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December 17, 2021

Sutton Planning Board
Sutton Town Hall
4 Uxbridge Road
Sutton, MA 01590

Re: Definitive Subdivision Plan of Land Application
UGPG RE Sutton LLC
Providence Road at Boston Road, Sutton, Massachusetts

Dear Members of the Sutton Planning Board:

On behalf of the applicant, below please find responses to all comments received to date, including comments from the Board of Assessors, Graves Engineering, the Planning and Economic Development Director, the Wilkinsonville Water District, and the general public. Together with our narrative responses below, we are submitting:

- Roadway plans, revised December 16, 2021;
- Definitive subdivision plan, revised December 16, 2021;
- Stormwater Management Report- PDF copy emailed to Graves Engineering (hard copies to follow Monday December 20, 2021).

Copies of this submittal have been sent to Graves Engineering via overnight delivery and to Wilkinsonville Water District via hand delivery.

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| I. | <u>Robert Nunnemacher - Board of Assessors Comments:</u> |
| 1. | The Board requests one AUTOCAD drawing of the entire approved subdivision and lots showing all the property lines and the related property line labels (bearings, distances or curve data), areas in acres and square feet, road names, town lines, easement lines, zoning lines and street names. |
| | Response: The surveyor of record will provide these files. |
| 2. | A street name of Unified Parkway for Lot 6 is acceptable. |
| | Response: Noted. The street name "Unified Parkway" has been added to the plans. |

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| 3. | Since Unified Parkway will not be a public way how will the public be restrained from using this as a major shortcut between Boston Road and Providence Road? |
| | Response: “Private Way – No Thru Traffic” signs have been added to the plans at the roadway entrances at Boston Road and Providence Road to address this concern. Certain residents have expressed a desire for Unified Parkway to become a public way. The Applicant is open to discussing whether the Town would want to accept the proposed roadway as a public road. |
| 4. | Will the Wilkinsonville Water District continue to use their existing drive or will they have access and utilities from Unified Parkway over a new driveway? |
| | Response: The applicant is committed to maintaining an access and utility easement to the existing Hatchery Drive well location. The Applicant has been actively coordinating with the Wilkinsonville Water District to determine their preferred access path to the existing well. While the final access path has not been finalized at this time, access and utility service will be maintained for the Wilkinsonville Water District. |
| 5. | Lot areas shall be shown to the nearest square foot and the acreage to two decimal places. |
| | Response: The surveyor of record has addressed this on the plans. |
| 6. | It appears that the minimum text height of 1/10 of an inch plan recording requirement is not complied with. |
| | Response: The surveyor of record has addressed this on the plans. |
| 7. | Only one of possible multiple abutter names are shown and may not be current. |
| | Response: The surveyor of record has addressed this on the plans. |
| 8. | Not all of the proposed lot lines have the appropriate linetype as shown in the legend. |
| | Response: The surveyor of record has addressed this on the plans. |
| 9. | All possible property comers on the perimeter and interior should be set and shown on the plan. |

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| | Response: The surveyor of record has located 38 property markers on the perimeter of the property and in their professional opinion, these markers are more than adequate for another surveyor to recreate the same parcel. New interior lot corners will be set upon completion of construction. |
| 10. | Are all the monuments shown exactly located at the property corner? If not they should be referenced. |
| | Response: The surveyor of record has addressed this on the plans. |
| 11. | All corners of Unified Parkway should be monumented. |
| | Response: The surveyor of record has addressed this on the plans. |
| 12. | The town boundary corner monuments should be shown on the plan. If they are missing they should be replaced. |
| | Response: The surveyor of record has addressed this on the plans. |
| 13. | Providence Road on the west side of the railroad as shown on sheets 2 & 3 should be widened or moved westerly so as to increase the curve radius (similar to the curve on the east side) to provide better sight distance for all vehicles and the turning radius for large trailer trucks. |
| | Response: Any traffic that may be generated by the future development of this subdivision will be reviewed by the Planning Board as part of site plan review process and is not before the Board as part of this Definitive Subdivision Plan. Accordingly, the Applicant does not believe improvements to Providence Road are warranted as part of the review of this Definitive Subdivision Plan. |
| 14. | The railroad siding tracks are not shown on sheet 2. Are they to be removed? |
| | Response: The rail switch has been removed and the tracks are no longer functional. |
| 15. | No existing buildings are shown on sheet 2. |
| | Response: The surveyor of record has addressed this on the plans. |
| 16. | The "sheet 3/sheet 4" text is "masked" and obscures the text under it. |

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| | Response: The surveyor of record has addressed this on the plans. |
| 17. | The present location of Hatchery Drive should be shown for the first couple of hundred feet southwest of Providence Road. |
| | Response: The surveyor of record has addressed this on the plans. |
| 18. | Is the center or one of the sidelines of Cold Spring Brook shown? Both sidelines should be shown for clarity. |
| | Response: The surveyor of record has addressed this on the plans. |
| 19. | Are the easement lines and overhead wire lines on sheets 4 & 9 to be retained (see #4)? Should the location of the existing primary water line also be shown? |
| | Response: The applicant is committed to maintaining an access and utility easement to the existing Hatchery Drive well location. The Applicant has been actively coordinating with the Wilkinsonville Water District to determine their preferred access path to the existing well. While the final access path has not been finalized at this time, access and utility service will be maintained for the Wilkinsonville Water District. |
| 20. | The brook commencing in the Wilkinsonville Water District land and going northeasterly through UGPG land to Providence Road is not shown. |
| | Response: The surveyor of record has addressed this on the plans. |
| 21. | The ownership of the easement on sheets 6 & 12 is not shown (probably a NEPCO easement). |
| | Response: The surveyor of record has addressed this on the plans. |
| 22. | On sheet 9, left side middle: what is the "S52°53 '20"E 10.00" supposed to be for? |
| | Response: The surveyor of record has addressed this on the plans. |
| 23. | On sheets 10 & 17 monument labels are obscured by property lines. |
| | Response: The surveyor of record has addressed this on the plans. |

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| 24. | On sheets 10 and/or 17 Cold Spring Brook is not shown at the Boston Road side. |
| | Response: The surveyor of record has addressed this on the plans. |
| 25. | On sheet 12 the south line of the NEPCO easement goes through several property lines labels. |
| | Response: The surveyor of record has addressed this on the plans. |
| 26. | On sheet 16, why is the easterly line of Lot 6 not parallel to the westerly line? |
| | Response: Unified Parkway (a.k.a. Lot 6) changes width to account for the required roadway geometry. In this section of the roadway, a tapered right turn lane has been designed, as such the proposed lot line reflects this condition. |
| 27. | On sheets 15, 16, 17 & 23 bearings and distances should be attached to the Zoning line that passes through Lot 5 for future clarification. |
| | Response: The zoning lines are established by the Town of Sutton's Zoning Map. |
| 28. | On sheets 18 & 19 there are no claims of ownership on the UGPG side half of Caplette Road. |
| | Response: It is the Applicant's understanding based on its conversations with the Planning Department that the ownership of the UGPG side of Caplette Road will be addressed through a warrant article at May 2022 Town Meeting. |
| 29. | On sheets 22 & 23 the Town should try to get a road widening easements from UGPG and Bruce Williams to widen the constricted portions of Dudley Road. |
| | Response: Any traffic that may be generated by the future development of this subdivision will be reviewed by the Planning Board as part of site plan review process and is not before the Board as part of this Definitive Subdivision Plan. Accordingly, the Applicant does not believe improvements to Dudley Road are warranted as part of the review of this Definitive Subdivision Plan. |
| 30. | Sheet 23, there is no "Wilkinsonville Road", it is the former location of Boston Road |
| | Response: Per the surveyor of record – H-3880-R County LO – county alters Boston Road which covers a portion of width and not the entire ROW. No records were |

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| | found at the registry suggesting that the town released rights to Old Wilkinsonville Road. Therefore, it remains a public ROW. |
| II. | <u>Jeffrey M. Walsh (Graves Engineering (GEI)) – Peer Review Comments:</u> |
| | <u>Subdivision Rules & Regulations</u> |
| 1. | GEI reviewed the waiver requests. GEI has no technical issues with the waiver requests except as noted in the three following comments. |
| | Response: Noted. |
| 2. | Use of curb inlets - GEI recommends that the waiver request to eliminate catch basin curb inlets be denied. Curb inlets serve a useful purpose of providing additional inlet hydraulic capacity and will allow inlet flow when catch basin grates are partially or fully clogged with leaf litter or trash. Furthermore, granite catch basin curb inlets and transition stones are customarily required in Sutton subdivisions, including the South Sutton Commerce Park industrial subdivision. GEI would not have an issue with the waiver request to allow catch basin spacing of approximately 325 feet near Basin 4 provided that the catch basins are configured with granite curb inlets and transition stones and that catch basins CB-402 and CB-403 at the intersection of Boston Road be configured with double-inlet grates instead of single-inlet grates. (§4.B.2.b) |
| | Response: Granite catch basin curb inlets and transitions have been added to the plans. Refer to the notes provided on the grading and utility plans. Also, CB-402 and CB-403 are now shown as double inlet grates on the plans. |
| 3. | GEI recommends that granite curbing be provided at the radii of the roadway intersections at Boston Road and at Providence Road, and at the intersections of the proposed road and the future site driveways. Such a configuration was used at South Sutton Commerce Park and served to discourage truck drivers from "cutting corners" and allowing truck tires to otherwise encroach upon and damage the curbing and road shoulders. (§5.G.1) |
| | Response: The plans now show granite curbing at the radii of the roadway intersections at Boston Road and Providence Road. In addition, notes have been added to call out required granite curbing along the radii at the intersections of the future site driveway. A vertical granite curb detail has been added to the plans. |

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| 4. | GEI recommends that a tree be added at stations 41+60+/- right and 42+90+/- right, and along the right (south) side of the road between stations 49+50+/- and 55+50+/- once the final layout of the Boston Road intersection has been determined. (§5.J.4) |
| | Response: Along the road, trees at have been added at stations 41+60, 42+90 and the south side between stations 49+50 and 55+50. |
| 5. | GEI has no issues relative to compliance with the Subdivision Rules & Regulations except for the following eight comments. |
| | Response: Noted |
| 6. | The plans do not currently have the subdivision name - GEI defers to the Planning Board whether a subdivision name other than "Proposed Road" is needed. The name and address of the owner of record, and the applicant need to be added to the plans. (§3.C.2.a) |
| | Response: The subdivision name of "Unified Parkway" has been added to the plans. The name and address of the owner of record along with the applicant have been added to the cover sheet of the plans. |
| 7. | The land plans prepared by WSP USA Inc. need to include the installation of granite monuments and iron pipes/rods. (§3.C.2.f & §5.M). |
| | Response: The surveyor of record has addressed this on the plans. |
| 8. | The lot areas in square feet need to be added to the land plans prepared by WSP USA Inc. (§3.C.2.g). |
| | Response: The surveyor of record has addressed this on the plans. |
| 9. | On Sheet C-901, construction detail "Typical Subdrain Detail" inadvertently indicates a minimum pipe depth of 2 feet. Per the regulations, the minimum depth of cover should be 2 feet. (§4.B.1.b) |
| | Response: The "Typical Subdrain Detail" has been revised to note the minimum depth of cover should be 2 feet. This detail is now shown on Sheet C-902. |
| 10. | Although listed in the table of contents for Appendix F of the Drainage Report, GEI did not receive pipe sizing calculations, which are required. The pipe sizing |

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| | calculations will need to include the reconfiguring of the drop inlet at the Boston Road entrance. (§4.B.2.b) |
| | Response: The pipe sizing calculations have been provided. These calculations include the reconfigured drop inlet at the Boston Road entrance. This existing structure has been revised to a double grate, eight-foot diameter basin. |
| 11. | On Sheet C-902, construction detail "HDPE Storm Drainage Trench" should specify bedding material per the regulations. (§4.B.2.b) |
| | Response: The "HDPE Storm Drainage Trench" detail has been revised accordingly. |
| 12. | GEI recommends that on Sheet C-901, on the construction detail "Typical Pavement Section" the thickness of the binder course be revised from 1-1/2" to 2-1/2". A binder thickness of 1- 1/2" is thin for the heavy-duty truck traffic that will use road. Furthermore, for comparison the South Sutton Commerce Park project had a binder course thickness of 2-1/2". (§5.F.3) |
| | Response: Per the project geotechnical engineer, they are recommending a Typical Pavement Section of 2.5 inches of binder course and 4 inches of wearing course based on the known soil conditions and projected uses. The plans have been updated. |
| 13. | On Sheet C-901, on the construction detail "Bituminous Concrete Sidewalk Pavement Section" the thickness of the gravel borrow needs to be revised from six inches to eight inches. Also, GEI recommends that the bituminous wearing course thickness be increased to 1-1/2". (§5.1.3.) |
| | Response: Per the project geotechnical engineer, they are recommending a Typical Sidewalk Pavement Section of 3 inches based on the known soil conditions. The plans have been updated and the gravel borrow has been increased from 6-inches to 8-inches. |
| | <u>Hydrology Calculations & Stormwater Management Review</u> |
| 14. | The hydrology computations and stormwater management documentation address construction of the subdivision road only, which is reasonable. As site development plans are prepared and submitted for approval, the hydrologic effects associated with lot development and stormwater management for the lots will have to be addressed during site plan review. |

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| | Response: Noted. |
| 15. | GEI reviewed the hydrology computations and found them to be in order except for the following comment. |
| | Response: Noted. |
| 16. | Pre-development Subcatchment E4 consist of a northern area and southern area that drain to different wetlands before the stormwater reaches a stream that is common to both areas. Subcatchment E4 and its corresponding post-development subcatchment(s) need to be divided so that peak runoff rates to each wetland system can be evaluated independently. |
| | Response: The stormwater report and calculation have been revised to divide Design Point 4 as recommended. |
| 17. | Compliance with the MassDEP Stormwater Standards and Stormwater Handbook is reasonable except as noted in the following comment. |
| | Response: Noted. |
| 18. | On Sheet C-403, access to the northern gate of Stormwater Management Area #2 is proposed down a 3H:1V (33%) slope. The slope of access to a stormwater basin can't exceed 20%. |
| | Response: The grading to the access to Stormwater Management Area #2 has been revised on the plans. |
| | <u>General Engineering Comments:</u> |
| 19. | Available sight distances for drivers of both passenger vehicles and trucks need to be evaluated and shown on the plans. At the Providence Road entrance there is an existing stone wall along the project's frontage; portions of the wall are noted to be rebuilt on Sheet C-402. The plans need to be clear as to how the wall is to be rebuilt so that adequate sight lines and distances are provided. Likewise at the Boston Road entrance, where a dead tree and understory could inhibit sight lines for drivers looking right as they attempt to exit the subdivision. |
| | Response: Sight distance lines have been added to the plans. The measured sight distance exceeds the minimum AASHTO design standard for this intersection of this |

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| | nature. Along these lines and between these lines and the street, plantings and amenities (e.g., stone walls) will be carefully rebuild or modified to ensure that no objects are not in excess of three feet tall to ensure these sight distances are maintained. |
| 20. | Intersection layout plans with turning templates for the largest vehicle anticipated to access the site (assumed to be a WB-67) need to be provided. The intersection designs need to allow trucks turning left to enter the site and trucks turning right to exit the site to pass one another. As currently proposed, it appears that two trucks will not be able to pass, which would result in traffic delays on the existing streets. |
| | <p>Response: Truck turning templates have been applied to the Providence Road/Unified Parkway intersection and are shown on the revised plans. The radii of the proposed Unified Parkway curb has been adjusted as needed to ensure that the largest anticipated trucks can safely navigate the intersection.</p> <p>Truck turning templates have not been applied to the Boston Road/Unified Parkway intersection because as previously noted, the intersection layout presented in this submission is a preliminary design and will be revised similar to what was shown in the conceptual plan included with the original submission. As can be seen on the conceptual plan, truck turning templates were applied to the layout and will be further refined and presented as part of the formal intersection improvement plan in conjunction with the site plan approval process for the development of this subdivision.</p> |
| 21. | Although sidewalks don't currently exist at the two proposed project entrances, cross walks and accessible curb cuts should be proposed across the proposed subdivision street - a pedestrian will have to travel approximately 90 feet to cross the subdivision street |
| | Response: Following a discussion with the Town, it is our understanding that crosswalks are not preferred on Boston Road or on Providence Road, but that a crosswalk is preferred to provide pedestrian connections within the subdivision. A crosswalk and an accessible curb ramp are now shown on the plans to connect the sidewalk along the road to a future sidewalk for Lot 2 and Lot 3. |
| 22. | Sheet 17 of the Existing Conditions Plans shows a 68" diameter sycamore tree near the proposed Boston Road entrance. The construction plans do not show the tree. The |

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| | tree should be shown on the construction plans and efforts made to retain the tree as part of the project. |
| | Response: The existing tree has been added to the plans and the applicant will make every effort to preserve the tree. |
| 23. | GEI understands that off-site improvements needed to address the number of vehicle trips or the type of vehicle(s) using the existing street network resulting from development of the lots will be addressed during site plan review for each lot, once the use and extent of development on each lot is determined. |
| | Response: Noted. The Applicant recognizes that any required off-site traffic improvements will be addressing during site plan review for each lot. |
| 24. | On Sheet C-903, construction detail "Typical Roadway Cross Section A-A" depicts the proposed retaining wall outside of the right-of-way. However, the Layout Plans (Sheet C-302) propose the retaining wall shall be within the right-of-way. GEI recommends that the Planning Board require any retaining walls to be outside the right-of-way. |
| | Response: The retaining wall is to be located within the right-of-way because it is a private way. The detail "Typical Roadway Cross Section A-A" has been revised to show this location correctly. |
| 25. | A sewer main is proposed between Providence Road (station 0+00+/-) and station 13+50+/-, thereby providing Lots 1, 2 and 4 direct access to the sanitary sewer system. The design engineer should explain how Lots 3 and 5 will be served by sanitary sewer. |
| | Response: A sewer main will be installed in the proposed roadway from Providence Road to approximately station 13+50 as shown on the plans. Stubs have been provided to Lot 1 and Lot 4. The sewer for Lots 2, 3 and 5 will flow towards Hatchery Drive and then connect to Providence Road. A sleeve has been added to the plans to allow for the future sewer from Lot 5 to cross the proposed roadway. The proposed sewer for each lot will be addressed through site plan review for individual lots. |
| 26. | The existing drop inlet at the Boston Road entrance that is to be reconfigured will be located in the new intersection. Because of the proposed curbing, runoff would probably bypass the reconfigured drop inlet's new grate. A new inlet should be |

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| | proposed upgradient of the intersection to capture the stormwater before it enters the intersection. |
| | Response: This existing structure has been revised to a double grate, eight-foot diameter basin. |
| | <u>General Comments:</u> |
| 27. | On Sheet C-403, the drain manhole at station 13+60+/-, 33' left needs to be labeled. |
| | Response: The label has been added to the plans. |
| 28. | On Sheet C-404, the headwall downstream of OCS-300 needs to be labeled. |
| | Response: The label has been added to the plans. |
| 29. | Sheet C-806 was inadvertently named as C-80C. |
| | Response: The sheet name has been corrected. |
| 30. | On Sheet C-902, construction detail "Typical Basin Cross Section Detail" refers to the Layout Plans, the reference should be revised to the Grading and Drainage Plans. |
| | Response: The reference has been corrected on the "Typical Basin Cross Section Detail". |
| 31. | On Sheet C-903, the roadway cross sections indicate the placement of 4" of loam for the proposed 4 ft. wide planting area. However, the Landscape and Lighting Plans (Sheets C-702 to C-706) indicate the placement of 6" of loam. The loam depth should be consistent. |
| | Response: The roadway cross section has been corrected to indicate the placement of 6" loam. |
| 32. | Construction details need to be provided for the proposed headwalls, sewer manholes and fence gates. |
| | Response: Details have been added to the plans for the proposed headwalls and sewer manhole. The fencing around the proposed basins have been removed from the plans. Therefore, there will be no fence gates. |

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| 33. | GEI understands that the proposed water and sewer utilities will be reviewed by the applicable utility provider. |
| | Response: Noted. The Applicant will continue to coordinate with the applicable utility providers. |
| III. | <u>Jennifer S. Hager – Planning & Economic Director Comments</u> |
| | <u>General Comments</u> |
| 1. | <p>The applicant has requested several waivers. Typically, these waivers are reviewed and addressed during the hearing process. However, two of the waiver requests need to be addressed as soon as possible.</p> <ul style="list-style-type: none"> ○ Section 2.d. - This section of the Regulations prohibits work on the site until approval of the subdivision and completion of the appeal period. The applicant requests that they be allowed to continue with a specific amount/type of site work. My only concern/question is if earth will be removed from the site. If so and Earth Removal Exemption application should be submitted and acted upon. ○ Section 3.C.1.f, 3.C.2, & 3.C.2.g – These sections prescribe various plan scales. The applicant has explained their use of differing scales. The plans show sufficient detail at the scales that were utilized. |
| | Response: At the Board’s hearing on December 6, 2021, the Planning Board voted to approve both requested waivers. |
| 2. | Dudley Road should be shown more completely and labeled on the “Overall” plan sheets. |
| | Response: Dudley Road is now shown clearly and labeled on the “Overall” plan. |
| 3. | Please specify aesthetic material and color for retaining walls. |
| | Response: Magnum Stone, by Cornerstone is proposed for the retaining wall system. A natural gray color is proposed. |

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| 4. | Please use alternate fencing on retaining walls similar to the attached. |
| | Response: Black vinyl chain link fence is proposed along the top of the retaining wall to provide fall protection (due to the wall height). Black chain-link fence is preferred due to the proximity of the fence to the edge of the roadway and snow removal operations. Any “solid” type fence would be subject to snow loading and possible damage. |
| 5. | Fencing is not required or recommended around detention ponds unless the applicant has a specific reason to do so. If fencing is utilized, please specify fence type. Galvanized chain link may not be utilized. |
| | Response: The fencing has around the detention basins has been removed from the plans. |
| 6. | The impact of headlights on properties across from the intersection of the roadway and Boston and Providence Roads should be considered and mitigated. |
| | Response: The geometric configuration of the proposed Unified Parkway/Boston Road intersection will be determined by the traffic volumes presented as part of the site plan review process for Buildings 1, 2 and 3. Accordingly, alterations to the intersection are premature in this Definitive Subdivision Plan proceeding. The configuration shown in this submission is preliminary and the Applicant is committed to doing what it can to mitigate headlight glare to the abutting properties, including, if warranted, realigning the southbound left turn approach to Boston Road in an easterly direction to reduce glare. |
| 7. | A no left turn for trucks sign should be installed at the Boston Road exit. |
| | Response: Any traffic that may be generated by the future development of this subdivision will be reviewed by the Planning Board as part of site plan review process and is not before the Board as part of this Definitive Subdivision Plan. Accordingly, the Applicant does not believe such signage is warranted as part of the review of this Definitive Subdivision Plan. |
| | <u>Subdivision Rules & Regulations</u> |
| 3.C.1.f. | The applicant has utilized an alternate scale that is adequate to show required details. Waiver requested |

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| | Response: At the Board's hearing on December 6, 2021, the Planning Board voted to approve the requested waiver. |
| 3.C.2. | The applicant has used an alternative scale that is adequate to show required details. Waiver requested for alternate scale as shown on plans. |
| | Response: At the Board's hearing on December 6, 2021, the Planning Board voted to approve the requested waiver. |
| 3.C.2.a. | Name and address of owner and applicant are not apparent on the plan set. |
| | Response: The name and address of the owner and applicant has been added to the cover sheet. |
| 3.C.2.c | Abutters across Providence, Buttonwood, Boston, and Dudley Roads are not shown. |
| | Response: The surveyor of record has addressed this on the plans. |
| 3.C.2.d. | Area and metes and bounds of easements is not shown. |
| | Response: The surveyor of record will provide metes and bounds on any new easements created. However existing easements do not have metes and bounds descriptions and therefore the surveyor cannot define the easements with metes and bounds. Approximate widths of existing easements will be shown where possible. |
| 3.C.2.f. | Permanent benchmarks are not apparent on the plan set. |
| | Response: The surveyor of record has addressed this on the plans. |
| 3.C.2.g. | The applicant has used an alternative scale that is adequate to show required details. Waiver requested. However, Dudley and Buttonwood Ave. should be shown and labeled on the Site/Locus map and both this map and the USGS map should be oriented in the same direction. |
| | Response: Dudley Road and Buttonwood Ave. are now shown and labeled on the Site Locus Map located on the cover sheet. Also, the Site Locus map and USGS map are now shown at the same orientation. |
| 3.C.2.h. | The square feet of lots is not shown. |

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| | Response: The surveyor of record has addressed this on the plans. |
| 3.C.2.j. | The covenant notation is not apparent on the recordable plans. The date block should be adjusted on the recordable plans to mirror the Bohler signature blocks for No Appeal and just the date of endorsement under the Boards signature lines. The other date lines should be eliminated. |
| | Response: The surveyor of record has addressed this on the plans. |
| 3.C.2.m. | The error of closure note is not apparent on the plans. |
| | Response: The surveyor of record has addressed this on the plans. |
| 4.A.2.k. | The roadway cross section is not like that in the appendix. A waiver must be requested. |
| | Response: The proposed roadway cross sections are different than the typical roadway cross section shown in Appendix A of the Bylaws. A waiver will be requested. |
| 4.A.3. | The width of roadway is proposed at 46' and 58'. Why is the roadway proposed so wide? A waiver must be requested. |
| | Response: It is the Applicant's position that the section 4.A.3 of the Subdivision Rules and Regulations does not establish a maximum width. The width of the roadway is to allow for the safety of the truck travel. Turn lanes are proposed at the entrance to the Providence Road and Boston Road along with the future site entrances. To the extent required, a waiver will be requested. |
| 4.B. | Stormwater Management - This will be reviewed in detail by the Town's consulting engineer. |
| | Response: Noted. |
| 4.D. | Fire Protection - As there has been discussion about the availability of an adequate supply of water for firefighting purposes, as each lot is proposed for development, the applicants will need to satisfy the Fire Department that an acceptable and Code compliant means has been provided in the form of certification of pressure and flows from the local water district and/or tank installation on the site or some other allowed means. |

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| | Response: The Applicant has been in discussions with the Wilkinsonville Water District regarding the nature of this project and projected domestic water demands. The discussion of fire protection has also been discussed with the District and the Applicant has committed to install onsite fire storage tanks (and pumps) should the engineer of record determine they are needed based on Code requirements. |
| 4.F. | The square footage of easements must be provided as their area cannot be counted toward required lot area. |
| | Response: The surveyor of record has addressed this on the plans. |
| 4.F.3. | Temporary construction easements may not be necessary for this subdivision as the roadway is intended to remain private and the lots are to be developed by the overall parcel owner. A waiver is required. |
| | Response: Because the proposed roadway is a private way, no temporary construction easements are required for the proposed subdivision. To the extent required, a waiver will be requested. |
| 4.H. | Removal of trees over 12" shall be prohibited in the front setback of proposed lots unless otherwise allowed by the Board. Please specify if trees exist and how they will be maintained. |
| | Response: Some trees, 12-inches or greater, within the proposed 50-foot Front Yard Setback to Lot 1 and 2 will be impacted as part of the required grading for the roadway construction. An inventory of these trees was conducted and approximately 110 were identified. The Applicant will commit to replacing these trees on a one to one ratio as part of the site plan approval process for Lots 1, 2 or 3. |
| 5.G.1. | Curbing shall be granite. Waiver requested for cape cod berm with concrete at intersections. |
| | Response: Noted. |
| 5.I. | Lighting – Please specify lighting fixture and pole color. IE: black |
| | Response: The proposed light fixture is a Lithonia Lighting DSX2 LED P8 40k T2M MVOLT mounted to a 35-foot pole. The proposed color is black. |

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| 5.I.4. | Sidewalks shall be of Portland cement concrete. Waiver requested for bituminous sidewalk. |
| | Response: Noted. |
| 5.J.4. | Please consider adding some sycamores, if appropriate for these soils, as these trees are historic and notable in Wilkinsonville. Waiver requested for total number of trees. |
| | Response: Sycamore trees have been added to the plans. |
| 5.M.1. | Granite monuments shall be installed along streets, please indicate this on the plans. |
| | Response: The surveyor of record has addressed this on the plans. |
| 5.M.2. | An iron pipe or iron rod marker shall be installed at all lot corners, please indicate this on the plans. |
| | Response: The surveyor of record has addressed this on the plans. |
| 4.B.2.b. | Reduction in cover over storm drains and size of pipe near Providence Road. |
| | Response: Waiver requested as noted on the cover sheet of the plans. |
| 4.B.2.c. | Increase in distance between catch basins at select locations and elimination of curb inlets. |
| | Response: Waiver requested as noted on the cover sheet of the plans. |
| 4.B.2.f. | Flared end section instead of headwalls at some locations. |
| | Response: Waiver requested as noted on the cover sheet of the plans. |
| | <u>Traffic Study Comment:</u> |
| | On residential subdivisions we require a traffic study with the submission of the application because the Institute of Traffic Engineers (ITE) has determined the average trip generation for various types of housing so a fairly accurate impact can be determined at that point. Additionally, it would not be appropriate to expect individual homeowners to implement traffic mitigation as they build their individual homes. When we are considering industrial subdivisions like Gilmore Drive and this subdivision, and we are unaware of the potential uses that will locate on the parcels, |

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| | we typically require traffic studies as each use undergoes its individual site plan review process. Therefore, when an industrial subdivision is filed our questions usually focus on whether we feel the proposed roadway is adequate for the potential traffic from proposed lots and are there any minimum improvements that may be necessary on abutting roadways with typical uses. This is why the applicant has submitted a conceptual drawing of likely improvements to Boston Road that would be necessary with some industrial build out that involves trucks. |
| | Response: Noted. |
| IV. | <u>Donald A. Provencher (Provencher Engineering) -Wilkinsonville Water District Comments:</u> |
| 1. | The stormwater calculations have been reviewed and were found to be complete and satisfactory. Adequate treatment of stormwater has been provided in the design, as well as more than adequate infiltration recharge. No increase in stormwater runoff peak flows or volumes are proposed. |
| | Response: Noted. |
| 2. | Test pits have been excavated in proposed stormwater detention /infiltration areas, and we have confirmed that adequate offset to groundwater exists at proposed stormwater detention/infiltration areas |
| | Response: Noted. |
| 3. | The subdivision plans have been reviewed and found to be complete and satisfactory, including erosion control measures. The boundary of the existing Zone II wellhead protection area of the WWD's Hatchery Road well has been depicted on the plans. |
| | Response: Noted. |
| 4. | The Long-Term Pollution Prevention Plan (LTPPP) was reviewed. The post-construction party responsible for implementing and maintaining the post development pollution prevention controls is identified as the applicant, UGPG RE Sutton, LLC. We request clarification as to the responsibility for the removal of snow and deicing practices for the proposed new roadway, in an effort to confirm whether those tasks are to be provided by the Town or by the applicant. |

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| | Response: As the proposed roadway is a private roadway, the Applicant will be responsible for the removal of snow and deicing on the proposed roadway, all as set forth in the Operations & Maintenance Plan. |
| 5. | The LTPPP calls for the minimization of the amount of sand and deicing chemicals to be applied on the roadway and recommends deicing chemicals as a pretreatment to snow / ice storm events. We recommend that the planning board condition any future approval such that no crystalized sodium chloride or other crystalized salt be allowed to be applied on the proposed subdivision roadway within roadway areas that drain and discharge into the Zone II of the Hatchery Road Well. This roadway area is specifically between proposed roadway stations 11+00 and 49+00. We recommend that deicing practices be limited to pre-treatment with a liquid salt brine, and / or sanding of the roadway within this sensitive area. |
| | Response: Low salt area signs have been added to the plans between stations 11+00 and 49+00. The Applicant will accept a condition limiting the use of deicing materials to calcium chloride both within the Zone II areas and next to jurisdictional wetlands, consistent with the Town's practices in other Zone II's and wetlands. |
| 6. | At prior meetings with the applicant, including one on October 26, 2021 at the WWD office, there was discussion regarding the provision of an access and water line easement for the benefit of the WWD, to be located at a mutually agreeable location off of the proposed roadway. The intent is for WWD to access the Hatchery Road Well pump station if it so chooses, and to provide a new 12-inch water main connection from the Hatchery Road Well directly to the proposed 12-inch main in the proposed roadway. This would allow for the existing smaller-sized cross-country water main and the existing unpaved dirt path off of Providence Road to the well to be abandoned, at the discretion of WWD, and will provide for necessary improvements to the water supply capacity and pressure, to the proposed development. Consequently, WWD will require that the applicant provide an easement and install a 12-inch ductile iron water main, between the pump station and the proposed 12-inch water main in the proposed roadway, and requests that the planning board condition any approval to require the same. |
| | Response: The Applicant acknowledges that they had discussions with the Wilkinsonville Water District about providing a new water line connection to the existing Hatchery Drive well location. While the Applicant is committed to providing this new well connection and access easement, the Applicant would respectfully request that this approval not include such a condition. Thus far, the discussions with the District have been conceptual in nature. The Applicant's engineer of record will |

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| | confirm the appropriate size line in the proposed Unified Parkway and what size line should be connected to the existing well line as the design advances. While the Applicant will provide a new pipe connection to the existing six-inch line within its own property, the Applicant would request that the District install and connect the remaining pipe within their parcel of land. |
| 7. | We recommend that the planning board condition any approval to require the applicant to provide the future collection of groundwater samples periodically, to determine any water quality impacts in the future. We recommend to install one MW near the location of TP-210, but adjacent to and closer to the proposed fence at the edge of the proposed stormwater management area #3; and another MW between proposed headwall HW-5B and proposed stormwater management area #2. |
| | Response: Monitoring wells near TP-210 and between HW-5B and proposed stormwater management area #2 have been added to the grading & drainage plans. The Applicant is willing to install the monitoring wells, but the monitoring and testing of water samples collected should be conducted by the Wilkinsonville Water District at their discretion and expense. The Applicant will grant access to these monitoring wells to the Wilkinsonville Water District or their agent, with reasonable notice and as required, so testing may be conducted. |
| 8. | We recommend that the planning board condition any future approval to ban the application of fertilizer to the east of the proposed roadway, within the Zone II well head protection area. This is specifically between proposed roadway stations 12+50 and 37+00. |
| | Response: The Applicant is not opposed to this restriction; however, with the significant investment in material and labor, we would request that we be allowed to fertilize the proposed trees and planting beds to help ensure successful growth in the years following their planting. |
| 9. | We recommend that the planning board require the applicant to provide an Environmental Site Assessment report regarding the existence and history of releases, or threat of release of oil or hazardous waste on the property, and if any, to require an assessment of migration and threat potential to the Hatchery Road well. |
| | Response: The Applicant, through its LSP (Coneco Engineers, Inc.), is providing an executive summary of the ESA's that were compiled for the three main parcels recently acquired. Specifically, they include the Aggregate parcels, Worcester Sand & |

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| | Gravel parcels, and the former Town owned parcels of land. The summary dated December 16, 2021 is attached hereto as <u>Exhibit A.</u> |
| 10. | We recommend that the planning board condition any future approval to require the applicant to paint, and maintain “Do Not Dump” labels on the pavement adjacent to all stormwater catch basins that drain to the Zone II. This includes a total of 23 catch basins (CB-200 through CB-210, and CB-300 through CB-311). |
| | Response: A note has been added to the catch basin detail. For each catch basin from CB-200 through CB-210 and CB-300 through CB-311, inscribed in the grate will be “Do Not Dump – Drains to Waterway”. |
| IV. | <u>Public Comments made during the December 6, 2021 Planning Board Hearing</u> |
| | William Bonin 650 Central Turnpike Not opposed to the development of the parcel but concerned with truck traffic and public roadway wear and tear. |
| | Response: As noted above, truck traffic and any required offsite improvements to the public roads will be subject to review by the Planning Board as part of site plan review for the development of the individual lots. |
| | Jamie LaPlant 26 Heritage Road Concerned with recent access road being cut in along tree line closest to Heritage Road land. |
| | Response: An access path was established to conduct geotechnical drilling along the ridge line of the hill. To safely access the area and allow for the drill rig to be operated safely, a small portion of the existing previously disturbed gravel pit area was regraded to facilitate access. |
| | Mario Germain 86 Boston Road Concerned with truck traffic. Asked why the proposed road cannot be a public road existing trucks from Millbury can use it and avoid a large position of Boston Road. |
| | Response: Traffic will be reviewed as part of site plan review for the development of the individual lots. The Applicant is open to discussing whether the Town would want to accept the proposed roadway as a public road. |

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| | <p>Robert Nunnemacher 24 Singletary Avenue He believes the applicant can do what they are proposing, by right. He is concerned with the impacts and changes to the character of the Town projects like this can have and wants the Town to think ahead into the future before approving.</p> |
| | <p>Response: Any impacts resulting from the development of individual lots will be reviewed as part of the Planning Board's site plan review for each lot.</p> |
| | <p>Brian Stevenson 664 Central Turnpike Can you restrict left turns onto Boston Road and make it right only for trucks? His broader concerns are on West Sutton Road, Boston Turnpike, Central Turnpike and keeping traffic off of those roads.</p> |
| | <p>Response: Traffic will be reviewed as part of site plan review for the development of the individual lots, including whether any such restrictions are warranted.</p> |
| | <p>Bob Largess Planning Board Member We can restrict trucks out, but how do we prevent trucks from entering the site through Wilks?</p> |
| | <p>Response: Traffic will be reviewed as part of site plan review for the development of the individual lots, including whether preventing such vehicle movements is warranted.</p> |
| | <p>Colby Gerard Al's Rubbish What improvements would be made to Providence Road and he is concerned with truck traffic under the existing railroad bridge. Concerned with the truck movements out of 68 Providence Road. They shut down traffic when the turn in and out.</p> |
| | <p>Response: Traffic will be reviewed as part of site plan review for the development of the individual lots.</p> |
| | <p>Brendon Sching 80 Dudley Road He is currently hearing construction noise. What mitigation can be provided during construction?</p> |

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| | Response: The Applicant will be sensitive to their neighbors' concerns, including noise, and will work with the site contractor to mitigate construction noise where practicable. |
| | Bill Walter 82 Boston Road He agrees with Mario and thinks the road should be a public road. He wants to divert existing traffic from Millbury through the site to access Boston Road. |
| | Response: Traffic will be reviewed as part of site plan review for the development of the individual lots. The Applicant is willing to discuss with the Town whether the Town is amenable to accepting the proposed roadway. |
| | Tracy Connor 34 Heritage Road She expressed a concern with the existing buffer between their property and the project. She asked what is required to separate the residential from the office light industrial zoned areas. Jen Hager stated that a 100-foot buffer is required inside the OLI zone line. |
| | Response: Noted. |
| | Dan Pederson Providence Road (Stonehenge Properties) He believes the Boston Road truck traffic needs to be considered as part of this project. He also agrees, the proposed road should be a public road. |
| | Response: Traffic will be reviewed as part of site plan review for the development of the individual lots. The Applicant is willing to discuss with the Town whether the Town is amenable to accepting the proposed roadway. |

Very truly yours,



Valerie A. Moore

VAM:dk



Exhibit A

ENVIRONMENTAL
ECOLOGICAL
SURVEY
CIVIL

December 16, 2021

Mr. Art Mahassel
UGPG RE, LLC
223 Worcester Providence Turnpike
Sutton, MA 01590

RE: **Environmental Due Diligence Executive Summary**
Former Aggregate Industries Property
Off Providence Road
Sutton, Massachusetts 01560

Dear Mr. Mahassel:

Coneco Engineers & Scientists (Coneco) presents the following Executive Summary of the relevant findings of environmental due diligence investigation activities performed by Coneco on behalf of UGPG RE LLC (UGPG) at the former Aggregate Industries property off Providence Road in Sutton, Massachusetts, hereinafter referred to as the "Site." Based on information provided by UGPG, the Site consists of 34 parcels of land located in the Town of Sutton, totaling 341.84 acres, and one parcel of land located in the Town of Millbury, consisting of 40.22 acres. The findings of this investigation were previously presented in a *Phase I Environmental Site Assessment and Supplemental Subsurface Investigation Report* prepared by Coneco for UGPG, dated January 8, 2021. The investigation was intended to provide an objective third party opinion as to the environmental status and conditions of the Site; identify recognized environmental conditions (RECs), controlled RECs (CRECs), and historical RECs (HRECs); gather preliminary information regarding the compliance of the Site with applicable environmental laws, regulations, and permits; and, describe current Site conditions to evaluate whether there is an indication that a release of oil and/or hazardous material (OHM) has occurred at the Site or that a threat of such a release exists.

Summary of Findings – Phase I ESA, September 2020

Coneco performed a Phase I ESA Site reconnaissance on September 29, 2020. A single-story building (the former Scale House) improves the parcel of land identified by the Sutton Assessor's Office as 105 Providence Road. A former maintenance garage (the Garage) is located to the north of the Scale House. A former sand and gravel processing structure (Processor) is located to the west of the Garage building. Two additional structures, including a former electrical shed and a second former garage structure are located east of the Scale House. At the time of Coneco's inspection, the Site buildings were vacant and no longer in use. Coneco observed railroad tracks located northeast of the Scale House, Garage, and Processor buildings. Several dirt paths and what appeared to be all-terrain vehicle (ATV) paths were located throughout the Site. Coneco observed several areas of dense vegetation, cleared areas, grading, piles of rock/boulders and soil/sand, electrical transmission lines and associated utility poles and transmission line structures, and ponds/wetlands throughout the remainder of the Site. An access gate is present on the southern portion of the Site along Boston Road. An electrical transmission line right-of-way

(ROW) for the New England Power Company (NEPCo) is located along the central portion of the Site and runs in a north-south direction.

- Based on historical aerial photographs and information provided by persons familiar with the Site, the east-northeastern portion of the Site was previously operated as a sand and gravel pit and as a stone quarry between 1938 and 1952 and appeared to have been expanded to the southeastern and southern portions of the Site from the 1960s through 1990s. The Site had recently been occupied by Aggregate Industries for gravel mining operations from at least 2005 until 2019. Coneco reviewed a Limited Removal Action (LRA) report prepared by Environmental Compliance Services, Inc. (ECS) for the Site, dated February 2016. Based on information provided in the LRA report, the 100 Boston Road portion of the Site was historically improved with a 2,991-square foot “service shop” style building constructed in 1960 and heated by natural gas at the time of ECS’s assessment. Coneco did not observe this building on the 100 Boston Road Site parcel indicating that the building was demolished sometime between 2016 and 2020. City directories identified the following former Site occupants: DeGaetano Bros Inc. (1992-1995); Pleasant Valley Gravel Company Inc. (2000-2010) at 100 Boston Road; and BNT Sand & Gravel Co. (1995-2000), and Aggregate Industries (2005-2017) at Providence Road.
- The 2016 LRA report indicates that, in June 2015, ECS observed the removal of one 500-gallon #2 fuel oil UST from the western side of the Scale House. ECS did not observe holes in the tank or staining within the tank excavation. Post-UST removal soil samples were analyzed for concentrations of extractable petroleum hydrocarbons (EPH) and polycyclic aromatic hydrocarbons (PAHs). One soil sample exhibited an EPH carbon fraction concentration of 3,650 milligrams per kilograms (mg/kg), which exceeded both the MCP RCS-1 and RCS-2 Reportable Concentrations (RCs) for this parameter. Therefore, approximately 4 tons of fuel oil-impacted soil was removed from the former Scale House UST location and transported off-Site for disposal under an LRA. Post-excavation soil samples did not contain EPH concentrations in excess of laboratory detection limits. Groundwater was not encountered within this excavation. ECS concluded that “groundwater impacts are not anticipated to have occurred as a result of this release.” ECS indicated that “no further response actions are warranted” associated with this historical UST release.

Coneco did not observe obvious indications of other USTs (i.e., vent pipes and/or fill ports) at the Site during the reconnaissance. The Sutton Fire Department provided Coneco with records for Aggregate Industries which included information regarding USTs and above-ground storage tanks (ASTs). A number of the tanks listed for the Site address (71 Providence Road) are believed to have been located on adjoining parcels, identified as 77 and 83 Providence Road, which were formerly owned and utilized by Aggregate Industries, but which are not part of the Site subject to this investigation. Documentation of the removal of several of these tanks is included in the February 2016 Storage Tank Closure and LRA report prepared by ECS.

- Coneco observed an approximately 2,500-gallon AST located on the portion of the Site identified as Parcel 69, on Map 6. This AST was labeled as containing diesel fuel. The

tank, which was constructed with secondary containment appeared to be in fair condition with no visible signs of stains or leaks on the ground surface around adjacent to the tank. The 2016 LRA report indicates that, in September 2015, ECS oversaw the removal of a 500-gallon diesel fuel AST from the 100 Boston Road portion of the Site. ECS stated that this tank contained diesel fuel and was located inside the building, with piping directly to a fuel dispenser located outside the building. ECS removed the AST and the piping, both of which appeared to be in good condition. Coneco did not encounter records or other documents of ASTs during the review of municipal records.

- The Site, Aggregate Industries Northeast Region, at 71 Providence Road, is identified as a Conditionally Exempt Small Quantity Resource Conservation and Recovery Act (RCRA) Generator (CESQG), which indicates that they generated less than 100 kilograms of hazardous waste per month. The search identifies generated waste as: ignitable waste, corrosive waste, tetrachloroethylene, waste oil, universal waste, and used oil. The search does not list violations associated with the Site. The database search does not identify the Site as a known release site. Coneco did not observe hazardous substances or the generation of hazardous waste at the Site.
- Coneco did not observe potential polychlorinated biphenyl (PCB)-containing equipment at the Site. A three-phase pole-mounted transformer bank was observed on a utility pole located adjacent to the electrical shed. Coneco did not identify labeling on the transformers indicating their potential PCB content.
- Coneco did not observe pits, ponds, or lagoons associated with the storage or treatment of wastewater at the Site. Bedrock outcrops were observed throughout the Site.
- Coneco observed a potential former floor drain within a bay of the Garage building. The former floor drain appeared to be sealed with concrete. A test pit (TP-14) was subsequently advanced adjacent to the south side of the Garage during subsurface investigation activities on October 13, 2020 to evaluate conditions in the vicinity of the floor drain. No visual, olfactory, or field screening evidence of a release of OHM was observed by Coneco in subsurface soil at this test pit location.
- An environmental database search was performed for Coneco by EDR to identify federal and state listings for the Site and to identify federal- and state-listed properties in the vicinity of the Site. The database search identified one Superfund Enterprise Management System (SEMS) Archive listing, one adjoining Resource Conservation and Recovery Act (RCRA) Generator listing, thirty (30) State Hazardous Waste Sites (SHWS) listings, five Leaking UST (LUST) listings, one Leaking AST (LAST) listing, two adjoining UST listings, and two Brownfield listings within the applicable search radii.
- Lewcott Corporation at 86 Providence Road is located approximately 50 feet north of the northern portion of the Site and is identified as a SEMS Archive listing. The search indicates that this property has a “Removal Only Site (No Site Assessment Work Needed)” status. Coneco attempted to review information regarding this facility from an online database but was unable to locate additional data. Based on its

close proximity to the Site, the release associated with this listing is a potential concern to the Site in the event that the extent of contamination had not been determined.

The 86 Providence Road property, listed as Polyclad Laminates, is also identified as a SHWS (two separate listings) and as a LAST. The following is a brief summary of these releases.

- SHWS: RTN 2-0018327 - release of 3,500 gallons of liquid phenol to soil and groundwater from an AST on September 6, 2011. This release achieved closure with the submittal of a Permanent Solution report to MassDEP on December 19, 2014.
- SHWS: RTN 2-0020090 - release of diesel fuel from a trailer on January 18, 2017. This release achieved closure with the submittal of a Permanent Solution No Condition report to MassDEP on February 21, 2017.
- LAST: RTN 2-0018481 - release of OHM on January 18, 2012. This release achieved closure with the submittal of an RAONR report to MassDEP on September 11, 2012 (RTN closed and linked to 2-0018327).
- J&G Foods Inc. at 71 Blackstone Street is located to the northeast of the Site, across Providence Road and is identified as a Small Quantity Generator (SQG), which indicates that this facility generates between 100 and 1,000 kilograms of hazardous waste per month. The database search does not identify this property as a known release site.
- The database search identifies the Site, Aggregate Plant at 71 Providence Road, as an Asbestos listing and Tier MA 2 listing. The Asbestos listing is associated with pipe insulation, trans panel, other caulking, glaze, floor, sink, etc. Approximately 2,400 square feet of material and 825 linear feet of material were removed from the Site in 2015.

Summary of Findings - Subsurface Investigation, October 2020 – December 2020

Supplemental Subsurface Investigation activities were conducted at the Site between October 13 and October 20, 2020 and included the excavation of exploratory test pits, the installation of test borings and groundwater monitoring wells, and the collection of groundwater samples for laboratory analysis. Coneco personnel provided environmental observation of the subsurface investigation while Sanborn Head and Associates (SHA) concurrently performed a geotechnical investigation of Site conditions.

- On October 13 and 14, 2020, nineteen (19) test pit excavations, designated TP-1 through TP-10, TP-10A, TP-11 through TP-15, TP-20, TP-26 and TP-27, were completed throughout the Site. No visual or olfactory indication of OHM impact was observed by Coneco in representative soil samples collected from the test pits excavated at the Site on October 13 and 14, 2020. As such, no test pit soil samples were submitted for laboratory analysis.

- Between October 14, 2020 and October 17, 2020, New England Boring (NEB) Contractors of Leominster, Massachusetts, with geotechnical oversight by Sanborn Head and environmental observation by Coneco, advanced six (6) soil borings at the Site, designated B1-W through B4-W, B5 and SH-1. No visual or olfactory indication of OHM impact was observed by Coneco in representative soil samples collected from the test borings advanced at the Site between October 14 and 17, 2020. As such, no test boring soil samples were submitted for laboratory analysis. Groundwater monitoring wells, identified as B1-W through B4-W, were installed by NEB in four of the six borings.
- On October 14, 15, and 20, 2020, Coneco collected groundwater samples from seven monitoring wells at the Site, including the newly installed monitoring wells B1-W through B4-W and three serviceable pre-existing monitoring wells identified as Well 4, Well C, and FW-1. The groundwater samples collected on October 14, 15 and 20, 2020 were submitted to Con-Test Analytical Laboratory (Con-Test), a Massachusetts and National Environmental Laboratory Accreditation Program-certified analytical laboratory located in East Longmeadow, Massachusetts, for the following analyses: EPH, volatile petroleum hydrocarbons (VPH), MCP-14 Dissolved Metals, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides and herbicides, perchlorate, and per- and polyfluoroalkyl substances (PFAS).

The VOC compound bromodichloromethane was detected at a concentration (7.2 micrograms per liter [$\mu\text{g/L}$]) that exceeds RCGW-1 RC for this compound in the groundwater sample collected from monitoring well B2-W. This compound, along with chloroform which was also detected in the sample from B2-W, is a common byproduct of chlorine disinfection processes associated with public water supply treatment. Concentrations of all other detected analytes in the monitoring wells sampled by Coneco at the Site between October 14 and October 20, 2020 are below the applicable MCP RCGW-1 and/or RCGW-2 Reportable Concentrations.

To verify the initial groundwater analytical data for monitoring well B2-W, Coneco returned to the Site on December 23, 2020 to re-sample monitoring well B2-W for laboratory analysis of bromodichloromethane by EPA Method 8260. Based on the results of the December 23, 2020 sampling event, bromodichloromethane was not detected above the laboratory quantification limit ($<1.0 \mu\text{g/L}$), which is below the applicable RCGW-1 RC for this compound. Therefore, it is the opinion of Coneco that no Reportable Condition exists at the Site in relation to the original detection of bromodichloromethane in groundwater at monitoring well B2-W, as the initial detection of this compound was not reproducible and could not be verified upon resampling of the well.

- On December 23, 2020, on behalf of UGPG, Coneco collected a groundwater sample from one pre-existing monitoring well, identified as MW-1, located on a vacant parcel of land off Hatchery Drive and Buttonwood Avenue in Sutton. The parcel on which MW-1 is located was previously operated as a sand/gravel mine by Worcester Sand and Gravel from at least 1966 through the early 2000s. No sheen or odors indicative of a

release of OHM were noted during monitoring well development associated with the sampling event. The groundwater sample collected from MW-1 on December 23, 2020 was submitted to Con-Test for analysis of EPH, MCP-14 Dissolved Metals, VOCs, pesticides and herbicides, perchlorate, and PFAS.

No concentrations of EPH, VOCs, pesticides, or PFAS were detected above the laboratory quantification limits in the analyzed groundwater sample. Minor concentrations of barium, the herbicide dicamba, and perchlorate were detected in the groundwater sample collected from MW-1. These detected concentrations were well below the applicable RCGW-1 Reportable Concentrations.

Summary of Findings - Limited Removal Action, August 2021

On August 10, 2021, Coneco was notified by UGPG that suspected petroleum impacted soil was encountered within a test pit advanced at the Site during geotechnical assessment activities for the planned development of the Site. The soil contamination was encountered at the location of a geotechnical test pit on the eastern portion of the Site behind the commercial properties addressed as 77-83 Providence Road, in Sutton, Massachusetts. Impacted soil was observed to be confined to a narrow seam at 6 to 8 feet below surface grade and did not extend to the groundwater table.

Following assessment of the extent of impacted soil, on August 11, 2021, Coneco personnel provided environmental oversight of LRA excavation activities to address the observed soil conditions at the Site. A total of 67.75 tons of petroleum-impacted soil were excavated during the LRA excavation and transported off-Site for reuse as daily landfill cover at an approved receiving facility.

Upon removal of the impacted soil, Coneco collected nine post-excavation confirmatory soil samples from the base and sidewalls of the LRA excavation area for laboratory EPH and VPH analysis. No EPH or VPH analyte concentrations were detected in excess of the applicable RCS-1 Reportable Concentrations in the post-excavation soil samples.

Based on observations made during the performance of response actions and post-LRA confirmatory soil sample analytical results, no completed pathways to surface water, groundwater, public or private potable water supply wells, stormwater drainage systems, sewer systems, or additional sensitive receptors were noted by Coneco to have been impacted in relation to the impacted soil at this location.

Conclusions of the Phase I ESA, Subsurface Investigation, and LRA

The USTs listed in the Sutton Fire Department records, for which Coneco could not determine physical locations (i.e., at the Site or at adjoining properties) were identified as a REC. However, the findings of the subsurface investigation completed at the Site in October 2020 did not identify previously unknown or undocumented USTs and no evidence of a release of OHM to soil or groundwater potentially related to historical USTs was identified.

The historical use of the Site as a gravel/mining operation, for which subsurface soil and groundwater conditions were assessed and did not identify regulated concentrations of OHM,

and the former Scale House UST and associated fuel oil release, for which an LRA was conducted and achieved regulatory closure, were identified as HRECs.

The current and historical use of the 86 Providence Road property, located to the north of the Site, and its listings as a SEMS Archive, SHWS, and LAST was identified as a potential environmental concern for the Site.

Based on the findings of the subsurface assessment activities performed at the Site from September through December 2020 as part of the subject environmental due diligence investigation, no evidence of a significant release of OHM to soil and groundwater was identified at the Site, no MCP reportable conditions requiring notification of the MassDEP were encountered, and it was the opinion of Coneco that no further action is necessary with regard to soil and groundwater conditions at the Site.

The Limited Removal Action performed at the Site in August 2021 to address a limited area of petroleum-impacted soil on the eastern portion of the Site successfully reduced petroleum concentrations in soil within this area below the applicable MCP RCS-1 Reportable Concentrations and to levels approaching natural background conditions. No potential for impact to groundwater was observed in relation to soil conditions on this portion of the Site. It is the opinion of Coneco that no further actions are required at the Site in relation to this LRA.

If you have any questions concerning this summary of findings, please feel free to contact the undersigned.

Sincerely,
Coneco Engineers & Scientists, Incorporated



Marc E. Brochu, LSP
Senior Project Manager



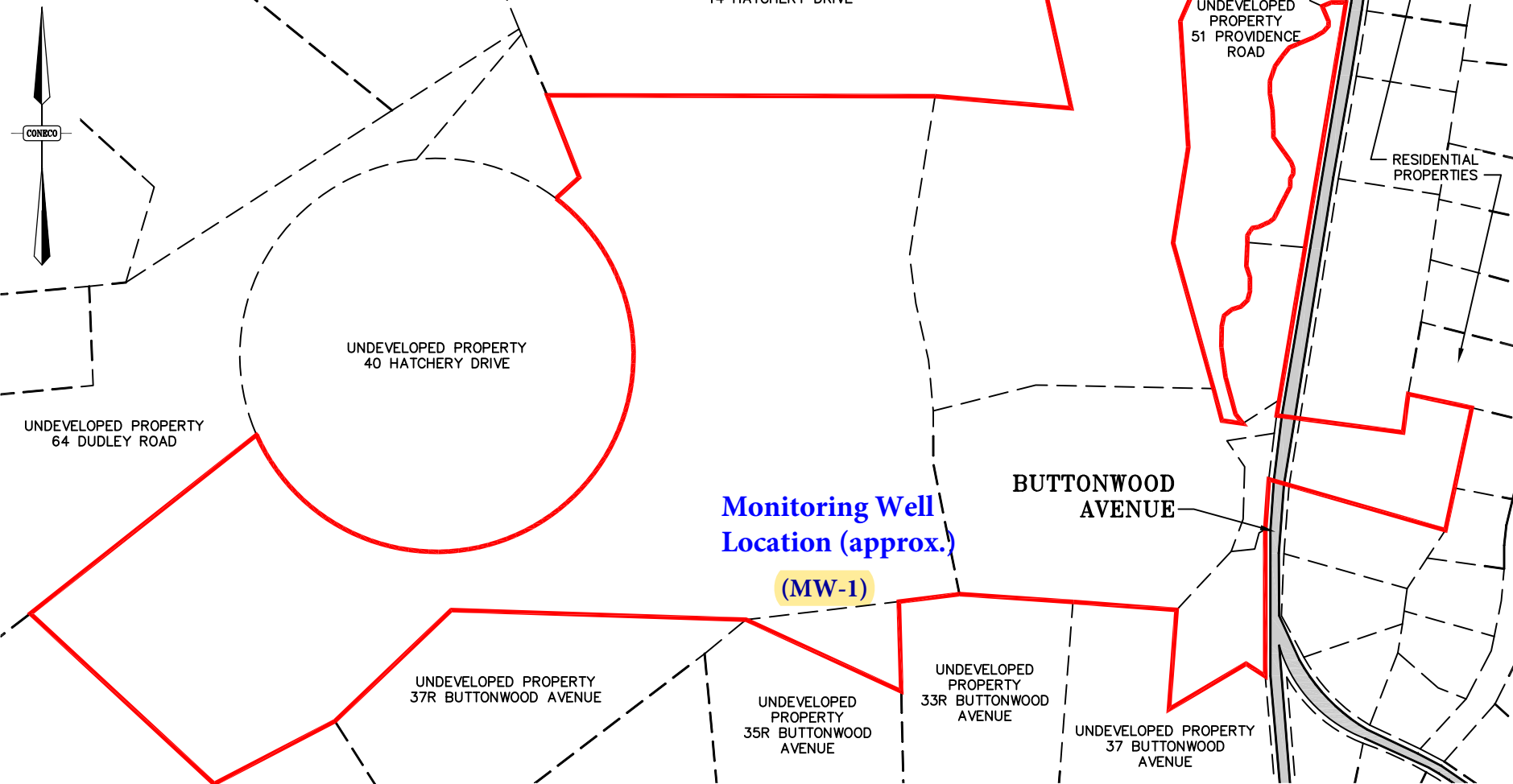
Brian F. Klinger, PG, LSP
Principal Geologist

ATTACHMENTS: Site Plans
 Groundwater Analytical Data Tables

Z:\Project Data\Environmental Projects\11086 - 11099\11086 - Sutton&Millbury,MA-MultipleProperties\Figures\11086_Aerial.mxd



NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON MASS GIS ONLINE ASSESSOR'S MAP AND CONECO FIELD OBSERVATIONS.



LEGEND

— SITE BOUNDARY
 - - - PARCEL BOUNDARIES

0 300' 600'
 SCALE: 1" = 300'



| | | |
|------|---------|----------|
| | DRAWN | CHECKED |
| BY | WCB | SML |
| DATE | 12/4/20 | 12/18/20 |

**VACANT FORMER INDUSTRIAL PROPERTIES
 OFF BUTTONWOOD AVENUE
 AND HATCHERY DRIVE
 SUTTON, MASSACHUSETTS**

PROJECT NO. 11198

FIGURE 3 - SITE PLAN

| Groundwater Analytical Results (Detections Only) Former Aggregate Industries Property – Off Providence Road | | | | | | | | | |
|---|----------|----------|----------|----------|----------|----------|----------|----------|--------|
| Sample Location | Well 4 | Well C | B1-W | B2-W | | B3-W | FW-1 | B4-W | RCGW-1 |
| Date Sampled | 10/14/20 | 10/14/20 | 10/15/20 | 10/15/20 | 12/23/20 | 10/15/20 | 10/20/20 | 10/20/20 | |
| Dissolved MCP 14 Metals by EPA Method 6020/747 (µg/L) | | | | | | | | | |
| Arsenic | 2.2 | <0.8 | <0.8 | <0.8 | -- | 5.8 | <0.8 | <0.8 | 10 |
| Barium | 11 | 210 | 16 | <10 | -- | 110 | 14 | 17 | 2,000 |
| Chromium | 1 | 1.7 | 1.8 | 1.6 | -- | 2.5 | 1.8 | 2.2 | 100 |
| Lead | <0.50 | 2.4 | <0.50 | <0.50 | -- | <0.50 | <0.50 | <0.50 | 10 |
| Nickel | <5.0 | <5.0 | <5.0 | <5.0 | -- | 15 | 32 | <5.0 | 100 |
| Selenium | <5.0 | <5.0 | <5.0 | <5.0 | -- | 19 | <5.0 | <5.0 | 50 |
| Zinc | <10 | <10 | <10 | <10 | -- | <10 | 10 | <10 | 900 |
| Pesticides by Method 8081B (µg/L) | | | | | | | | | |
| Endosulfan I | <0.052 | <0.057 | <0.056 | 0.10 | -- | 0.13 | <0.048 | <0.057 | 2 |
| VOCs by EPA Method 8260 (µg/L) | | | | | | | | | |
| Bromodichloromethane | <1.0 | <1.0 | <1.0 | 7.2 | <1.0 | <1.0 | <1.0 | <1.0 | 3 |
| Bromoform | <1.0 | <1.0 | <2.0 | <2.0 | -- | <2.0 | <1.0 | <1.0 | 4 |
| Chlorodibromomethane | <0.50 | <0.50 | <0.50 | 0.89 | -- | <0.50 | <0.50 | <0.50 | 2 |
| Chloroform | <2.0 | <2.0 | <2.0 | 32 | -- | <2.0 | <2.0 | <2.0 | 50 |
| Perchlorate by EPA Method 332 (µg/L) | | | | | | | | | |
| Perchlorate | 0.02 | 0.112 | 0.075 | 0.063 | -- | 0.078 | 0.025 | 0.051 | 2 |
| PFAS by Method 434-PFAAS (ng/mL) | | | | | | | | | |
| Perfluorobutanoic acid (PFBA) | 2.3 | 2.4 | 2.3 | <2.0 | -- | 3.2 | <2.0 | <2.0 | NS |
| Perfluoropentanoic acid (PFPeA) | 2.4 | 4.1 | 2.3 | 7.1 | -- | 4.6 | <2.0 | <2.0 | NS |
| Perfluorohexanoic acid (PFHxA) | <2.0 | 2.8 | <2.0 | 5.8 | -- | 4.4 | <2.0 | <2.0 | NS |
| Perfluoroheptanoic acid (PFHpA)* | <2.0 | <2.0 | <2.0 | 2.9 | -- | 3.9 | <2.0 | <2.0 | SUM |
| Perfluorooctanoic acid (PFOA)* | 4.5 | 8.9 | <2.0 | 7.8 | -- | 8.6 | <2.0 | <2.0 | SUM |
| Perfluorooctanesulfonic acid (PFOS)* | <2.0 | <2.0 | 2.0 | 4.5 | -- | 4.7 | <2.0 | <2.0 | SUM |
| Perfluorononanoic acid (PFNA)* | <2.0 | <2.0 | <2.0 | 2.1 | -- | 2.1 | <2.0 | <2.0 | SUM |
| N-EtFOSAA | <2.0 | 4.3 | <2.0 | <2.0 | -- | <2.0 | <2.0 | <2.0 | NS |
| Sum of regulated PFAS compounds | 4.5 | 8.9 | 2.0 | 17.3 | -- | 19.3 | <2.0 | <2.0 | 20 |
| Notes: 1) RCGW-1 RCs are listed in 310 CMR 40.1600 and derived in Section 9.2. 2) Analytical results and RCs are reported in micrograms per liter (µg/L) except for PFAS, which is reported in nanograms per liter (ng/mL). 3) < indicates the analyte was not detected above the specified laboratory quantification limit. 4) -- indicates sample not analyzed for specified analyte. 5) Bold indicates an exceedance of the RCGW-1 RC. 6) NS indicates standard not promogulated for specified analyte. 7) Analytes with an asterisk (*) indicate compounds regulated by the MassDEP, which include PFDA, PFHpA, PFHxS, PFNA, PFOS and PFOA. 8) The less stringent RCGW-2 RCs (not listed) apply to groundwater monitoring wells Well C and FW-1, which are not located within a current or potential drinking water source area. | | | | | | | | | |

| Groundwater Analytical Results: December 23, 2020 (Detections Only) Vacant Parcel Off Hatchery Drive and Buttonwood Avenue | | |
|--|-------|--------|
| Analyte | MW-1 | RCGW-1 |
| Dissolved MCP 14 Metals by EPA Method 6020/747 | | |
| Barium | 24 | 2,000 |
| Herbicides by EPA Method 8151 | | |
| Dicamba | 0.053 | 5,000 |
| Perchlorate by EPA Method 332 | | |
| Perchlorate | 0.171 | 2 |
| Notes: 1) RCGW-1 RCs are listed in 310 CMR 40.1600 and derived in Section 9.1. 2) Analytical results and RCs are reported in µg/L. 3) NS indicates standard not promogulated for specified analyte. | | |