

*The following answers are being provided by Women's Development Corporation and its engineers in response to the abutters' questions regarding the Anawan School Apartments:*

- 1. Will a gravity flow (or pumped flow) below ground oil water separator system be installed under the new parking lot to remove gas, oil, and antifreeze spills or auto washing soaps and waxes from parking surface rainwater runoff?**

*RESPONSE: See attached memo from Commonwealth Engineers (8/24/17)*

- 2. Does the \$819.00/mo. Rent for a one bedroom apt. and \$984.00/mo. Rent for a two bedroom apt. include heat, hot water, electricity, grounds keeping, parking, and snow plowing?**

*RESPONSE: Yes, the owner will pay all utilities except cable and telephone, as well as all maintenance and grounds keeping.*

- 3. Can the parking indicated on the site plan be redesigned to save the Rehoboth Senior Center Community Garden and to preserve the current Senior Center Parking for use by the Senior Center? Rehoboth taxpayers have been paying for the Senior Center with a tax override for over a decade and many would like the opportunity to use the facility available to all seniors, without subtracting its services, grounds and 32 spot parking to redistribute to a housing complex which is only available to some. Existing Community Gardens will remain. They will need to be relocated per DEM regulations.**

*RESPONSE: No changes are proposed to the current number of parking spots at the Senior Center. There are currently 62 spaces for the Senior Center. There will be 52 new spaces created for the housing component.*

- 4. At 13,850 square feet and 3 stories high, this will be the largest residential building ever built in Rehoboth, a rural town with private well water and septic systems. Have hydrology studies been done on the site to determine available potable underground water for the potential 82 renters? Will the water pressure be adequate to operate the proposed fully sprinklered fire suppression system for the building? What is the projected water consumption for laundry facilities, garden irrigation, lawn maintenance, car washing?**

*RESPONSE: See attached memo from Northeast Water Solutions (8/17/17)*

- 5. The well head location at the rear property boundary indicates there is a mandatory 212 foot radius well water protection buffer all around it, half of which lies on an abutters property. Will the abutter's property within the protection area be restricted in use, ie, with no septic system or parking within the protection area radius?**

*RESPONSE: See attached memo from Northeast Water Solutions (8/17/17)*

- 6. What is the time period allotted for local residents' preference?**

*RESPONSE: Local Preference is part of the required Affirmative Fair Housing Marketing Plan which is regulated by the Department of Housing and Community Department's G.L C.40B Comprehensive Permit Project Guidelines.*

- 7. Is it true that after the initial period allotted for local residents, that the development will be open to anyone in the country?**

*RESPONSE: Fair housing laws dictate that we must give equal opportunity to all qualified applicants. Location of current or past residence is not a disqualifying factor.*

- 8. How many apartments will be reserved permanently for Rehoboth Residents?**

*RESPONSE: There will be no permanent reservation for town residents.*

- 9. What are criteria for two bedroom units given the development is purportedly senior housing?**

*RESPONSE:*

- The 2BR units are intended for couples with medical need for multiple bedrooms, or for instances where a caregiver or family member is necessary for health reasons*
- Onsite management will verify unit occupancy with routine checks, and ensure that only individuals on the lease are residing there*
- The funding programs we administer have very specific and limiting guidelines for qualifying residents and for appropriate housing for family size and need, and we have decades of experience in enforcing those regulations.*

- 10. The Development will require an exemption to the current Town By-Law that requires septic systems be designed to provide 60,000 sq. ft per 1,000 gal./day flow. What facts support that the proposed septic system design will be effective and safe using less land than the By-laws require?**

*RESPONSE: See attached memo from Commonwealth Engineers (8/24/17)*

- 11. What are the results of the perc. tests that were done on the site? What is the soil composition?**

*RESPONSE: See attached memo from Commonwealth Engineers (8/24/17)*

- 12. What is the depth of the water table? If less than 18 inches, will an exemption to current By-laws be granted to the project?**

*RESPONSE: See attached memo from Commonwealth Engineers (8/24/17)*

- 13. Have there been hydrologic studies completed and what are the results?**

*RESPONSE: See attached memo from Northeast Water Solutions (8/17/17)*

- 14. Do hydrologic studies demonstrate that the aquifer can accommodate the roughly 3 million gallon/year draw, likely to be required by the 36 units, without effecting the wells of the abutters including the Rehoboth Senior Center? What about during periods of drought?**

*RESPONSE: See attached memo from Northeast Water Solutions (8/17/17)*

- 15. There has been discussion of the possibility of the WDC project sharing the Rehoboth Council on Aging's well. What would be the potential liabilities to the Town if this were to happen?**

*RESPONSE: The existing well is not suitable for the development. As noted previously, a new well will be put in service. If there is any sharing of the new well, the question of liability should be referred to the Town of Rehoboth.*

**16. Given that the WDC will lease the property from the Town, who would be responsible if the aquifer is insufficient either do to design or drought?**

*RESPONSE: See attached memo from Northeast Water Solutions (8/17/17)*

**17. What happens to the property if the Federal Government ends or reduces support for the LIHTC program?**

*RESPONSE: The LIHTC program provides a tax incentive for private investors to invest in affordable housing. The program does not rely on any direct funds from the government. All funds from the LIHTC program come directly from the bank/investor who enters a legal contract to give funds to the project when certain benchmarks are met.*

**18. What happens to the lease if the WDC goes out of business? Does the Town end up holding the bag?**

*RESPONSE: WDC and its management arm HOC have over 30 years of experience developing and managing affordable housing. Our financial strength is closely reviewed for underwriting of any and all funding. WDC, HOC, and each property are audited annually, the results of which are carefully reviewed by our investors and lenders.*

**19. Will the WDC carry insurance that will indemnify the Town of Rehoboth against any claims or lawsuits?**

*RESPONSE: Yes, there will be insurance as required under the lease agreement which will be executed with the Town of Rehoboth.*

**20. Will the development utilize “dark skies” compliant lighting?**

*RESPONSE: Yes, all exterior lighting will be dark sky compliant.*

**21. Why is the Town limited to a review of the lease only once every 25 years?**

*RESPONSE: Answer to be provided by the Town of Rehoboth*

**22. Please explain why the PIOLT agreement requires a \$75,000 initial payment from the WDC when we are giving the WDC \$50,000 of our CPA funds?**

*RESPONSE: Answer to be provided by the Town of Rehoboth*

**23. Does the town have proper fire apparatus to protect this three story facility?**

*RESPONSE: Answer to be provided by the Town of Rehoboth*

**24. The development's well protection area overlaps the abutter's property. How will the Town address this?**

*RESPONSE: WDC will negotiate with the abutting neighbor to secure an easement for the well-protection area. The easement will require some use restrictions to ensure the safety and quality of the water supply.*

**25. Under the guidelines of the Low Income Housing Tax Credit Program (LIHTC) developers may not deny Section 8 vouchers. Does this mean than non-seniors with Section 8 will be eligible to live there?**

*RESPONSE: There is no such requirement under the LIHTC program. However, under federal and local fair housing laws, management cannot discriminate against applicants holding a Section 8 voucher. Non-senior Section 8 applicants will not be eligible due to the age restriction provision of the zoning.*

**26. Is the project open to non-senior disabled residents?**

*RESPONSE: No. We are not public housing and thus not required to accept non-senior disabled persons. Additionally non-seniors are not eligible due to the age restriction provision of the zoning.*

## Memo

**To:** Dean Harrison - WDC  
**From:** Robert F. Ferrari, PE  
**CC:** Charlotte Thomas-Davison - WDC  
Tim Behan – Commonwealth Engrs.  
**Date:** August 17, 2017  
**Re:** Anawan School Elderly Housing – Response to Comments

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The purpose of this project memorandum is to provide a response to review comments and questions raised by abutters to the project site. Each comment related to the proposed new public water supply system is presented as identified in the comment document, followed with the appropriate response.

**Review Comment #4:** *At 13,850 square feet and 3 stories high, this will be the largest residential building ever built in Rehoboth, a rural town with private well water and septic systems. Have hydrology studies been done on the site to determine available potable underground water for the potential 82 renters? Will the water pressure be adequate to operate the proposed fully sprinklered fire suppression system for the building? What is the projected water consumption for laundry facilities, garden irrigation, lawn maintenance, car washing?*

**Comment #4 Response:** This project is a redevelopment of a former public school facility that included a water supply well and an on-site wastewater disposal system therefore there is a previous history of water use and wastewater disposal on this site.

- An evaluation of the water demands for the proposed development has been performed, determining an average daily water demand of approximately 2,770 gpd and a maximum demand of 4,160 gpd, assuming 100% occupancy of the proposed residential units.
- The projected water demands, determined using MADEP criteria, include all sanitary/potable (including laundry) water demands. Irrigation water (gardens, lawns) are not included, as they are not to be provided by the public water system. Car washing is not proposed for this facility.
- The Fire Suppression System, designed in accordance with local, State and Federal Code, will be designed with a dedicated water storage tank and pump system to assure the correct flowrate and pressure for the sprinklers. The public water supply system does not directly serve the fire suppression system, and would only provide water makeup to the

Fire Suppression Water Storage Tank, to replace evaporative or other minor losses, on an as-needed basis.

- A preliminary Engineering Evaluation has been conducted for this site, as part of the due diligence to determine viability for development. Based upon this evaluation there is sufficient groundwater availability (recharge and storage) to meet the needs of the proposed development, without adversely impacting neighboring wells. A more detailed and comprehensive study is required (by MADEP) and planned by the developer, following installation of exploratory wells. This study will include a well pumping test program to assess the effective well yield and water quality, and an evaluation of potential impacts upon the aquifer, nearby water courses and neighboring wells.

**Review Comment #5:** *The well head location at the rear property boundary indicates there is a mandatory 212 foot radius well water protection buffer all around it, half of which lies on an abutters property. Will the abutter's property within the protection area be restricted in use, ie, with no septic system or parking within the protection area radius?*

**Comment #5 Response:** In close consultation with MADEP, the developer has considered and evaluated a number of alternatives for development of public water supply wells for the site. If a single well is used the Zone I protective radius is 212 feet. An alternative to use two (2) wells is also under consideration, with each well having a Zone I protective radius of 191 feet. In either case, the protective zone would overlap the neighboring lot (39-100E) to the east. The majority of the neighboring lot area incorporated into the wellhead protection zone is identified as wetlands, and a wetland buffer zone that extends west to overlap the project site. Therefore, there is extremely limited or no opportunity for any development of the neighboring area included within the Zone I wellhead protection area, regardless of whether a public well(s) is developed on the project site.

**Review Comment #13:** *Have there been hydrologic studies completed and what are the results?*

**Comment #13 Response:** Development of any community public water supply system (wells) in Massachusetts is conducted under the regulatory authority and approval of MADEP. The MADEP Rules and Regulations require that a comprehensive pumping test and hydrogeologic evaluation be performed, as part of the regulatory review and approval process. Any public water supply well must meet stringent criteria regarding minimization of contaminant threats and impact upon the aquifer, nearby water courses and water supply wells. The pumping test program must be performed using the wells proposed for the new development therefore such work cannot be completed until after exploratory wells have been installed.

**Review Comment #14:** *Do hydrologic studies demonstrate that the aquifer can accommodate the roughly 3 million gallon/year draw, likely to be required by the 36 units, without affecting the wells of the abutters including the Rehoboth Senior Center? What about periods of drought?*

**Comment #14 Response:** Drilled bedrock wells are proposed to supply water to the development therefore the aquifer capacity includes recharge via precipitation infiltration into the bedrock, and the water storage capacity within the bedrock. Bedrock recharge is affected by precipitation

and drought conditions however the bedrock storage capacity is substantially more stable, particularly at depth. Based upon the projected average daily demand (2,770 gpd or 66.6% of maximum daily demand) the proposed development will have a total annual demand of 1.01 million gallons. A study of the Senior Center water use (2011 to 2014) determined an average daily demand of 386 gpd, equivalent to a total annual demand of 0.141 million gallons. Therefore the average annual total site water demand is approximately 1.151 million gallons. However, the use of on-site wastewater disposal systems will recycle an average of 85% of the total water withdrawals to the aquifer, therefore the net annual site (Senior Center and proposed development) groundwater withdrawal is reduced to 0.172 million gallons for the .

A preliminary assessment of bedrock recharge was performed, estimating the recharge from on-site precipitation to be on the order of 1.33 to 2.07 million gallons per year. The net site water withdrawal (0.172 MG/yr) is approximately 8.3% to 13% of the annual precipitation recharge. This is an extremely conservative estimate of recharge because it does not include excess recharge from the surrounding area and watershed. Water is also stored in fractures and voids in the underlying bedrock. Based upon the anticipated range of bedrock porosity (0.1% to 0.25%), a minimum of 673,000 to a maximum of 1,682,000 gallons of groundwater resides in the bedrock beneath the site, to a depth of 400 feet below the ground surface. Again, this is a conservative estimate because access to stored water and water transmissivity through the bedrock can extend off-site.

A comprehensive hydrogeologic evaluation including pumping tests, assessment of effective yield and recharge will be conducted as part of the MADEP permitting and approval process for the proposed public water supply system. The public water supply system must be able to supply water to the proposed community without adverse impact upon neighboring wells or water resources.

**Review Comment #16:** *Given that the WDC will lease the property from the Town, who would be responsible if the aquifer is insufficient either due to design or drought?*

**Comment #16 Response:** The terms of the lease agreement will determine the responsible party for different problems that could occur on this site.

The potential for a shortfall in aquifer capacity is minimized by the use of a comprehensive hydrogeologic evaluation, as part of the design and permitting process. The hydrogeologic evaluation and safe yield projection must, by design and intent, include an assessment of well and aquifer yield under a condition of “180-day zero recharge” (severe drought condition).





**COMMONWEALTH** Engineers & Consultants, Inc.  
▶ 400 Smith Street  
Providence, RI 02908  
▶ Tel. 401•273•6600  
Fax 401•273•6674

August 24, 2017

Mr. Dean Harrison  
Women's Development Corporation  
461A Broad Street  
Providence, RI 02907

RE: ANAWAN SENIOR HOUSING (A.P. 39 LOT 97)  
BAY STATE ROAD, REHOBOTH, MA  
ABUTTERS QUESTIONS  
CE&C PROJECT NO. 15040.00

Dear Mr. Harrison:

Commonwealth Engineers & Consultants, Inc. (CE&C) is in receipt of questions from abutters and offers comments on the attached page.

Please contact me at 273-6604 should you require additional information.

Sincerely yours,  
COMMONWEALTH ENGINEERS & CONSULTANTS, INC.

A handwritten signature in black ink, appearing to read 'Timothy Behan'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Timothy Behan, P.E.

cc: file

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1. Will a gravity flow (or pumped flow) below ground oil water separator system be installed under the new parking lot to remove gas, oil, and antifreeze spills or auto washing soaps and waxes from parking surface rainwater runoff? These systems are mandatory for most urban high density development adjacent to residential areas to prevent groundwater pollution of adjacent properties.

*Stormwater system will be designed in accordance with DEP standards.*

4. At 13,850 square feet and 3 stories high, this will be the largest residential building ever built in Rehoboth, a rural town with private well water and septic systems. Have hydrology studies been done on the site to determine available potable underground water for the potential 82 renters? Will the water pressure be adequate to operate the proposed fully sprinklered fire suppression system for the building? What is the projected water consumption for laundry facilities, garden irrigation, lawn maintenance, car washing? *Answer by others.*

5. The well head location at the rear property boundary indicates there is a mandatory 212 foot radius well water protection buffer all around it, half of which lies on an abutters property. Will the abutter's property within the protection area be restricted in use, ie, with no septic system or parking within the protection area radius? *Answer by others.*

10. The Development will require an exemption to the current Town By-Law that requires septic systems be designed to provide 60,000 sq. ft per 1,000 gal./day flow. What facts support that the proposed septic system design will be effective and safe using less land than the By-laws require? *Septic system will be designed in accordance with DEP standards and be reviewed and approved by DEP through the groundwater discharge permit program.*

11. What are the results of the perc. tests that were done on the site? What is the soil composition? *Results of the perc. tests and soil composition are available for review at Commonwealth Engineers & Consultants, Inc., call 401-273-6604 and ask for Tim Behan.*

12. What is the depth of the water table? If less than 18 inches, will an exemption to current By-laws be granted to the project? *Water tables vary depending on location. Exemptions for project have not been granted yet.*

13. Have there been hydrologic studies completed and what are the results? *Answer by others.*

14. Do hydrologic studies demonstrate that the aquifer can accommodate the roughly 3 million gallon/year draw, likely to be required by the 36 units, without effecting the wells of the abutters including the Rehoboth Senior Center? What about during periods of drought? *Answer by others.*

15. There has been discussion of the possibility of the WDC project sharing the Rehoboth Council on Aging's well. What would be the potential liabilities to the Town if this were to happen. *Answer by others.*

16. Given that the WDC will lease the property from the Town, who would be responsible if the aquifer is insufficient either do to design or drought? *Answer by others.*

20. Will the development utilize "dark skies" compliant lighting? *Dark sky lighting will be utilized to the maximum extent possible.*