

April 2, 2024

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

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

Dear Mr. Rondeau:

BETA Group, Inc. has reviewed revised documents for the proposed development entitled ***“Site Plan, 100 and 110 East Central Street”*** located in Franklin, Massachusetts. This letter is provided to update of our findings, comments, and recommendations relative to the proposed development.

BASIS OF REVIEW

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

- Plans (11 sheets) entitled: ***“Site Plan, 100 and 110 East Central Street”***, revised to March 26, 2024, prepared by United Consultants Inc. of Wrentham, MA stamped by Carlos Quintal, MA PE #30812.
- ***Drainage Analysis for Site Plan, 100 and 110 East Central Street.*** prepared by United Consultants, Inc. Wrentham, MA, dated January 5, 2024.
- Plan (1 sheet) entitled: ***“100 & 110 East Central Street-Franklin, MA Site Stormwater Facilities Plan”*** prepared by United Consultants dated January 05, 2024.
- Plan (1 sheet) entitled: ***“100 & 110 East Central Street-Franklin, MA Site Watershed Plan”*** prepared by United Consultants dated January 05, 2024.

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

- ***Zoning Chapter 185 From the Code of the Town of Franklin***, current through October 2019
- ***Zoning Map of the Town of Franklin, Massachusetts***, attested to April 30, 2019
- ***Stormwater Management Chapter 153 From the Code of the Town of Franklin***, Adopted May 2, 2007, including amendments dated February 17, 2021.
- ***Subdivision Regulations Chapter 300 From the Code of the Town of Franklin***, current through January 1, 2016
- ***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

INTRODUCTION

The project site includes two parcels, Assessors Map 286 Parcels 30 & 31, with a total area of 56,329+ square feet located at 100 & 110 East Central Street in the Town of Franklin (the “Site”). The Site is located within the Commercial 1 zoning district. Lots adjacent to the Site to the south along Cross Street are located in the Single-Family IV zoning district. The lots east and west of the site along East Central Street are all within the same district. The Site is located just outside the limits of the Water Resource District.

The existing Site is the location of a single-family residential dwelling at 110 East Central Street and a 10-unit apartment building at 100 East Central Street. Each of the sites have access from East Central Street. The single-family residence at 110 East Central Street has a driveway opening at the easterly property line. The apartment building at 100 East Central has 2 access driveways from East Central Street at each property line. The proposed development is to raze the existing single-family dwelling at 110 East Central Street and construct a multi-story multi-use structure with a footprint area of 5,500± sq. ft. that will provide another 20 housing units and 500 square feet of commercial use in the first floor. The existing apartment building has 10 parking spaces, 7 in the front of the building and 3 at the rear around the dumpster pad. The driveway access extends around both sides of the building. The structure is setback 70'± from the right of way and 15' from the westerly sideline. The existing dwelling at 110 East Central Street is 15'± from the easterly sideline and the paved driveway provides access to a 2-car garage. The proposed building at 110 East Central Street will be set 10.4' from the easterly property line and 20.5' from the front. A 5' wide sidewalk will provide pedestrian access from the building to the existing sidewalk on East Central Street. and will be connected by a 4' wide sidewalk to the rear of the building. Access from East Central Street will be limited to a single driveway opening coincidental with the existing driveway opening at the common property line between 100 & 110. An additional 41 spaces will be provided behind the 2 structures including 2 accessible spaces.

The site generally slopes from east to west parallel with East Central Street towards an isolated wetland, which encroaches into the rear southwest corner of the parcel at 110 East Central. The apartment building is 9' higher than the pavement at East Central Street and the existing driveway is an 8% grade up to the building from East Central Street. The existing driveway into the dwelling at 110 East Central is a steeper grade of 12% up from east central. 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. NRCS soil maps indicate that the site is classified as Urban Land and Charlton-Hollis-Rock Outcrop Complex with a Hydrologic Soil Group (HSG) rating of A (high infiltration potential). There is exposed ledge behind the structure at 100 East Central which protrudes 10' above the adjacent pavement. Test pits were conducted on site primarily along the front of the lot and indicate the presence of 1-4' of fill overlying a sandy loam layer 2.5-3.0' thick over the ledge which sits at 90-102" below grade.

To accommodate the grades, the project proposes to construct several retaining walls around the site to contain the fill needed for access to the buildings and to maintain reasonable grades for the proposed parking at the rear of the lot. Along East Central Street, retaining walls ranging in height from 18" to 7' will be built in front of the new building at 110 to support the sidewalk access to the front of the building. In front of 100 East Central, a smaller wall ranging in height from 6-18" will be provided adjacent to the entrance driveway. At the rear of the site, a retaining wall will be constructed along the entire easterly edge of the proposed parking lot. This wall will exceed 12' in height at its maximum. The proposed stormwater improvements will be limited. A subsurface infiltration structure will be provided in the front of the lot west of the driveway entrance which will treat and infiltrate the roof runoff from both structures and the runoff from the pavement areas at the front of the lot. Runoff from the rear parking lot will primarily be treated by a proprietary inlet control structure at the rear southwest corner of the pavement which will discharge directly towards the wetlands at the southeast corner of the parcel.

Site Lighting will be provided primarily by wall mounted units on the face of the 2 buildings. A single pole mounted fixture will be provided in the center of the rear parking lot which will adequately provide the light necessary for the entire lot without any spillage onto the adjacent residential lots.

FINDINGS, COMMENTS, AND RECOMMENDATIONS

GENERAL

- G1. The proposed dumpster pad is shown off the property. The designer should review this location and confirm that the pad can be installed within the property limits and/or an easement can be obtained. *UC: The applicant controls the abutting property. A proposed easement has been added to the plans. The applicant will provide the Planning Board an easement agreement for the dumpster pad area.*

BETA2: No further comments

ZONING

The Site is located within the Commercial 1 Zoning District. The boundary between the Single-Family IV Zone and the Commercial I District is coincidental with the rear property line across both lots, where the abutters are residential dwellings on Cross street. The proposed development is to maintain the existing 10-unit residential structure at 100 East Central and replace the existing single family dwelling structure at 110 East Central with a 20-unit multi-family structure with 500 sq. ft. of commercial use on the first floor. The applicant has requested to maintain the existing lot configuration as 2 separate lots rather than combine them into a single lot. As presented at the hearing, they will provide cross easements between the 2 lots for access, utilities, parking, and maintenance. They have also asked that the Board look at the residential unit density of the development as a single lot rather than 2 individual lots.

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

Each of the 2 lots meets the requirements for lot area, depth, frontage, width; front and side yards; building height; and impervious coverage. The proposed building at 110 will also meet all the setback requirements, for the underlying zone. A Zoning Schedule of existing and proposed conditions is shown on the Cover Sheet (Sheet 1) of the drawing set.

- Z1. The table on Sheet 1 should be changed to read 100 and 110 rather than 122 and 138 East Central Street. *UC: The table on Sheet 1 has been revised.*

BETA2: Comment Addressed, no further comments

- Z2. Since the 2 lots are to remain as individual lots, BETA recommends that the table be revised to show that each lot individually will continue to comply with Zoning for setbacks, lot configuration and coverage. *UC: Two separate zoning tables have been added to sheet 1.*

BETA2: Comment addressed No further comments

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

Existing access to the Site is via three curb cuts on East Central Street. Two of the openings provide access to the multi family structure at 100 East Central and the third provides access to the existing single-family dwelling at 110 East Central Street. The proposed driveway access into the site will be limited to a single driveway opening at the lot line which is where the 2nd driveway into 100 East Central is located today.

This opening will be widened to provide a 24' wide driveway which will access a total of 49 parking spaces. The existing 8 parking spaces in front of the building at 100 East Central Street will be maintained. The remaining 41 spaces will be located behind the proposed building at 110 East Central Street.

Parking requirements defined by the Zoning Bylaw are for Commercial Uses, 1 space is required per 500 sq. ft. of gross floor area; for Residential use 1.5 spaces are required per unit. The areas provided in the parking requirement summary result in a total required parking space count of 46 spaces.

- P1. In accordance with §185-21.C(5) of the bylaws, ***"Parking lots for 20 or more cars shall contain or be bordered within five feet by at least one tree per 10 parking spaces,...."*** For the proposed 49 spaces this would equate to 5 trees. The proposed 5 trees are shown on sheet 5 of 10. UC: *Agreed.*

BETA2: No further comments

- P2. In accordance with §185-21.C(4), ***(4) Loading areas and parking areas for 10 or more cars shall provide screening in accordance with § 185-35.*** See L1 below. UC: *See response to comment L1 below.*

BETA2: No further comments

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. A profile of the sidewalk has been added on Sheet 10 which demonstrates that the walkway will meet ADA requirements for grade. Maximum grade shown is 4.0± %. Because the buildings are higher than the sidewalk on East Central Street, masonry retaining walls will be installed along the back side 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)

- C1. 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. UC: *Curbing labels have been added to sheet 3.*

BETA2: Comment Addressed. It should be noted that vertical granite will be used on the entrance only. The remainder of the site will be vertical concrete.

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

BETA2: BETA will defer this to the Board.

- 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. *UC: Agreed. No comment.*

BETA2: BETA will defer this to the Board.

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.

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

BETA2: 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 this to the Board for final approval.

UTILITIES

Each of the structures will be provided with new service connections to the utilities in East Central Street for sewer, water, and stormwater. Electricity and communication will be connected overhead. Detailed review of utilities is anticipated to be provided by the DPW and Fire Chief, as applicable.

STORMWATER 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.B(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. *UC: The applicant has requested a waiver.*

BETA2: The waiver is only for that piping which is directly connected with the subsurface infiltration structures. All other piping will be RCP. BETA will defer this to the Board. *UC2: The roof drain piping is also proposed to be PVC.*

BETA3: No further comment. As previously noted, BETA does not take issue with the request and defers to the Board.

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 deminimus calculation be conducted for the untreated flow towards East Central Street.

UC: The deminimus 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: 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 reduction from predevelopment will meet the Maximum Extent Possible definition for redevelopment and BETA has no further comments regarding this issue.

SW3. The impervious surface area which discharges towards the isolated wetlands at the southeast corner of the parcel is greater than existing conditions and is therefore subject to the standards to the full extent of the regulations. BETA does not support the use of the proprietary separator as a terminal treatment process and recommends that the designer consider the use of a sand

filter installed offline. This would eliminate the need for the proprietary separator and provide the nutrient removal required by the laws.

UC: A stormwater system, pond 2, has been added to the rear parking area. Catch basin 4 has been revised to a standard deep sump hooded catch basin.

BETA2: Comment addressed.

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%.

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

BETA2: Comment addressed. The detail on sheet 9 should indicate that minimum depth of sand fill beneath Pond 2 should be 2.0'. *UC2: The detail has been revised on sheet 8.*

BETA3: Comment addressed.

TOTAL SUSPENDED SOLIDS (STANDARD NUMBER 4): *For new development, stormwater management systems must be designed to remove 80% (90% per Town Bylaw) of the annual load of Total Suspended Solids (TSS).*

The project is required to treat the 1.0-inch water quality volume per Town Bylaws. At the front of the site, the static storage volume provided in the proposed infiltration BMP is more than what is required. The Deep sump catch basin will provide the pretreatment required. At the rear of the site, the treatment will be provided by a deep sump catch basin and a proprietary separator.

SW5. The impervious surface area tributary to CB 4 is greater than 0.25 acres. In accordance with Volume 2, Chapter 2 of the standards, the impervious surface area tributary to a deep sump catch basin should be less than 0.25 acres. BETA recommends that this design be modified to meet the criteria.

UC: Catch basin 5 has been added and the impervious area directed to catch basin 4 has been reduced to have 7,587 sq. ft.

BETA2: Comment addressed.

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 – 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 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. The untreated discharge toward East Central Street will need to be considered under the redevelopment issue. BETA agrees that this will meet the definition of Maximum Extent Possible*

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.

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

BETA2: BETA will defer this issue to the DPW.

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.*

SW7. The manufacturer's maintenance requirements for the proprietary separator should be included in the manual.

UC: The proprietary separator has been removed from the project.

BETA2: No further comments

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

Mr. Gregory Rondeau, Chairman

April 2, 2024

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

Very truly yours,
BETA Group, Inc.

A handwritten signature in blue ink, appearing to read "Gary D. James".

Gary D. James, PE
Senior Project Manager

A handwritten signature in blue ink, appearing to read "Matt Crowley".

Matthew J. Crowley, PE
Senior Project Manager

cc: Amy Love, Planner