August 6, 2024

Ms. Breeka Lí Goodlander, Agent
Town of Franklin Conservation Commission
355 East Central Street
Franklin, MA 02038

Re: Veterans Memorial Drive Extension and Definitive Subdivision
MassDEP File No. 159-1292
Notice of Intent Peer Review Update

Dear Ms. Goodlander:

BETA Group, Inc. (BETA) has reviewed revised documents and plans for the project entitled ***Veteran Memorial Drive Extension & Definitive Subdivision,*** located at ***0 Veterans Memorial Drive off of Irondequoit Road*** in Franklin, Massachusetts. This letter is provided to present BETA's findings, comments and recommendations.

BASIS OF REVIEW

The following supplemental documents were received by BETA and will form the basis of the review:

- Notice of Intent Packet entitled ***Notice of Intent- Veterans Memorial Drive Extension and Definitive Subdivision***; prepared by Guerriere & Halnon, Inc.; dated April 5, 2024. Packet Includes:
  - Application Process Signature Form;
  - Property Access Signature Form;
  - Local Filing Fee Calculation Worksheet;
  - Resource Area Impact Summary Form;
  - Abutter Notifications;
  - Affidavit of Service;
  - WPA Form 3 and Fee Transmittal Form;
  - Project Narrative;
  - Figures (NHESP, FEMA and Locus); and
  - Wetland Replication Plan.
- Plans (14 Sheets) entitled ***Definitive Subdivision Plan of Land Veterans Memorial Drive Extension, Franklin, Massachusetts***; prepared by Guerriere & Halnon, Inc.; dated April 2, 2024; revised July 10, 2024; stamped and signed by Robert E. Constantine, II, MA PLS No. 49611 and Dale Mackinnon MA P.E. No. 34575.
- Stormwater Report entitled ***Stormwater Report for Veterans Memorial Drive Extension Subdivision Franklin, MA***; prepared by Guerriere & Halnon, Inc.; dated April 3, 2024; revised July 9, 2024; stamped and signed by Dale Mackinnon, MA P.E. No. 34575.
- Peer Review Responses entitled ***Comments from BETA Group, Inc.: Veterans Memorial Drive Extension and Definitive Subdivision, Franklin, MA;*** prepared by Guerriere & Halnon, Inc.; dated July 19, 2024. Inclusive of:
  - Peer Review Responses from Goddard Consulting Inc; and
  - Wetland Replication Plan prepared by Goddard Consulting.

Review by BETA included the above items along with the following, as applicable:

- Site Visit on May 8, 2024
- ***Massachusetts Wetlands Protection Act 310 CMR 10.00*** effective October 24, 2014
- ***Massachusetts Stormwater Handbook*** effective January 2, 2008 by MassDEP
- ***Stormwater Management Chapter 153 From the Code of the Town of Franklin,*** Adopted May 2, 2007
- ***Wetlands Protection Chapter 181 From the Code of the Town of Franklin,*** dated August 20, 1997
- ***Town of Franklin Best Development Practices Guidebook***, dated September 2016

PEER REVIEW UPDATE

The Applicant has provided revised materials and written comment responses pursuant to BETA's June 7, 2024 peer review letter. BETA's original comments from the June 7, 2024 peer review letter are included in plain text. The July 19, 2024 comment responses attributed to Guerriere & Halnon, Inc. (GH), are provided in *italics* and are prefaced with "*GH:*" and responses attributed to Goddard Consulting (GC) are provided in *italics* and are prefaced with "*GC:*". BETA's most recent responses are provided in **bold text** and are prefaced with "**BETA2**:".

BETA's responses in this letter identify additional information that should be provided by the Applicant to demonstrate compliance with the Bylaw.

SITE AND PROJECT DESCRIPTION

The Site is 16.90-acre parcel identified by the Town of Franklin Assessor's Office as Assessor's Map 259 Lot 7 located off Irondequoit Road at 0 Veterans Memorial Drive in Franklin, Massachusetts (the Site). The Site is bounded to the north by a residential neighborhood, to the west by Franklin High School, and to the south and east by apartment complexes. Existing conditions at the Site include an undeveloped wooded lot consisting of hardwood uplands vegetated with species including Eastern white pine (*Pinus strobus*), American beech (*Fagus grandifolia*), and red maple (*Acer rubrum*); and isolated wetland complexes. Topographic relief at the Site generally follows a west-to-east orientation.

No Resource Areas Subject to Protection or Jurisdiction under the Massachusetts Wetlands Protection Act (M.G.L. ch.131 s.40) and its implementing regulations at 310 CMR 10.00 (collectively "the Act") are located at the Site. Resource Areas that are Jurisdictional under the Town of Franklin Wetlands Protection Bylaw (Chapter 181) and its associated regulations (collectively "the Bylaw") are present at the Site and include:

- Isolated Vegetated Wetland (IVW); and
- Associated Buffer Zones (25-foot No Disturbance Zone, 50-foot No Build Zone and the 100-foot Buffer Zone).

The boundaries of onsite Resource Areas were previously confirmed by an Order of Resource Area Delineation (ORAD) issued under MassDEP File No. 159-1273 on September 7, 2023. Previously confirmed boundaries are as follows:

- The GC-1 to GC-26 Series IVW;
- The GC-100 to GC-126 Series IVW; and
- The I-1 to I-11 Series IVW.

The Site is not located within any Surface Water Protection Areas (Zone A, B, or C), or Zone I, Zone II or Interim Wellhead Protection Areas. There are no Outstanding Resource Waters (ORWs) or Areas of Critical Environmental Concern (ACEC) present, and the most recent Natural Heritage and Endangered Species Program (NHESP) mapping does not depict any Priority Habitat of Rare Species or Estimated Habitat of Rare Wildlife at the Site. There are no NHESP-mapped Certified or Potential Vernal Pools located within 100 feet of the Site. The IVWs at the Site do not exhibit Vernal Pool characteristics.

Natural Resource Conservation Service (NRCS) soil maps indicate the presence of the following soil type at the Site, Montauk fine sandy loam, 3 to 8 percent slope with a Hydrologic Soil Group (HSG) rating of C.

Proposed work is associated with the construction of a Town owned road extension to service a proposed residential development pursuant to M.G.L. Chapter 40B (40B) and includes the following activities (collectively referred to as "the Project"):

- Installation of erosion controls;
- Clearing existing vegetation;
- Construction a temporary stormwater basin and temporary stormwater swales;
- Filling of the I-Series IVW;
- Grading;
- Establishment of the new roadway;
- Creation of a 1,960-sf wetland replication area;
- Installation of utilities;
- Installation of a gated fence;
- Construction of the 60-unit residential complex with associated Site features outside of jurisdictional areas; and
- Stabilization of the Site.

The Project will result in direct impacts to IVW, the associated 50-foot No Build Zone, and 100-foot Buffer Zone. The Applicant has requested a Bylaw Variance for the filling of the I-Series IVW and has proposed a 2:1 wetland replication area. The proposed wetland replication area will be 1960-sf and will connect the two existing IVWs. The Applicant has submitted an alternatives analysis and a functions and values analysis in support of the proposed wetland impacts and replication area.

ADMINISTRATIVE AND PLAN COMMENTS

The plan set (as identified above) is missing information and requires additional information for clarity.

Table 1. NOI Plan

NOI Plan Requirements	Yes	No
Scale of 40'=1" or larger	✓**(BETA2:)**	
North Arrow (with reference)	✓	
Topographic contours (2' intervals)	✓	
Existing Conditions Topography (with source and date of survey)	✓ **(BETA2:)**	
Proposed Topography	✓	
Existing and Proposed Vegetation	✓ **(BETA2:)**	
Existing Structures and Improvements	✓	
Resource Areas and Buffer Zones labeled	✓	
Location of Erosion Controls	✓	

Details of Proposed Structures	✓	
Construction Sequence and Schedule	✓	
Registered PLS Stamp (Existing Condition Plans Only)	✓	
Assessors' Reference	✓ **(BETA2:)**	
Abutting Property Assessors' Reference	✓	
Survey Benchmark	✓	
Accurate Plan Scale	✓	

PLAN AND GENERAL COMMENTS

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

> "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: Erosion Control has been added around the replication area.

BETA2: BETA recommends that the Applicant also depict erosion and sedimentation controls along the proposed access path to the wetland 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: Based on our discussion with the Conservation Commission at the July 11, 2024 public hearing the Commission was in agreement that the 50'+1" scale used is acceptable.

BETA2: BETA defers to the Commission on this requirement. No further comment required.

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

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

BETA2: Comment addressed.

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: 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.

BETA2: The Applicant has submitted the results of the tree survey which is anticipated to be discussed at the next public hearing. However, BETA recommends that the Applicant clarify the

number of trees with a three (3)-inch or greater caliper to be removed, as the plans state 36 trees and the narrative states 46 trees. In addition, the plans should be revised to depict what appears to be a proposed access route with less tree impacts (depicted with red linework).

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

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

BETA2: Comment addressed.

WETLAND RESOURCE AREAS AND REGULATORY REVIEW

BETA has completed a regulatory review of the submitted documents and plans, focusing on compliance with jurisdictional regulations set forth in the Bylaw.

The NOI application includes narrative information describing the Project, and the proposed impacts within Resource Areas have generally been quantified and described. Proposed mitigation measures include the creation of a 1,960-sf replication area and conducting all associated monitoring. However, the revised NOI requires further information regarding impacts to Buffer Zones, and compliance with Bylaw provisions to confirm regulatory compliance.

Resource Areas at the Site have been previously approved by the above-referenced ORAD (MassDEP File No. 159-1273).

BETA2: The revised materials provided by the Applicant have not demonstrated full compliance with the requirements of the Bylaw and further Plan edits have been requested to protect onsite Resource Areas. While a tree count associated with required clearing within Buffer Zone to access the wetland replication has been completed, a Buffer Zone restoration plan should be provided per Bylaw Section 7.11. In addition, a cross section of the proposed replication area with the proposed grading and depth to groundwater should be provided for compliance with Section 7.14.2 of the Bylaw. Additional erosion controls have also been requested along the access path to the restoration area to protect onsite Resource Areas.

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

BETA2: Comment addressed.

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

GC: GC and G&H has changed the erosion control devices to 12-inch composite filter tubes.

BETA2: Comment addressed.

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

GC: The Wetland mitigation report by GC, provided in the NOI, has the replication protocol and schedule. This information will also be put on corresponding NOI plans by G&H. G&H will also put ground water elevations/hydric soil indicators depths and cross sections of the latest and proposed wetland areas on the plans. Soil profiles and depth of hydric soils are provided as an attachment herein.

BETA2: The Applicant has provided the protocol and schedule for the replication area and soil profiles for the IVWs to be filled, the soil profiles for the wetlands adjacent to the replacement area, and the existing and proposed wetland replacement area on the plans. A cross section with the proposed grading and depth to groundwater should be provided. This could be considered as a condition of approval.

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

GC: The impact wetland area is sparsely vegetated with 2 large red oaks and several small, sweet pepperbushes. GC flagged 5 Sweet Pepperbush shrubs with blue ribbon which are labeled "save". These will be saved and added to the wetland replacement area in addition to that which is proposed to be planted. The attached wetland replication report has been updated with this information.

BETA2: Comment addressed. BETA recommends the Commission include a Special Condition stating that the plants to be saved shall be reviewed during the preconstruction meeting to ensure that the contractor is aware of this aspect of the replication plan as it relates to the proposed planting list.

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

BETA2: The Applicant identified where the proposed construction access will be located on the Plans. BETA recommends the Applicant show erosion controls downgradient of the construction access path within Buffer Zones. The Applicant should provide a Buffer Zone restoration plan detailing stabilization procedures, plantings, and any other activities that will occur to restore the disturbed portions of the Buffer Zone.

The Applicant has also provided additional species for proposed tree plantings along the roadway, some of which are not native. BETA recommends a Special Condition requiring that all vegetation planted within Buffer Zone consists of native species. Based on the list provided on Sheet 5 of the plans, this would include sugar maple (*Acer saccharum*), American hornbeam (*Caprinus caroliniana*), white oak (*Quercus alba*), pin oak (*Quercus palustris*), and American liberty elm (*Ulmus americana*).

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

GC: GC flagged the wetland trees within the proposed wetland replacement area to remain on hummocks. Trees were flagged with blue ribbons which says "save". These include trees within and directly adjacent to the replacement area and consist of: Two 4-6" dbh red maples, three 10-14" dbh red maples, one 4 trunk red maple and one 6-10" dbh tupelo. Sweet pepperbush shrubs will be dug up with special consideration to keep root ball intact with the hope of re-using within the replacement area.

BETA2: Comment addressed; see BETA2 response to Comment W4.

WPA Performance Standards Comments

The Project does not propose any work within Areas Subject to Protection or Jurisdiction under the Act.

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

BETA2: A narrative should be provided identifying the steps taken to mitigate work within the Buffer Zones in accordance with Bylaw Regulation Section 7.11.2. See BETA2 response to Comments A1 and W5.

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

BETA2: Comment addressed.

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: 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.

BETA2: BETA defers to the Commission regarding the missing information from the Project Narrative and recommends a Special Condition requiring the Applicant to provide the full contact list of contractors, engineer, owner, and other applicable individuals prior to the start of work.

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: 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.

BETA2: Comment addressed.

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: 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.

BETA2: No further comment required.

STORMWATER MANAGEMENT REVIEW

The proposed primary stormwater system which will treat and infiltrate the runoff from most of the proposed impervious surfaces at the Site will consist of three (3) infiltration basins along the eastern extent of the Project. Two (2) of the proposed stormwater basins will discharge towards the existing development at 20 Veterans Memorial Drive and be treated by the existing stormwater system at this location. Pretreatment for the three (3) infiltration basins will be provided by deep sump catch basins and a sediment forebay formed by a 2'x4' gabion weir. Two (2) subsurface infiltration systems will be provided to treat the runoff from the proposed pavement areas at the rear of the proposed building. These systems will be lined with a 40-mil impervious liner and will therefore act primarily as detention basins. A separator row will be provided at the inlet for pre-treatment. Discharge from the chambers will be conveyed to the forebays at Infiltration Basins 2 & 3. At the front of the building, two (2) detention basins are proposed and will collect runoff from the impervious surfaces at the front of the building prior to discharge to the

forebays at Infiltration Basins 2 & 3; however, the detention basins themselves will only qualify as providing pretreatment.

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: 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 discharge to a natural swale against the northern stone wall and maintaining existing drainage patterns. MassMapper 1' GIS contours have been added, as the current AP-2 design point provides adequate information to determine stormwater impacts to the downgradient properties.

BETA2: Additional review of the 2021 USGS LIDAR contours demonstrates that all of these areas will flow towards the northeast corner of the parcel and combine on the parcel at 218 Oak Street. Comment addressed.

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

BETA2: Comment addressed.

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: The detention basin details 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.

BETA2: Comment addressed.

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

BETA2: Comment addressed.

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

BETA2: Comment addressed.

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: 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.

BETA2: Comment addressed.

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: 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.

BETA2: Comment addressed. As clarified by the Applicant, the roadway runoff is directed around this culvert into the proposed infiltration basin; therefore, the culvert will only receive overland flow which in this case does not require treatment.

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: 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.

BETA2: Comment addressed.

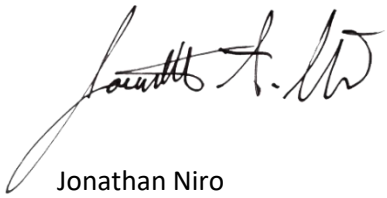
REVIEW SUMMARY

Based on our review of the NOI submittal and Project plans, the Applicant will be required to submit additional information to demonstrate compliance with the Bylaw.

If we can be of any further assistance regarding this matter, please contact us at our office.

Very truly yours,
BETA Group, Inc.

Anna Haznar
Staff Scientist



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