



May 16, 2024

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

**Re: Proposed Parking Lot
19 Cottage Street
Site Plan and Special Permit Peer Review**

Dear Mr. Rondeau:

BETA Group, Inc. (BETA) has reviewed revised documents for the project entitled “**Proposed Parking Lot at 19 Cottage Street**” located at 19 Cottage Street in the City 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 for Approval of a Site Plan, dated March 18, 2024, including the following attachments:
 - Cover Letter
 - Form P
 - Application for approval of a Site Plan and Special Permit
 - Certificate of Ownership
 - Certified Abutters List
- Plans (4 sheets) entitled: **Development Plan, Proposed Parking Lot, 19 Cottage Street**, dated March 15, 2024, revised May 9, 2024, prepared by Dunbar Engineering & Management Group of Franklin, MA.
- Operation and Maintenance Plan, dated May 9, 2024, prepared by Dunbar.
- Response to Comments Letter, dated May 9, 2024, prepared by Dunbar.
- Site Plan & Special Permit Memo, dated May 13, 2024, prepared by Michael Maglio, P.E., Town Engineer.
- Re-Painting Plan (1 Sheet), dated may 9, 2024, prepared by Dunbar.
- HydroCAD model, dated April 21, 2024, prepared by Dunbar (received via email).

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

Compiled Review Letter Key

BETA reviewed this project previously and provided review comments in letters to the Planning Board dated April 16, 2024 (*original comments in italics*). Dunbar Engineering & Management (DUNBAR) has provided responses (responses in standard text) and this letter includes BETA's comments on the status of each (*latest status in bold italics*).

1.0 SITE AND PROJECT DESCRIPTION

The project site includes one parcel, Lot 286-217, with a total area of 0.22 acres located at 19 Cottage Street in the Town of Franklin (the "Site"). The Site is in the Downtown Commercial District. Lots surrounding the Site are also within this district. The Site is not located within the Water Resource District.

The existing Site is primarily a vacant lot. The building that was located on the parcel has been removed sometime after 2022. The parcel is predominantly pavement and appears to be used for parking. A pedestrian walkway, presumed to be associated with the former building, is still present on the southern side of the Site. A paved connection to the abutting parking lot to the north is present in the rear of the parcel. The New York Central Lines, LLC railroad right of way is located at the rear of the parcel. As shown on the site plans, the tracks are approximately 14' lower than the site area.

The proposed development of the lot will be to provide additional parking for the existing restaurant on the abutting lot at 4 East Central Street. The guardrail between the two parcels will be removed and the paved surface will match the existing pavement edge for the abutting lot. Movement through the parking lot will be one-way only from Cottage Street into the abutting parking lot and then out to Cottage Street. The lane will be limited to 18.5' width with angled parking. Overall, the lot will provide an additional 17 parking spaces including 2 compact spaces. Three light poles will be provided for site lighting. Vertical granite curbing is proposed around the outside edge of the lot and at the entrance.

Topography within the limit of work is generally directed away from the center of the Site to the west towards the railroad right-of-way or east towards Cottage Street. No wetland resource areas are known to be located within or in the vicinity of the Site. 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. Test pits conducted on site indicate that the soils are a medium to coarse Gravelly Sand with a high permeability rate which is conducive to infiltration.

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 mitigate the increase in impervious area.

2.0 WAIVERS

The Applicant has not requested any waivers. A Special Permit is requested to allow off-street parking as a primary use.

BETA2: A waiver has been requested to allow parking spaces with a length of 18-feet, rather than 19-feet. BETA notes that an 18-foot stall length is a typical industry standard.

3.0 GENERAL REVIEW COMMENTS

- G1. *Recommend expanding plan viewport to include the existing restaurant and identifying its main building entrance.*

DUNBAR: The entrance and ADA access to The Rome restaurant has been added to Existing and Proposed plan views.

BETA2: Plan revised. Issue resolved.

4.0 TOWN OF FRANKLIN ZONING REQUIREMENTS

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

The project proposes an off-street parking use and is located within the Downtown Commercial (DC) district. Off-street parking is permitted in the DC district but is listed as an accessory use, defined as a “use of land found on the same parcel as the principal use, but incidental, subordinate, and reasonably related to the principal use.” As the principal use is located on another parcel, it is unclear if this accessory use is permitted. A Special Permit has been requested to allow the proposed use.

- Z1. *BETA defers to the Town regarding the proposed special permit.*

DUNBAR: As requested by the Planning Board on April 22, 2024, the proposed parking has been revised to utilize the available space in both Lots 217 and 17. Assuming the waiver request for a 1-foot reduction in required parking space length is approved, all proposed travel lanes will be a minimum 22-foot wide to accommodate two-way travel, all current 15-16 foot long parking spaces on existing Lot 17 will be increased to 18 feet in length, and three (3) ADA-complaint parking spaces will be provided adjacent to the existing access ramp. The proposed re-painting and incidental work on Lot 17 is submitted with this response package to the Planning Board as an ANR plan.

BETA2: BETA defers to the Town. No further comment.

- Z2. *Consider combining the subject parcel with the adjacent lot which it will serve to comply fully with the Zoning Requirements.*

DUNBAR: Please see the response to Comment Z1.

BETA2: No further comment.

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

The project will comply with dimensional requirements for lot area, frontage, lot depth, front, side, and rear yards, building height, and lot coverage.

- Z3. *Revise parking lot design such that the portion of the front yard within 10’ of the street lot line is free from parking and fully landscaped (§185-12).*

DUNBAR: The revised plan increases the grassed area to meet the 10-foot offset from the street lot line.

BETA2: Plan revised. Issue resolved.

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 the existing sidewalk and curbing along Cottage Street. No modifications to the sidewalk or curbing are proposed. Refer to Traffic Assessment and Impact Section below.

Proposed curbing within the parking area and at the driveway entrance is identified as vertical granite curbing.

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:

Z4. *Indicate north arrow on all plan views (§185-31.C.(3).(b)).*

DUNBAR: North arrows have been added to all plan views.

BETA2: Plan revised. Issue resolved.

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 study or impact report. As the project proposes only a small parking lot and is associated with an existing business, impact on traffic is anticipated to be minimal.

T1. *Revise pavement detail to include depth of compacted gravel subbase.*

DUNBAR: Details have been revised to show a 12" compacted gravel base.

BETA2: Detail revised. Issue resolved.

T2. *Provide detail for reconstructed sidewalk areas. The DPW should be consulted to confirm current Town design standards.*

DUNBAR: I contacted the Franklin DPW via telephone on April 22, 2024 and was transferred to the Town Engineer, Mike Maglio. Mr. Maglio indicated the detail provided was adequate. I have Note 2 to the Details Sheet 24-03 referencing Town of Franklin Construction Standards for pavement and sidewalks.

BETA2: BETA defers to the Franklin DPW on this issue. No further comment.

SITE ACCESS AND CIRCULATION

Access to the Site is proposed via modifying an existing curb cut along Cottage Street. Egress is provided via a connection to the abutting parking lot to the north. The proposed driveway entrance is 18'-6" in width.

T3. *Confirm that the proposed configuration has been reviewed by the Town Fire Department.*

DUNBAR: The required Fire Department plan set and fee were provided to the Planning Department on March 18, 2024. As of the date of this letter I have not received comments from the Fire Department.

BETA2: BETA defers to the Fire Department on this issue.

T4. *Provide turning exhibits to show that typical vehicles, including a waste collection vehicle (refer to comment T10), can complete the turn into the abutting parking lot and continue to the egress point.*

DUNBAR: The revised parking configuration has all spaces perpendicular to a minimum 22-foot wide two-way travel lane.

BETA2: *The parking lot layout has been revised and no turning issues are anticipated for vehicles traveling in the access aisles.*

T5. *Work proposed along the site frontage, including the relocated driveway entrance (consistent with detail), sidewalks, and curbing should be clearly shown in the plan view.*

DUNBAR: As noted in the Response to Comment T2, the Town Engineer indicated the curb cut detail provided was adequate. I have added limits and labels to the PROPOSED plan to show the limits of the existing curb cut and the proposed extension.

BETA2: *BETA defers to the Town Engineer on work within the ROW.*

T6. *Include new or reset curbing and new sidewalk along Cottage Street at the existing curb cut to be removed. Identify extent of sidewalk reconstruction on the plans.*

DUNBAR: See response to Comment T5.

BETA2: *BETA defers to the Town Engineer for work within the ROW.*

T7. *Depict the existing driveway entrance on the plans for comparison to proposed entrance location.*

DUNBAR: I have added limits and labels to the PROPOSED plan to show the limits of the existing curb cut and the proposed extension.

BETA2: *Location provided. Issue resolved.*

T8. *Proposed one-way circulation is dependent on use of an abutting lot. Although both lots are currently under the same ownership means of ensuring the parking lot will remain usable in the future should be provided, such as an easement.*

DUNBAR: See response to Comment Z1.

BETA2: *Plan revised to include two-way circulation. Issue resolved.*

T9. *Clarify the linework for the rectangular blocks located in the rear of the property, presumed to be dumpsters. Indicate anticipated path of travel trash disposal vehicles if applicable.*

DUNBAR: Dumpsters have been labeled and an enclosure provided. The revised parking plan calls for a minimum 22-foot wide two-way travel lane which will allow trash disposal vehicles to get into position. The owner also indicated that the trash collection occurs early in the morning when the parking lot is empty.

BETA2: *Information provided. Issue resolved.*

PARKING AND LOADING

Required parking is defined by §185-21.B(1)(b) of the Town Zoning Bylaw. The project does not propose a new use, but is accessory to an existing restaurant use. Required parking for this offsite use is calculated as follows:

Use Designation	Criteria	Building Area	Required Parking
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Restaurant (Nonresidential)	1 space per 500 SF of floor area	4,000 ± Sq. Ft.	8 Spaces
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The required parking is provided by the existing parking lot, which appears to contain a minimum of 34 parking spaces within the area depicted on the plans. The project proposes 17 new parking spaces, 2 of which are designated as compact parking spaces.

No new accessible parking spaces are proposed. In accordance with 521 CMR 23.2.1, for a parking lot with 17 spaces, 1 must be designed as van accessible. In addition, for a total parking count of 51+ spaces between both lots, 3 must be designed as accessible spaces. Only 2 existing spaces on the abutting lot are denoted as accessible, and one of those spaces is noncompliant with 521 CMR 23.2.1 as it lacks the required access aisle.

All maneuvering aisles are at least 18'-6" feet wide and designated as one-way; angled parking spaces are 10± feet wide and 28 feet long with a 45° angle; compact spaces are 17'-6" long and 8' wide.

Refer to Landscaping and Grading section or discussion of screening requirements.

T10. *Confirm the total number of spaces in both lots and provide one additional accessible parking space, as required. Include an Accessible route per 521 CMR 20 from the proposed accessible parking space to the building entrance.*

DUNBAR: See response to Comment Z1. The revised plan provides 19 new parking spaces on Lot 17 and re-painting on Lot 217 to provide 35 spaces, three of which are accessible spaces and one which is van accessible. The revised plan provides a total of 54 spaces and a net increase of 19 spaces. The Parking Legend on the DEVELOPMENT PLAN Sheet 24-01 has been updated to reflect this information.

BETA2: Plan revised. For a total of 54 parking spaces, 3 accessible spaces are required. These accessible spaces will be provided in the northeast corner of the re-painted lot, and one of the spaces has been designed as van accessible. Issue resolved.

T11. *BETA recommends that the applicant revise the existing accessible spaces to comply with 521 CMR 23.4.*

DUNBAR: The revised plan provides three accessible parking spaces adjacent to the existing access ramp with one space van accessible space. Signage has also been added.

BETA2: Plan revised. Issue resolved.

T12. *Revise design such that no off-street parking area is located within 10 feet of a street right-of-way (§185-21.C(1)).*

DUNBAR: The plan has been revised to meet this requirement.

BETA2: Plan revised. Issue resolved.

T13. *Provide turning moment to show that a vehicle can exit parking spaces P1, P2, P16, and P17 without backing into a public way (§185-21.C(3)).*

DUNBAR: The revised parking configuration has all spaces perpendicular to a minimum 22-foot wide two-way travel lane. Since two-way travel is permitted, backing into a public way can be avoided.

BETA2: Plan revised. Issue resolved.

- T14. *BETA defers to the Town regarding compliance with §185-21.C(7)(a). Although the parking lot proposes fewer than 20 spaces, it is part of a larger parking lot with greater than 20 spaces. The proposed entrance and existing egress are within 150' of other parking lot entrances and exits on the same side of the street.*

DUNBAR: At the April 22 Planning Board Meeting, the Planning Board acknowledged Lot 17 as a separate lot and requested that Lot 17 be submitted as a separate ANR plan so that the two lots (217 & 17) could be combined for parking configuration only. Since there are only 19 full spaces proposed for Lot 217, I believe the regulation cited in the comment does not apply.

BETA2: BETA defers to the Town regarding interpretation of the bylaw.

- T15. *Revise compact parking spaces to be at least 19 feet in length (§185-21.C(9)(a)).*

DUNBAR: Compact parking spaces have been removed from the revised plan. All proposed new spaces are 18 feet long. In order to achieve the 10% pervious area and the requested 22-foot wide two-way travel lane on this narrow lot, a waiver for a one foot reduction from the 19 foot requirement is requested.

BETA2: BETA defers to the preference of the Board on granting of the waiver and notes that an 18-foot stall length is a typical industry standard.

- T16. *Identify snow storage areas for the parking lot.*

DUNBAR: Snow storage area has been added to the PROPOSED plan.

BETA2: Snow storage area identified as being located within 13 of the new (19) parking spaces. BETA notes that even if all 13 of the parking spaces are used for snow storage the total number of provided parking spaces is an improvement over the existing conditions. Also, hatched areas of the parking lot that are not used for vehicle maneuvering may be able to be used for smaller storm events.

- T17. *In conjunction with other comments provided in this section, evaluate if the two adjoining parking areas can be reconfigured/restriped into a single parking area with improved circulation.*

DUNBAR: The revised plan incorporates this suggestion. Assuming the waiver request for a 1-foot reduction in required parking space length is approved, all proposed travel lanes will be a minimum 22-foot wide to accommodate two-way travel, all current parking spaces on existing Lot 17 will be increased to 18 feet in length, and three (3) ADA-complaint parking spaces will be provided adjacent to the existing access ramp.

BETA2: Parking layout revised. Request waiver to allow a parking area aisle of less than 24-feet in width. BETA notes the Town Engineer has provided suggestions for improving some of the aisle width that are less than 24 feet under separate cover.

6.0 SIGNAGE AND LIGHTING

No signs are indicated on the plans.

- SL1. *Include signage designating one-way movement through the parking lot.*

DUNBAR: One-way movement is no longer proposed.

BETA2: Issue dismissed.

- SL2. *Provide required sign for accessible parking space (See parking and loading section).*

DUNBAR: Accessible signage exists for the two existing spaces (including “van accessible”). A third sign will be added as labeled on the PROPOSED plan. The R7-8 sign detail was added to the DETAILS Sheet 24-03.

BETA2: Plan revised. Issue resolved.

SL3. *Indicate treatment of existing “Rome customer parking only” sign present at the site entrance.*

DUNBAR: The existing “The Rome ENTRANCE ONLY” and “The ROME EXIT ONLY” signs will be removed. New “The ROME PARKING ONLY” signs are proposed at both two-way access points. The PROPOSED plan has been updated to reflect this.

BETA2: Plan revised. Issue resolved.

SL4. *Indicate if a new sign similar to the existing “The Rome Restaurant Enter Only” sign on the abutting lot will be proposed.*

DUNBAR: New “The ROME PARKING ONLY” signs are proposed at both two-way access points. The PROPOSED plan has been updated to reflect this.

BETA2: Plan revised. Issue resolved.

The project proposes three new luminaires, two located along the southern parking lot boundary and one located along the western boundary. Lighting is identified as LXM4 with 12’ pole height. A photometric plan was provided with the plan set.

SL5. *Clarify if any lighting is provided for the existing parking lot to ensure safe pedestrian movement to the restaurant.*

DUNBAR: The existing parking lot on Lot 17 is illuminated by a flood light mounted to a utility pole adjacent to the west corner of the restaurant.

BETA2: Information provided. Issue resolved.

SL6. *Revise lighting design such that no illumination extends beyond the site’s property lines. (§185-31.C(4)(e). A waiver may be appropriate for illumination that extends onto the existing parking lot and to the Cottage St sidewalk.*

DUNBAR: During the April 22 Planning Board meeting, the Planning Board indicated that the small amount of light shown spilling past the property line is acceptable because it adds some measure of additional safety to all adjacent properties.

BETA2: BETA defers to the Board. No further comment.

SL7. *Clarify if proposed luminaire is directed downward and/or shielded to mitigate light pollution.*

DUNBAR: The proposed luminaire is directed downward. The proposed fixture would be ordered with integral louver has improved back light control. Cutsheets are attached.

BETA2: Information provided. Issue resolved.

7.0 UTILITIES

Proposed utilities depicted on the plans include underground electric conduit for proposed light poles. Interconnection for this conduit is proposed at the utility pole located near the southeast property line.

U1. *Indicate if any existing utilities associated with the former building remain on-site that may interfere with the proposed work.*

DUNBAR: The contractor who razed the previous building on Lot 217 (Dirtworks Excavating, Franklin) stated that water and electric ran into the building at the front near the street and that those utilities were disconnected. I have added a label to the EXISTING plan to show where those shutoffs are located. The notes on the DEVELOPMENT plan still require the contractor to notify DIGSAFE to verify all existing utilities.

BETA2: Information provided. Based on building and shutoff locations, these utilities are unlikely to interfere with the proposed subsurface infiltration system. Issue resolved.

8.0 LANDSCAPE TREATMENT & GRADING

The project proposes 6" topsoil and seed along grassed areas at the eastern and southern lot boundaries. No tree or shrub plantings are proposed.

The project includes outdoor parking for 10 or more cars.

LA1. *Evaluate if the proposed parking area will be visible from any residential uses (e.g. 28 Cottage Street) to determine if screening in accordance with §185-35 is required.*

DUNBAR: There are several condominiums across Cottage street from Lot 217 which currently view a large portion of the Downtown Commercial District already, including areas beyond the RR property westerly down West Central Street. All abutters within 300 feet of Lot 217 were notified of the April 22 Planning Board meeting to review this site plan and there were no resident concerns expressed. The revised plan proposes an 11-foot wide grassed area along the front of the property. Any plantings to establish screening would not significantly reduce the visibility of this lot by nearby property owners in the Downtown Commercial District but it would have a significant negative impact on site distance (and thus safety) of drivers exiting this lot.

BETA2: BETA defers to the Town regarding screening requirements.

LA2. *BETA defers to the Town regarding whether the project need comply with §185-21.C(5) regarding bordering trees. Although the project proposes fewer than 20 spaces, it will be part of a larger parking lot with greater than 20 spaces.*

DUNBAR: See response to Comment T14.

BETA2: BETA defers to the Town regarding screening requirements.

LA3. *It appears that two dumpsters will be located near the rear of the site. They are not proposed on concrete pads with screened enclosures, as is typically required by the Board.*

DUNBAR: A 8-foot high chain-link fence enclosure with privacy slatting has been added to the PROPOSED plan on Sheet 24-01. The existing dumpsters have always been on bituminous pavement and the cost of a concrete pad is a substantial added cost to the property owner's already-significant investment in site improvements and stormwater management.

BETA2: Enclosures have been provided. BETA defers to the Town regarding the need for concrete pads.

9.0 STORMWATER MANAGEMENT

The proposed stormwater management design consists of a subsurface infiltration system located beneath the parking lot. Stormwater runoff will be conveyed to this system via deep-sump, hooded catch basins.

Minimal documentation has been provided for the stormwater management design. BETA's review is thus limited to available information provided in the plan set.

GENERAL

SW1. *Provide printouts of HydroCAD report discussed on Sheet 2, Note 23.*

DUNBAR: The requested HydroCAD report was provided via email on April 22, 2024 and approved by BETA just prior to the Planning Board Meeting that evening. Design revisions to meet the required 10-foot offset from the street ROW reduced the total runoff to the front catch basin to an area less than 100 square feet, so that catch basin has been eliminated and the stormwater design has been modified to send all runoff to the catch basin at the back corner of the lot. The revised HydroCAD report is provided as an Exhibit to the Operation and Maintenance Plan submitted with this response package.

BETA2: *HydroCAD provided. All provided models are consistent with the plans. Issue resolved.*

SW2. *Include measures to adjust, add inlet stone at discretion of DPW, or replace existing grate (e.g. 3-flange) at the existing catch basin located at the proposed driveway entrance.*

DUNBAR: I mentioned this suggestion during my April 22 telcon with Town Engineer Mike Maglio. He indicated that no additional notes were necessary, that the DPW will work coordinate with the contractor during the permitting process.

BETA2: *BETA defers to the Town Engineer for work within the ROW.*

MASSDEP REPORTABLE RELEASES

The MassDEP Waste Site / Reportable Release database does not identify the Site as the location of a reportable release.

STORMWATER MANAGEMENT REGULATIONS (CHAPTER 153) AND MASSDEP STORMWATER STANDARDS

The project proposes to disturb less than one acre of land within the Town of Franklin and is not in proximity to wetland resources. Therefore, the project is only subject to Chapter 153 and the Massachusetts Stormwater Standards to the extent requested by the Board (185-31.C.(3)(m)). The following sections are provided for the Boards consideration.

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 – **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 a subsurface infiltration system. No calculations have been provided to compare pre- and post-development peak discharge rates. However, the project proposes a net decrease in impervious area and will direct the majority of the parking lot to the proposed structural control measure (SCM). A net decrease in peak discharge rate from the project is anticipated as a result of the proposed work.

SW3. *Provide calculations referenced on Sheet 2, Note 23 for pre- and post-development peak discharge rates and to confirm the subsurface system is adequately sized.*

DUNBAR: See response to Comment SW1. As stated in Note 23 on Sheet 24-02, the chambers will be half full as a result of the projected 10-Yr storm.

BETA2: Calculations have been provided via a hydroCAD model. The subsurface system has been sized to infiltrate all stormwater runoff in its catchment and therefore a net decrease in peak discharge rates and runoff is anticipated. Issue resolved.

SW4. *Indicate whether the existing building roof will also drain to the subsurface system.*

DUNBAR: Based on the existing contours of Lot 17, all roof drainage either drains towards the street or to the back edge of Lot 17 along the shared property line with the Commuter Rail.

BETA2: Information provided. Issue resolved.

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 (HSGR). Other soil groups in the vicinity of the Site are rated as HSGR A (high infiltration) which may imply high infiltration potential at the Site. Test pits conducted in the vicinity of the subsurface infiltration system (DH-1 and DH-2) indicate that subsurface soils are generally medium-coarse Sand with some gravel and cobbles. Test pits were completed to a depth of 114" (9.5') below grade with no groundwater detected. Percolation rates were identified as <2 min / inch. Notes on the plan indicate that a rate of 8.27 in/hr. was used in the design.

Groundwater recharge is proposed via a new subsurface infiltration system. The project is expected to provide a recharge volume in excess of what is required.

SW5. *Indicate personnel responsible for logging deep-hole tests.*

DUNBAR: I performed the soil evaluation and perc tests (Soil Evaluator License # 647). This information has been added to the Deep Hole Logs on Sheet 24-01.

BETA2: Information provided. Issue resolved.

SW6. *Indicate methodology used for conducting percolation tests, if used for exfiltration rate, or clarify if exfiltration rate is based on soil textural analysis only.*

DUNBAR: I used the perc test specified for Title 5 with pre-soak and timings for 12", 9" and 6".

BETA2: As noted in the Stormwater Handbook, a Title 5 percolation test is not acceptable for determining hydraulic saturated conductivity. The designer should clarify if the exfiltration rate used in the HydroCAD model is based on the Rawls rate associated with the textural analysis.

SW7. *Indicate provided storage volume in subsurface infiltration system.*

DUNBAR: Chamber total storage is 2,869 cubic feet (0.066 acre-feet).

BETA2: The provided storage volume is in excess of the required recharge volume. Issue resolved.

SW8. *Evaluate proposed depth of subsurface infiltration system (approximately 8 feet below ground) in relation to elevation of groundwater. In the absence of an identified groundwater elevation, groundwater should be assumed to coincide with the lowest elevation reached during test pitting. Based on test pit logs, DH-2 was completed to an approximate elevation of 299.5', which is above the system bottom of 299.22'.*

DUNBAR: Evidence of high groundwater was not observed in nearby DH-1 which reached Elevation 298.6. There are no observed signs of seepage along the slope of the Commuter Rail

property which has a toe elevation of 293. Observations will be made during construction to confirm that groundwater is deeper than bottom of chamber.

BETA2: Information provided. In consideration that the project would qualify as a redevelopment if it were fully subject to the stormwater management standards and that the subsurface conditions will be observed through the Town during construction no further analysis is required at this time.

SW9. Provide calculations showing that all infiltration BMPs will fully drain within 72 hours.

DUNBAR: The chambers will fully drain in 24 hours. The revised HydroCAD report is provided as an Exhibit to the Operation and Maintenance Plan submitted with this response package.

BETA2: Based on the exfiltration rate and small system size, the infiltration BMP is anticipated to fully drain within 72 hours. Issue resolved.

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 SCM	TSS Removal %
A	Deep Sump Catch Basin	Isolator Row	Subsurface Infiltration System	80%

The project has been designed to provide at least 80% TSS removal for treated impervious areas, including the proposed parking lot and a portion of the existing parking lot. The proposed infiltration SCM is adequately sized to treat the required 1-inch water quality volume.

The Site is located within an area with a rapid infiltration rate. As such, the project is required to provide at least 44% TSS removal as pretreatment. Pretreatment is provided via deep-sump catch basins and isolator row.

A Long-Term Pollution Prevention Plan has not been provided.

SW10. Provide Long-Term Pollution Prevention Plan.

DUNBAR: The LTPPP is provided as Section 2.6 of the Operation and Maintenance Plan submitted with this response package.

BETA2: Plan provided. Issue resolved.

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 parking lot is not anticipated to generate more than 1,000 vehicle trips per day and would therefore not qualify as 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 would be 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 to be met only 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). A basic sediment & erosion control plan has been provided depicting silt soxx perimeter controls and inlet protection.*

SW11. *Provide anti-tracking measures at the driveway entrance.*

DUNBAR: A 30' x 30' anti-tracking pad has been added to the Sediment and Erosion Control plan Sheet 24-03 and Note 4 added to the Erosion & Sediment Control Notes. The minimum length of 50 feet cannot be achieved due to the estimated limit of excavation for the Stormtech system.

BETA2: *Pad provided. Issue resolved.*

SW12. *In coordination with DPW, provide inlet protection for existing catch basin on Cottage Street.*

DUNBAR: A “See Note 3” label has been added to this catch basin. Note 3 states “The contractor shall install UltraTech 9217 Ultra-Drain Guard® or approved equal in all catch basin/drain grates within and adjacent to the limit of work. Drain guards shall be inspected and maintained according to manufacturer's specifications.”

BETA2: *Protection provided. Issue resolved.*

SW13. *Provide anticipated location(s) of soil/material stockpile area on plans with erosion and sedimentation control measures to limit transport of materials.*

DUNBAR: Proposed material storage area has been added to the SEDIMENT & EROSION CONTROL PLAN on Sheet 24-03. Sediment Barrier is shown/required along the entire downstream perimeter of this lot. Additional measures may be required as noted/required in the Erosion & Sediment Control Notes.

BETA2: *Stockpile location provided. Issue resolved.*

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. Basic inspection and maintenance requirements for the subsurface system are provided on the site plans.*

SW14. *Indicate how future property owners will be notified of the presence of the stormwater management system and the requirement for proper operation and maintenance.*

DUNBAR: The process is outlined in Section 2.2 of the Operation and Maintenance Plan included with this response package.

BETA2: *Information provided. Issue resolved.*

SW15. *Provide approximate annual maintenance budget to ensure the Owner is aware of the system's operating cost.*

DUNBAR: See response to Comment SW14.

BETA2: *Estimated budget provided. Issue resolved.*

ILLICIT DISCHARGES (STANDARD NUMBER 10): *All illicit discharges to the stormwater management system are prohibited. An Illicit Discharge Compliance Statement has not been provided.*

SW16. *Provide Illicit Discharge Compliance Statement signed by the Owner.*

DUNBAR: The Illicit Discharge Compliance Statement signed by the Owner is provided as an Exhibit of the Operation and Maintenance Plan included with the response package.

BETA2: *Statement provided. Issue resolved.*

10.0 SUMMARY

Based on our review of the Project documents and plans, the Applicant is required to provide additional information to the Planning Board to demonstrate compliance with the Town's Zoning Requirements, proper stormwater system design, and generally accepted engineering practices.

BETA has specifically noted the following:

- The proposed use is dependent on a Special Permit from the Town. The need for a Special Permit could be removed if the parcels were combined.

DUNBAR: The request for a Special Permit remains since the application is for Lot 217 only. As requested by the Planning Board on April 22, 2024, the proposed parking has been revised to utilize the available space in both Lots 217 and 17. Assuming the waiver request for a 1-foot reduction in required parking space length is approved, all proposed travel lanes will be a minimum 22-foot wide to accommodate two-way travel, all current 15-16 foot long parking spaces on existing Lot 17 will be increased to 18 feet in length, and three (3) ADA-complaint parking spaces will be provided adjacent to the existing access ramp. The proposed re-painting and incidental work on Lot 17 is submitted with this response package to the Planning Board as an ANR plan.

BETA2: *BETA defers to the Town regarding the proposed Special Permit.*

- The parking lot must be revised to comply with front yard requirements, ADA/MAAB requirements, and to ensure adequate turning movements.

DUNBAR: The revised plan is compliant with all of these requirements. See responses to Comments Z1, Z3, T4, T10, T11, T12 and SL2.

BETA2: *The parking lot has been revised. BETA has no further comments relating to its design.*

- Insufficient detail has been provided at the site entrance. The plans must show that the sidewalk along Cottage Street will function after construction.

DUNBAR: See response to Comment T5.

BETA2: *BETA defers to the Town Engineer on work within the ROW.*

- The proposed lighting does not comply with the Zoning Bylaw and will create illumination on abutting properties.

DUNBAR: See response to Comment SL6.

BETA2: *Additional lighting information has been provided. BETA defers to the Town regarding acceptable light spillage.*

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- A model has not been provided for the subsurface infiltration system and therefore it is unknown if it will function as anticipated.

DUNBAR: See response to Comment SW1.

BETA2: A HydroCAD model has been provided and the design of the system is consistent with the plans. Issue resolved.

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

Very truly yours,
BETA Group, Inc.



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