



April 25, 2025

Ms. Breeka Lí Goodlander, Agent
Town of Franklin Conservation Commission
355 East Central Street
Franklin, MA 02038

**Re: 151 Grove Street
MassDEP File No. 159-1313
Notice of Intent Peer Review #2**

Dear Ms. Goodlander:

BETA Group, Inc. (BETA) has reviewed revised documents and plans for the Notice of Intent (NOI) seeking approval for the construction of a self-storage facility and associated site work (the Project) at **151 Grove Street** in Franklin, Massachusetts (the Site). This letter is provided to present BETA's findings, comments and recommendations.

BASIS OF REVIEW

The following revised documents were received by BETA and will form the basis of the review:

- Letter entitled **Comments for BETA Group 151 Grove Street, Self Storage Facility Site Plan**; prepared by Guerriere & Halnon, Inc.; dated April 8, 2025.
- Report entitled **Construction Period Pollution Prevention Plan and Erosion and Sedimentation Control Plan for Guardian Self Storage II**; prepared by Guerriere & Halnon, Inc.; dated April 10, 2025.
- Report entitled **Long Term Operation and Maintenance Plan (O&M Plan) for Guardian Self Storage II**; prepared by Guerriere & Halnon, Inc.; dated April 10, 2025.
- Plan (1 Sheet) entitled **Operation and Maintenance Plan for Self Storage Building**; prepared by Guerriere & Halnon, Inc.; dated January 8, 2025 and revised on April 10, 2025; unsigned and unstamped.
- Plan (12 Sheets) entitled **Guardian Self Storage II**; prepared by Guerriere & Halnon, Inc.; dated January 8, 2025 and revised on April 10, 2025; stamped and signed by Robert E. Constantine, II, MA PLS. No. 49611 and Dale Mackinnon, MA P.E. No. 34575.
- Stormwater and Illicit Discharge Compliance Statement, untitled and undated.

Review by BETA included the above items along with the following, as applicable:

- Site Visit on March 10, 2025
- **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 September 2016

PEER REVIEW UPDATE—APRIL 25, 2025

The Applicant has provided revised materials and written comment responses pursuant to BETA's March 24, 2025 peer review letter. BETA's original comments from the March 24, 2025 peer review letter are included in plain text. Comment responses attributed to Guerriere & Halnon, Inc. (G&H), are provided in *italics* and are prefaced with "G&H:" BETA's most recent responses are provided in **bold** and are prefaced with "**BETA2:**".

BETA's responses in this letter note that the Applicant has resolved Bylaw compliance issues, pending deliberation by the Commission.

SITE AND PROJECT DESCRIPTION

The 4.07-acre Site is located at 151 Grove Street and consists of one (1) parcel identified as Map 294 Lot 001-000 in Franklin, Massachusetts. The Site is bounded to the north and west by the Franklin State Forest, to the east by Grove Street, and to the south by commercial buildings. Existing conditions at the Site include an undeveloped wooded lot consisting of a mixed hardwood forest vegetated with species including Eastern white pine (*Pinus strobus*), sweet birch (*Betula lenta*), and red maple (*Acer rubrum*). An Isolated Vegetated Wetland (IVW) that is jurisdictional only under the Town of Franklin Wetlands Protection Bylaw (Chapter 181) and its associated regulations (collectively "the Bylaw") is present at the Site along Grove Street. Topographic relief at the Site generally follows a west-to-east orientation.

No Areas Subject to Protection or Jurisdiction under the Massachusetts Wetlands Protection Act (M.G.L. ch.131 s.40) and its implementing regulations at 310 CMR 10.00 (collectively "the Act") are present at the Site. Areas Subject to Jurisdiction/Protection under the Bylaw are present at the Site and include:

- IVW; and
- Buffer Zone (25-foot No Disturbance Zone, 50-foot No Build Zone, and the 100-foot Buffer Zone).

The Site is not located within any Surface Water Protection Areas (Zone A, B, or C), or Zone I, Zone II or Interim Wellhead Protection Areas. There are no Outstanding Resource Waters (ORWs) or Areas of Critical Environmental Concern (ACEC) present, and the most recent Natural Heritage and Endangered Species Program (NHESP) mapping does not depict any Priority Habitat of Rare Species or Estimated Habitat of Rare Wildlife at the Site. There are no NHESP-mapped Certified or Potential Vernal Pools located within 100 feet of the Site. The IVW at the Site does not exhibit Vernal Pool characteristics.

Natural Resource Conservation Service (NRCS) soil maps indicate the presence of the following soil type at the Site, Charlton-Hollis-Rock outcrop complex, 3 to 8 percent slopes, with a Hydrologic Soil Group (HSG) rating of A/D, Merrimac fine sandy loam, 3 to 8 percent slopes with a HSG rating of A and Undorthents, sandy with an HSG rating of A.

Proposed work is associated with the construction of a 2-story, 36,100-square foot Guardian Self Storage II facility and associated Site features ("the Project"). More specifically, proposed activities include:

- Installation of erosion controls along the limits of work;
- Installation of the construction entrance;
- Clearing, grubbing and grading of the Site;
- Installation of the construction fence;
- Construction of a temporary settling basin;
- Construction of retaining walls;

- Construction of the bituminous paved single access drive and parking area;
- Construction of the building;
- Installation of drainage manholes and catch basin;
- Installation of all drainage risers, grates and covers;
- Installation of utilities;
- Installation of the security gates and chain link fence;
- Construction of the stormwater basin;
- Installation of landscaping; and
- Stabilization of the Site.

The Project will result in 4,746-sf of impacts to the 25-50-foot No Build Zone and 15,254-sf of impacts to the 50-100-foot Buffer Zone.

ADMINISTRATIVE AND PLAN COMMENTS

The plan set (as identified above) is missing information and requires additional information for clarity.

Table 1. NOI Plan

NOI Plan Requirements	Yes	No
Scale of 40'=1" or larger	✓	
North Arrow (with reference)	✓	
Topographic contours (2' intervals)	✓	
Existing Conditions Topography (with source and date of survey)	✓	
Proposed Topography	✓	
Existing and Proposed Vegetation	✓ (BETA2)	
Existing Structures and Improvements	✓	
Resource Areas and Buffer Zones labeled	✓	
Location of Erosion Controls	✓	
Details of Proposed Structures	✓	
Construction Sequence and Schedule	✓ (BETA2)	
Registered PLS Stamp (Existing Condition Plans Only)	✓	
Assessors' Reference	✓	
Abutting Property Assessors' Reference	✓	
Survey Benchmark	✓	
Accurate Plan Scale	✓	

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: 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: 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.

BETA2: Comment addressed.

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

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

BETA2: Comment addressed.

WETLAND RESOURCE AREAS AND REGULATORY REVIEW

BETA has completed a regulatory review of the submitted documents and plans, focusing on compliance with the regulations set forth in the Bylaw.

The NOI application includes narrative information describing the Project and the proposed impacts within Buffer Zone have been quantified and described. Proposed mitigation measures include the use of erosion controls, construction of a stormwater basin and planting of vegetation outside of the Buffer Zone. However, the NOI requires further information regarding construction details, impacts to Buffer Zones and associated mitigation, and compliance with Bylaw filing requirements to confirm regulatory compliance.

BETA2: The Applicant has addressed plan comments and provided additional information to describe the Project and Site. BETA has deferred to the Commission regarding approval of proposed seed mixes within jurisdictional areas and the requirement for submitting a Variance Request. Special Conditions for the Commission's consideration are provided in Comments W2 and W5.

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: 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: 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: 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.

BETA2: Comment addressed. The species list of the proposed seed mix that will be used in jurisdictional areas should be included on the plans. This could be considered a condition of approval.

WPA PERFORMANCE STANDARDS COMMENTS

The Project does not propose any work within Areas Subject to Protection under the Act.

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: An Erosion & Sedimentation Control Plan including the requested information has been added to sheet 3.

BETA2: Comment addressed.

- 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: We are requesting that this requirement be provided prior to construction.

BETA2: BETA recommends the Commission include a Special Condition requiring information outlined in Section 7.9.1 of the Bylaw be submitted to the Commission prior to the commencement of work.

- 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: 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).

BETA2: Comment addressed. The species list of the proposed seed mix that will be used in jurisdictional areas should be included on the plans.

- 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: 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.

BETA2: BETA's understanding is that stormwater infrastructure would qualify as a "structure"; however, this matter is deferred to the Commission. If so, a Variance request could be submitted in the event that design changes are not feasible.

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

G&H: 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.

BETA2: Comment addressed.

STORMWATER MANAGEMENT REVIEW

A review of the Project's compliance with the Massachusetts Stormwater Management Standards and the applicable local Regulations is currently ongoing under the Planning Board review process.

REVIEW SUMMARY

Based on our review of the NOI submittal and Project plans, the applicant has submitted additional information to comply with the Bylaw, and the Commission may choose to deliberate of the items deferred to them in this letter.

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

Very truly yours,

BETA Group, Inc.



Anna Haznar
Staff Scientist



Jonathan Niro, PWS
Project Manager

Ms. Breeka Lí Goodlander, Agent

April 25, 2025

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cc: Amy Love, Town Planner

Bryan Taberner, AICP, Director of Planning & Community Development

Matt Crowley, P.E., BETA