

HANCOCK ASSOCIATES

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September 18, 2025

Dunstable Zoning Board of Appeals
Leo Tometich, Chair
511 Main Street
Dunstable, MA 01827

Subject: Comprehensive Permit: MCO Cottage Rentals, 164 Pleasant Street
Civil Peer Review of Second Submission

Dear Mr. Chair,

Hancock Associates has been retained by your Board to perform a civil engineering technical review of the Comprehensive Permit for MCO Cottage Rentals at 164 Pleasant Street. Hancock Associates has reviewed the **second submission** for Comprehensive Permit (received September 12, 2025 via email) and offer the following comments and guidance to the Board.

All comments have either been addressed or can be conditioned in a decision to be completed before building permits are issued. Initial comments that did not require responses are omitted. Applicant responses are **shaded** and *italicized*.

Documents Reviewed - 2nd Submission

1. Response to Comments letter, dated September 12, 2025.
2. PEER REVIEW Materials from MCO Cottage Rentals.
3. Site Development Plans, revised September 10, 2025.
4. Existing Conditions Plan, included with Site Development Plans, revised September 10, 2025.
5. Revised Stormwater Report; Revised Stormwater Analysis; Revised Stormwater Operation & Maintenance Plan.
6. Pre-Development & Post-Development Watershed Maps, dated April 7, 2025.
7. Soil Logs (Forms 11 & 12), dated September 5, 2025.
8. Vehicle Swept Path Plan, dated September 10, 2025.

References

1. 760 CMR 56.00 – Comprehensive Permit; Low or Moderate Income Housing.
2. Town of Dunstable Zoning Bylaws, adopted as of June 2024.

3. Town of Dunstable General Bylaws, amended September 2023, with focus on:
General Wetlands Bylaw;
Municipal Stormwater Discharge Bylaw;
Public Water Supply Cross Connection Control Bylaw;
Stormwater Management and Erosion Control Bylaw;
Streets, Ways, and Driveways Bylaw; and
Water Supply Protection Bylaw.
4. Town of Dunstable Board of Health Rules, amended April 2022.

Initial Review of Submission

760 CMR 56.05(2) contains the required elements of a submission of a Comprehensive Permit to the Zoning Board of Appeals. The following is a paraphrased list of the required elements with regard to our civil review of the submission.

- (a) Preliminary site development plans with the locations and outlines of proposed buildings; the proposed locations, general dimensions, and materials for streets, drives, parking areas, walks and other paved areas; and proposed landscaping improvements and open areas. Any project of five or more units must have a site plan stamped by a registered professional architect or engineer.

Preliminary site development plans have been submitted. As noted below, specific information to support peer review is missing from the plan set and supporting documents.

Response: No response required.

ITEM CLOSED.

- (b) A report on existing site conditions and a summary of conditions in the surrounding areas, showing the location and nature of existing buildings, existing street elevations, traffic patterns and character of open areas, if any, in the neighborhood.

An existing conditions plan set and an existing conditions narrative have been submitted. We request the Applicant provide a narrative of the project impacts as noted on page 12 of the Dunstable ZBA Comprehensive Permit Application packet.

Response: This information is attached in Exhibit package by MCO.

ITEM CLOSED.

- (c) Preliminary, scaled, architectural drawings. For each building the drawings shall be prepared by a registered architect, and shall include typical floor plans, typical elevations, and sections, and shall identify construction type and exterior finishes.

Preliminary architectural plans have been submitted. These plans are excerpts from a recently completed MCO Cottage community in Lancaster. We request

the Applicant provide a preliminary architectural plan set that includes the required information listed in 760 CMR 56.05(2)(c).

Response: This information is attached in Exhibit package by MCO.

ITEM CLOSED.

- (d) A tabulation of proposed buildings by type, size (number of bedrooms, floor area) and ground coverage, and a summary showing the percentage of the tract to be occupied by buildings, by parking and other paved vehicular areas, and by open areas.

A building tabulations summary has been submitted and provides all required information. We suggest the Applicant add a similar tabulation to the site development plan set.

Response: This information is added to the revised site plans.

ITEM CLOSED.

- (e) **ITEM CLOSED.**

- (f) A preliminary utilities plan showing the proposed location and types of sewage, drainage, and water facilities, including hydrants.

A preliminary utilities plan is included in the submitted site development plans. As noted below, specific information to support peer review is missing from the plan set and supporting documents.

Response: This information is added to the site plans as appropriate.

ITEM CLOSED.

- (g) **ITEM CLOSED.**

- (h) A list of requested Waivers.

A list of requested waivers has been submitted. We expect the waiver list to evolve as the project moves through the hearing process, and we request an updated request list as required. As noted below, we request more specificity as to which requirements are to be waived.

Response: No response required at this time.

ITEM CLOSED.

Zoning Compliance (ZC) Comments

The site is zoned R-1 Single Family Residence District and Mixed Use District (MUD) overlay.

ZC1

Add front yard, side yard and rear yard setback lines to layout plan to demonstrate compliance with zoning setback requirements.

Response: A zoning offset line has been added on the appropriate plan sheets.

ITEM CLOSED.

ZC2

Provide a table on a layout plan (see LM2) similar to the Zoning Requirements table on Sheet 2. Include proposed dimensions, areas, offsets, etc. to demonstrate compliance with zoning requirements.

Response: A zoning offset line has been added to the revised plan set. All proposed structures are well inside the building envelope.

ITEM CLOSED.

Site Survey (SS) Comments

SS1

On Sheet EC1, fix the overwrites in the Notes.

Response: The overwrite has been corrected.

ITEM CLOSED.

SS2

On Sheet EC1, show approximate location of structure(s) on abutting properties at 136 Pleasant Street and along Parkhurst Street.

Response: This information has been added to the revised plan set.

ITEM CLOSED.

SS3

On Sheet EC2, show existing water main and hydrant assembly in Pleasant Street.

Response: This information has been added to the revised site plan set.

ITEM CLOSED.

Site Layout & Materials (LM) Comments

LM1

Separate the layout and materials from the existing/proposed grading. On the new Layout & Materials plans, include:

- Zoning setback lines, wetland flagging and buffer zones, flood plain extents, NHESP extents;
- Road dimensions and radii, parking stall dimensions, parking stall count, handicap stall markings;

- Road type labels, curb type labels, walkway widths;
- Proposed permanent and temporary project signs and street signs; and
- Limit of disturbance line.

Turn off existing and proposed grading.

Response: This information has been added to the revised plan set.

ITEM CLOSED.

LM2

Provide a table similar to the “Zoning Requirements” table on Sheet 2. Include proposed dimensions, areas, offsets, etc. to demonstrate compliance with zoning requirements.

Response: A zoning offset line has been added to the revised plan set. All proposed structures are well inside the building envelope.

ITEM CLOSED.

LM3

Provide a parking calculations table. Include required handicap-accessible stalls and parking stall dimensions (both standard and handicap-accessible).

Response: Parking layouts have been revised. The basis for the changes is to allow for a minimum of 2 designated spaces for 2 or 3-bedroom cottage and 1.5 spaces for each 1-bedroom cottage, The plan allows for the following parking options:

24 constructed garage spaces.

12 driveways for single cottages on exterior of island – 2 plus car spaces per unit

40 drive-in spaces along center island, these service (2 spaces per) the 12 units within the island, 2 spaces per unit and additional 0.5 spaces for the 1-bedroom cottages.

Overflow parking at northwest and southeast corners of the site, total 24 spaces for visitor parking, including handicapped spaces.

Total parking space on site is now 112.

See Parking Tabulation Table on revised site plans.

ITEM CLOSED.

LM4

The proposed walkways along the west side (sheet south) and east side (sheet north) of the development cut through the proposed parking stalls. Verify the parking stalls are adequately sized excluding the walkway, or shift the stalls as needed.

Response: Proposed parking in these areas have been reconfigured to avoid this issue.

ITEM CLOSED.

LM5

There are no walkways or patios shown for the proposed units. Locate these items, as well as any other impervious structures. Revise the HydroCAD analysis as needed.

Response: Proposed walkways have been added to the revised site plans and HydroCAD models have been updated.

ITEM CLOSED.

LM6

Provide a swept-path analysis that demonstrates access for Dunstable Fire Department vehicles complying with Massachusetts Comprehensive Fire Safety Code (527 CMR 1.00).

Response: A swept-path plan has been provided as a separate exhibit.

ITEM CLOSED.

LM7

Depict an ADA/MAAB-compliant pedestrian travel path from any units designated for handicap access to Pleasant Street.

Response: Currently, there are no units designated for handicapped access. However, the proposed site grading allows for an ADA/MAAB-compliant pedestrian travel access route from the project units to Pleasant Street. Also, two handicapped parking spaces have been added to the common parking areas.

Handicap-accessible units should be noted on the final site plans, and handicap-accessible parking stalls should be located in close proximity to said units and should demonstrate compliance with ADA/MAAB requirements. For this review, we are satisfied the preliminary layout and grading will allow the handicap-accessible parking stalls to be relocated and graded as required.

WE RECOMMEND THIS ITEM BE CONDITIONED IN THE BOARD'S DECISION.

Site Grading (GR) Comments

GR1

Provide top of wall/bottom of wall callouts along proposed retaining walls.

Response: This information has been added to the revised site plans.

We could not find the top of wall/bottom of wall callouts on the Site & Grading Plans. Retaining walls greater than 48" in height are required to have design plans prepared by a structural engineer to be reviewed and approved by the Building Department. For this review, we are satisfied with the preliminary layout of the proposed segmental block retaining walls.

WE RECOMMEND THIS ITEM BE CONDITIONED IN THE BOARD'S DECISION.

GR2

If grading is turned off on the Site Utility Plans (sheets 7 & 8), then turn on catch basins.

Response: Grading layers will be turned on within the utility drawings.

ITEM CLOSED.

GR3

Provide spot grades over proposed soil absorption system area to demonstrate 2% minimum sheet flow over system.

Response: Proposed finish grading over the soil absorption system will be shown on separate plan set. Proposed finish grading will meet all requirements of Title 5 (310 CMR 15.0000 and Town of Dunstable Board of Health regulations.

ITEM CLOSED.

Site Drainage (DR) Comments

DR1

Consider turning on existing and proposed grading, to depict which sections of driveways are sheet flowing to which catch basins.

Response: This comment will be considered.

ITEM CLOSED.

DR2

For the DMH downstream of the CB 3# catch basins, the CB-3C inlet/outlet angle is less than 90 degrees and vertically overlaps. Consider using a larger diameter manhole, lowering the outlet invert, shifting the DMH further downstream, or adding a DMH for a new connection for CB 3C.

Response: This issue has been rectified on the revised site plan set.

ITEM CLOSED.

DR3

For the DMH downstream of the CB 4# catch basins, shift the DMH further upstream to get all inlet/outlet angles closer to 90 degrees.

Response: This issue has been rectified on the revised site plan set.

The drain manhole, now labeled DMH 6, was not adjusted. We expect this and similar drainage structures to be adjusted on the final site plans as the layout and grading is revised and finalized. For this review, we are satisfied with the preliminary layout and design of the proposed drainage structures. ITEM CLOSED.

DR4

Provide length and slope callouts for all proposed drainpipe over 5 feet in length.

Response: This information has been added to the revised site plans.

ITEM CLOSED.

DR5

Show and label inspection port locations for all chamber systems. Describe stormwater overflow conditions for the recharge systems, and depict any outlet control structures and overflow piping as required.

Response: The locations of the proposed inspection ports have been added to the site plans. All recharge systems have been designed to accommodate up to the 100-year design storm, no overflow piping and/or structures are proposed.

ITEM CLOSED.

DR6

Provide the estimated seasonal high groundwater at each of the proposed recharge systems to demonstrate a minimum 4-ft offset, or 2-ft offset with mounding analysis.

Response: Soil testing was performed by Haley Ward, Inc. for the design of the soil absorption system prior to the design of the entire site. Soils were found to be well-drained sand and gravels with relatively deep depths to estimated seasonal high water tables. Soil logs for these test pits will be submitted as part of the supplemental information. This office is aware that additional soil testing will need to be conducted on site. Additional soil testing will be conducted at the appropriate time.

ITEM CLOSED.

DR7

Show limit of disturbance.

Response: A limit of disturbance line has been added to the site plans.

ITEM CLOSED.

DR8

Labeling comments:

- Call out catch basins with double grates and shallow catch basins.
- Provide numbering labels for all DMH callouts. Avoid duplicate numbers (DMH 5).
- Relabel northwest stormwater recharge system to "D" to agree with HydroCAD report.

Response: This information has been added to the revised site plans.

We could not find callouts for double-grated or shallow-catch basins on the Site & Grading Plans. The final site plans should reflect this information. For this review, we are satisfied with the preliminary proposed drainage structures to function as required.

WE RECOMMEND THIS ITEM BE CONDITIONED IN THE BOARD'S DECISION.

Site Utilities (UT) Comments

UT1

Provide a preliminary septic design, including design flow calculations, septic tank sizing, and soil absorption system sizing. Demonstrate compliance with 310 CMR 15 (Title 5), specifically with setback requirements and offsets to groundwater and finish grade.

Response: This information will be provided under separate cover.

ITEM CLOSED.

UT2

Provide preliminary layout of septic tanks, pump chambers (if required), sewer lines and force mains (if required).

Response: This information will be provided under separate cover.

ITEM CLOSED.

UT3

Consider turning on existing and proposed grading.

Response: The referenced layers have been turned on.

ITEM CLOSED.

UT4

Turn off roadway center line and proposed striping.

Response: The referenced layers have been shut off.

ITEM CLOSED.

UT5

Change waterline linetype to match Legend.

Response: The linetype has been revised.

ITEM CLOSED.

UT6

Show limit of disturbance.

Response: A limit of disturbance line has been added to the site plans.

ITEM CLOSED.

Landscape & Lighting (LL) Comments

LL1

Provide a photometric lighting analysis for the proposed development. Demonstrate an illuminance of 0.0 foot candles on abutting properties. Provide light pole and light fixture details.

Response: A typical light pole detail has been added to the revised plan set. Photometric plans and final cut sheets of outdoor lighting will be provided to the Board for review.

A photometric analysis is recommended during a Comprehensive Permit review. However, given the distance of the units to the abutting parcels and the lower elevation of the development, the chance of illuminating the abutting properties is highly unlikely. The Board could request an analysis be provided for their review, or waive this specific review and condition the Board's decision to provide a photometric plan to be reviewed before building permit.

WE DEFER TO THE BOARD.

LL2

Provide a planting list for all proposed trees and shrubs.

Response: The applicant requests that final plant lists be made a condition of approval.

WE RECOMMEND THIS ITEM BE CONDITIONED IN THE BOARD'S DECISION.

LL3

Show the limit of disturbance. Show and label areas to be grassed/landscaped.

Response: Limit of disturbance has been added to the plan set.

ITEM CLOSED.

LL4

Turn off flood hazard zone alteration on Sheet 9.

Response: The flood hazard zone alteration layer has been shut off on Sheet 9.

ITEM CLOSED.

Erosion Control (ER) Comments

ER1

Show location(s) of temporary sediment basins and stockpiles. Show temporary drainage swales to the sediment basins as needed. Locate the basins outside of infiltration chamber footprints.

Response: The erosion and sedimentation plan has been revised accordingly.

ITEM CLOSED.

ER2

Turn off flood hazard zone alteration on Sheet 11.

Response: The flood hazard zone alteration layer has been shut off on Sheet 11.

ITEM CLOSED.

ER3

Show the limit of disturbance.

Response: A limit of disturbance line has been added to the revised site plans.

ITEM CLOSED.

ER4

Minor comments:

- Turn off or shade back proposed development.
- Turn off proposed striping
- Remove callout near WF55.

Response: These minor comments has been addressed on the revised site plans.

ITEM CLOSED.

Construction Details (DT) Comments

DT1

Add standard handicap parking stall detail(s).

Response: This information has been added to the revised site plans.

ITEM CLOSED.

DT2

Provide a light pole and light fixture details.

Response: This information has been added to the revised site plans.

ITEM CLOSED.

Stormwater Report (SW) Comments

The Stormwater Report prepared by Haley Ward includes the MassDEP “Checklist for Stormwater Report”, a narrative and calculations for the MassDEP 10 Standards.

SW1

Provide a signed Illicit Discharge Compliance Statement signed by the owner, or revise Standard 10 of the “Checklist for Stormwater Report”.

Response: A signed Illicit Discharge Compliant Statement signed by the owner has been provided.

ITEM CLOSED.

SW2

Check count of residential units – the Executive Summary in the Comprehensive Permit Application states “44 cottage style residences”.

Response: The project includes 48 rental units contained within the 36 buildings as shown on the site plans.

ITEM CLOSED.

SW3

Typo in Standard 1 section: “stormwater”.

Response: The typographical error has been corrected.

ITEM CLOSED.

SW4

In Standard 3 section, define “n” in equation and where the “0.40” value came from.

Response: The “n” utilized in the equation is the void space (porosity) in the stone bedding.

ITEM CLOSED.

SW5

In Standard 4 section, include the provided water quality volume in the narrative.

Response: This information was added to the stormwater narrative.

ITEM CLOSED.

SW6

We recommend the Board include a condition for a SWPPP to be submitted prior to construction.

Response: No response required.

WE RECOMMEND THIS ITEM BE CONDITIONED IN THE BOARD’S DECISION.

SW7

Provide an Illicit Discharge Compliance Statement signed by the owner, or revise Standard 10 of the “Checklist for Stormwater Report”.

Response: This information has been provided.

ITEM CLOSED.

Stormwater Analysis (SA) Comments

The Stormwater Analysis prepared by Haley Ward includes a drainage narrative, a HydroCAD report, watershed maps, a soils map and a flood map.

SA1

Check count of residential units – the Executive Summary in the Comprehensive Permit Application states “44 cottage style residences”.

Response: The project includes 48 rental units contained within the 36 buildings as shown on the site plans.

ITEM CLOSED.

SA2

Provide soil logs supporting the “well-drained sands” determination and the infiltration rate of 8.27 inches per hour.

Response: Soil logs for test pits performed to date are provided in separate exhibit.

ITEM CLOSED.

SA3

Check curve number for “Wood-Grass Combination, HSG A” in table and in HydroCAD report.

Response: CN values utilized in the HydroCAD models has been checked and updated as necessary.

ITEM CLOSED.

SA4

Provide documentation of NOAA Atlas 14, Volume 10 rainfall data.

Response: The requested documentation is provided.

ITEM CLOSED.

SA5

In section 1.6.2, include verbiage regarding the size of the underground chambers and how the 100-year stormwater volume is contained entirely within the chambers with no overflow.

Response: Additional verbiage has been added to the revised stormwater narrative.

ITEM CLOSED.

SA6

In section 1.6.2, include verbiage that any surface runoff in overflow conditions are directed away from all proposed structures.

Response: Additional verbiage has been added to the revised stormwater narrative.

ITEM CLOSED.

SA7

Check CN values with those listed in the Stormwater Analysis, and make any revisions as required.

Response: CN values utilized in the HydroCAD models were checked and updated as necessary.

ITEM CLOSED.

SA8

Revise the total impervious areas as needed to account for additional walkways, patios, and other adjustments. Revise the HydroCAD analysis accordingly.

Response: Additional impervious areas will be accounted for in the updated HydroCAD model.

ITEM CLOSED.

SA9

Account for the difference between the total areas listed in the Pre- and Post-Development HydroCAD analysis. We recommend a short narrative in the Stormwater Analysis.

Response: Since the stormwater runoff from the proposed roof areas are routed to individual recharge units, the total area of the proposed roof areas was removed from the overall post-development area.

ITEM CLOSED.

Stormwater Operation & Maintenance Plan (OM) Comments

OM1

Provide contact information of the party responsible for required maintenance under *Contact Numbers*. We recommend moving the Contact Numbers section to the first page (after the title page).

Response: This information has been added to the O&M narrative.

ITEM CLOSED.

Conclusion

All comments have either been addressed or can be conditioned in a decision to be completed before building permits are issued.

Please do not hesitate to contact us should you have any questions or comments.

Regards,
Hancock Associates



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Senior Project Manager



Robert M. DiBenedetto, PE
Project Engineer