



April 4, 2024

Mr. Gregory Rondeau, Chairman
355 East Central Street
Franklin, MA 02038

**Re: 19 Dean Avenue
Site Plan Peer Review**

Dear Mr. Rondeau:

BETA Group, Inc. (BETA) has reviewed documents for the project entitled **“Special Permit Application Proposed Site Redevelopment Plans for 19 Dean Avenue”** located at 19 Dean Avenue in the Town of Franklin, MA. This letter is provided to outline BETA’s findings, comments, and recommendations.

Basis of Review

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

- Application and cover letter to Amy Love, Town Planner dated March 1, 2024, prepared by CHA Consulting inc. which included.
 - Application for Special Permit and Site Plan Approval.
 - Application Fees.
 - Certified Abutters List.
 - Notarized Certificate of Ownership.
- Plans (8 sheets) entitled: **“Proposed Mixed Use Redevelopment Project, 19 Dean Avenue, Franklin, MA”**, dated March 01, 2024, prepared by CHA Consulting Inc. of Norwell, MA stamped by Kelley Killeen, MA PE #38991 and William J. Donovan, MA PLS #49622.
- Drainage Report for Site Redevelopment for proposed Mixed Use, 19 Dean Avenue, dated March 01, 2024, prepared by CHA Consulting Inc. of Norwell, MA stamped by Kelley Killeen, MA PE #38991.

Review by BETA will include the above items along with the following:

- Site Visit
- **Zoning Chapter 185 From the Code of the Town of Franklin**, current through July 2021
- **Zoning Map of the Town of Franklin, Massachusetts**, attested to October 7, 2020
- **Stormwater Management Chapter 153 From the Code of the Town of Franklin**, Adopted May 2, 2007
- **Subdivision Regulations Chapter 300 From the Code of the Town of Franklin**, current through March 8, 2021
- **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

1.0 SITE AND PROJECT DESCRIPTION

The project site is one parcel, Assessors Map 279 Parcel 169, with a total area of 3,433± square feet located at 19 Dean Avenue in the Town of Franklin (the "Site"). The Site is located within the Downtown Commercial District. The lots to the south, west, and east of the parcel are in the same district. The parcel to the east is the Town of Franklin public parking lot associated with the commuter rail station. The Frontage on Dean Avenue is on the north side of the parcel. The parcels across the street are in the Residential V District. The Site is located outside the limits of the Water Resource District. The only open space on the lot is a small courtyard at the left rear corner of the building. Project plans indicated the site was granted a Zoning Board of Appeals approval for a mixed-use development dated May 04, 2022. The lot and structure are currently non-conforming in several aspects. As indicated on the plans, the site will be brought into compliance for several items where possible with some improvements to the approval conditions. The Site is not located within a wellhead protection area, a FEMA mapped 100-year floodplain, an NHESP-mapped estimated habitat of rare or endangered species, or any other critical area.

The project proposes to raze the existing building and construct a 2,304 square foot 3 story structure with a mixed use of 3 residential units and 375 square feet of commercial space. Parking for the residential use will be provided in 3 (presumed) garage spaces which will be accessed directly from Dean Avenue. All other required parking will be provided by existing public parking spaces around the site. Line spacing for public spaces on Dean Street will be modified as needed to accommodate the new garage entrances.

It is important to note that based upon the size of the lot (< 1 acre), the site development is not directly subject to Chapter 153: Stormwater of the bylaws. In addition, there are no wetland resource areas on or adjacent to the site which would require protection under the Wetlands Zoning by Law; however, in accordance with §185-31.C.(3)m the Board may request a stormwater report to ensure compliance with the Massachusetts Stormwater Management Standards. The design does call for some stormwater improvements and BETA will provide a general review of the design to ensure that it will work to improve the existing conditions.

2.0 WAIVERS AND RELIEF

The Applicant has requested the following waivers, variances, and other forms of relief from the submittal requirements:

WA1. *Special Permit to allow two (2) additional residential units beyond the one (1) unit permitted.*

WA2. *Waiver from the need to provide the required number of on-site parking spaces.*

The site plans note the following previously granted approvals by the Board of Appeals.

WA3. *Relief from the minimum required rear yard setback.*

WA4. *To allow a building up to 50' in height. The currently proposed project will be conforming for stories/height.*

WA5. *Previously granted special permit to allow for the reconstruction of a pre-existing nonconforming building.*

WA6. *Previously granted variance to construct residential units 1 / 2 story above street level.*

WA7. *Previously granted variance to allow usage without off-street parking.*

3.0 GENERAL REVIEW COMMENTS

- G1. *BETA recommends that floor plans and elevation views be provided to clarify the layout of the building.*

4.0 TOWN OF FRANKLIN ZONING REQUIREMENTS

The project is subject to the Town of Frankling zoning regulations outlined under Chapter 185. Review comments related to the zoning bylaw are provided in the following sections.

The project proposes a Mixed Use consisting of commercial and residential uses and is located within the Downtown Commercial (DC) district.

Multifamily or apartment residential uses are permitted in the DC district subject to the requirement that all dwelling units are located above the street level floor and no more than one unit per 2,000 sq. ft. of lot area is permitted. The applicant has requested a special permit to allow two residential dwelling units, where only one would normally be allowed based on lot area.

Certain typers of commercial uses are allowed in the DC district; several categories of commercial uses are not allowed or require a special permit.

- Z1. *BETA defers to the Town regarding the proposed special permit.*
- Z2. *Provide plan or note showing that the proposed residential units are located on the floors above the street level floor (§185 attachment 7, note 5).*
- Z3. *Clarify the nature of the proposed commercial uses and confirm that they are permitted uses.*

NONCONFORMING LOTS (§185-10)

The project is located on an existing nonconforming lot. As the proposed project includes a multifamily use, the exceptions outlined in §185-10.A would not apply to the project. Refer to comments Z5 and Z6.

SCHEDULE OF LOT, AREA, FRONTAGE, YARD AND HEIGHT REQUIREMENTS (§185 ATTACHMENT 9)

The project will comply with dimensional requirements for frontage, lot width, front yard, side yard, building coverage, building height, and maximum impervious coverage. The project does not comply with dimensional requirements for lot area, lot depth, and rear yard.

According to the site plan notes, a special permit was previously granted to allow a building up to 50' in height and from the rear yard setback.

- Z4. *BETA defers to the Town regarding applicability of previously granted approvals from the Board of Appeals to the current project.*
- Z5. *Evaluate if additional relief needs to be requested for lot area and lot depth, which were not specifically referenced in the previously granted variances/special permits from the Board of Appeals. BETA notes that, per §185-10.A(2), the exceptions granted to nonconforming lots do not apply to lots that are used for multifamily use.*

PARKING, LOADING AND DRIVEWAY REQUIREMENTS (§185-21)

Refer to Traffic Assessment section below.

SIDEWALKS (§185-28) AND CURBING (§185-29)

The project proposes to retain and reconstruct the existing sidewalk along Dean Ave. Proposed curbing includes vertical granite curb. Sidewalks scale at 4'-5" in width not including the width of the curb, and are presumed to match the existing widths.

- 26. *Consult the DPW to confirm the proposed sidewalk and driveway details are acceptable. Typically welded wire reinforcement if provided for driveways and sidewalks have a concrete thickness of 5".*

SITE PLAN AND DESIGN REVIEW (§185-31)

The project has been submitted for Site Plan Review and is required to conform to the requirements of this section. The submission is in compliance with this section except as noted below:

- 27. *Identify existing and proposed land and building uses on the plans (§185-31.C.(3).(e)).*

LANDSCAPING AND SCREENING (§185-35)

Refer to Landscape and Grading section below.

5.0 TRAFFIC ASSESSMENT AND IMPACT

The Applicant has not provided a traffic assessment and impact report or traffic study. The project proposes to utilize proposed on-site and existing public parking spaces along Dean Street.

GENERAL TRAFFIC COMMENTS

- T1. *Provide a turning movement to demonstrate that vehicles can enter the site without encroaching into the modified parallel parking spaces on Dean Avenue.*

SITE ACCESS AND CIRCULATION

Access to the Site is proposed via three (3) vehicular access driveways for residents. Other visitors to the Site will access the property via off-site public parking spaces on Dean Street and in the surrounding area. A concrete sidewalk with vertical granite curb is provided along the street frontage.

- T2. *Provide curb breaks along sidewalk at proposed driveway entrances.*

PARKING AND LOADING

Required parking is defined by §185-21(B) of the Town Zoning Bylaw. The proposed development includes mixed residential and commercial uses. Required parking is calculated as follows:

Use Designation	Criteria	Dwelling Units / Floor Area	Required Parking
Residential Dwellings in DC District	1.5 spaces per dwelling unit	3 Dwelling Units	5 Spaces
Nonresidential	1 space per 500 SF of floor area	375 Sq. Ft.	1 Spaces
Total			6 Spaces

The project proposes three (3) on-site parking spaces to be used by residents. Parking for commercial portions of the project will be provided by existing public parking spaces located near the project. Two (2) existing public parking spaces will be removed to allow resident access. A waiver has been requested from the Parking, Loading, and Driveway requirements of §185-21.

Residential parking spaces (assumed to be in garages) are not striped, but each include an area at least 9.8 feet wide and 19 feet long. Public parallel parking spaces to be re-striped are shown as 9.2 feet wide and 18 feet long.

- T3. *BETA defers to the Town regarding the proposed waiver.*
- T4. *BETA defers to the Town regarding parallel parking spaces, which are required to be at least 24 feet in length per §185-21.C(9). The existing parallel parking spaces are depicted between 20 and 22 feet long.*
- T5. *Confirm that the residential parking spaces are located within the building and provide interior dimensions for the walls to ensure there is adequate space to exit/enter vehicles.*
- T6. *Although public parking options exist in vicinity of the Site, the applicant should provide information on the number of public spaces within 300 feet of the building and the existing/proposed parking demand to ensure adjacent private lots are not impacted.*

6.0 SIGNAGE AND LIGHTING

The project proposes does not propose any new signage or lighting identified on the plans.

- SL1. *It is anticipated that exterior lighting will be required for safety and security. Provide lighting information, as applicable, and associated photometric plan to confirm there is no nuisance spillage.*

7.0 UTILITIES

Proposed utilities depicted on the plans include domestic water, fire service, sanitary sewer, and underground electric service. Domestic water and fire service is proposed via new 2" and 3" copper (type k) pipe, respectively, which will connect to the existing main at Dean Ave. Sanitary sewer service is proposed via a new PVC SRD35 pipe which will connect to the existing service at Dean Ave. Electrical service is proposed via interconnection to Utility Pole R3 at near the northeast corner of the property along Dean Ave.

- U1. *Consult the DPW to determine final pavement treatment for roadway patching (currently shown as only 3" bituminous thickness) and any details for crossing the existing water and sewer (vitrified clay pipe).*

8.0 LANDSCAPE TREATMENT & GRADING

The project proposes an 18-inch wide grassed strip along the eastern side of the building. The remainder of the Site will be impervious surfaces or pervious pavers. No tree or shrub plantings are proposed.

Post-development grading is shown to be generally similar to pre-development grading. Spot grades show that slopes will be directed away from the proposed building.

- LA1. *Provide spot grades along driveway and sidewalk to show how these features will interact with existing features and Dean Ave. Confirm that driveways will drain towards the roadway.*
- LA2. *Confirm whether proposed grading will match existing grading at the limit of work and that no offsite grading is required.*

9.0 STORMWATER MANAGEMENT

The proposed stormwater management design consists of a new underground concrete galley retention drainage system located beneath the proposed building. Stormwater runoff will be conveyed to this

system via a connection to the building's roof drain. Overflow from the galley system will be conveyed to the MS4 beneath Dean Ave. Additionally, a foundation underdrain is proposed which will drain to a new leaching catch basin.

GENERAL

- SW1. *BETA defers to the Town regarding the proposed rigid connection to the Dean Avenue drain line.*
- SW2. *Provide sizing calculation for proposed 6" outlet pipe from underground system.*
- SW3. *Provide invert information for existing sewer line and water main along Dean Ave and review for potential conflicts with drainage pipe. The survey shows an invert elevation of 303.20' at the nearby sewer manhole which could conflict with the proposed drain line invert of 302.5'.*
- SW4. *Provide calculations or documentation to demonstrate that the pervious paver base and leaching catch basin have adequate storage and can infiltrate the required stormwater runoff without ponding or surcharging the foundation drain. BETA notes the proposed leaching basin will extend to a depth of 12± feet below grade and could be impacted by groundwater.*

STORMWATER MANAGEMENT REGULATIONS (CHAPTER 153)

The project proposes to disturb less than one acre of land within the Town of Franklin. It is therefore not subject to the Stormwater Management Regulations. The project is also required to comply with the Town of Franklin Best Development Practices Guidebook (BDPG). Compliance with these regulations is outlined below and throughout the following sections.

SUBDIVISION REGULATIONS - STORMWATER MANAGEMENT REGULATIONS (§300-11)

Additional requirements for stormwater management are outlined in §300-11 of the Town of Franklin Subdivision Regulations.

- SW5. *Revise proposed drainage pipe to be reinforced concrete or request waiver (§300-11.B(2.a)). BETA notes that current proposed pipe sizes (8" or less) are not available in concrete.*

MASSDEP REPORTABLE RELEASES

The MassDEP Waste Site / Reportable Release database does not identify any releases at the Site.

MASSDEP STORMWATER STANDARDS

The project has been designed to comply with the Massachusetts Stormwater Standards as outlined by MassDEP. Compliance with these standards is outlined below:

LOW IMPACT DEVELOPMENT (LID) TECHNIQUES

Proposed LID measures include no disturbance to any wetland resource area, use of pervious pavers, and reduced impervious area.

NO UNTREATED STORMWATER (STANDARD NUMBER 1): *No new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.* The project does not propose any new discharges to wetlands. Overflow from the underground galley system will be conveyed to the Town's MS4 system in Dean Avenue. Any overflow from the leaching basin and pavers is expected to flow overland onto adjacent properties– **complies with standard.**

POST-DEVELOPMENT PEAK DISCHARGE RATES (STANDARD NUMBER 2): *Stormwater management systems must be designed so that post-development peak discharge rates do not exceed pre-development peak*

discharge rates. The project proposes to mitigate increases to runoff rates with the use of an underground galley system. The provided summary table indicates a decrease in peak discharge rate and peak runoff volume to all watersheds.

SW6. *Provide HydroCAD model for pre-development conditions.*

SW7. *Review area used in HydroCAD model. The lot area is 3,433 Sq. ft. but only 3,000 Sq. Ft. has been accounted for in the design.*

RECHARGE TO GROUNDWATER (STANDARD NUMBER 3): *Loss of annual recharge to groundwater should be minimized through the use of infiltration measures to maximum extent practicable.*

NRCS soil maps indicates the presence of Urban Land with no assigned Hydrologic Soil Group Rating. No test pits have been conducted at the Site and soil conditions are therefore unknown. The underground galley system has been designed with an infiltration rate of 0.52 in/hr.

Groundwater recharge is proposed via a new underground galley system and a leaching catch basin. As a net decrease in impervious area is proposed, no recharge is required; however, the project has been designed with the intent to provide 1.0-inch recharge volume for the impervious areas per Town of Franklin stormwater regulations. Additional clarification is needed to confirm the recharge volume will be provided.

SW8. *Recommend a condition to perform test pits during construction to determine suitability of stormwater infiltration and estimated seasonal high groundwater elevation.*

SW9. *Indicate source of the 0.52 in/hr. infiltration rate used in the design.*

SW10. *Revise provided recharge volume calculation to include only the storage volume located below the lowest invert elevation of 303'. Additional storage may be included for the proposed stone reservoir located beneath the chamber.*

SW11. *Revise recharge calculations for consistency with HydroCAD. A volume of 320 cu. ft. is calculated in the report, but a volume of 227 cu. ft. is designed in hydroCAD.*

SW12. *A setback of at least 10 feet from building foundations is required for all SCMs. (MA Handbook V1C1 Pg 8); however, as a redevelopment some relief from this criterion is anticipated. Evaluate if leaching systems can be located outside the footprint of the building. If not practicable, confirm that the subsurface system can be placed under the building without impairing structural stability and provide calculations demonstrating that the underground galleys are designed to handle anticipated live and dead loads from the building.*

SW13. *Provide calculations showing that all infiltration BMPs will fully drain within 72 hours.*

TOTAL SUSPENDED SOLIDS (STANDARD NUMBER 4): *For new development, stormwater management systems must be designed to remove 80% of the annual load of Total Suspended Solids (TSS).*

The project includes the following treatment trains:

Treatment Train	SCM 1	SCM 2	Infiltration BMP	TSS Removal %
A	None	None	Underground Galley System	80%
B	None	None	Leaching Basin	80%

The project has been designed to provide at least 80% TSS removal for treated impervious areas. The proposed infiltration BMP has been sized to treat the required 0.5-inch water quality volume.

A Long Term Pollution Prevention Plan is included in the O&M Plan.

SW14. *Provide calculations for required/provided water quality volume. The required volume is based on the total post-development impervious area, not the net change in impervious area.*

HIGHER POTENTIAL POLLUTANT LOADS (STANDARD NUMBER 5): *Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific stormwater management BMPs.*

The project is not considered a LUHPPL – **standard not applicable.**

CRITICAL AREAS (STANDARD NUMBER 6): *Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas.*

The project is not located in a critical area – **standard not applicable.**

REDEVELOPMENT (STANDARD NUMBER 7): *Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable.*

The project is considered a redevelopment under the definition of “Development, rehabilitation, expansion, and phased projects on previously developed sites, provided the redevelopment results in no net increase in impervious area.” Certain standards need only be met to the maximum extent practicable.

EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8): *Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities. As the project proposes to disturb less than one acre of land, it will not be required to file a Notice of Intent with EPA nor develop a Stormwater Pollution Prevention Plan (SWPPP). An erosion control plan has been provided showing temporary fence and inlet protection.*

SW15. *Provide detail for drain inlet protection.*

SW16. *Provide anti-tracking measures at site entrance to ensure all construction vehicle traffic onto or out of the Site is controlled.*

SW17. *Provide perimeter controls (and associated detail) along the limit of work. Compost filter tube is recommended.*

SW18. *Provide measures to protect/restore the infiltration capacities of soils in proposed leaching area during construction.*

OPERATIONS/MAINTENANCE PLAN (STANDARD NUMBER 9): *A Long-Term Operation and Maintenance Plan shall be developed and implemented to ensure that stormwater management systems function as designed. A Stormwater Operation and Maintenance Manual was provided with the Stormwater Management Report.*

SW19. *Indicate how future property owners will be notified of the presence of the stormwater management system and the requirement for proper operation and maintenance.*

SW20. *Provide map, drawn to scale, that shows the location of all stormwater BMPs in each treatment train and snow storage areas.*

SW21. *Provide approximate annual maintenance budget.*

SW22. *Provide signature of owner on the O&M Plan.*

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SW23. *Include operation and maintenance requirements for underground galley system, underslab drainage system, and leaching basin and add to maintenance checklist.*

ILLICIT DISCHARGES (STANDARD NUMBER 10): *All illicit discharges to the stormwater management system are prohibited. An unsigned Illicit Discharge Compliance Statement was provided with the submission.*

SW24. *Provide owner's signature on Illicit Discharge Compliance Statement.*

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

Very truly yours,
BETA Group, Inc.



Stephen Borgatti, PE, MENG
Senior Project Engineer



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Senior Project Manager