



Guerriere & Halnon, Inc.

ENGINEERING & LAND SURVEYING

www.gandhengineering.com

Est. 1972

Milford Office
333 West Street, P. O. Box 235
Milford, MA 01757-0235
(508) 473-6630/Fax (508) 473-8243

Franklin Office
55 West Central Street
Franklin, MA 02038-2101
(508) 528-3221/Fax (508) 528-7921

Whitinsville Office
1029 Providence Road
Whitinsville, MA 01588-2121
(508) 234-6834/Fax (508) 234-6723

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April 8, 2025

Franklin Conservation Commission
355 East Central Street
Franklin, MA 02038
Attn: Breeka Li Goodlander, Agent

RE: ***Comments from Beta Group 151 Grove Street, Self Storage Facility Site Plan***

Dear Members of the Commission:

On behalf of our client, Mark Yadisernia, 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**.

PLAN AND GENERAL COMMENTS

- A1. *The Massachusetts Department of Environmental Protection (MassDEP) issued a DEP file number (File No. 159-1313) with the following technical comments:*

The applicant should provide test pit data in the location of proposed infiltration structures consistent with the design and siting criteria found in Volume 2 Chapter 2 of the MA Stormwater Management Handbook for each applicable BMP type. Per the V2Ch2 of the handbook infiltration basins should be set back at minimum 50ft from surface waters of the Commonwealth. The applicant should therefore demonstrate that portions of the basin which contribute to the calculated recharge volume (below el. 287.20) are outside of this 50ft setback, consider alternative locations which meet this requirement.

G.H. Response: We are requesting confirmatory testing prior to construction.

- A2. *The following elements are missing from the provided plans:*

- a. *The proposed tree line and individual trees/shrubs with a diameter greater than 1" proposed for removal should be shown on the Plans per Bylaw Regulation Section 7.18.1.6. It is BETA's understanding that the Commission generally increases the size threshold for tree location based on the Project and therefore defers to the Commission on this matter.*

G.H. Response: As discussed at the previous Conservation meeting, a transect has been provided identifying 3" D.B.H trees, as is shown on sheet 2 of the plan set.

- b. *The Construction Sequence and Schedule should be depicted on the Plans per Bylaw Regulation Section 7.18.1.14.*

G.H. Response: Construction sequence and schedule has been added to sheet 3 of the plan set.

*RESOURCE AREA AND BOUNDARY
COMMENTS*

W1. *The wetland has been identified as isolated due to a lack of connection to a surface water. The culvert within the wetland does not connect the wetland to a waterbody; rather, it is connected to a catch basin located on the eastern side of Grove Street, which discharges runoff from adjacent parking lots into the IVW through an 18-inch reinforced concrete pipe (RCP). The IVW likely formed over time as a result of this discharge.*

BETA concurs with the qualification of the wetland as isolated, and agrees with the locations of boundary flags placed in the field based on observations of hydrophytic vegetation, presence of hydric soils, and indicators of hydrology.

G.H. Response: Acknowledged.

CONSTRUCTION COMMENTS

W2. *The Project, as currently depicted, will disturb more than one (1) acre of land; therefore, a Notice of Intent (NOI) must be submitted to the Environmental Protection Agency (EPA) under the Construction General Permit (CGP) and a Stormwater Pollution Prevention Plan (SWPPP) must be prepared. The Commission could consider a Special Condition within the Order of Conditions that requires the submission of the SWPPP for review and approval prior to the commencement of work.*

G.H. Response: Acknowledged, we do not object to this requirement.

MITIGATION COMMENTS

W3. *Seed mixes proposed for the Site and the area where each type will be applied should be included on the Plans. BETA recommends the use of a native seed mix within jurisdictional areas where feasible.*

G.H. Response: A New England Conservation Seed Mix shall be placed in the disturbed areas not identified as “GRASS” on sheet 7. Disturbed areas identified as “GRASS” on sheet 7 will be seeded with typical grass lawn seed.

*WPA PERFORMANCE STANDARDS
COMMENTS*

BYLAW REGULATORY COMMENTS

W4. *The Applicant should provide an Erosion & Sedimentation Control Plan which includes contact information of the person(s) responsible for inspection and maintained erosion control, and all other requirements listed in Section 7.12.1 of the Bylaw Regulations.*

G.H. Response: An Erosion & Sedimentation Control Plan including the requested

information has been added to sheet 3.

W5. *BETA defers to the Commission on the approval of the Project Narrative due to Bylaw requirements being absent (Bylaw Regulation Section 7.9.1.) including who is performing the work and when the proposed activity will be done.*

G.H. Response: We are requesting that this requirement be provided prior to construction.

W6. *The Applicant should provide a narrative with information on the steps taken to mitigate unavoidable impacts for work proposed within the Buffer Zones (Bylaw Regulation Section 7.11.2). Plantings do not appear to be proposed within the altered portions of the Buffer Zone.*

G.H. Response: A New England Conservation Seed Mix is proposed in all disturbed areas within the Buffer Zones that are not needed to be maintained. The New England Conservation Mix is also proposed in disturbed areas outside of the Buffer Zones (see response to W3).

W7. *The Applicant should submit a Variance request for work proposed within the 25-50-foot Buffer Zone. BETA defers to the Commission on the issuance of this Variance.*

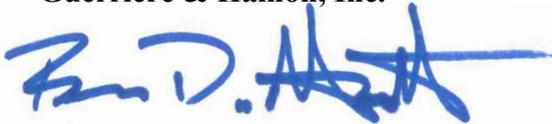
G.H. Response: There are no proposed structures within the 25-50-foot Buffer Zone, and no work at all proposed within the 0-25-foot Buffer Zone. If the flared end sections or the emergency spillway are considered structures, we will look to remove them from the Buffer Zone if possible and seek a variance if not.

W8. *A Vernal Pool statement in accordance with Section 7.7 of the Bylaw Regulations should be provided.*

G.H. Response: A vernal pool statement can be found in the Wetland Border Report (provided by Goddard Consulting) on page 1 in the second paragraph under "Summary of Findings". On page 12 of this report mapping is provided showing neither Certified Vernal Pools or Potential Vernal Pools are located on or near the site.

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.



Brian Hassett
Project Manager