



January 2, 2025

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

**Re: 759 Union Street
Site Plan Peer Review**

Dear Mr. Rondeau:

BETA Group, Inc. (BETA) has reviewed documents for the project entitled “**Business Incubator Flex Building**” located at 759 Union Street in Franklin, Massachusetts. This letter is provided to outline BETA’s findings, comments, and recommendations.

Basis of Review

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

- Application Package including:
 - Form P Approval of a Site Plan
 - Cover Letter w/ Project Description
 - Certificate of Ownership
 - Certified Abutters list
- Site Plans (11 sheets) entitled: **Business Incubator Flex Building Site Plan 759 Union Street Franklin, Massachusetts**, dated November 12, 2024, prepared by Guerriere & Halnon, Inc, Inc. of Franklin, MA
- Stormwater Report for Business Incubator Flex Building, 759 Union Street, Franklin, MA, dated November 12, 2024, prepared by Guerriere & Halnon, Inc, Inc. of Franklin, MA

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 March 01, 2016
- **Zoning Map of the Town of Franklin, Massachusetts**, amended July 13, 2016
- **Massachusetts Wetlands Protection Act 310 CMR 10.00** effective October 24, 2014
- **Massachusetts Stormwater Handbook** effective January 2, 2008 by MassDEP
- **Stormwater Management Chapter 153 From the Code of the Town of Franklin**, Adopted May 2, 2007
- **Wetlands Protection Chapter 181 From the Code of the Town of Franklin**, dated August 20, 1997
- **Town of Franklin Best Development Practices Guidebook**, dated February 2021

1.0 SITE AND PROJECT DESCRIPTION

The project site includes one parcel, identified by the Town of Franklin Assessor's Office as Map 314 Lot 13, with a total area of 1.33 acres located at 759 Union Street in the Town of Franklin (the "Site"). The Site and surrounding lots are located within the Commercial II or Rural Residential I Zoning districts. Interstate Route 495 abuts the Site to the south. The Site is not located within the Water Resource Protection District.

The existing Site is currently vacant and predominantly covered in woodlands. Topography at the Site generally slopes to the north or east away from a high point in the southwestern corner of the property and towards Union Street. The Site is not located within a Zone II wellhead protection area, a FEMA-mapped flood zone, an NHESP-mapped estimated habitat of rare or endangered species, or any other critical area. NRCS soil maps indicate the presence of Woodbridge fine sandy loam with a Hydrologic Soil Group (HSG) rating of C/D (very low infiltration rate when saturated), Montauk Fine Sandy Loam with HSG C (low infiltration rate), and Canton fine sandy loam with HSG B (medium infiltration rate).

The project proposes to construct a 15,080± sq. ft., 1-story building described as a business incubator flex building. Paved parking/loading areas are proposed to the north and south of the building and driveways along the east and west sides. Access to the Site is proposed via a new driveway access/egress with a curb cut at the Union Street cul-de-sac. Additional site features include cape cod berm, signage, a retaining wall, dumpster enclosure, lighting, and landscaping. Proposed utilities include domestic water, fire service, gas service, and sanitary sewer. Stormwater management is proposed via a new closed drainage system which will convey stormwater runoff to a subsurface detention system and a subsurface infiltration system.

2.0 GENERAL REVIEW COMMENTS

G1. Confirm legal right to construct proposed site features in the existing easements throughout the Site.

3.0 SITE VISIT

BETA visited the Site on December 23, 2024. Observed conditions were generally consistent with the existing conditions plan.

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 a use described as a business incubator flex building and is located within the Commercial II (CII) zoning district.

Business incubator uses are permitted in the CII district by right (See §185 Attachment 2, 2.24).

Z1. BETA notes that various commercial and warehouses uses are not permitted in the CII zoning district or require a special permit. BETA recommends a condition requiring the final uses to comply with the Zoning Bylaw.

22. Clarify if the proposed uses will include warehouse and office uses, as stated on the “parking requirements” calculations on Sheet C4. Certain types of Office uses require a Special Permit from the Board of Appeals, and Warehouse uses are not permitted in the CII zoning district. Note that, per §185-9, the most specific use shall be used in determining the governing schedule category.

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, lot width, front yard, side yard, rear yard, building coverage, and maximum impervious coverage.

Insufficient information has been provided for building height, but the building is identified as one-story in the stormwater report narrative.

Portions of the lot do not have adequate lot depth; however, the building footprint is located within an area of the lot that meets the minimum lot depth requirements. (See comment Z4 below)

23. Indicate height, in feet, of the proposed building.
24. The lot depth indicated on the Zoning table on Sheet 4 of 11 is the maximum depth provided on the site. The minimum lot depth on the site is along the northerly property line where it is only 161.93'. BETA will defer to the Building Commissioner whether the lot meets this zoning requirement.

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

Refer to Traffic Assessment section below.

EARTH REMOVAL (§185-23)

The project is anticipated to require significant earth disturbance and may require further permitting under this section.

25. Quantify approximate required earth removal volume to determine if a Special Permit is required.

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

The project is located within a Commercial II zoning district and is required to provide sidewalks in accordance with this section. A 5-foot-wide sidewalk is proposed along the eastern side of the building. Proposed curbing includes modified cape cod berm along the perimeter of parking and driveway areas.

26. In accordance with this section of the bylaw, a 6-ft wide, concrete sidewalk along the street frontage separated from the traveled way by either granite or vertical concrete curbing is required unless site conditions that would preclude usefulness as certified by the Board.
27. The site development is located within the existing 10' wide pedestrian easement along Union Street. The construction of the retaining wall along Union Street precludes the use of the easement. The applicant should address the issue of continued pedestrian access across this easement.

TREE PLANTING (§185-30)

Refer to Landscaping Section below.

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:

- Z8. Provide data quantifying on-site generation of noise and odors (§185-31.C.(3).(p)).
- Z9. Provide sight line information at proposed entrance/exit ways (§185-31.C.(3).(t)).
- Z10. In accordance with §185-31.C.(3).(s) a detailed description of traffic circulation, safety and capacity in sufficient detail to allow the Board to make a determination of whether a traffic impact analysis is necessary should be provided.

LANDSCAPING AND SCREENING (§185-35)

Refer to Landscape and Grading section below.

5.0 TRAFFIC IMPACT AND ASSESSMENT

The Applicant has not provided a formal traffic assessment, nor has any trip generation data been provided.

GENERAL TRAFFIC COMMENTS

- T1. The applicant should provide the Planning Board with sufficient information regarding traffic conditions on Union Street, to allow the Board the ability to determine if a traffic assessment is required.
- T2. The Site is located beyond a narrow (10' – 17'± wide) portion of Union Street which is the only means of accessing and exiting the Site. BETA recommends that the DPW and the Fire Department provide input on the minimum pavement width required for safe and adequate access to and from the site on Union Street. BETA recommends a minimum pavement width of 20' in order to comply with NFPA requirements.

SITE ACCESS AND CIRCULATION

Access to the Site is proposed via a new curb cut and driveway entrance connecting to Union Street, specifically the existing cul-de-sac at the end of the roadway. The site entrance will connect to a new driveway with one-way circulation counter-clockwise around the building. The driveway connects to parking spaces along the south and north building walls as well as a small parking area on the north side of the Site.

Proposed driveways are 24-ft in width at the site entrance and parking areas and 18-ft in width elsewhere.

- T3. Review turning exhibit provided on Sheet 10. The exhibit shows the Fire Truck striking, or nearly striking, the proposed guardrail next the southeast bay. Several turns appear to be very tight and the exhibit should be reviewed by the Town Fire Department.
- T4. Indicate the type of vehicle expected to be used for loading activities and provide turning exhibit to show that this vehicle can reach the Site and navigate the proposed driveways.

PARKING AND LOADING

Required parking is defined by §185-21 of the Town Zoning Bylaw. The proposed development includes business incubator uses and the applicant has chosen to calculate required parking based on a mix of

office (10% of floor area) and warehouse (90% of floor area) uses. Required parking is calculated as follows:

Use Designation	Criteria	Building Area	Required Parking
Other Office and Banks	1 space per 250 SF of floor area	1,508 Sq. Ft.	6 Spaces
Warehouse	1 Space per 1,000 SF of floor area	13,572 Sq. Ft.	14 Spaces
Total			22 Spaces

The project proposes 31 total parking spaces. Two (2) of the parking spaces are designed to be accessible, one of which will be van accessible, in accordance with 521 CMR 23.2.1.

All maneuvering aisles are at least 24 feet wide. Generally parking spaces are 9 feet wide and 19 feet long. Parking spaces in front of overhead doors are 14 feet wide and 19 feet long.

- T5. BETA defers to the Town regarding the appropriate floor area for use in calculating required parking. The calculations provided by the applicant apply the “warehouse” designation to most of the building which may not reflect the actual final use of the building, since it is not an allowed use in the zone.
- T6. Clarify if the 14’ x 19’ spaces in front of each overhead door are parking spaces usable by anyone or loading areas for which use will be restricted.
- T7. Revise location of accessible parking spaces. Accessible spaces serving a particular facility must be located on the shortest accessible route of travel to an accessible entrance. While the proposed parking spaces are somewhat close to the northeast bay, the distance to the southwest bay entrance is over 300 feet. Additionally, the accessible route must be extended to connect to each bay entrance.
- T8. BETA defers to the Town regarding the requirements of §185-21.C(6) requiring parking spaces to be within 300 feet from the building entrance they are meant to serve. While all parking spaces are within 300 feet of the southwesternmost bay when measured via a straight line, the distance that patrons would need to travel to reach the building entrance, using the sidewalk on the eastern side of the building, is greater than 300 feet.
- T9. Identify snow storage areas for the parking area and driveway.

6.0 SIGNAGE AND LIGHTING

The project proposes a “business sign” at the site entrance as well as a stop sign to control egress from the Site. Accessible parking signs are proposed at applicable parking spaces.

- SL1. Provide details and dimensions for proposed “business” sign.
- SL2. Recommend providing “one way” and “do not enter” signs to enforce the proposed one-way circulation.
- SL3. Provide “van” designation for accessible parking signs.

A photometric plan has been provided indicating twenty (20) new wall or door mounted luminaires around the building perimeter, each located at one of the proposed bay entrances. Provided cutsheets depict a downward facing light. A photometric plan has been provided showing illumination levels throughout the Site.

The Illuminating Engineers Society of North America (IESNA) recommends the following illuminance for parking lots:

Level	Horizontal Illuminance (Min)	Vertical Illuminance (Min.)	Uniformity Ratio (Max/Min)
Basic Maintained Illuminance	0.2	0.1	20/1
Enhanced Security Illuminance	0.5	0.25	15/1

Luminance within the parking lot is not consistent with the above table as noted below.

- SL4. Provide legend on photometric plan clarifying which symbol corresponds to which luminaire.
- SL5. Recommend providing lighting for the northern parking area and the entrance driveway.
- SL6. The photometric plan shows some areas of extreme luminance exceeding the recommended max. uniformity ratio. Recommend revising lighting design to lower the lighting levels at doorways.
- SL7. Indicate the hours of operations for lighting. Identify which lights are to be on after close of business for security purposes.

7.0 UTILITIES

Proposed utilities depicted on the plans include domestic water, fire service, gas service, and sanitary sewer.

Domestic water, fire service, and natural gas services are proposed via new 1.5", 6," and 1" services, respectively, connecting to the existing mains at Union Street. Sanitary sewer service is proposed via a new 8" PVC service which will connect to an existing sewer service to the northeast of the Site within an existing sewer easement. Two new sewer manholes are proposed to facilitate this connection.

- U1. Clarify proposed disposition of the existing sanitary sewer manhole located at the northeastern corner of the Site. This structure is within the retaining wall footprint and thus presumably requires removal. Indicate proposed treatment of the existing 6" PVC extending from this structure to the southwest.
- U2. The proposed doorways as shown are wide enough to accommodate vehicular traffic into the building. In accordance with the plumbing code, floor drains and an oil water separator will be required and should be shown prior to the connection with the municipal sewer collection system.

8.0 LANDSCAPE TREATMENT & GRADING

The project proposes numerous tree and shrub plantings throughout the project area. New trees are generally proposed along driveways, around parking areas, and around the building perimeter.

Per §185-21.C.(5), the project is required to provide 1 tree per 10 parking spaces. For 32 spaces, 4 trees are required. The planting plan includes 11 trees to satisfy this requirement.

The project includes outdoor parking for 10 or more cars as well as loading areas and is required to provide screening in accordance with §185-35. Residential uses are present to the east of the Site across Union Street. Some shrub plantings are proposed between the outdoor parking and these uses and

some existing vegetation is noted to remain; however, it is unclear if post-development screening will meet the requirements of this section.

The project Site abuts the Route 495 Right-Of-Way which is greater than 75 feet in width. The project is therefore required to comply with §185-30. Six trees are proposed along the southwestern property line, but they have not been positioned to meet the requirements of this section.

- LA1. Provide required screening, consistent with the requirements of §185-35.B, between outdoor parking / loading areas and the abutting residential uses. BETA notes that all surveyed existing trees along Union Street within the property boundaries, except for one 24" Oak Tree, are within the limits of tree clearing.
- LA2. Clearly identify whether existing trees along the Union Street frontage are to be retained or removed. BETA recommends retaining these trees to the maximum extent practicable, pending review by the Tree Warden. Provide tree protection for all trees to be retained.
- LA3. Provide required tree plantings to comply with §185-30. Trees must be planted at least every 30 feet in a row between 30 and 50 feet back from the right-of-way. Trees must be of two-inch caliper and approved by the Tree Warden. BETA further recommends depicting the existing edge of pavement for the highway and the existing treeline along the highway to evaluate the extent of vegetation that will remain following proposed tree clearing.
- LA4. Indicate proposed seed mix and loam depth for landscaped areas; use of native seeding is encouraged especially in areas which are not required to be a fine lawn.

The project includes substantial regrading throughout the project area. Grading is predominantly fill and a retaining wall is proposed along the northern and eastern sides of the Site and a boulder wall is proposed along the western side of the Site and portions of the southern side of the Site.

- LA5. Recommend depicting drainage structures on the grading plans to confirm that proposed catch basins align with low points.
- LA6. Provide detail and design specifications for proposed retaining wall and boulder wall.

9.0 STORMWATER MANAGEMENT

The proposed stormwater management design consists of a new subsurface infiltration system proposed on the northern side of the building. The Stormwater runoff will be conveyed to this system via a new closed drainage system consisting of catch basins, manholes, and roof drains. A portion of the Site will be first conveyed to a new subsurface detention system on the southern side of the building which discharges to the infiltration system. Both subsurface systems include a separator row for additional stormwater treatment. Overflow from the stormwater management system will be conveyed through a new headwall and discharged northeast onto Union Street.

GENERAL

- SW1. The proposed cover at each catch basin is less than 2 feet from the top of pipe. Revise catch basin detail to show flat top cover which will allow connections with this cover depth.
- SW2. Provide detail for headwall and outfall apron.

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. Compliance with these regulations is outlined

below and throughout the following sections.

- SW3. Provide a description of construction and stockpile and/or excess materials removed from the Site expected to be stored on-site, including description of controls to reduce pollutants from these materials and other wastes (§153-12.L).
- SW4. Obtain an easement for catch basin CB#1, which is located in the Union Street ROW (§153-15.A(11) & §300-11.A(6)).

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

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

- SW5. In accordance with the design of the storm drain system, the pipes from DMH 1,2, & 10 into the south chamber system have a design velocity greater than 10 ft/sec. (11.71 ft/sec). BETA recommends that the slopes be adjusted to reduce the design velocity accordingly. (§300-11.B(1)).
- SW6. Revise proposed roof drain to be reinforced concrete or request waiver (§300-11.B(2.a)).

BEST DEVELOPMENT PRACTICES GUIDEBOOK

The project is required to comply with the requirements of the Town of Franklin 2021 Best Development Practices Guidebook (BDPG).

- SW7. Indicate if proposed seed mix and plantings will reflect native vegetation, particularly near woodland areas (BDPG Page 7).
- SW8. Confirm that landscaping plan has been designed in accordance with the planting bed and seeding guidelines outlined on Page 13.

MASSDEP STORMWATER STANDARDS

The project is subject to the Wetlands Protection Act and Town regulation §153-13 and therefore must comply with the Massachusetts Stormwater Standards as outlined by MassDEP. Compliance with these standards is outlined below:

LOW IMPACT DEVELOPMENT (LID) TECHNIQUES

Proposed LID measures include

- No disturbance to any wetland resource area,

- SW9. Uncheck the boxes for “minimizing disturbance to existing trees and shrubs, use of country drainage, and treebox filter. These LID measures are not applicable to the Site.

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. A new outfall is proposed at the northeastern corner of the Site. The outfall consists of a headwall for which minimal information has been provided. Hatching suggests that the design intent is to provide a stone apron at this headwall, but no detail or callouts are provided on the plans.

- SW10. Provide a detail for the rip rap apron at the outfall, including calculations for sizing of the stone.

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 and a subsurface detention system. Calculations indicate a decrease in peak discharge rate and peak runoff volume to all points of analysis.

SW11. Correct the scale on the watershed plans. The listed scale of 1" = 20' appears to be incorrect.

SW12. Provide spot grades along the Union St cul-de-sac to evaluate if any off-site stormwater runoff will be collected by CB #1. The offsite catchment area must be accounted for in the sizing of the infiltration system.

SW13. Review HydroCAD model for Pond INFIL 1. The primary outlet device should be a 12" RCP pipe to match the utility plan. The current model indicates a horizontal orifice/grate which is inconsistent with the plans.

SW14. Review HydroCAD model for Pond DET 2. The outlet invert is located at the bottom of chambers, leaving a 6" layer of crushed stone that will not be able to drain. As the bottom of the system will be lined with an impervious barrier, the model should assume that this crushed stone will be permanently inundated with stormwater and unable to contribute to stormwater management. As such, it should be excluded from the hydroCAD model.

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 the presence of Woodbridge fine sandy loam with a Hydrologic Soil Group (HSG) rating of C/D (very low infiltration rate when saturated), Montauk Fine Sandy Loam with HSG C (low infiltration rate), and Canton fine sandy loam with HSG B (medium infiltration rate). Test pits conducted at the Site indicate that subsurface soils are generally loamy sand. A Rawls Rate of 1.02 in/hr has been utilized in design of the subsurface infiltration system; this rate is applicable to sandy loam with HSG B.

Redoximorphic features were detected in several of the test pits suggesting an estimated seasonal high groundwater depth of 36" to 40" below grade. However, no indications of groundwater were detected in proposed infiltration system area to the bottom depth of 96" – 120" below grade.

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.

SW15. Because the soil logs did not describe soil density and depth to water table, and soil descriptions are contrary to NRCS soil group description, BETA recommends that infiltration tests be conducted to confirm the design exfiltration rate.

SW16. Verify that test pits have been logged by a qualified soils professional and provide soil evaluator licensed number if applicable.

SW17. The design exfiltration rate of 1.02 in/hr. is within the range quoted by NRCS (0.00-1.42 in/hr) for the soil group in the infiltration system footprint. However, as noted this exfiltration rate may be as low as 0.00 in/hr. (See SW15 above). BETA recommends that the design be based upon actual infiltration test results.

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 is also subject to §153-16.B of the Town of Franklin Stormwater Management Regulations. As a new development, the project is required to meet the performance standards outlined in §153-16.B. The project will meet this requirement by retaining the volume of runoff equivalent to 1.0” multiplied by the total post-construction impervious surface area within the proposed subsurface infiltration system.

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	85%
B	Deep Sump Catch Basin	Subsurface Detention System	Subsurface Infiltration System	92.5%

The project has been designed to provide at least 80% TSS removal for treated impervious areas. The proposed infiltration SCM has been sized to treat the required 1-inch water quality volume.

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

SW18. The isolator row meets the pretreatment requirements for the subsurface system; therefore, the deep sump catch basin should not be listed in the pretreatment analysis.

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 includes a business incubator use. Though specific uses are unknown at this time, they are unlikely to qualify as LUHPPLs based on permitted uses within the CII zoning district.

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.**

SW19. Revise narrative to exclude information that does not pertain to this project i.e. “Medway groundwater protection district.”

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

The project does not qualify as a redevelopment – **standard not applicable.**

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, a Notice of Intent will be required to file with EPA including development of a Stormwater Pollution Prevention Plan (SWPPP). A SWPPP was not provided with the submission; the narrative indicates a SWPPP will be issued prior to construction. Erosion control measures are depicted on the plans including compost filter tubes, stabilized construction entrance, inlet protection, and designated stockpile areas.

SW20. Provide perimeter controls along the northern property line.

SW21. Provide criteria for permanent or temporary restoration of disturbed areas including how soon after disturbance these measures will be implemented.

SW22. Provide seed mix for temporary/permanent stabilization.

SW23. Provide measures to protect open excavations for subsurface structures during construction.

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

SW24. Indicate how future property owners will be notified of the presence of the stormwater management system and the requirement for proper operation and maintenance.

SW25. Provide map, drawn to scale, that shows the location of all stormwater BMPs in each treatment train and snow storage areas.

SW26. Provide signature of owner on the O&M Plan (§153-18.B(5)).

SW27. Include provision requiring a documentation submittal to the DPW confirming when maintenance has been satisfactorily completed (§153-18.B(6)).

SW28. Include operation and maintenance requirements for headwall and scour protection and add to maintenance checklist.

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.

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 MassDEP Stormwater Management Standards, the Town of Franklin Regulations, and generally accepted engineering practices.

BETA has specifically noted the following significant concerns regarding the project submittal:

- The project lot overlaps several easements for which minimal information has been provided.
- The proposed uses are inconsistently described on the plans and it is therefore unclear if the project is permitted within the Commercial II zoning district.
- The potential impact of the Site on Union Street has not been evaluated. Due to the project's location at the end of a narrow roadway which primarily serves existing residential uses, a traffic assessment may be appropriate.
- The project does not comply with screening (§185-35) and tree planting (§185-30) requirements.
- The infiltration rate used for design of the stormwater management system is inconsistent with NRCS mapping and may result in an undersized system.

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

Very truly yours,
BETA Group, Inc.



Stephen Borgatti, PE, MENG
Senior Project Engineer



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