



April 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 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, prepared by Dunbar Engineering & Management Group of Franklin, MA.

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 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 her 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.

3.0 GENERAL REVIEW COMMENTS

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

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

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).*

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)).*

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

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.*

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

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
Restaurant (Nonresidential)	1 space per 500 SF of floor area	4,000 ± Sq. Ft.	8 Spaces

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

- 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)).*
- 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.*
- T15. *Revise compact parking spaces to be at least 19 feet in length (§185-21.C(9)(a)).*
- T16. *Identify snow storage areas for the parking lot.*
- 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.*

6.0 SIGNAGE AND LIGHTING

No signs are indicated on the plans.

- SL1. *Include signage designating one-way movement through the parking lot.*
- SL2. *Provide required sign for accessible parking space (See parking and loading section).*
- SL3. *Indicate treatment of existing "Rome customer parking only" sign present at the site entrance.*
- SL4. *Indicate if a new sign similar to the existing "The Rome Restaurant Enter Only" sign on the abutting lot will be proposed.*

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

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.*

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.*

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.*

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.*

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.*

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.*

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.*

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

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.*
- 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.*
- SW7. *Indicate provided storage volume in subsurface infiltration system.*
- 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'.*
- SW9. *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 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.*

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.*

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

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

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.*

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

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.*

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.
- The parking lot must be revised to comply with front yard requirements, ADA/MAAB requirements, and to ensure adequate turning movements.
- Insufficient detail has been provided at the site entrance. The plans must show that the sidewalk along Cottage Street will function after construction.
- The proposed lighting does not comply with the Zoning Bylaw and will create illumination on abutting properties.

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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.

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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