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F4593

March 28, 2025
Franklin Planning Board
355 East Central Street
Franklin, MA 02038
Attn: Amy Love, Town Planner

RE: *Comments from Beta Group 124/126 Grove Street Site Plan Modification*

Dear Members of the Board:

On behalf of our client, NEAG, Inc, Guerriere & Halnon, Inc. has prepared the following information to address comments contained in the letter to the Planning Board from BETA Group.

BETA's findings, comments and recommendations are shown in *italics* followed by our response in **bold**.

TOWN OF FRANKLIN ZONING REQUIREMENTS

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

- Z1. *BETA recommends a condition requiring the site plan modification approval to be contingent on filing of the ANR, which is required to meet side yard requirements.*

G.H. Response: An ANR will be provided as requested.

INDUSTRIAL DISTRICT PERFORMANCE CONTROLS (§185-22)

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

- Z2. *Provide data quantifying anticipated sound, noise, vibrations, odor, and flashing to determine conformity with these requirements (§185-22.A).*

G.H. Response: The current use of the site is not changing. The site will be reconfigured and an 87,507 SQFT addition to the building is proposed. These changes will not increase the items identified in the regulation noted.

EARTH REMOVAL (§185-23)

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

Z3. *Quantify approximate required earth removal volume to determine if a Special Permit is required.*

G.H. Response: A cut/fill summary has been added to the grading plan, sheet 9 of 21. The project is anticipated to result in a net fill of 27,415 cu.yds. This cut/fill analysis is a comparison between the existing and proposed finish grades, and does not account for the removal of any unsuitable materials found on site.

SITE PLAN AND DESIGN REVIEW (§185-31)

Z4. *Provide note on the Landscaping Plan stipulating that all plantings shall come from the Best Development Practices Guidebook (§185-31.C.3(k)).*

G.H. Response: A note has been added to the Landscaping Plan, see note 2.

Z5. *Provide required photometric plan (§185-31.C.3(l)).*

G.H. Response: A photometric plan has been provided for the proposed constructed areas. See sheet 13 of 21.

WATER RESOURCES DISTRICT (§185-40)

Z6. *Confirm that the warehouse uses will not include any storage of materials identified in §185-40.D.1 (a, d, h, n, o, p, q, r, and s).*

G.H. Response: No hazardous waste is stored within the existing building footprint and is not proposed within the new building addition.

TRAFFIC ASSESSMENT AND IMPACT

GENERAL TRAFFIC COMMENTS

T1. *Based on the traffic volume data provided, an operational assessment should be conducted at the Grove Street and Prime Park intersection to understand the impacts associated with shifting the entering truck traffic to this intersection. A Level of Service (LOS) analysis of both the AM and PM peak hours is recommended.*

G.H. Response: See Vanasse and Associates Response Letter dated 12/13/2024.

T2. *The TIA should discuss and clarify if any additional traffic is expected to be generated based on the proposed expansion of the warehouse.*

G.H. Response: See Vanasse and Associates Response Letter dated 12/13/2024.

T3. *Evaluate if a heavy duty pavement section is needed for the proposed loading areas and driveways that will primarily accommodate trucks and large vehicles.*

G.H. Response: See Vanasse and Associates Response Letter dated 12/13/2024.

SIGHT DISTANCE

T4. The TIA states that selective trimming/vegetation removal will be required to exceed the recommended minimum sight distances at the Prime Park and 122 Grove Street. Provide a plan illustrating the extent of the existing vegetation trimming/removal that is required. This plan should also evaluate and depict existing and proposed sight distance triangles at both Prime Park and the southern driveway entrance.

G.H. Response: The requested sight triangle and trimming plans have been prepared by Vanasse and Associates and are included in the revised submittal package.

SITE ACCESS AND CIRCULATION

T5. Confirm that the proposed configuration has been reviewed by the Town Fire Department.

G.H. Response: See the Fire Department letter dated November 19, 2024.

T6. Provide vehicle turning exhibits to depict how a typical heavy vehicle will enter, exit, and traverse the Site as well as access each proposed loading area.

G.H. Response: Sheet 15A Truck Turning Exhibit Plan has been added to the revised site plan set.

PARKING AND LOADING

T7. Provide table identifying the required parking spaces based on proposed/existing uses and gross floor area. Clarify existing uses in the #124 Grove Street building.

G.H. Response: See sheet 3 Site Plan Overview for parking calculations for existing and proposed uses. G&H requests 124 Grove Street be considered a stand-alone entity for the purposes of this site plan modification's parking review. No modifications are proposed to the 124 Grove Street site, and the parking will not count towards 126 Grove parking requirements as they are located 300+' away.

T8. Provide the required number of parking spaces or request relief from the Planning Board per §185-21.A(4). Although 700 total parking spaces are proposed, parking spaces more than 300 feet from the building entrance they serve may not be counted towards fulfilling of parking requirements unless the Planning Board determines the circumstances justify this greater separation of parking from use (§185-21.C(6)).

G.H. Response: As per the table on Sheet 3, we request a determination from the planning Board from Section 185-21.

T9. Provide a total of 6 accessible parking spaces in the #126 Grove Street parking lot, 1 of which must be designed as van accessible.

G.H. Response: As requested, additional handicap spaces have been added to the proposed site, and a total of 6 handicap parking spaces are now depicted on the plan.

T10. *Revise locations of accessible parking spaces for #126 Grove Street to be as near as possible to the building entrance and provide required accessible route per 521 CMR 20.*

G.H. Response: Revised handicap space locations have been proposed, and signage and sidewalks for accessibility have been provided.

T11. *Revise all accessible parking spaces to include the required access aisle and signage.*

G.H. Response: Van accessible spaces has been provided as requested.

T12. *BETA defers to the Town if the existing parking spaces to remain at #124 Grove Street should also be modified to address the previous review comments.*

G.H. Response: G&H requests 124 Grove Street be considered a stand-alone entity for the purposes of this site plan modification's parking review. See comment response T7.

T13. *Identify snow storage areas for the parking area and driveway.*

G.H. Response: Snow Storage areas have been added to the plan as requested.

SIGNAGE AND LIGHTING

The project proposes "do not enter" signs, electric vehicle signs, stop signs, and handicap parking sign.

SL1. *Include "van accessible" designation on handicap parking sign detail.*

G.H. Response: Details and locations have been provided as requested.

SL2. *Provide photometric plan to confirm adequacy of existing site lighting.*

G.H. Response: Proposed construction areas have had lighting added, and a photometric plan for this new lighting has been provided. Existing lighting has not been considered, as the existing light fixture model and performance is unknown and could not be accurately modeled.

SL3. *Indicate proposed treatment of the existing light pole that is located within the footprint of the southern parking area driveway.*

G.H. Response: Existing light poles within proposed work areas shall be removed and preserved for reuse on site as needed.

SL4. *The TIA states that "One Way" and "Do Not Enter" signs should be provided within the NEAG site to restrict the use of the proposed driveway to entering trucks only. Show the proposed location of these signs on the site plans.*

G.H. Response: Signs have been added to the Site Plans and details added to sheet 14.

SL5. *Add the "Snow Storage Prohibited" sign to the Construction Details plan sheet.*

G.H. Response: Snow Storage signs have been added to the Site Plan and a Detail was addressed on Detail Sheet 14

SL6. *Provide additional detail for the proposed crosswalk markings, such as width, line thickness and spacing, and color.*

G.H. Response: A detail for the proposed crosswalks has been provided Sheet 14 of 17 as requested.

UTILITIES

U1. *Confirm with the Fire Department that the removal of three fire hydrants will not impair fire safety.*

G.H. Response: The fire department reviewed the site plans and stated they did not have any comments. See letter from the Fire Chief dated November 19, 2024. Should the Department request any additional hydrants, the applicant will work the department to provide them prior to construction.

U2. *Confirm that adequate water will be provided following the removal of the northern 8" CLDI water pipe. In addition, the plans should indicate what will happen at each end of the water mains that will be cutoff by the proposed building.*

G.H. Response: The plans have been revised to indicate the section of pipe to be removed, with the ends capped. In addition, the loop is to be re-established with a new connection to the existing water main in Prime Park.

U3. *Confirm with the utility provider that the proposed entrance to the southern parking area is acceptable. BETA observed several utility poles and electrical equipment in this area and the proposed driveway appears to conflict with a guy wire.*

G.H. Response: G&H will work with the local Utility to ensure their equipment and poles are not compromised.

LANDSCAPE TREATMENT & GRADING

LA1. *Provide required screening of the northwestern loading area (§185-35.A & B).*

G.H. Response: Additional screening has been added to the to the loading area adjacent to Grove Street, Plantings have been located so as not to impede the site distance at this entrance.

LA2. *Provide information on seed mixes for disturbed areas; use of native seeding is encouraged especially in areas which are not required to be a fine lawn.*

G.H. Response: Seed mix shall be in accordance with the Best Design Development Practices.

LA3. *The Board should consider whether new tree plantings are needed along Prime Park and the northern driveway to replace landscaping that will be removed for the proposed building.*

G.H. Response: G&H will defer to the board on this. The north side of Prime Park currently has established tree growth, and this is not being impacted by the proposed work. G&H notes that the proximity of the addition to Prime Park may make the location inappropriate for typical street trees.

LA4. *Provide detail and design specifications for proposed retaining wall.*

G.H. Response: Engineering design and specifications for the proposed retaining wall is to be provided by a third-party firm and will be completed and approved prior to construction.

LA5. *BETA recommends that earthwork notes be added to the plans reflecting the geotechnical engineering recommendations outlined on pages 9 thru 17 of the Northeast Geotechnical, Inc. Geotechnical Engineering Report.*

G.H. Response: An exhibit plan sheet has been added to the plan set to display the recommendation pages 9-17 from the Northeast Geotechnical, Inc report, as requested.

STORMWATER MANAGEMENT

GENERAL

SW1. *Consider providing a grate or similar measure at the 36" outfall to prohibit access by pedestrians and wildlife.*

G.H. Response: A trash grate has been added to the outfall as requested. See drainage and detail sheets.

SW2. *Provide catch basin catchment areas to ensure that impervious surface area does not exceed ¼ of an acre and treatment is being provided by deep sump catch basin in accordance with the handbook.*

G.H. Response: The proposed grading and catch basin locations have been revised to meet this requirement. The catch basin catchment areas have been tabulated in the revised stormwater report as part of the pipe sizing calculations.

SW3. *Provide measures to restore Basin #2. BETA observed some shrub plantings in the far edges of the basins which may impair basin functioning. Denser vegetation is present in the wetland portion of the basin, and it is unclear if this area will properly function as an infiltration basin. Also identify proposed access to the basin, as the proposed retaining wall and tractor trailer parking area will require removal of the existing unpaved pathway which slopes down to the basin.*

G.H. Response: Notes have been added to the drainage plans requiring the removal of shrubs and trees within the upland portion and berm of basin #2. A new basin access path has been added to the design as requested.

SW4. *Provide invert information for existing sewer line and water services at crossings with proposed drainage pipe.*

G.H. Response: Information on these buried utilities is limited. G&H has proposed a test pit to be conducted at the location of the drain and sewer crossing, to be conducted prior to the start of construction. Similarly, depth to the water services on site is not available. G&H notes that the inverts of proposed drainage structures at crossings are similar to those of the existing drainage infrastructure. Additional test pits could be conducted prior to construction to determine the water service depth prior to construction.

SW5. *Provide detail for typical catch basins and drainage manholes.*

G.H. Response: Details for both have been provided on detail sheet # 16.

SW6. *Provide detail for DMH 24-17 or update internal weir wall detail to show location of weir wall within this drainage manhole.*

G.H. Response: The stormwater system has been significantly revised, and DMH 24-17 no longer requires a internal weir wall. A detail has been provided for the weir manhole DMH 24-27.

SW7. *Revise impermeable liner for subsurface system to extend along all sides of the basin. If stormwater is allowed to migrate towards the retaining walls, wall stability may be impacted.*

G.H. Response: The Subsurface Detention system has been eliminated from the design, and partially replaced with a new subsurface infiltration system. This new system is located further from the proposed retaining wall, and the vertical impervious barrier maintained to protect the wall from stormwater migration.

SW8. *The Board should consider whether fencing should be provided around Basin #2. The basin is 7 feet deep and could pose a safety hazard to workers and site visitors at #124 and #126 Grove Street.*

G.H. Response: G&H defers to the board on this matter.

SW9. *The rim elevations indicated for riser nos. 2 & 4 on sheet 11 of 17 appear to be incorrect since they are indicated to be 12-16' below grade.*

G.H. Response: The stormwater system has been significantly revised, and risers 2 & 4 have been eliminated from the design.

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

SW10. *BETA notes that the required 20 feet setback to the property line has not been met for Basin #1. However, this is an existing nonconformity. (§300-11.A(7.a)).*

G.H. Response: Acknowledged.

SW11. *Provide pipe sizing calculations for the 25-year storm to demonstrate that the design velocity for storm drains, catch basins, and related installations is between 2.5 and 10.0 feet per second. (§300-11.B(1)).*

G.H. Response: These calculations have been provided in the stormwater report as requested.

SW12. *Provide catch basin detail indicating a 4' sump (§300-11.B(3.c)).*

G.H. Response: This provided on detail sheet # 16 as requested.

BEST DEVELOPMENT PRACTICES GUIDEBOOK

SW13. *Indicate if proposed seed mix and plantings will reflect native vegetation, particularly near woodland areas (BDPG Page 7).*

G.H. Response: Within the Buffers any disturbed areas will be planted with the New England Conservation Seed Mix.

SW14. *Confirm that landscaping plan has been designed in accordance with the planting bed and seeding guidelines outlined on Page 13.*

G.H. Response: The landscaping plan has been designed in accordance with Section VI of the Franklin Best Development Practices Guidebook.

LOW IMPACT DEVELOPMENT (LID) TECHNIQUES

The project does not include substantial LID measures.

SW15. *Revise MassDEP Checklist to exclude “no disturbance to any wetland resource areas” and “minimizing disturbance to existing trees and shrubs.” The proposed impacts to Basins #2 and #3 will include disturbance to wetland resource areas and existing vegetation.*

G.H. Response: The checklist has been revised as requested.

NO UNTREATED STORMWATER (STANDARD NUMBER 1):

SW16. *Provide calculations for sizing of riprap aprons, including existing aprons to remain. Replace existing apron at the OCS 24-1 outlet if needed based on calculations.*

G.H. Response: Riprap sizing calculations have been provided as requested. These calculations indicate that the existing apron dimensions at OCS 24-1 are adequate, and a note has been added requiring this apron be refurbished to restore its condition.

SW17. *Restore the existing riprap apron at the Basin #1 spillway. BETA observed that the apron is generally degraded and may not function correctly.*

G.H. Response: A note requiring this apron’s restoration has been added as requested.

POST-DEVELOPMENT PEAK DISCHARGE RATES (STANDARD NUMBER 2):

SW18. *Existing basin #2 has been designated as a wetland resource area. Provide an interim point of analysis at the wetland boundary and demonstrate that a net decrease in peak discharge rate and runoff volume is proposed.*

G.H. Response: As discussed at the 1/28/25 working session, 80% TSS removal is achieved for the equivalent water quality volume associated with the net increase in impervious area for the project, prior to discharge to Basin #2. Similarly, the water quality volume for the remaining balance of existing impervious areas is treated to a minimum of 62.5% TSS removal, an improvement over the existing treatment level of 44%. Achieving the above performance standard eliminates the 50’ setback to wetlands for the infiltration components of basin #2, and allows for the inclusion of infiltration within the upland portion of basin #2 to be included in the stormwater model. An interior berm dividing the wetland and infiltrating areas is not required.

SW19. *Existing basin nos. 1 & 2 are each indicated as infiltration basins in the stormwater report relative to treatment. The test pit data conducted adjacent to Basin #2 indicate that the height above groundwater and the soils will qualify this basin, however there is no test pit data regarding basin No. 1. BETA recommends that test pit data be conducted in Basin 1 to confirm depth to groundwater*

and soil type. In addition, if conditions qualify the basins then exfiltration should be assumed for both existing and proposed conditions in the hydro cad analysis.

G.H. Response: Additional test pits and in-situ permeability testing have been performed in each existing basin. The parent material in Basin #1 varies. In TP 101 & 102, a 3-4' thick layer of loam sits atop a C2 layer of Sand. In TP 103, this loam layer is not present, allowing for improved recharge. The permeability testing yielded similarly varied results. The Stormwater Handbook requires the use of the most restrictive permeability rate in infiltration models. In addition, estimated seasonal high groundwater in all three test pits was observed to be within 0-2' of the existing basin floor. Accordingly, no infiltration was included for Basin #1 in either the pre-development or post-development HydroCAD models. The basin outlet is no longer proposed to be modified, as this will preserve the ponds existing dewatering performance.

SW20. Revise hydroCAD model to account for the existing low area south of the southwestern building corner. Based on grading, this area is expected to function as a detention basin under pre-development conditions and should be modeled as such.

G.H. Response: The HydroCAD model has been revised as requested.

SW21. Review the northern boundary of subcatchment PR-4. Based on the grading plan, stormwater runoff from Prime Park will flow into the subcatchment.

G.H. Response: The intent is to preserve the existing gutter on Prime Park and prevent stormwater runoff from entering the site. The grading has been revised, and the subcatchment boundary updated.

SW22. Identify time of concentration flowpaths on the watershed plans.

G.H. Response: Time of concentration flowpaths have been added to the pre- and post-development watershed plans as requested.

SW23. Provide rim elevations for existing catch basins to remain in the southern parking area to confirm that the proposed expansion will be properly graded to the drainage system.

G.H. Response: Rim elevations for all existing structures to remain have added to the existing conditions plan, see sheet 3B.

SW24. Review HydroCAD model for subcatchment PR-6 and EX-6; Revise area modelled as "water surface" to match the pond's surface area up to the contour reflecting the static water level at elevation 256.20.

G.H. Response: The water surface land cover area for subcatchments PR-6 and EX-6 have been revised to reflect the static water level in basin 2 as requested.

RECHARGE TO GROUNDWATER (STANDARD NUMBER 3):

SW25. Due to NRCS soil classification of A/D soils BETA recommends infiltration tests be conducted in Basin #2 to determine infiltration rate, confirm drawdown calculations, and determine whether a subdrain

should be included in the design. BETA notes that the presence of wetlands suggests that the capacity for infiltration in this area may be limited.

G.H. Response: In-situ permeability testing has been performed in Basin 2 as requested, and the results are summarized in a report by Northeast Geotechnical, Inc, dated March 14, 2025, and is included with this submittal. The testing resulted in observed infiltration rates of 1.8 in/hr and 30.3 in/hr for TP's #104 and #105. As discussed during the 1/28/25 working session and subsequent discussions with Gary James, the IVW footprint within basin #2 has been excluded from the available surface area for infiltration in the HydroCAD model, and an infiltration rate of 1.02 in/hr utilized for the upland portions of Basin #2.

SW26. Verify that test pits have been logged by a qualified soils professional.

G.H. Response: Test pits and in-situ permeability testing were completed by Christian Rice, P.E. from Northeast Geotechnical, see attached report.

SW27. Revise design of the subsurface detention basin to account for identified groundwater elevations. The groundwater depth of 18' below grade for boring B-8, for example, corresponds to an elevation of 256.2' ±, well above the system bottom elevation of 252'. If the system bottom cannot be raised, a watertight seal or similar means may be required to prevent groundwater intrusion.

G.H. Response: The 8" diameter CMP detention system has been eliminated from the design, and partially replaced with a Cultec Recharger 902HD subsurface infiltration system. The bottom of stone elevation for this system is 264.0, well above observed groundwater in boring B-8. Accordingly, a water tight seal is no longer required. The vertical impervious barrier remains to restrict horizontal migration of stormwater towards the proposed retaining wall.

SW28. A portion of Basin #2 is a wetland resource area and therefore the ability to infiltrate groundwater to provide recharge may be limited. Recommend separating the non-wetland portion of the basin from the wetland portion of the basin in the provided recharge volume calculations.

G.H. Response: As requested, the IVW footprint within basin #2 has been excluded from the available surface area for infiltration in the HydroCAD model.

SW29. BETA notes that a 50' setback is required between infiltration basins and surface waters, which includes wetlands. As wetlands are present in Basin #2, this setback is not provided. However, this is an existing nonconformity. BETA defers to the Town.

G.H. Response: During the working session on 1/28/25, it was determined that meeting specific TSS removal targets prior to discharge to Basin #2 would eliminate this requirement. These targets have been met (See SW18 response) G&H defers to the board.

SW30. Clarify the intent of the Earth Berm detail, which identifies a berm consisting of low permeability fill. The existing berm for Basin #2 is outside the limit of work, so it is unclear if the berm is intended to be replaced for consistency with the detail. BETA notes that the existing berm has several trees and shrubs growing on it which could impact stability. Plas should identify measures to be implemented to bring berm to current standards.

G.H. Response: The earth berm detail is required for the removal of the existing basin #2 spillway and reconstruction of the berm in this location. Notes have been added to sheet 11 requiring the removal of brush and trees within the upland portion basin 2 and its berm.

TOTAL SUSPENDED SOLIDS (STANDARD NUMBER 4):

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

SW31. Utilization of Infiltration Basin Nos. 1 & 2 for total phosphorous removal required by the by law is predicated on their ability to qualify as infiltration basins. Additional information should be provided to indicate that these 2 basins will qualify as infiltration basins and provide the treatment assumed in the report. (See SW19 above)

G.H. Response: Infiltration testing has been performed in both basins. Due to observed groundwater elevation and varying infiltration rates, basin 1 does not qualify. However, the overflow from basin 1 is routed through two additional infiltration BMPs (the Cultec System and Basin #2), which provide recharge volumes in excess of the required volumes. Basin 2 qualifies based on the additional permeability testing. Calculations have been provided in the revised stormwater report demonstrating that the proposed Cultec system has sufficient storage to treat the WQV from Basin 1, in addition to its own contributing watersheds.

SW32. Due to the presence of wetlands within Basin #2, the 80% TSS removal requirement should be achieved prior to discharge to the wetlands. BETA recommends that the design review the potential to provide the 80% TSS Removal in that portion of the basin outside the limits of the wetlands prior to using this wetland area for excess storage.

G.H. Response: TSS removal targets have been achieved as discussed during the 1/28/25 working session. See SW18 response.

SW33. Provide required pretreatment for Basin #1. The TSS worksheet lists a vegetated filter strip, but stormwater runoff from the parking lot conveyed over a paved spillway without pretreatment.

G.H. Response: Deep Sump Hooded Catch basins and a Contech CS-4 WQMH have been provided to achieve the required pretreatment. The existing paved spillways are now proposed to be closed with curbing.

SW34. Remove pretreatment devices from TSS worksheet for total TSS; the 80% TSS provided by the infiltration basin is inclusive of required pretreatment.

G.H. Response: The TSS worksheets have been revised as requested.

SW35. Indicate if existing catch basins to remain are deep-sump.

G.H. Response: The existing sump depth in remaining catch basins varies, and sediment depth within the basins may have resulted in underestimated sump depths. The applicant will evaluate the sump depths during construction, and replace any structures that do not meet the requirements of a deep-sump catch basin. Observed sump depths have been included on sheet 3B of the revised site plan set.

EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8):

SW36. It should be noted that a stormwater management permit from the DPW will be required for the overall site disturbance which includes the development and submission of a SWPPP.

G.H. Response: After site plan approval, the client will work with the DPW and submit a SWPPP.

SW37. Provide specific maintenance requirements for construction-period erosion controls.

G.H. Response: The stormwater report narrative has been revised to include specific maintenance requirements for erosion controls, see Standard 8, sections G & H.

SW38. Revise limit of work depicted on Sheets 4 and 5 to include wetland replication areas. The erosion and sediment control plan must depict a clear and definite delineation of any areas of vegetation or tree disturbance (§153-12.1).

G.H. Response: the limit of work has been revised as requested.

SW39. Provide description of construction and stockpile and/or excess materials removed from the Site expected to be stored on-site, as well as all other information described in §153-12.L

G.H. Response: Additional stockpile locations have been provided on sheets 4 & 5, and additional descriptions of stockpile protection, erosion control, and stabilization has been provided in the revised standard 8 section of the stormwater report.

SW40. Provide anti-tracking measures at all three driveway entrances to ensure all construction vehicle traffic onto or out of the Site is controlled.

G.H. Response: Anti tracking measures have been added as requested.

SW41. Identify proposed locations for catch basin inlet protection on Sheets 4 and 5.

G.H. Response: Silt sack location have been added to sheets 4 and 5 as requested.

SW42. Provide criteria for permanent or temporary restoration of disturbed areas including how soon after disturbance these measures will be implemented.

G.H. Response: Revised as requested. See Standard 8, sections B.8 and B.9 of the revised stormwater report.

SW43. Provide seed mix for temporary/permanent stabilization.

G.H. Response: Seed mix for areas within the Buffer shall be the New England Conservation Mix. All other areas with follow the Town of Franklins Best Practice Guidebook.

SW44. Provide location(s) of proposed soil/material stockpile areas and staging areas on plans with erosion and sedimentation control measures to limit transport of materials. Areas should be located outside of buffer zones to the extent practicable.

G.H. Response: Additional stockpile areas have been added to sheets 4 & 5, including sediment control measures. All locations are outside of buffer zones as required.

SW45. Identify provisions for protecting infiltration capacity of existing infiltration basins during construction.

G.H. Response: all existing infiltration basins will be protected by erosion control barriers. All existing catch basins will have silt sacks installed prior to any earth disturbance.

SW46. *Revise construction sequence to include restoration and landscaping.*

G.H. Response: The construction sequence has been revised to include restoration and landscaping as requested.

OPERATIONS/MAINTENANCE PLAN (STANDARD NUMBER 9):

SW47. *Clarify if an existing Operation and Maintenance Plan is in place for the Site, and whether Operation and Maintenance will be performed concurrently with the #124 Grove Street drainage system.*

G.H. Response: Presently there is no O & M plan in existence for 124/126 Grove St, however going forward, the applicant intends to follow the prepared O & M Plan for 126 Grove St.

SW48. *Indicate how future property owners will be notified of the presence of the stormwater management system and the requirement for proper operation and maintenance.*

G.H. Response: Notification requirements for future owners have been added to Standard 9, section B of the stormwater report narrative. These measures include a disclosure notice to be included with the deed, and providing future owners with a copy of the approved Long Term O&M Plan.

SW49. *Provide map, drawn to scale, that shows the location of all stormwater BMPs in each treatment train and snow storage areas.*

G.H. Response: A stormwater BMP plan has been provided with the revised stormwater report.

SW50. *Provide list of drainage easements and the purpose of each, including easement along Prime Park (§ 153-18.B(4)).*

G.H. Response: There is one 20' wide drain easement along the existing brook that exists on the 124 Grove Street property. The applicant is currently proposing to combine lots 124 Grove Street and 126 Grove Street. Once the two lots are combined, all the rights in easements between 124 and 126 Grove Street would be extinguished as they would no longer be necessary. Any easements that contain rights that benefit 120 and 122 Grove Street owned by Amego Inc would remain. These appear to include the "Utility Easement and Right of Way", "20 ft. Wide Slope and Construction Easement", "30 Ft. Wide Utility Easement", "20' Wide Utility Ease." and 20 Ft. Wide Drain Easement Along Existing Brook" as shown on Plan 253 of 1989 in Plan Book 379 and reference in Deed 8740 Pg. 671. All the aforementioned easements are on the 124 Grove Street property. This comment is addressed by G&H with the understanding that ultimately, rights and title are a matter of law and should be addressed by an attorney. See Note 10 Sheet 2 of 21.

SW51. *Provide signature of owner on the O&M Plan (§153-18.B(5)).*

G.H. Response: A signature will be provided prior to the endorsement of the plan set.

SW52. *Revise O&M Plan to include requirement to notify the Director of changes in ownership or assignment of financial responsibility (§153-18.D(1)).*

G.H. Response: Standard 9, section B has been revised to include this requirement.

SW53. *Revise O&M Plan to include requirement that amendments to the maintenance schedule must be*

made by mutual agreement of the Director and the responsible parties (§153-18.D(2)).

G.H. Response: Standard 9, section A has been revised to include this requirement.

SW54. Clarify means of accessing Basin #2 for maintenance, as the proposed wall will impede access.

G.H. Response: A new basin access path has been added to the revised plan set.

SW55. Include operation and maintenance requirements for outfalls and riprap aprons.

G.H. Response: O&M requirements have been included in the revised standard 9 section of the stormwater report.

SW56. Recommend including cut sheet from subsurface detention system manufacturer detailing inspection and maintenance requirements as an attachment to the O&M Plan.

G.H. Response: Cultec and Contech cut sheets for their respective BMPs proposed on site have been included in the revised stormwater report.

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, Town Regulations, and generally accepted engineering practices.

BETA has specifically noted the following regarding the Site, in addition to those review comments above:

- The project does not conform to the parking and loading requirements of §185-21 of the Town Zoning Bylaw. The Town should discuss whether strict conformance is required for this project.*
- The project does not conform to the requirements of 521 CMR detailing accessible parking requirements.*
- The submittal does not provide adequate information on lighting.*
- Insufficient information has been provided for restoration of disturbed areas.*
- The Stormwater Management Design depends on an existing Infiltration Basin which has been designated as a wetland resource area. It is unclear how the wetlands will impact Basin functionality.*
- The submittal does not provide adequate information on erosion controls and operation & maintenance.*

We believe these responses have addressed the concerns expressed by BETA Group from their review letter. Should you have any further questions or concerns, please contact our office.

Sincerely,
Guerriere & Halnon, Inc.



Michael Hassett
Project Manager