



November 7, 2025

By Electronic Mail: rhummel@wayland.ma.us

Wayland Planning Board
Town of Wayland
41 Cochituate Road
Wayland, MA 01778

Re: 37, 39, and 45 Waltham Road – Application for Limited Site Plan Approval

Dear Members of the Board:

As you know, this firm represents neighbors and abutters to the Carroll School's North Wayland campus located at 37-45 Waltham Road.¹ At your hearing this past Wednesday evening, the Applicant expressed a willingness to answer or address the numerous questions and comments presented so far by Board members, municipal officials, and the community regarding its proposal to expand the School's facilities. We appreciate this collaborative approach.

Questions and comments have taken many forms, including two letters from our experts (Chessia and Horsley), two letters from my client group (one addressed to this Board, and one to the Lincoln Select Board), memoranda from Wayland boards and officials, and comments made during Wednesday's hearing. We would like to offer the following Consolidated List of Questions and Comments, to ensure that every issue and concern is captured and brought to the Applicant's attention. At the end of this letter, we are proposing additional action items for the Applicant to take as part of this site plan review process.

Some of the issues addressed below may be more relevant to the Conservation Commission or Board of Health's review of the Project, but I think we can all agree that there is a fair amount of jurisdictional overlap, and it benefits all interested parties if concerns related to public safety, environmental impacts, and design are raised, and answered, in a comprehensive rather than piecemeal fashion.

¹ Adam and Dawn Curry, 1 Appletree Lane; Adam and Alexis Schayowitz, 2 Appletree Lane; Andrew and Catherine Cooper, 5 Appletree Lane, David and Lisa Raftery, 6 Appletree Lane; Lisa Freedman and Mark Dutkewych, 15 Linway Road, Lincoln; Jeff and Hannah Sias, 109 Old Sudbury Road, Lincoln; and John and Julia Sullivan, 37 Longmeadow Road, Lincoln; and Peter and Mimi Borden, 36 Longmeadow Road, Lincoln.

Consolidated List of Questions and Comments

Facility Operations and Management

1. Please explain/identify your proposed phasing of student enrollment increases (from 50 to 250). Will Wayland boards or officials be notified of the commencement of additional phases?
2. What is the School's plan for managing construction on the campus? What is the anticipated construction scheduled? (see request for construction management plan, below)
3. What is the School's long-range development and operational plan? Are there plans to change the use of School-owned property at and behind 10 Appletree Lane (12 Appletree Lane)? Is there a plan to expand the Wayland campus and/or facilities any further, or to consolidate all three Carroll School campuses to one location?
4. What are the School's intentions with 10 Appletree Lane, 10A Appletree Lane, and 12 Appletree Lane? This is a quiet, dead-end residential street, and therefore the use of this property should be limited to one, single-family house. There should be a specific restriction against using this land for the storage and/or operation of maintenance vehicles and equipment. The field on 10 and 12 Appletree Lane shall not be used for any athletic activities. A salt shed should not be located on these properties, particularly given concerns for runoff into the pond on 10A Appletree Lane.
5. The School should identify its weekend and evening event schedule, for review by the Board and the community. Reasonable restrictions should be imposed to prevent the campus from evolving into an "event space" that hosts programs unrelated to the School.
6. Has the School performed any sort of alternatives analysis, that considers alternatives that would have less impact on the neighborhood, such as reduced building size and reduced student enrollment that is better scaled to the size and character of the neighborhood? Also, what alternatives have been explored concerning the layout of buildings and infrastructure on the Site, such re-using existing structures and focusing the development of new structures on the rear of their property farthest from the street.
7. With the elimination of the garage storing equipment and maintenance vehicles, please explain where those functions will be moved to on the campus. In addition, please explain where the salt shed will be relocated.

Vehicular Access Issues

8. Will the School recommit to the conditions outlined in the 2016 site plan approval, specifically the documents entitled “39 and 45 Waltham Road, Wayland Conditions to Site Plan Approval” and “The Carroll School: Drop-Off/Pick-Up/Parking Protocol”?
9. Will the School agree to implement more bus routes, with enough seats to accommodate all Wayland campus students, and subsidize the buses as a way to encourage use by Carroll families?
10. What is the School’s plan to manage student pick-up and drop-offs in the morning and afternoon hours? (see, request for student transportation management plan, below). Will the School agree to require all vehicle queuing/staging for pick-up and drop-off to be confined to the school’s campus (i.e., no queuing/staging on Waltham Road, Old Sudbury Road, Lincoln Road, Appletree Lane, Longmeadow Road, Linway Road, or other nearby streets)? Has the School considered a uniformed crossing guard or police details during pick-up/drop-off times (at the school’s expense) and/or formalized phased/staggered pick-up/drop-off schedules?
11. Will the School agree to restrictions on the School’s use of neighborhood streets, specifically including Appletree Lane, Longmeadow Road, and Linway Road? These side streets should not be used for faculty, staff, parent, student transportation, delivery, or maintenance vehicles. Longmeadow Road should not be used as pass-through access to Waltham Road by staff and other drivers (including delivery trucks). These roads could be posted with the appropriate signage and enforcement.
12. A new driveway opening is proposed approximately 150 feet west of the easterly opening, opposite the driveway serving 37 Longmeadow Road and slightly offset from Longmeadow Road. The only egress from the School will be from the existing easterly driveway opening, which is opposite and offset from Longmeadow Road by approximately 100 feet. The intensification of these driveways will potentially interfere with the operation of the intersection of Longmeadow Road and Waltham Road. Typically it is required that new intersection roads or intensification of driveways be either directly opposite an existing roadway (i.e., Longmeadow Road), or separated from the existing roadway by at least the length of the minimum stopping sight distance to avoid conflicts with opposing traffic movements, which in this case would be approximately 250 feet based on a 35 mph speed . The present design does not meet that standard.
13. Has the School evaluated all feasible alternatives to the 3-driveway design currently proposed? We are concerned that the current layout, with an entrance and exit serving the School in close proximity to Longmeadow Road, a public school bus stop, and residential driveways create a foreseeable point of traffic congestion and conflict.

(see request for professional transportation engineering peer review, below)

14. The original intent for the driveway running along the existing sports fields was, as stated to the neighbors, for emergency egress and ingress. A restriction should be imposed memorializing this prior commitment. Specifically, it should not be used for maintenance and other vehicles to pass and park.
15. The Board's peer reviewer noted that the fire truck turning plan ("swept path") indicates several conflicts – the fire apparatus modeled cannot navigate the internal driveways adequately. Further, the plan indicates that the ladder truck would need to enter the westbound lane of travel in Waltham Road when exiting the School's easterly driveway turning right (eastbound), which is prohibited under the state Fire Prevention Code. See, Section 18.2.3.4.8 (prohibiting "the use of the opposite travel lane [] in the design of all new fire apparatus access roads."). I further note that the model does not show how the ladder truck would turn *left* out of the School's driveway, which would be more likely route for the truck to return to the fire station (whether Wayland's in town center, or Lincoln's which is even closer).
16. Has the School discussed a "mutual aid" arrangement with the Wayland and Lincoln Fire Departments? The Wayland fire station is approximately 3.5 miles from the School, whereas the Lincoln fire station is approximately 1 mile away.

Traffic Impacts and Mitigation

17. In the TIAS, the Applicant claims that Waltham Road between Longmeadow Road and the Carroll School entrance carries 1,950 vehicle trips daily, including 407 in the peak morning hour (p.4), which was presumably determined based on data collected using automatic traffic recorders placed somewhere on Waltham Road for two consecutive days in February, 2025.

It then states that the proposed expansion project will generate 904 "additional" daily vehicle trips, including 275 in the peak morning hour. The TIAS then used this data to model the impact of these "additional" vehicle trips on the future operation of nearby intersections, including Concord Road (Rt. 126), and Lincoln Road. This is known in traffic engineering parlance as "level of service." In Table 10 of the TIAS, it is revealed that the predicted delay at the Concord Road/Waltham Road (WB) intersection will increase from 43.5 seconds (without the project) to 140.6 seconds (with the project). This is a 223% increase. Similarly, at the intersection of Lincoln Road (SB) and Waltham Road, delays will increase from 15.9 seconds to 48.5 seconds, a 205% increase. The 95th percentile queue at these intersections will also increase significantly, from 87.5 feet to 242.5 feet at Concord Road, and from 17.5 feet to 80 feet at Lincoln Road.

What mitigation measures is the School proposing to offset these material adverse

impacts to the operation of neighborhood intersections?

18. The TIAS, p. 21, states that it estimated the expected trip generation from the project (250 students and 80 staff) based on “empirical trip generation data from the existing Carroll School’s Lincoln campus”. It then concluded that there would be 904 daily trips attributable to 204 new students. (Table 5). The TIAS does not explain how it interpolated the Lincoln campus data, and it is unclear if the data included school buses or staff. Nor does the TIAS provide the total trip generation for the proposed Project, which would be for 250 students and 80 staff, which is more relevant than the increase in the number of trips generated. Please clarify the methodology and provide the total number of vehicle trips expected to be generated by the School when fully-occupied.
19. A comment was made at the last Planning Board hearing that the TIAS’s afternoon peak hour modeling may not be representative of peak hour traffic in this location, where end of the school day may be earlier than the traditional afternoon peak commuting hour. The TIAS should be amended to include a second afternoon peak hour analysis for intersection operations at study area intersections.

Screening / Landscaping

20. Would the School consider implementing a thicker (2-3x) concentration of mature evergreen trees for shielding neighborhood views of the new and existing buildings? Specifically, there should be more tall, mature, and dense screening running along Waltham Road/Old Sudbury Road for the length of the campus’s frontage. Additionally, it would be reasonable to impose a requirement that most building and exterior lighting be turned off by 8 PM, with minimal, dim interior and ground-level exterior lighting remaining if necessary for security. Motion sensors can be installed for greater illumination, if required for security purposes.

Stormwater Management Design

21. It appears that the existing school facilities and infrastructure approved in 2016 was not constructed in accordance with the design indicated on the 2016 Approved Plans and associated Approved Stormwater Report. Please explain why this is. Constructing a project in variance with approved plans is a violation of the site plan review decision and likely any associated wetland permits issued in 2016.
22. There are numerous discrepancies and inconsistencies in the Applicant’s stormwater modeling, which affects the design of the drainage system shown on the site plans. Has the Applicant reviewed the comments from John Chessia, P.E. and Jason Kriell, P.E., and can it respond to those comments?
23. There are three stormwater infiltration facilities proposed including one open basin

- (infiltration area 1) and two subsurface infiltration facilities (infiltration areas 2 and 3). According to the Site Plan prepared by Oak Consulting dated August 28, 2025 no test pits are shown for infiltration facilities 1 and 2. Only one test pit (TP-203) is shown for infiltration area 3. The MADEP Stormwater Handbook (Volume 2, Chapter 2 and Volume 3, Chapter 1) requires a minimum of at least three test pits for open infiltration basins and two test pits for each subsurface infiltration facility “at the point where recharge is proposed”². Please explain this discrepancy.
24. The MADEP Stormwater Handbook requires at least two feet of vertical separation between the bottom of stormwater infiltration facilities and the seasonal high groundwater. The Handbook also requires a groundwater mounding analysis if the vertical separation is less than four feet³. According to the test pit data provided at infiltration area 3, the vertical separation is 2.42 feet. This requires a groundwater mounding analysis.⁴ Please explain why none has been provided.
25. The proposed magnitude of infiltration systems here is inconsistent with (and exceeds) MADEP Stormwater Standard 3. Standard 3 states, “the annual recharge from the post-development site shall approximate the annual recharge from pre-development conditions based on soil type”⁵. The proposed stormwater design is sized 19,264 cubic feet and exceeds the existing, pre-development conditions (2110 cubic feet) by a factor of nine. This significant increase in annual recharge above existing conditions will raise groundwater levels throughout the site on a year-round basis and will modify the estimated seasonal high groundwater elevations that are utilized as the base level to design both the stormwater and wastewater infiltration systems. Will the School prepare a steady-state groundwater model to evaluate these post-development groundwater conditions?

Other Hydrology Issues / Septic System Design

26. According to MASSGIS, an additional surface water feature is shown along the eastern property boundary that appears to connect to a small pond, then to the wetland, and ultimately contributes to Hazel Brook. This feature is not shown on the Site Plan and should be evaluated as both a jurisdictional wetland and as a direct hydrologic connection between the subject site and the wetland shown on the Site Plan.

² MADEP Stormwater Handbook, Volume 2, Chapter 2, pages 88 - 90

³ MADEP Stormwater Handbook, Volume 3, Chapter 1, page 58

⁴ The purpose of a groundwater mounding analysis is to predict water table rises associated with infiltration of stormwater and wastewater into the subsurface and the potential impacts including inundation of the infiltration systems, which can lead to increased overflows and off-site flooding and breakout of the mounded groundwater at the land surface in surrounding areas.

⁵ MADEP Stormwater Handbook, Volume 1, Chapter 1 page 1.

27. The project plans also show a proposed wastewater discharge with a Title 5 design flow of 3300 gallons/day (4950 gallons/day according to Wayland Health Regulations). Title 5 and the Wayland Board of Health Regulations both require a groundwater mounding analysis for a system of this size to ensure that the minimum vertical separation of 5.0 feet is maintained under post-development conditions⁶ The Applicant has submitted a groundwater mounding analysis using the Hantush model, showing an groundwater elevation increase of 0.12 feet. However, the Applicant has utilized several questionable inputs to the Hantush model. First, they have selected a duration of 1 day. MADEP recommends using 90 days duration to attain steady state (long term) conditions⁷ Second, they have assumed the flow rate at 3300 gallons day; 4950 gallons/day (Wayland local health regulations) should be used. Will the Applicant correct these modeling errors?
28. The Applicant has also assumed a saturated thickness (vertical depth of groundwater) of 15 feet in its Hantush model, but provides no basis for this. The only test pit (TP-206) within the proposed infiltration area shows a saturated thickness of only 2.4 feet⁸. Will the Applicant conduct additional subsurface investigations to determine an accurate saturated thickness?
29. Applicant has assumed a hydraulic conductivity value in the Hantush model of 60 feet/day, but has not provided any basis for this. An on-site permeability (slug test) should be conducted to measure the actual hydraulic conductivity.

Requests for Additional Information / Action Items

In addition to responding the above questions/comments, we respectfully ask, through the Board, that the Applicant do the following before the next Planning Board hearing:

1. Construction Management Plan. The Applicant should prepare and file a robust and comprehensive construction management plan for Board and community review. That Plan should contain project-specific details addressing at a minimum the following:
 - a. Construction phasing, including a construction schedule, which should address whether construction will disrupt current school operations (specifically, morning and afternoon peak hour trips to and from the property).
 - b. Trucking Plan, which shall specify (i) planned truck routes (ii) estimated volumes of any imported and exported materials (iii) estimated truck trips and (iv) construction period mitigation measures including without limitation

⁶ Title 5 requires a mounding analysis for systems with flows greater than 2000 gpd; Wayland requires a mounding analysis for flows greater than 1000 gpd.

⁷ MADEP Guidelines for the Design, Construction, Operation, and Maintenance of Small Wastewater Treatment Facilities with Land Disposal, July 2018, page 21.

⁸ Test pit TP-206 was excavated to a depth of 120 inches and shows a depth to estimated seasonal high groundwater of 91 inches. The difference between these two values is 29 inches or 2.4 feet.

- details and locations of crushed stone entrance pads, street sweeping protocols and dust control measures to be implemented on the Property.
- c. Construction administration (hours of construction, hours of deliveries, trash and debris removal).
 - d. Communication (designated contacts on site).
 - e. Noise and Dust Control (tree removal, public street cleaning and repair, dust, noise, rock crushing).
 - f. Erosion Control (silt sacks, hay bales, silt fences, etc., tree protection plan, drainage infrastructure).
 - g. Construction staging (staging areas, trailer locations, open storage areas, truck holding locations, security measures).
 - h. Traffic and parking during construction (on-site locations, snow removal, warning signs, police details).
2. Transportation Management Plan. The Applicant should prepare and file a robust Transportation Management Plan that addresses vehicle queuing/staging for pick-up and drop-offs, and faculty parking. The Plan should also address parking and bussing arrangements for special events and athletic events on any Carroll School campus that include the use of the Wayland campus in any capacity.
 3. Supplemental Traffic Study. The Applicant should collect additional speed and volume data on Waltham Road as recommended by the police chiefs, and should incorporate that data as well other adjustments discussed above in a supplemental TIAS for the Board and community's review.
 4. Peer Review of Applicant's Traffic Study. The Applicant has appropriately commissioned a 41-page Traffic Impact and Access Study ("TIAS") with appendices in connection with the Project. MassDOT has specific guidelines that inform how TIAS reports are prepared. The Applicant's TIAS appears to be professionally prepared by a reputable, multi-disciplined engineering firm, Fuss & O'Neill. According to the TIAS, the Project is expected to generate an additional 905 vehicle trips per day, on a roadway that only carries approximately 2,000 trips per day.

The Project is also expected to cause material deterioration of intersection operations in the study area, as measured by delays for vehicles getting through intersection, and the length of the queue of vehicles stacked up at intersecting roads. It is imperative that the Towns of Wayland and Lincoln scrutinize this issue with the same professional vigor that went into the Applicant's TIAS. We respectfully request that the Board engage a peer review transportation engineer for this task, and we are happy to recommend several that have performed these services for other municipalities. This type of peer review typically results in identification of mitigation to offset project-generated traffic impacts, such as intersection signalization, crosswalks, sidewalks, roadway alignment changes, etc..

5. Drainage/Septic/Hydrology Review. The Applicant should respond, point by point, to all of the comments raised by Mr. Kreil, Mr. Chessia, and Mr. Horsley concerning apparent deficiencies and discrepancies in the presentation of materials to the Planning Board, Conservation Commission, and Board of Health. Specifically, and without limitation, the Applicant should:
 - a. perform the additional test pits required under the Stormwater Handbook;
 - b. adjust the modeling assumptions in the Hantush mounding analysis for the leach field, and prepare the required mounding analysis for the stormwater recharge areas;
 - c. identify the locations of all stormwater recharge areas to ensure compliance with setback requirements and soil suitability;
 - d. explain why the “existing condition” scenario in the stormwater model does not match what was approved in 2016;
 - e. evaluate the long-term impacts of proposed increase in recharge on groundwater elevations on project site and abutting properties;

Thank you for your diligence in reviewing this application.

Very truly yours,

/s/ Daniel C. Hill

Daniel C. Hill

cc: William J. Proia, Esq.
Wayland Select Board
Lincoln Planning Board
Lincoln Select Board