that Fire Department approval be made a condition of approval.			
24		Town of Dracut Zoning Bylaws - 6.1.8.1.D	Per Zoning Bylaws standard 90° parking spaces are to be 10' wide. Will a waiver be requested for reduced parking widths?	The existing 2003 Special Permit approved a reduction in the parking space width to 9 feet for these properties.		
24A		Town of Dracut Zoning Bylaws - 6.1.8.1.D	We defer to the board for waiver approval.			
25		Town of Dracut Zoning Bylaws - 6.1.8.1.F (Architectural Access Board's regulations (521 CMR 023.00))	The AAB regulations state that there are to be 9 accessible spaces when there are 401-500 total spaces provided, but there seem to be only 7. Please revise.	There are a total of 12 exterior ADA spaces and another 3 ADA spaces within the parking levels of Building E.	JT	10/6/2025



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25A	4 - OVERVIEW PLAN & A0.6	Town of Dracut Zoning Bylaws - 6.1.8.1.F (Architectural Access Board's regulations (521 CMR 023.00))	There are now 8 outdoor ADA spaces (Sheet 4 - OVERVIEW PLAN) and 6 ADA spaces within the parking garage of Building E (Sheet A0.6) making a total of 14 spaces. The total of 9 accessible spaces minimum is met therefore, this comment is closed.		JT	10/6/2025
26	13 - UTILITY PLAN	Town of Dracut Bylaws - Article II; Sec. 6	Please confirm plans have been submitted to the Dracut Board of Sewer Commissioners for approval.	Dracut Bylaw Chapter 14, Article II, Section 6 applies only to Definitive Subdivision Plans filed in accordance with MGL Chapter 41 Section 81M. Following approval of the Special Permit and prior to construction, final plans will be submitted to the Dracut Sewer Department for review.		
26A	13 - UTILITY PLAN	Town of Dracut Bylaws - Article II; Sec. 6	We defer to the Board if the Sewer Commission should review the project due to the scale of the project.			
27	13 - UTILITY PLAN		Please provide detail for sewer connection to trunkline.	A saddle connection detail has been added to the plans.	MW	10/6/2025
28	13 - UTILITY PLAN		Please verify if existing gas line under BLDG-E will remain or be removed.	The existing gas line under Building E is now noted as being "to be removed".	MW	10/6/2025
29	13 - UTILITY PLAN		Are there any bollards proposed around proposed fire hydrants? Please consider providing bollards.	There is one existing hydrant within the on-site pavement that is currently protected by jersey barriers. All other hydrants, existing to remain or proposed, are located behind curb lines.	MW	10/6/2025
30	13 - UTILITY PLAN		DMH-12 is in conflict with water design, please revise.	DMH-12 has been relocated to avoid the conflict with the existing water line.	MW	10/6/2025
31	13 - UTILITY PLAN		Please clarify if water is connecting to BLDG-E at the north-west corner of the building, because it appears that it also connects on the east side of the building.	We have clarified the location of the water connection for Building E. There is only one connection, which is on the east side of the building.	MW	10/6/2025
32	13 - UTILITY PLAN		Please provide 10' of separation between water and sewer. For example it seems that this isn't provided for the water and sewer service east of BLDG-E.	The plans have been revised to provide 10' of separation between the water and sewer.	MW	10/6/2025
33	13 - UTILITY PLAN		Please clarify if drainage upstream of CB-9 is being removed.	The plans have been revised to call for CB-9 and the drainage upstream to be removed and replaced with a new catch basin.	MW	10/6/2025
34	13 - UTILITY PLAN		Gate valve connecting to proposed hydrant by BLDG-F is in conflict with proposed drainage. Please revise.	The plan has been revised to relocate the hydrant branch due to the conflict with the drainage.	MW	10/6/2025
35	13 - UTILITY PLAN		The existing water near BLDG-E is cut and capped on one side but not the other. It is unclear the abandoned, remain active, and removal limits. Please revise.	The existing water at Building E is now noted as being cut and capped at both ends.	MW	10/6/2025
36	16 - DETAIL SHEET	ADA	Accessible ramps are missing detectable warning panels please show these on the plans.	Neither the ADA nor the MA AAB regulations require detectable warning panels on the curb ramps.		
36A	13 - UTILITY PLAN & 19 - DETAIL SHEET	521 CMR Section 18.8	Per 521 CMR Section 18.8, Detectable warnings shall be provided where a walk crosses or adjoins a vehicular way. Please show these on the plan and details.	The section cited is titled "Transportation Terminals" and is not applicable to this site.		
37	17 - DETAIL SHEET		Is there a brick section for the DRAIN MANHOLE? Based on what is shown, the 6" frame is to be directly on top of the cone/slab section. Please consider providing a brick section for future field adjustments.	The drain manhole detail has been revised to specify brick under the manhole frame and cover.	MW	10/6/2025
38	17 - DETAIL SHEET		Deep sump catch basin eccentric cone detail shows a pipe entering the structure. There doesn't seem to be any CBs online, like in this detail. Please revise.	The catch basin detail has been revised to remove the pipe shown entering the structure.	MW	10/6/2025
39	18 - DETAIL SHEET	Town of Dracut Stormwater Management Rules and Regulations Section 7. B.3.c.i.	Please clarify where oil & water separator is being proposed. The project is within a LUHPPPL, therefore an oil & water separator should be provided.	The project site is considered a LUHPPPL due to the high intensity use parking lot. Two First Defense hydrodynamic particle separators with internal storage for sediment and floatable hydrocarbons are proposed as part of the redevelopment as equal measures to a traditional oil/water separator. The project will convert a significant area of existing paved parking lot into building roof, which will greatly reduce the area of high intensity parking lot which is exposed to rainfall thereby providing an improvement over existing conditions. We believe this design approach is appropriate for the use and consistent with the intent of the regulations for high intensity use parking lots.	JT	10/6/2025
40	18 - DETAIL SHEET		Please indicate material for service pipe on water service connection detail.	The detail has been revised to indicate the water service will be Type K copper.	MW	10/6/2025
41	18 - DETAIL SHEET		There is a detail for a thrust block, please clarify where this is proposed. Are there any thrust blocks proposed other than at tees? Thrust blocks should be used at all bends as well.	The detail for thrust blocks has been updated to include bends as well as tees.	MW	10/6/2025
42	19 - DETAIL SHEET		There is a detail for a sanitary sewer manhole and one for a sewer service cleanout, please clarify where these are proposed.	Neither are currently proposed for this project. The details have been removed from the plans.	MW	10/6/2025



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STORMWATER REPORT						
43	Proposed Conditions & Compliance with MassDEP Stormwater Standards	Town of Dracut Stormwater Management Rules and Regulations Section 7.E.1	The proposed conditions section says that this project meets 50% TP removal to the maximum extent practicable. But, this project does not have any measurable amount of TP removal. Therefore, the requirement is not met. The applicant performed test pits and it appears infiltration bmps are feasible based on soil type and seasonal high groundwater. Also, the water quality structure chosen is a hydrodynamic separator that does not claim phosphorus removal. There are water quality structures that have filters designed to remove phosphorus to meet this requirement. Please revise to meet the 50% TP removal requirement.	An underground infiltration system has been added to the design. This system will provide treatment of contributing runoff and achieve approximately 60%-70% TP removal in accordance with the MassDEP Stormwater Handbook		
43A	Proposed Conditions & Compliance with MassDEP Stormwater Standards	Town of Dracut Stormwater Management Rules and Regulations Section 7.E.1	No calculations have been provided to confirm that there is enough water quality volume to treat the contributing area (0.8" times contributing impervious area). Please provide calculations showing the required water quality volume (0.8 in times the total post construction impervious area of the redeveloped site). The stormwater report shows between 1,744 and 1,923 cfs is provided. Please confirm this meets the water quality requirements. If this isn't fully met then an explanation needs to be provided stating why it can't be met and why it is considered to be meeting the requirement to the maximum extent feasible.	<p>The contributing area to the proposed underground system is 36,583 sf of which 26,444 sf is pavement. The water quality volume of runoff from the paved surfaces is 1,896 cfs using an 0.8 inch depth. The underground system has capacity to store 1,854 cfs before discharging through the overflow pipe. The underground system can nearly store the water quality volume statically and is designed to provide treatment to the maximum extent practicable given the numerous site constraints and will result in a significant improvement in water quality over existing conditions. In addition, the water quality unit (First Defense) upstream of the underground system is able to achieve 80% TSS removal prior to runoff entering the system.</p> <p>The First Defense water quality units are sized based on water quality flow to treat runoff from their contributing areas which we believe meets the intent of the performance standards for redevelopment sites.</p> <p>Though not included in the analysis, per recently obtained record plans, additional treatment through recharge is provided in the existing underground infiltration rows.</p>		
44	Compliance with MassDEP Stormwater Standards	Town of Dracut Stormwater Management Rules and Regulations Section 7.G.12	The project did not provide sizing calculations to show the drainage pipes are sized to accommodate the 25 year storm and maintain velocities between 2.5 and 10 fps. Please provide.	<p>Pipe sizing calculations have been provided for the proposed drain pipes however, the existing drainage system, which is largely remaining in place, is not sized for the 25-year storm. This redevelopment project will reduce impervious surfaces, and will provide stormwater infiltration on site, resulting in improvements to the existing conditions and providing compliance with the MA stormwater standards to the maximum extent practicable.</p>		
44A	Compliance with MassDEP Stormwater Standards	Town of Dracut Stormwater Management Rules and Regulations Section 7.G.12	We defer to the Board if this is acceptable.			
45	Stormwater Modeling Methodology/Appendix G - Supplemental Calculations and Backup Data		The rainfall data provided and modeled is for the 12 hr rain event not the 24 hr rain event. Please revise to use the 24 hr rainfall event.	The rainfall data has been corrected to utilize the 24 hr events as noted.	MW	10/6/2025
46	Appendix C - Soils Information		Please provide hydrologic soil groups for the soils in the NRCS soil report.	The hydrologic soil group information has been added to the NRCS soil report.	MW	10/6/2025
47	Appendix G - Supplemental Calculations and Backup Data (First Defense High Capacity)		Please provide Water Quality flow calculations to confirm the correct First Defense model to be proposed to achieve 80% TSS removal rates.	Water Quality Flow calculations are included in Appendix G of the revised Stormwater Management Report.	MW	10/6/2025
48	Operation & Maintenance Plan		O&M Plan must be signed.	Prior to construction, a final, signed O&M plan will be submitted to the town.		
48A	Operation & Maintenance Plan		We recommend this be made a condition of approval.			
2nd Review						
CIVIL PLANS						
49	10 - GRADING & DRAINAGE PLAN (2 OF 4) & 20 - DETAIL SHEET		For the infiltration system detail, please show SHGW elevation relative to the system to confirm at least 2' separation is provided.	The SHWT has been depicted and labeled on the detail.		
50	HydroCAD		The subsurface system does not have capacity for the 100-year storm based on the HydroCAD model. The peak elevation is 104.14' which is 4.14' above the top of the subsurface chamber system. It is recommended that stormwater BMPs are sized for the 100-year storm event.	We acknowledge that the analysis shows that the underground system surcharges during a 100-year storm, however we feel the design is appropriate given that the capacity of the on-site conveyance pipes will be greatly exceeded during a 100-year storm. The inflow rate to the system during a 100-year storm is 8.23 cfs which cannot be conveyed through a 12 inch pipe. Increasing the size of the system would not provide a net benefit in this case.		
51	HydroCAD		The outlet pipe for the subsurface chamber system is coming out of the separator row instead of the chambers. The separator row is meant to trap sediment before discharging to the chambers. Therefore, the outlet pipe should be on the regular chamber and not the separator row chamber. Please revise.	The outlet pipe configuration has been revised as noted.		