



January 6, 2025

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

**Re: Site Plan Review
55 Constitution Boulevard
Site Plan Application**

Dear Mr. Rondeau:

BETA Group, Inc. is pleased to provide engineering peer review services for the proposed project entitled “**55 Constitution Boulevard**” located in Franklin, MA. This letter is provided to update our findings, comments, and recommendations.

Basis of Review

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

- Letter addressed to Chair Gregory Rondeau from Beals Associates Inc. **RE: 55 Constitution Boulevard Site Plan Review, Peer Review Response** dated December 30, 2024.

Review by BETA will include the above items along with the following:

- **Chapter 185: Zoning From the Code of the Town of Franklin**, adopted March 5, 1930
- **Chapter 300: Subdivision of Land From the Code of the Town of Franklin**, adopted September 29, 1986
- **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

Compiled Review Letter Key

BETA reviewed this project previously and provided review comments in letters to the Planning Board dated December 11, 2024 (*original comments in italics*). Beals Associates, Inc. (BAI) has provided responses (responses in standard text) to all the comments except those related to **Stormwater Management**. This letter provides BETA’s response to each (*latest status in bold italics*).

1.0 SITE AND PROJECT DESCRIPTION

The project site includes one parcel, Lot 313-059, with a total area of 15.61 acres located at 55 Constitution boulevard in the Town of Franklin (the “Site”). The Site is located within the Industrial zoning district. Lots along Constitution Boulevard adjacent to the site are also within this district, however the first parcel on Constitution Boulevard is occupied by the Franklin Fire Department. The 2 lots along King

Street adjacent to the fire station are in the General Residential Zone. These 2 parcels do abut the site, however only one is occupied currently. The lots along the rear property line are also in the General Residential zone however, the direct abutter along the entirety of the rear property line is an Assisted Living facility. The Site is not located within the Water Resource District.

The existing Site has a 70,125 sq. ft. 3-story Office Manufacturing building with 1,074 paved parking spaces, including 14 accessible spaces. There are 2 driveway openings from Constitution Boulevard into the site from the roadway located at each end of the building, although only the first one provides access to both sides of Constitution Boulevard, which is a divided roadway. There are also several loading docks at the rear of the building.

Topography at the Site is generally directed west away from Constitution Boulevard towards the rear of the parcel. There is a vegetated wetlands area flagged behind the building and an isolated vegetated wetlands at the northwest corner of the parcel behind the residence at 648 King Street. The paved area directly behind the building is supported by a 9-10' high concrete retaining wall adjacent to the flagging. Behind the paved parking, the site is heavily wooded with a minimum buffer width of 134' from the pavement to the property line. At the southwest corner of the site, there is a stormwater basin that accepts runoff from several sites on this side of Constitution Boulevard. The Site is not located within a FEMA mapped 100-year floodplain, an NHESP-mapped estimated habitat of rare or endangered species, or any other critical area. NRCS soil maps indicate the presence of Woodbridge fine sandy loam with a Hydrologic Soil Group (HSG) rating of C/D (low infiltration potential) and Ridgebury fine sandy loam with an HSG of D (very low infiltration potential).

The project proposes to demolish the existing site features and construct two Warehouse Buildings. Warehouse Building A will be in the area of the existing office building and will have a footprint of 124,875 sq. ft. Building B will be in the northeast corner of the parcel. It will have a footprint of 60,300 sq. ft. and be setback 122.5' from the rear property line. Reduced parking will be provided along the outside of the two warehouse buildings with loading docks located at the rear of Building A and the southerly end of Building B. Based upon their orientation, none of the loading docks will be visible from Constitution Boulevard. Access to the Site will be through the two existing curb cuts. Each will be modified slightly to improve the curb radius and widen the throat to accommodate the anticipated truck traffic. Stormwater management is proposed via two new subsurface infiltration structures. The current runoff pattern through the site towards the existing basin at the southerly end of the site will be maintained.

2.0 WAIVERS

The Applicant has requested several waivers from §300-11: Stormwater Management. Refer to Section 9.0 below for a discussion of these waivers.

3.0 SITE VISIT

BETA visited the Site on December 4, 2024. Observed conditions were generally consistent with the existing conditions plan except as noted below and throughout this report.

SV1. Evaluate if the existing dilapidated building located near the "A" series wetlands can be removed and demolished to enhance the wetland buffer zone and reduce overall impervious area.

BAI: [No response provided]

BETA2: Issue remains outstanding.

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 Warehouse uses and is located within the Industrial (I) zoning district. Warehouse uses are permitted by right in this district.

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

The project will comply with dimensional requirements for frontage, lot width, front yard, side yard, building height, building coverage, and maximum impervious coverage.

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

Refer to Traffic Assessment section below.

INDUSTRIAL DISTRICT PERFORMANCE CONTROLS (§185-22)

The project is located within an Industrial District and therefore must conform to these requirements.

- Z1. *Provide data quantifying anticipated sound, noise, vibrations, odor, and flashing to determine conformity with these requirements (§185-22.A).*

BAI: Chapter 185, Section 22.A reads as follows:

“Disturbances. No sound, noise, vibration, odor or flashing (except for warning devices, temporary construction or maintenance work, parades, agricultural activities or other special circumstances) shall be perceptible without instruments more than 400 feet from the boundaries of the originating premises within an Industrial District or more than 200 feet inside the boundaries of a commercial or business district or more than 100 feet inside the boundaries of a residential district. However, the Board of Appeals may grant a special permit for an exception for activities not meeting these standards in cases where the Board determines that no objectionable conditions will thereby be created for the use of other properties.” The section of the Bylaw referenced by the reviewer requires that all uses in industrial districts conform to what is noted above. The proposed project and application are for the redevelopment of the existing site into two industrial buildings, and at the time of this writing, no specific tenants have been identified for the proposed development. As there are no tenants identified, there are no specific sounds, noise, vibrations, odors, or flashing that would be otherwise perceptible from the development and any tenants that were to occupy the buildings would be required to comply with the regulation. Should it satisfy the Board, BAI requests as a condition of approval of the project that any tenant be required to comply with Chapter 185, Section 22.A.

BETA2: BETA will defer this issue to the Board.

EARTH REMOVAL (§185-23)

The project is anticipated to require significant earth disturbance and may require further permitting under this section. The Stormwater Management Report identifies a net fill of 3,350 ± Sq. Ft. for the project.

- Z2. *Indicate if significant earth removal is anticipated. As the proposed earthwork requires a net fill, excavated material should be re-used on-site to the extent practicable. A Special Permit may be required if earth removal is significant.*

BAI: It is not anticipated that earth removal will be required as part of this project. The project has been designed to be a balanced site or require fill. Should a need arise to remove earth from the proposed development, then the applicant would file for a special permit from the Board of Appeals as required in the Chapter 185, Section 23.

EARTHWORK SUMMARY	
TOTAL CUT	21,350± CY
TOTAL FILL	24,701± CY
NET EARTHWORK	3,350 CY± (FILL)

BETA2: Comment addressed.

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

The project is not located within a Commercial I, Commercial II, or Business zone and thus new sidewalks are not required along street frontage. Existing sidewalks are not present along the western side of Constitution Boulevard, but midblock crosswalks are present at each existing driveway entrance to connect to the sidewalk along the eastern side of the roadway. Sidewalks are proposed along each driveway entrance to connect to these midblock crosswalks. Sidewalks, pedestrian walkways, and crosswalks are present throughout the Site to provide access to building entrances.

Proposed curbing includes precast concrete curb around all parking areas and driveways.

Z3. *BETA recommends that the Town consider upgrades to each midblock crosswalk to comply with ADA/MAAB requirements, including detectable warning panels and pedestrian crossing signs when doing next scheduled roadway work.*

BAI: Acknowledged.

BETA2: BETA will defer this to the DPW.

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. *Provide note on the landscaping plan noting that all plantings shall come from the Best Development Practices Guidebook (§185-31.C.(3).(k)).*

BAI: A note has been added to Sheet C121, Landscape Plan, that “all plantings shall come from the Best Development Practices Guidebook.”

BETA2: Comment addressed

LANDSCAPING AND SCREENING (§185-35)

Refer to Landscape and Grading section below.

5.0 TRAFFIC IMPACT AND ASSESSMENT

The Applicant provided a Traffic Impact and Access Study (TIAS) for the proposed warehouse development. The TIAS was conducted in accordance with MassDOT *Transportation Impact Assessment Guidelines* and current industry standards and practices.



GENERAL TRAFFIC COMMENTS

- T1. *Please clarify why the Synchro analysis reports provided in the Appendix do include a pedestrian phase for all the scenarios analyzed at the King Street/Constitution Boulevard intersection.*

BAI: See response from the traffic engineer in Attachment A.

BETA2: Comment addressed.

- T2. *Confirm that the King Street/Constitution Boulevard traffic signal is not currently coordinated with the adjacent locations along King Street.*

BAI: See response from the traffic engineer in Attachment A.

BETA2: Comment addressed.

TRIP GENERATION

The use of Land Use Code (LUC) 150 (Warehouse) for the estimation of expected new trips to be generated by the proposed development is appropriate.

TRIP DISTRIBUTION

The proposed distribution of new trips provided in the TIAS is appropriate.

SITE ACCESS AND CIRCULATION

Access to the Site is proposed via two new driveway entrances (north and south) located along Constitution Boulevard. The new driveway entrances are located partially within the footprint of existing entrances to be replaced. These entrances provide access to various internal driveways, parking areas, and loading areas throughout the Site. The northern driveway entrance and its connecting driveway is designed with heavy duty pavement to accommodate trucks and it the most direct route to the loading areas.

Stop signs are provided at each driveway entrance to control turns onto Constitution Boulevard.

Turning Exhibits have been provided demonstrating that the driveways can accommodate a WB-67 semi-trailer. Turnaround areas are provided in the rear of the Site which have been sized for these vehicles.

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

BAI: Our office met with Joseph Barbieri, the Deputy Fire Chief of the Franklin Fire Department, on December 11th, 2024. During the meeting, discussions surrounding screening the northern edge parking area closer to the dormitory side of the fire house to prevent possible disturbance from headlights. Our office has revised the plans to include a berm off the edge of the northern parking area in line with the dormitory portion of the Fire Department. The berm will be 4 feet tall and supported with tree plantings to further block the disturbance to the dormitories.

BETA2: Based upon the revised Site Landscape Plan, sheet C121 it appears that the proposed berm is limited to a small portion of the shared property line between the parcel and the Fire Department building. This berm could be lengthened substantially if the parking spaces along this edge of the access driveway were eliminated. BETA will defer this issue to the Board however it should be noted that based upon the excess parking spaces provided (13), the elimination of 10-11 spaces along this common property line would allow the berm to be extended 100'+ west to further screen the fire department building while continuing to maintain compliance with the overall zoning requirements. It is also important to note that based upon

aerial imagery, there is currently a dense evergreen buffer between the fire department building and the parking lot.

- T4. *Include turning exhibit for WB-67 semi-trailer exiting the Site. A right-turn onto the southbound lane of Constitution Boulevard may not be possible due to the existing median.*

BAI: A turning exhibit for a WB-67 semi-trailer was previously provided on Sheet C200, WB- 67 Turning Analysis included within the plan set. As demonstrated on the Plan, a WB-67 has sufficient space to exit the site northerly onto Constitution Boulevard. The site driveway was designed in a manner to prevent trucks from exiting the site in the southerly direction along Constitution Boulevard. A sketch demonstrating this has been attached with this letter under Attachment B.

BETA2: BETA recommends that signage be provided at the entrance indicating no right turns at this exit from the site.

- T5. *Include turning exhibits illustrating a WB-67 can back into the designate spaces, as well as their path when the exit the space.*

BAI: The loading dock spaces for the proposed development have been designed to be 14 feet wide on center with a 130' apron as measured from the building face to the face of curb. This dimension is typical on industrial projects such as this and provide adequate turning for WB-67 trucks to navigate the docks. Sheet C200 in the plan set has been revised demonstrating that there is sufficient space for WB-67 trucks to enter/exit the docks.

BETA2: The exhibit should be developed based upon a centered position along with the adjacent vehicle in a centered position. It appears that with this starting position, an additional 1-2' of pavement width will be required for trucks leaving the dock area on Building A.

- T6. *Note that Turning Analysis sheets label both buildings as Building A.*

BAI: The typo has been corrected.

BETA2: No further comments.

- T7. *Confirm legal right to reconstruct the northern driveway entrance, which is located within an electric easement. BETA notes that proposed grading and landscaping will be conducted very close to existing electric equipment.*

BAI: Confirmed. No language was found within the easement document restricting relocation of the existing driveway.

BETA2: No further comments.

PARKING AND LOADING

Required parking is defined by §185-21.B of the Town Zoning Bylaw. The proposed development includes Warehouse uses. Required parking is calculated as follows:

Use Designation	Criteria	Building Area	Required Parking
Building A Office	1 space per 250 SF of floor area	24,975 Sq. Ft. (20% of Floor Area)	25 Spaces
Building A Warehouse	1 space per 1,000 SF of floor area	99,900 Sq. Ft. (80% of Floor Area)	100 Spaces
Building B Office	1 space per 250 SF of floor area	12,060 Sq. Ft. (20% of Floor Area)	13 Spaces

Building B Warehouse	1 space per 1,000 SF of floor area	48,240 Sq. Ft. (80% of Floor Area)	49 Spaces
Total			186 Spaces

The project proposes 311 total parking spaces. Approximately 135 of these spaces are located near to Building A and 176 spaces are located near to Building B. For each building, four (4) spaces are designed to be accessible, and two (2) spaces are designed to be van accessible, in accordance with 521 CMR 23.2.1.

All maneuvering aisles are at least 24 feet wide; parking spaces are 9 feet wide and 19 feet long.

Six (6) tractor trailer parking spaces are located to the rear of Building A. These spaces are designed to be 12' wide and 55' long.

Twenty-four (24) loading docks are proposed for Building A and seven (7) loading docks are proposed for Building B. Loading docks are 14' wide and 60' long.

T8. *The provided parking greatly exceeds that which is required by the bylaw. BETA recommends that the Applicant confirm that all proposed spaces are needed. Excess spaces could be removed to reduce impervious area and impacts to wetland resource areas.*

BAI: Confirmed. The parking provided for on the plans has been developed in consideration for current market needs for this type of speculative building, which the applicant believes is appropriate to attract high quality tenants. With that noted, Sheet C120, Site Layout and Materials Plan, has been revised to include an area of reserve parking spaces on the western side of Building B, where if the parking spaces are not determined to be needed, then they would be banked should a future tenant require the spaces.

BETA2: BETA will defer this issue to the Board. However, if the Board does approve the reserve status of these spaces, then the proposed stormwater collection system in this area should be relocated to the inside edge of the parking along the new edge of the traveled way.

T9. *Clarify if the locations marked as "egress" on the Site plans also designate building entrances. Parking spaces must be located within 300 feet of the building entrance (§185-21.C(6)).*

BAI: The locations marked as egress on the Site Plans were not intended to designate the main building entrances, as building entrances would not be expected at multiple locations along the loading dock face of the building. The egress notation was intended to allow for an easier review of the plans to determine where various doors were in lieu of needing to review the architectural plans for door locations. For clarity, the main building entrances into the building are now noted as "Entrance", and secondary doors for egress and/or emergency access are noted as "Egress". It should also be noted that Chapter 185 §21.C(6)) reads entirely as follows:

"Parking spaces more than 300 feet from the building entrance they serve may not be counted towards fulfillment of parking requirements unless the Planning Board determines that circumstances justify this greater separation of parking from use."

All parking spaces for Building A remain located within 300 feet of the building entrance(s). Approximately 60 of the parking spaces provided on the westerly side of Building B are located greater than 300 feet from the building entrance (300 feet measured along the path of travel along a sidewalk). The spaces have been located along an access drive the provides 360-degree access around the entire building. To minimize the amount of impervious area associated with the development, parking spaces have been provided along the drive to provide an efficient parking layout that reduces the need for additional impervious surfaces. Furthermore, we believe

that for industrial use such as this, while the main entrance to the building is provided on the eastern side of the building, it is common for workers in an industrial setting to enter side doors into the building. For these reasons, we believe the separation of the parking from the main entrance is justified.

BETA2: BETA will defer this issue to the Board whether the pedestrian access doorways described as egress meet the definition of building entrance or if circumstances justify the separation.

T10. *Evaluate if a building entrance could be provided in front of the accessible parking spaces for Building B. Per 521 CMR 23.3.1, accessible parking should be located on the shortest accessible route of travel to the building entrance. If an additional entrance not feasible, we recommended relocating the accessible spaces to be along either the east or west side of the building.*

BAI: The accessible parking spaces have been relocated to provide the shortest accessible route of travel to the building entrances. See Sheet C120, Site Layout and Materials Plan.

BETA2: Comment addressed.

6.0 SIGNAGE AND LIGHTING

The project proposes various signs including accessible parking signs with potential van accessible designation, stop signs, pedestrian crossing signs, and fire station signs. MUTCD references are provided for each. A potential freestanding sign is also labeled on the plans near the northern driveway entrance.

A photometric plan has been provided indicating forty (40) new wall or pole mounted luminaires around the building perimeter and throughout the parking areas.

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 generally consistent with the above table and the photometric plan does not indicate any light spillage beyond the property lines.

SL1. *Provide cutsheet for proposed luminaires.*

BAI: Cutsheets have been provided for the proposed light fixtures, and are included with this letter under Attachment C.

BETA2: Comment addressed

SL2. *There is some minor light spillage onto Constitution Boulevard at each of the entrances. It is restricted to the immediate area around the entrance. BETA recommends that the applicant request a waiver.*

BAI: It appears that the comment refers to Chapter 185 Section 31.1C(4)(e), which reads as follows:

“No site feature or activity shall create glare or illumination which extends beyond a site’s property lines and creates a hazard or nuisance to neighboring property owners or on adjacent roadways. Lighting shall be designed to provide the minimum illumination necessary for the safety and security of the proposed activity. Lighting shall be designed such that the light source is shielded, and the light is directed downward.”

As stated in the comment, there is minor light spillage onto Constitution Boulevard at both entrances and is restricted to the immediate area around the entrance. The Bylaw restricts glare or illumination which extends beyond a site’s property lines and creates a hazard or nuisance to neighboring property owners or on adjacent roadways. The lighting the spills into Constitution Boulevard is a maximum of a 0.5 foot-candle, and while minimal it will enhance lighting at the intersection of the site driveways for the safety and security of the proposed development. The lighting has also been designed to be shielded and directed downward. As the lighting has been designed in accordance with the requirements of this section, BAI does not believe a waiver is necessary and meets the intent of this Bylaw.

BETA2: Based upon the interpretation of the Board regarding this issue in the past, BETA recommends that the applicant request the waiver. As in the past, the spillage at the entrance driveway is within the limits of the intensities allowed through the granting of the waiver.

7.0 UTILITIES

Proposed utilities depicted on the plans include domestic water, fire service, sanitary sewer, electric service, gas service, and telecommunications. The majority of existing utilities on the Site will be removed and capped. Interconnection for all utilities will be provided via existing connections to services along Constitution Boulevard.

Domestic water and fire service is proposed via new 10” DICL water pipe with 4” and 8” DICL connections to each building. Five (5) new fire hydrants are also proposed throughout the Site. Sanitary sewer service is proposed via new 8” PVC pipe as well as several new sewer manholes. Building connections will be 6” PVC. The new water and sanitary sewer services will also connect to existing services which continue north onto the Fire Department property.

Natural gas, electric, and telecommunications services are proposed via a new underground connection to be coordinated with the utility providers. Two new electric manholes, two new transformers (1 per building) and a new telecom manhole are proposed.

U1. *Indicate if a new easement is proposed for conveyance of sanitary sewer and water across the Site and whether the existing easement will be dissolved.*

BAI: As the sewer and water lines are being relocated outside of the existing easement, a new utility easement will be required to accommodate the new locations, and the existing easement will be dissolved.

BETA2: See comment below.

U2. *Confirm the purpose of the northwest water service and sanitary sewer connections leading to the Fire Department property.*

BAI: The purpose of the water and sanitary sewer connections leading to the Fire Department is to maintain existing service connections to the Town of Franklin’s Fire Department. Furthermore, as noted in the property deed, which is contained within the Site Plan Application narrative as

Appendix A, a 20' Utility Easement was granted to the Town of Franklin for public sewerage facilities.

BETA2: The 20' wide sewer easement at the northwest corner of the parcel will not be impacted by the proposed development. However, the utilities (water, sewer & drainage) which serve the Franklin Fire Department building at 800 King Street are located within the existing 30' wide easement noted above. The 20' wide easement extends from the westerly property line to a manhole inside the 30' wide easement. BETA recommends that a draft of the revised easement be developed for review by Town Counsel to ensure that the rights of the Town are maintained.

U3. Confirm legal right to connect to existing sanitary sewer within utility easement to the south.

BAI: Confirmed. The sewer easement is owned by the applicant and has been utilized for the past 23+ years by the existing building with conveyance right to adjacent properties.

BETA2: BETA will defer this issue to the DPW. (See comment above)

8.0 LANDSCAPE TREATMENT & GRADING

The project proposes numerous deciduous tree and shrub plantings throughout the project area. New trees are generally proposed along driveways, around parking areas, or within landscaping islands.

Per §185-21.C(5), the project is required to provide 1 tree per 10 parking spaces. For 311 spaces, 32 trees are required. The landscaping plan includes 79 trees throughout the parking lots to satisfy this requirement.

The project includes outdoor parking for 10 or more cars and loading docks and is thus required to provide screening in accordance with §185-35. Residential uses and districts are present to the rear of the Site (#648 & 656 King Street). Portions of the Site are anticipated to be adequately screened by existing vegetation to remain; however, proposed tree clearing near Building B will greatly reduce the length of the vegetated area. Only five isolated trees are proposed in this area.

Disturbed areas are proposed to be restored with 12" loam and seed with lawn mix. Landscape islands will be provided with 6" of mulch instead.

The project includes moderate regrading throughout the project area, particular along the western limits of the Site. Grading appears to be primarily fill, though excavation will be required to install stormwater controls and building foundations. The steepest proposed slopes appear to have a grade of 2H:1V. An erosion control blanket is proposed at such slopes.

LA1. Provide required screening for the loading docks and parking areas associated with Building B. Based on BETA's site observations, the residential buildings at #648 and #656 King Street are readily visible from the existing Site, and proposed tree clearing will further reduce the vegetated area (§185-35.A).

BAI: BAI acknowledges Chapter 185 Section 35.A is applicable, however the following sections of the Bylaw reads as follows:

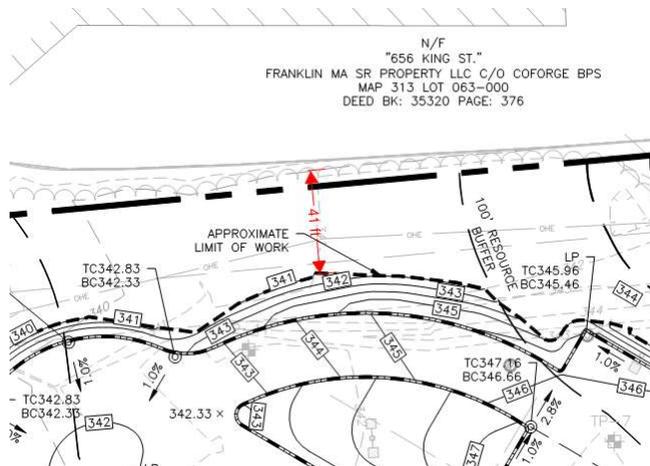
Chapter 185 §35.B ""Screening" in this context, shall mean an area four feet wide, densely planted with evergreen trees or shrubs three feet or more in height when planted, or a wall, fence or earth berm 12 inches or more in height or equivalent visual screening by natural vegetation or difference in elevation between potential viewers and the screened areas."

Chapter 185 §35.C "The following shall apply to any use in an Industrial or Business District if located on premises within 500 feet of a residentially used structure in an adjacent residential

district not allowing that use and if located on a lot which abuts or extends into that residential district by less than 75 feet or abuts another lot which has frontage only within the residential district. Such uses shall provide a greenbelt along the portion of the lot which abuts the residential district or abutting lot cited above. Such greenbelt shall consist of an area not less than 15 feet wide containing a dense grouping of trees and shrubs providing a natural barrier between the lot and the adjacent premises. The trees and shrubs shall have a height of not less than three feet initially and shall be expected to have an effective height of not less than seven feet within five years.”

As noted in Section B, screening can be accomplished by any of the following: new plantings, a wall, an earthen berm 12” or more in height, or equivalent visual screening by natural vegetation, or difference in elevation between potential viewers and the screened areas. Furthermore, as noted in Section C, for an industrial project such as this less than 500 feet from a residential use, a greenbelt not less than 15 feet wide containing a dense grouping of trees and shrubs providing a natural barrier between the lot and the premises must be provided.

As documented in the screenshot to the right, a natural greenbelt buffer approximately 41 feet wide at the narrowest has been provided between the access drive and the edge of the clearing on the adjacent property. As the greenbelt as is almost three times the required natural barrier in the bylaw, BAI believes adequate screening has been provided.



BETA2: To the west BETA agrees that 40'± of existing vegetation will remain. However, the berm that exists presently along the 50' protective covenant setback will be impacted by the proposed access driveway as shown in the sketch above. In addition, based on the field visit, BETA noted that both the Assisted Living Facility and the residence to the northwest were readily visible from the site. BETA recommends that the landscape buffer in this area and along the northerly edge of the parcel be converted to a dense evergreen buffer rather than the deciduous trees and shrubs currently specified for further review and discussion by the Board.

LA2. Provide information on seed mixes; use of native seeding is encouraged especially in areas which are not required to be a fine lawn and in proximity to wetland resource areas.

BAI: Our office has revised Sheet C121, Landscape Plan, to include seed mixes such as a New England Showy Wildflower Mix and a New England Conservation/Wildlife Mix, and the locations of these seed mixes have been depicted on the plan. Additional plantings have been added along the pervious areas within the resource areas to improve the vegetated buffer zones.

Specifications for each of the two seed mixes being used for stabilization of the site have been provided. See Attachment D for the specifications.

BETA2: No further comments.

- LA3. *Verify that proposed tree plantings near the eastern side of Building B will not impact proposed drainage lines and other utilities.*

BAI: Verified. The tree plantings are not anticipated to impact proposed drainage lines or other utilities.

BETA2: Several of the proposed trees along this side of Building B are located directly above the proposed sewer line which may impact future maintenance. BETA will defer this issue to the DPW.

- LA4. *Provide contour labels for proposed grading between the eastern parking area and Constitution Boulevard to clarify design intent. Recommend extending limit of work to the existing 347' contour and providing spot grades to ensure that this area will properly drain to the parking area.*

BAI: Additional contour labels have been added to the grading on the eastern side of the Building A parking adjacent to Constitution Boulevard. BAI does not agree that extending the limit of work to the 347 contour and clearing many of the trees and screening adjacent to Constitution Boulevard is appropriate nor necessary. The area is intended to remain as has been functioning for the past 23+ years.

BETA2: There is a 12" RCP culvert that comes from the existing depression in this area which will not be maintained in the future. It appears that this culvert drains the existing depression in the island. BETA recommends that the inlet to this culvert be identified and if it does drain this localized depression than it should be maintained.

- LA5. *Provide spot grade(s) at the northern driveway entrance to confirm how the Site will interact with Constitution Boulevard and whether any off-site stormwater runoff will be able to flow onto the Site.*

BAI: Additional detail has been provided. The entrance is intended to maintain existing grades within Constitution Boulevard, where the off-site stormwater runoff does not flow into the northern driveway entrance.

BETA2: Detail not provided; comment remains.

- LA6. *Provide spot grades along the top of the existing retaining wall to confirm that its height is suitable for the proposed grading.*

BAI: Sheet C101, Supplemental Existing Conditions Plan as well as Sheet C130 Grading Plan, have been updated to include spot grades along the top of the existing retaining wall. BAI continues to believe the grading will function in harmony with the retaining wall.

BETA2: No further comments.

9.0 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 key issues regarding the project:

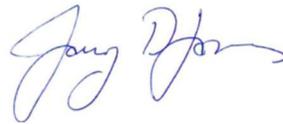
- *Some additional information is required to comply with zoning requirements.*
- *Numerous easements are present on the Site for which the applicant should demonstrate the legal right to conduct work within.*
- *The project has insufficient screening from abutting residential uses.*
- *Multiple waivers have been requested from §300-11 which should be reviewed by the Town.*
- *The responses to the stormwater comments have not been provided and these issues remain outstanding.*

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

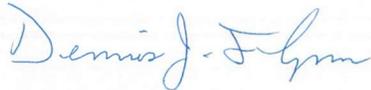
Very truly yours,
BETA Group, Inc.



Stephen Borgatti, PE, MENG
Senior Project Engineer



Gary D. James, PE
Senior Project Manager



Dennis Flynn, PE PTOE
Associate