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July 19, 2024

Conservation Commission
355 East Central Street
Franklin, MA. 02038
Attn: Breeka Li Goodlander

RE: *Comments from BETA Group, Inc.: Veterans Memorial Drive Extension and Definitive Subdivision, Franklin, MA*

Dear Breeka Li:

On behalf of our client, the Town of Franklin, Guerriere & Halnon, Inc. has prepared the following information to address the comments contained in the letter from BETA Group, Inc. dated June 7, 2024.

BETA Group, Inc. findings, comments and recommendations are shown in *italics* followed by our response in **bold**.

PLAN AND GENERAL COMMENTS

A1. *The Massachusetts Department of Environmental Protection (MassDEP) has issued a DEP file number (159-1292) with the following technical comments:*

“Noting that IVWs are not jurisdictional under the WPA, MassDEP still recommends the use of appropriate sedimentation barriers during replication area construction in order to prevent sedimentation of adjacent IVWs.”

GH RESPONSE: Erosion Control has been added around the replication area.

A2. *The following elements are missing from the provided Plan Set:*

a. *The provided Plan Set has a scale of 50'=1". BETA defers to the commission on the Bylaw requirement of plan scales at 40'=1" or larger per Bylaw Regulation Section 7.18.1.1. The Applicant's use of 50'=1" appears reasonable for this Site.*

GH RESPONSE: Based on our discussions with the Conservation Commission at the July 11, 2024 public hearing the Commission was in agreement that the 50'=1" scale used is acceptable.

- b. *Provide survey dates/methods for all on-the-ground topographic and boundary survey efforts in the plan notes.*

GH RESPONSE: Information has been added to Sheet 3 of 13.

- c. *The existing tree line and individual trees/shrubs with a diameter greater than 1" proposed for removal should be shown on the Existing Conditions Plans per Bylaw Regulation Section 7.18.1.5. It is BETA's understanding that the Commission generally increases the size threshold for tree location based on the Project and therefore defers to the Commission on this matter.*

GH RESPONSE: Based on discussions at the July 11, 2024 public hearing the Commission requested a 3" tree diameter transect sampling was acceptable in lieu of the 1" requirement of the bylaw. Further clarification is required on the specifics (sample width, acceptable transect alignment) and request further discussion with the commission at the July 25, 2024 public hearing.

- d. *Depict the Assessors' references for the Site on all plan sheets.*

GH RESPONSE: Assessor information is located on all sheets within the title block under Owner/Applicant

WETLAND RESOURCE AREA AND REGULATORY REVIEW

CONSTRUCTION COMMENTS

- W1. *The provided plans state that 1,030 sf of IVW will be disturbed, while the NOI filing states 980 sf. The Applicant should clarify which number is accurate and increase the size of the replication area if necessary.*

GH RESPONSE: The correct number is 980+/- sf. and has been updated on Sheet 5 of 13.

MITIGATION COMMENTS

- W2. *Proposed erosion controls include the use of silt fence and mulch sock. Silt fence is not permitted erosion control measure in the Town of Franklin (Pg. 13 of Town of Franklin Best Development Practices Guidebook). The Applicant should coordinate with the Conservation Commission to determine the appropriate erosion control measure for the Site. Twelve (12)-inch diameter compost filter tube may be an appropriate option commensurate with the scope of the Project.*

GH RESPONSE: See attached response from Goddard Consulting, LLC dated June 18, 2024

- W3. *The Applicant should provide the replication protocol and schedule, cross sections of altered and proposed replicated areas, and groundwater elevation data for the proposed replication area on the plans (Bylaw Regulation Section 7.14.2). The protocol attached to the NOI could be transferred to the plans for the contractor's reference; however, a cross section depicting*

proposed grading and depth to groundwater should be provided.

GH RESPONSE: See attached response from Goddard Consulting, LLC dated June 18, 2024

- W4. *In the Wetland Replication Plan, the Applicant proposes to remove hydrophytic vegetation from the I-Series IVW impact area and stockpile it for use within the replication area. If this approach is pursued, it is recommended that these plantings be used as a supplement to, and not a replacement for, the proposed planting schedule.*

GH RESPONSE: See attached response from Goddard Consulting, LLC dated June 18, 2024

- W5. *The Applicant should provide information regarding the intended access to the replication area. Given that clearing of Buffer Zone will be required for access and grading, a Buffer Zone restoration plan should be provided for the Commission's review and should include proposed erosion controls to protect the replication area.*

GH RESPONSE: The proposed access path to the replication area and additional erosion controls have been added to the plan set accordingly.

- W6. *The location of the proposed replication area was observed to be vegetated by hydrophytic plant species including sweet pepperbush (*Clethra alnifolia*), highbush blueberry (*Vaccinium corymbosum*), and red maple (*Acer rubrum*). The Applicant should consider maintaining the existing hydrophytic vegetation (particularly the red maples) when grading the replication area. This existing vegetation could be incorporated into the replication area through establishing hummocks to preserve their root systems while field adjusting the limits of the replication area if this results in any decrease in the overall area of replication. It is recommended that the Commission include a Special Condition in the Order of Conditions requiring the Applicant to flag vegetation to remain in the field and revise the planting schedule (if necessary) for review and approval by the Commission and/or Agent.*

GH RESPONSE: See attached response from Goddard Consulting, LLC dated June 18, 2024

WPA PERFORMANCE STANDARDS

BYLAW REGULATORY COMMENTS

- W7. *The Applicant should provide a narrative with information on the steps taken to mitigate for unavoidable impacts for work that is proposed within the Buffer Zones (Bylaw Regulation Section 7.11.2). Plantings do not appear to be proposed within the Buffer Zone, and it is recommended that the Applicant consider planting native shade trees along the new roadway.*

GH RESPONSE: Trees have been added to the site plan and note added to the species required on Sheet 5, details located on Sheet 11.

W8. *The Erosion and Sediment Control Plan should include a description of the measures that will be taken to properly install and maintain the erosion control devices used during the project, the names and phone numbers of all individuals that will be responsible for erosion controls, as well as the requirement that the erosion control will be inspected weekly and all other criteria set forth in Bylaw Regulation Section 7.12.*

GH RESPONSE: Information has been added to Sheet 4, including the entirety of the standard 8 section of the stormwater report, which includes the contact information of the person/entity responsible for plan compliance, inspection/maintenance schedule, and other requirements of section 7.12.

W9. *BETA defers to the Commission on the approval of the Project Narrative due to several Bylaw requirements being absent from the current Project Narrative (Bylaw Regulation Section 7.9.1.) including who is performing the work, a detailed description of all of the activity within Conservation jurisdiction, and when the proposed activity will be done.*

GH RESPONSE: This was discussed with the Commission at the July 11, 2024 public hearing, acknowledged and noted that a full contact list of contractor, engineer, owner, and other applicable individuals will be provided in accordance with the expected special conditions requirements, prior to the start of construction.

W10. *The Applicant provided a Construction Sequence on the plans that does not appear to include all proposed construction activities. A Construction Sequence with all proposed construction activities including building construction and installation of drainage structures should be included within the NOI and plan set (Bylaw Regulation Section 7.15.1).*

GH RESPONSE: A revised construction sequence has been provided on sheet 4 of the revised plan set and within the standard 8 section of the revised stormwater report.

W11. *The Applicant submitted a Variance request for the filling of an IVW with proposed wetland replication. BETA defers to the Commission on the issuance of this waiver.*

GH RESPONSE: Waiver request was discussed with the Commission at the July 11, 2024 public hearing and it is our understanding that the waiver is anticipated to be approved.

STORMWATER MANAGEMENT REVIEW

GENERAL

SW1. *The discharge from the roadway system at Headwall #6 near the 175 Irondequoit Road property line will not discharge to the Town of Franklin Parcel at 218 Oak Street. Rather, it will flow*

towards the parcel at 346 Oak Street and the B-series wetlands. BETA recommends that a separate design point for the B-series wetlands be developed in the existing conditions analysis for comparison with the proposed discharge from headwall #6.

GH RESPONSE: G&H notes that the B-series wetlands does drain to the #218 Oak Street parcel via an existing/natural channel, as confirmed by GIS 1' contours and a site walk with Mike Maglio and Franklin DPW employees. As noted in the G&H response to comment SW7, headwall #6 does not receive runoff from the proposed roadway and instead functions as a pass-under for several existing/natural swales conveying runoff from the west, allowing this runoff to pass under the proposed roadway, being discharged to a natural swale against the northern stone wall and maintaining existing drainage patterns. MassMapper 1' GIS contours have been added to the pre/post watershed plans in this area. Accordingly, a new design point has not been added, as the current AP-2 design point provides adequate information to determine stormwater impacts to the downgradient properties.

SW2. *Based on the data identified in TP-9, it appears that there will be blasting required to establish the proposed grades for both the building and the parking at the rear of the building. These areas are far enough downgradient from the GC-Series wetlands that groundwater impacts within Resource Areas are not anticipated. However, the design should address the potential issues associated with the groundwater that will be intercepted by the proposed slope at the rear of the building to ensure that it will not impact the proposed stormwater system.*

GH RESPONSE: An underdrain has been added at the bottom of the proposed cut slope to intercept groundwater and prevent impacts to the proposed stormwater system.

SW3. *The catch basins inside the detention basins, as shown in the stormwater report, will have a 1-1/2" orifice opening in the side of the structure. BETA recommends that a detail be provided for this orifice and that the table on Sheet 7 be modified to identify the orifice invert elevations at CB Nos. 4 & 5.*

GH RESPONSE: the detention basin detail has been revised to identify the 1.5" orifice and the structure invert table on sheet 7 revised to identify the orifice invert elevations as requested.

SW4. *The construction details provided for the detention basins on Sheet 12 do not reflect the design as shown on the grading sheet (Sheet 6). There is no embankment around these basins; rather, they are depressions adjacent to either the proposed building or access roadway. In addition, the inlet into the catch basin is shown as a 1" diameter pipe located below grade. Based on the calculations, this inlet is 1.5" diameter and level with the bottom of the basin. The detail should be modified to address these conflicts.*

GH RESPONSE: The details have been revised to accurately depict the detention basin configurations and the perforated outlet pipe shown on the detail has been modified to match the elevations specified in the HydroCAD model.

SW5. *Although it is not a design issue, the floors of the two (2) detention basins are directly over ledge based on test pit data and should be noted as such on the plans in the Detention Basin Profile.*

GH RESPONSE: The detention basin profile has been revised to identify both the existing and proposed ledge depths.

SW6. *The total suspended solids (TSS) calculation for the treatment train through the detention basins should be shown. Detention Basin 2 is required to provide a minimum of 25% TSS removal to meet the 44% pretreatment requirement. It appears that there is a grass shoulder adjacent to the roadway which will act as a filter strip. The detail should be modified to show this and the TSS calculation sheet for this train should also be provided.*

GH RESPONSE: The detail has been revised and the TSS calculation sheets for the detention basins added to identify the filter strip as requested. G&H also notes that both detention basins discharge to sediment forebays and infiltration basins, which provide additional TSS removal prior to any stormwater discharge.

SW7. *TSS calculation sheet for the discharge at Headwall #6 should be submitted. Presently, it does not appear that the runoff from the proposed roadway conveyed to this headwall will meet the treatment requirements. The designer should indicate which best management practices (BMPs) are being used/designed for this discharge point.*

GH RESPONSE: Headwall 6 does not receive runoff from any of the proposed impervious surfaces, and only discharges intercepted overland runoff from the west to prevent its capture by the proposed roadway drainage system. Accordingly, TSS removal standards do not apply and the requested TSS calculation sheet has not been provided.

SW8. *Based on the provided plans, it appears that the calculations for both storage and infiltration in the infiltration basins includes the forebay areas. These areas cannot be used in the analysis of the capacities of the basins. BETA recommends that the designer:*

- a. *Reduce the height and area of the forebays to provide greater storage area and volume for exfiltration in the basin itself; and*
- b. *To minimize the size of the forebay, direct only that portion of the runoff from the tributary impervious surfaces which needs this incremental treatment to bring the pretreatment up to the standard.*

These measures should minimize the impact of the loss of the forebay in the analysis of the basins.

GH RESPONSE: The HydroCAD calculations have been revised as requested to exclude the sediment forebay from exfiltration calculations, and the forebays revised to reduce their volume

as recommended. Two rows of chambers have been added to Cultec Chamber System #2 to help offset the loss of storage and infiltration.

We believe these responses have addressed the concerns expressed by BETA Group, Inc. from their review letter. Should you have any further questions or concerns, please contact our office.

Sincerely,
Guerriere & Halnon, Inc.

Amanda Cavaliere

Amanda Cavaliere
Franklin Office Manager

Attachments