

May 27, 2021

Sturbridge Planning Board  
Town of Sturbridge  
Ms. Jean Bubon, AICP  
308 Main Street  
Sturbridge, MA 01566

**Re: Town Staff & Planning Board Review Comment / Response Letter  
Proposed Noble Energy Travel Center & EV Discovery Center  
195, 197, 201 & 201A Charlton Road (Route 20), Sturbridge, MA  
CMG ID 2020-127**

Dear Members of the Board,

CMG is providing the enclosed Site Plan entitled “Noble Energy Proposed Travel Center & EV Discovery Center”, prepared by CMG, revise date May 27, 2021 for your review.

Please see the below annotated responses to address comments from Town Staff and Planning Board members received to date; specifically outlined in three (3) memorandums from Jean Bubon, Town Planner to the Planning Board, dated May 11, May 12, and May 18, 2021.

### **Review Comments**

- 1. The applicant has requested a Special Permit for several of the signs proposed. Many of the signs for the EV Discovery Center are conceptual in nature making it difficult if not impossible determine that the signs meet the Special Permit criteria outlined in Section 22.05.5 of the bylaw. The applicant should advise how he wishes to proceed with the sign request*

**CMG Response: The Applicant is requesting Special Permit approval for the two (2) “EV Discovery Center” signs based on the 5/17/21 DRC approval. Planning Board also approved the Special Permit for these two (2) signs at last evenings 5/25/21 Planning Board Meeting. Applicant is withdrawing all other EV building signage request at this time. The Applicant will provide a separate signage application in the future once the sponsors and restaurant name is determined.**

2. *The applicant should provide additional narrative to explain how it believes the sign request complies with the Special Permit criteria stated in the bylaw. Information was provided at the DRC meeting, but additional narrative to justify the request should be provided as part of the Special Permit application. There are only a few signs on the Travel Plaza that require a Special Permit including the canopy signs, the Freestanding Sign and the Noble Sign. I have reviewed my notes from the DRC meeting and know that the freestanding sign is slightly larger than the 50 square feet due to the speed limits posted and the number of brands being displayed. The Noble sign size was chosen due to the scale being more appropriate with the architecture. However, additional information should be provided to explain why the number of canopy signs are being requested.*

**CMG Response:** CMG provided a separate letter to the Board dated May 24, 2021 detailing the proposed signage compliance with the Special Permit criteria. Planning Board approved the Special Permit for the requested signage at last evenings 5/25/21 Planning Board meeting.

3. *A Request for a Determination of Applicability had been submitted to the Conservation Commission (SCC) and a Determinations was issued for this property. The SCC determined that the areas described in the request are not areas subject to the MA Wetland Protection Act (WPA) or within the Buffer Zone. They also determined that the areas described in the request do not appear to be subject to the Sturbridge Wetland Bylaw (SWB). The SCC had noted that the existing stormwater management system on site exits this site and has been found to be connected to the MA DOT stormwater system associated with Charlton Rd. (Rt. 20). At that time, it was uncertain if the system discharged to a wetland resource area which may be subject to protection under the WPA or the SWB. In discussions with DEP, staff have been informed that changes to made to stormwater which discharges into wetland resource areas, would appear to be a regulated activity pursuant to the WPA and the SWB. It was our understanding that the project team will provide additional information on this as they work to develop plans for the site re-development. To date, it has not been confirmed to the SCC where the stormwater discharges to. Please provide such information to the SCC when it is available.*

**CMG Response:** The portion of the site discharging to the quad-grate catch basin structure within the Route 20 right-of-way ultimately discharges beneath Route 20 via a 2' x 3' culvert to an off-site drainage system which outlets to daylight behind the Cornerstone Bank based on available Mass DOT Highway Improvement Plans and 1999 Cornerstone Bank property mapping. It appears this outlet conveys stormwater to an off-site wetlands system adjacent to Hobbs Brook behind the Cornerstone Bank property greater than 200 ft. from the project site.

**Based upon the ANRAD filed and approved by the Conservation Commission, the proposed Noble project work area is not located within any jurisdictional area or buffer. According to 310 CMR 10.02(2)(d):**

*“Any activity proposed or undertaken outside the areas specified in 310 CMR 10.02(1) and outside the Buffer Zone is not subject to regulation under M.G.L. c. 131, § 40 and does not require the filing of a Notice of Intent unless and until that activity actually alters an Area Subject to Protection under M.G.L. c. 131, §40”.*

**The proposed site plan includes a detailed Soil Erosion and Sedimentation Control Plan and the project will require a Construction Period Stormwater Pollution Prevention Plan (SWPPP) to prevent any type of off-site alteration to any jurisdictional wetlands. Based upon the Conservation Commission’s ANRAD determination and the proposed erosion controls, it is CMG’s opinion there is no additional required permitting associated with the proposed drainage system. MassDOT will review the proposed drainage improvements as part of the MEPA EENF review and State Highway Access permitting process.**

**CMG will provide a copy of the project’s Stormwater Management Report to the Sturbridge Conservation Commission under separate cover as requested.**

4. *Overall, it appears that BMPs have been added to treat stormwater exiting the site and some recharge has been provided for. However, it appears that a majority of the site’s stormwater including the parking lots will be directed into the MA DOT system. It should be confirmed with MA DOT that this will be permitted by them. In addition, all efforts should be made to manage stormwater on site. Underground chambers could be used in parking lot areas and/or low impact development BMPs to minimize parking lot runoff especially if the system does discharge into a wetland resource area. The SCC has been working with MA DOT to address the stormwater systems throughout town which are failing and/or have resulted in wetland impacts. MA DOT has indicated that the systems are overloaded from private stormwater systems and runoff entering state roads from private property.*

**CMG Response: Coordination with MA DOT is currently underway by the Applicant’s Traffic Engineer, Vanasse & Associates, Inc. The proposed stormwater improvements were designed to the maximum extent practicable given existing site constraints, including “D” type soils, high groundwater elevation, and subsurface contamination. Due to these site constraints, the stormwater design does not allow for infiltration on-site. Therefore, the applicant is proposing a reduction in impervious areas in comparison to the pre-construction conditions as well as low impact development BMP’s such as grass pavers.**

**The proposed stormwater design decreases off-site runoff for all calculated storm events and provides upgraded treatment in accordance with land use with high potential pollutant load (LUHPPL) standards through the use of proprietary water quality units to reduce existing impacts to MA DOT’s Route 20 stormwater system.**

5. *Please provide documentation of the DOT stormwater system discharge.*

**CMG Response: See CMG Response to Comment #3.**

6. *A comment on the water meters for the building is that they will have to meet town spec.*

**CMG Response: A note regarding water meter conformance with Sturbridge Water Department Specifications has been added to the Utility Plan Sheet #2. Please see note #8 on revised Sheet C-4.2.**

8. *From Chief Dessert – Via Email 05-07-2021*

*Hi Jean, my only concern at this time is based on information provided to me by Lt. Lombardi and I concur. He expressed concern that TT units will be pulling out of the far east driveway. This driveway will not be the driveway controlled by a traffic light and therefore TT units will be crossing over all lanes of travel when making a left turn out of there. As you are aware this is a high-speed road and having the TT units crossing over all travel lanes to turn left will be unsafe. I would also be concerned that the traffic light would stop TT's as they pull out and potentially leave TT units stopped across the lanes as they pull out.*

**CMG Response: See May 20, 2021 Vanasse & Associates response to comment letter.**

9. *Chief Dessert is accurate in what I expressed to him. The only addition I'd like to include is most of these trucks would probably exit, 20 westbound heading towards the pike and 84 ramps. As stated by the Chief, this is dangerous for TT units pulling out onto route 20 crossing eastbound lanes. I would caution the solution of only allowing "right turn only" out of this exit as that will create further problems for TT units attempting to make a u-turn in the Hobbs brook plaza or no better at 49/20 to reverse direction of travel.*

**CMG Response: See May 20, 2021 Vanasse & Associates response to comment letter.**

10. *At the EV building, does the middle support for the 2nd floor restaurant deck conflict with the accessible access route? A couple snips are below. A person coming up the ramp may not be able to turn left at the top of the ramp toward the door. If the accessible striping were to be swapped, the ramp may land between the supports and improve access. It should also be noted that this building design is conceptual and these support locations may not be accurate. If these support locations do change, the accessible route should be accommodated or modified.*

**CMG Response: The locations of the three (3) proposed supports for the 2<sup>nd</sup> floor restaurant deck are now shown on the plan set. The location of the proposed ADA route is revised to include a reduced sized ADA sidewalk transition which allows for approximately 7 feet of clearance. Please see revised ADA Plan, Sheet C-3.3.**

11. *At the convenience store, is a ramp needed from the prep area to the trash enclosure? A snip is below.*

**CMG Response: CMG is in agreement with the Planning Board that the above-mentioned sidewalk would be best utilized as a ramp. The plan set is revised to show a break in the curb line at this proposed ramp. Please see revised Site Layout Plan, Sheet C-2.0.**

12. *At the convenience store, similar to Comment #1, is there sufficient area for a person in a wheelchair to go up the ramp and spin to the left toward the front door?*

**CMG Response: The ADA ramps located near the proposed travel center are revised to include one (1) singular ADA ramp. This ramp includes 4.5 feet of clearance along the top landing which exceeds the required 4 feet of clearance needed. Please see revised ADA Plan, Sheet C-3.3.**

13. *In the above snip from Comment #3, is the stop sign in conflict with the crosswalk?*

**CMG Response: The proposed stop sign is now shifted to be in-line with the proposed stop bar and no longer conflicts with the proposed 8-foot-wide crosswalk.**

14. *Is an agreement needed between the two properties to allow the convenience store property to discharge sewer through the EV center property?*

**CMG Response: There will be several cross easements that will need to be created to allow for the site configuration as proposed. Such easements will include, but not limited to, sewer, water, utilities, and other easements as may be warranted.**

15. *Snow storage areas should be more clearly labeled on the plan.*

**CMG Response: Additional snow storage areas are now included on the Site Layout Plan to allow for more storage for parking areas associated with the travel center and E.V. Discovery Building.**

16. *Generator locations should be reviewed to insure there are no (noise) impacts to nearby residential neighbors.*

**CMG Response: The project currently proposes one (1) generator for the proposed Travel Center. The generator is located directly behind the building for ease of access necessary for maintenance and repairs. The location also provides approximately 130 feet of separation from the nearest property line and approximately 570 feet of separation to the nearest residential dwelling. CMG believes the proposed generator location will not have negative noise impacts to abutting residential neighbors.**

17. *The barrier around the outdoor seating area should be reviewed and potentially changed to insure it will provide an appropriate barrier for vehicular traffic.*

**CMG Response: A decorative crash / traffic rated wall is now proposed along the perimeter of the proposed patio. The proposed wall will be traffic rated and designed by a Registered Massachusetts Structural Engineer to protect pedestrians from vehicular traffic.**

18. *We would like to see a Sweep Path Analysis for our Fire Apparatus. Fire Lanes marked out on the plan for access within 50 feet from the building. Both buildings to be sprinklered for fire suppression systems. We would like to see a fire hydrant placed on site for accessibility by Fire Department.*

**CMG Response: The fire truck turning radius for Sturbridge's largest fire apparatus is now included on the revised Truck Turn Figure, Sheet C-6.0. The proposed fire lanes are shown on the revised Truck Turn Figure as a light grey hatch.**

**Both buildings will sprinklered for fire suppression systems. A fire hydrant is proposed in the rear landscape island along the site access driveway as labelled on the revised Site Layout Plan, Sheet C-2.0.**

19. *There seems to be a bit of a conflict – the Transportation Demand portion of the TIA talks about providing bike racks for employee use (page 5) and the Pedestrian and Bike section (page 13) talks about the roadway not providing sufficient width to support bicycle travel. Can you please address this? For the record, we do like to see bike racks installed where appropriate.*

**CMG Response: M.G.L. states that bicycles are allowed on roadways unless otherwise prohibited. While Route 20 does not provide formal bicycle accommodations or meet MassDOT’s requirements “share the road”, bicycles are allowed and the planned improvements need to accommodate bicyclists. This is consistent with the information presented in Vanasse’s April 2021 traffic study report.**

**Per the traffic study, a bike rack will be provided, an accommodation that will also be required by MEPA and MassDOT. Two (2) proposed bike racks are now proposed to accommodate both facilities on the revised Site Layout Plan, Sheet C-2.0.**

Please contact me if you need any additional information at (774) 241-0901.

Sincerely,

CMG ENVIRONMENTAL, INC.



David T. Faist, PE  
Principal Engineer



Robert Lussier  
Project Engineer