

# United Consultants, Inc.

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March 26, 2024

Mr. Gregory Rondeau, Chair  
Franklin Planning Board  
355 East Central Street  
Franklin, MA 02038

**Re: 100 – 110 East Central Street -Site Plan Peer Review**

Mr. Chairman and Board Members,

On behalf of the owner, 100 East Central Street RE, LLC and 110 East Central Street RE, LLC, we have provided a summary of the following outstanding comments from The Town Planner, BETA Group, Inc. BETA Group, Inc. has provided review comments for the Planning Board as well as the Conservation Commission. We have also provided comments received from the Town of Franklin Planning Board at the public hearings. Our responses are immediately following each comment and they have been italicized.

## Town Planner

### General:

1. The site is located at 100-110 East Central St in the Commercial I Zoning District  
*Agreed.*
2. The applicant is proposing to construct a mixed use three story building with 20 residential units and 1 commercial unit. A Special Permit is required in the Commercial I Zoning District, Under 185 Attachment 7, 6.1.a.(footnote 3) – No more than one dwelling unit per 2,250 sq/ft, additional dwelling units may be allowed by Special Permit from the Planning Board.  
*The applicant has filed a Special Permit request.*
3. Letter will be submitted from BETA, Fire and DPW.  
We have received letters from BETA and the Franklin Fire Department. Their comments as well as responses can be found in this letter.

### Overview:

- 10 Units are allowed and the Applicant is proposing 20 Units under Special Permit.  
*Agreed*
- 30 Parking Spaces are required; the applicant is proposing 10 parking spaces on the current lot. The applicant is proposing an additional 35 spaces on abutting lot and will provide an easement agreement.  
*The applicant agrees to provide an easement agreement to the Planning Board.*

### Requested Waivers:

- To allow the use of PVC and HDPE pipe for the roof drains and underground stormwater storage area.
- To allow site lighting to extend past the property line.  
*The applicant has requested the two above waivers.*

## BETA Group, Inc - Planning Board

### SIDEWALKS (§185-28)

No public sidewalks are proposed under this project. There are sidewalks across the frontage on East Central Street. A concrete sidewalk from the proposed new building at 110 East Central will be extended to the sidewalk along East Central and match at the far west edge of the parcel at 100 East Central. Because the buildings are higher than the sidewalk on East Central Street, masonry retaining walls will be installed along the backside of the sidewalk along East Central to provide the fill necessary to bring the grades up at the front of the structures to match the proposed foundation grades. These walls will range in height from 2.5-7'. There are no Landscaping plans proposed for this area between the new structure and the existing parking spaces and East Central. The proposed subsurface infiltration structure in front 100 East Central will restrict the landscaping capabilities in this area to shallow rooted shrubs and flowers.

### CURBING (§185-29)

- CI. Based upon the site plans, it appears that the entirety of the parking lot will have vertical granite curbing. However, the curbing is not labeled. BETA recommends that the curbing be labeled on Sheet 3 of 10.  
*Curbing labels have been added to sheet 3.*

**BETA2 - 3/8/2024 It should be noted that vertical granite will be used on the entrance only. The remainder of the site will be vertical concrete.**

*UCI - Agreed.*

### 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 proposed lighting plan shows that the lighting will primarily be mounted on the face of the 2 buildings with only 1 pole mounted fixture in the middle of the rear parking lot. These will effectively light the driveway entrance from East Central Street and the entrances at each of the buildings. There will be some minor spillage onto East Central Street at the driveway entrance and along the sidewalk.

- SP1. There are no architectural plans included in the submission. BETA recommends that building elevations be provided especially from the front along East Central Street where the proposed masonry retaining walls will impact the street view.

*The applicant will provide architectural plans to the Board.*

**BETA2 - 3/8/2024 BETA will defer to the Board on this.**

*UCI - No response.*

- SP2. As previously noted, there will be some minor spillage of light beyond the property line along East Central Street. The waiver from §185-31(4) (e) has been requested.

*Agreed. No comment.*

**BETA2 - 3/8/2024 BETA will defer to the Board on this.**

*UCI - No response.*

### SCREENING (§185-35)

The project proposes outdoor parking for 10 or more cars which must be screened in accordance with this section. Residential districts are located to the south of the Site along Cross Street. There are 3 single family residential dwellings abutting the parcel at 57, 65 & 71 Cross Street.

L1. There is no screening proposed at the rear of the parking lot, and based on aerial imagery, it does not appear that the existing vegetation in this area is thick enough to screen the area. However, there will be a structural retaining wall ranging in height from 6-16 feet, along the edge of the parking across this entire common property line. At its closest, the wall will be less than 3' from the property line. Based upon the exposed height of the wall, BETA recommends that a 4' fence be placed along the top of the wall to act as a screen for the abutters. This will act to prevent headlights from shining into the 2nd story windows of the abutting homes.

*A 4 foot wood stockade fence has been added to the wall detail on sheet 10.*

**BETA2 - 3/8/2024 The comment has been addressed. The detail on Sheet 10 shows both a guard rail and a 4' high wood stockade fence. BETA will defer to the Board for final approval.**

*UCI - No response.*

## Storm Water Management

The overall impervious surface *coverage* across the site will be increased by 30%. In addition, overall site disturbance will exceed 1.0 acre and it is therefore subject to the stormwater by law. Based upon the grade differential across the lot, all the areas associated with the new development will be raised up to 16' above existing grades. Retaining walls are proposed along East Central Street and along the entire southerly edge of the parking to support the fill. The exception to the fill will be the area of exposed ledge directly behind the structure at 100 East Central. In this area approximately 8' of ledge will need to be removed to allow the parking lot pavement. A proposed subsurface infiltration system will be provided at the northeast corner of the parcel adjacent to East Central Street. This system will accept runoff from the roof of each structure and the pavement area near the front of the lot. The overflow from this system will be directed into the existing municipal stormwater collection system in East Central Street. A discharge from the rear parking lot will be directed into the isolated wetlands at the southeast corner of the parcel. This discharge will be treated with a proprietary separator and deep sump catch basin. Overall, the site is a combination of redevelopment and new development.

### STORMWATER MANAGEMENT REGULATIONS (CHAPTER 153)

The project proposes to disturb land in excess of one acre within the Town of Franklin. It is therefore 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.

SW1. The applicant has requested a waiver from §300-11. (2.a) to allow the use of PVC and HDPE pipe for the roof drains and subsurface infiltration system. BETA has no issues with this request but will defer the matter to the Board.

*The applicant has requested a waiver.*

**BETA2 - 3/8/2024 The waiver is for that piping which is directly connected with the subsurface infiltration structures. All other piping will be RCP. BETA will defer to the Board.**

*UCI The roof drain piping is also proposed to be PVC piping.*

### MASSDEP STORMWATER STANDARDS

The project is subject to the Massachusetts Stormwater Standards as outlined by MassDEP. Compliance with these standards is outlined below:

**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 proposes one new outfall which will discharge on to a rip rap apron prior to discharge towards the isolated wetlands. This runoff will be treated by a proprietary separator and deep sump catch basin. A portion of the impervious surfaces along the front of the site which includes the sidewalk, and the entrance driveway will flow untreated onto East Central Street.

SW2. BETA recommends that a de minimus calculation be conducted for the Untreated flow towards East Central Street.

*The de minimus calculation was conducted and resulted in a removal of 74% TSS. The pre-development conditions have an impervious area of 10,967 sq. ft. which is un-treated, directed toward East Central Street. The storm-water system has provided for capture of all but 2,906 sq. ft. of the impervious area which results in a reduction of 73.5% of the untreated storm-water flow toward East Central Street.*

**BETA2 - 3/8/2024** The proposed development will meet the requirements for new development for overall treatment and infiltration for both the Mass Stormwater Standards and the by-law. Accordingly the deduction from predevelopment will meet the Maximum Extent Possible definition for redevelopment and BETA has no further comments regarding this issue.

*UCI - Agreed.*

**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 a net increase in impervious area and changes to site hydrology. Stormwater runoff will be mitigated via a new subsurface infiltration BMP. Calculations indicate a decrease in peak discharge rate to all watersheds.

**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 indicate that soil in the area of proposed infiltration system is Charlton-Hollis-Rock complex with a Hydrologic Soil Group (HSG) rating of A (high infiltration potential). The proposed subsurface infiltration system will provide the static storage volume required for all the impervious surfaces on site.

SW4. Based upon the calculations, the impervious surface area tributary to the Infiltration system is 18,994 sq. ft. which represents 53.7% of the total 35,327 Sq. ft. on site. Accordingly, the system does not meet the requirements of the Standard since it is less than 65%. BETA recommends that the designer review the Potential to direct additional impervious surface area through the infiltration System to increase the percentage to 65%.

*A storm-water system, pond 2, has been added to the rear parking area. Refer to Appendix A for storage volume provided.*

**BETA2 - 3/8/2024** Comment addressed. The detail on Sheet 9 should indicate that minimum depth of sand fill beneath Pond 2 should be 2.0'.

*UCI - The detail has been revised on sheet 8.*

**HIGHER POTENTIAL POLLUTANT LOADS (STANDARD NUMBER 5):** *Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific storm-water BMPs.* The project is not considered a LUHPPL- not applicable.

CRITICAL AREAS (STANDARD NUMBER 6): *Stormwater discharges to critical areas must utilize certain storm water management BMPs approved for critical areas.* The project is not located within a critical area - not applicable.

REDEVELOPMENT {STANDARD NUMBER 7}: *Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable.* The design has been designed to meet the standards without considering the redevelopment issues associated with the site.

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 greater than one acre of land, it will be required to file a Notice of Intent with EPA and develop a Stormwater Pollution Prevention Plan (SWPPP). Erosion control measures are depicted on the plans include silt fence, inlet protection, stabilized construction entrance, dust control, and designated stockpile area.

SW6. The applicant is reminded that a Stormwater permit from the Franklin DPW is required based upon the size of the disturbance.

*Upon receipt of approvals the applicant will file for a Stormwater permit prior to commencing with construction.*

**BETA2 - 3/8/2024 BETA will defer to this issue to the DPW.**

*UCI - Agreed.*

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

### **BETA Conservation Commission Review Comments**

W8. Provide specifications of the proposed seed mixture(s) proposed for the stabilization of disturbed areas within the Buffer Zone. BETA recommends that native species with wildlife habitat value (i.e., pollinator species) be proposed within the Buffer Zone. In, addition consideration should be given to woody plantings in these areas to mitigate the loss of woody vegetation from clearing efforts.

*New England Conservation and Wildlife Mix has been proposed for the planning areas within the Buffer Zone.*

*A note has been added to seed the listed area with a New England Conservation and Wildlife mix.*

*Twenty two shrubs were added within the disturbed buffer zone area. See sheet 5.*

**BETA - 3/7/2024 Comment resolved; however BETA recommends the use of the Northern Bayberry (*Myrica pennsylvanica*) rather than the proposed Southern Bayberry (*Morella caroliniensis*) due to the Project's location within Massachusetts.**

*UCI - The plan has been revised on sheet 5.*

W13. The Construction Sequence and Schedule should be provided within the NOI application in addition to the plans (Bylaw Regulations Section 7.15.1)

*The Construction Sequence and Schedule has been provided for inclusion within the NOI.*

**BETA - 3/7/2024 The Construction Sequence and Schedule appears to differ between the plans and the narrative. BETA recommends that the most up-to-date sequence be used across all documents, which is assumed to be the one provided with the narrative.**

*UCI - The Construction Sequence and Schedule has been revised on sheet 6.*

## Planning Board Comments - Hearing March 7, 2024

1. Parking for commercial space.

*Spaces 40 and 41 have been designated as the commercial spaces. Directional signage and signs demarcating the spaces have been added to sheet 3.*

2. Transverse section.

*Architectural elevations provided addressed the comment.*

3. Provide lighted bollards or planters at the patio area.

*Lighted bollards have been added to sheets 3 and 4. See bollard detail on sheet 8 for details.*

4. BETA traffic review.

*BETA has provided a review letter dated March 21, 2024.*

5. Wall at infiltration pond eliminated.

*Agreed no comment.*

### Mark

6. Commercial space expanded – provide dedicated spaces.

*The applicant has expanded the Commercial space to 949 sq. ft. which requires two parking spaces. Two parking spaces have been provided with signage demarcating that they are designated for the commercial space.*

7. Site lighting – photometric plan.

*The photometric plan has been included with the revised plans.*

### Greg

8. Provide signage for commercial spaces.

*Spaces 40 and 41 have been designated as the commercial spaces. Directional signage and signs demarcating the spaces have been added to sheet 3.*

9. Provide a second handicap space at 110 ECS.

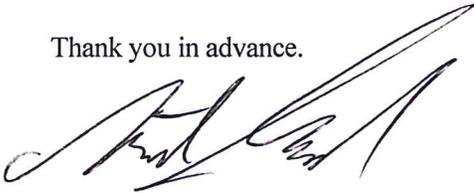
*Two handicap parking spaces have been provided (Spaces 1 and 37). The applicant can convert space 2 to a handicap space if needed based on the commercial space use and or if a tenant is in need of a handicap parking space. The plan proposes to have space 2 as a conventional parking space with the ability to be converted to a handicap space if needed.*

10. Retaining walls to be designed by a structural engineer.

*Note 3 on sheet 10 states "all walls requiring a building permit will be designed by a structural engineer". Walls 1, 2, 5 and 6 will exceed 4 feet in height and will require a building permit.*

We look forward to meeting with the Planning Board and the Conservation Commission to discuss this project further.

Thank you in advance.



Richard Goodreau  
Project Manager