

June 27, 2025

Tyler Paslaski
Town of Franklin Conservation Commission
355 East Central Street
Franklin, MA 02038

**Re: MassDEP File No. 159-1316
731 King Street
Abbreviated Notice of Resource Area Delineation Peer Review
Franklin, Massachusetts**

Dear Ms. Goodlander,

BETA Group, Inc. (BETA) is pleased to provide peer review services for the Abbreviated Notice of Resource Area Delineation (ANRAD) submitted for the parcel located at **731 King Street, further identified as the Town of Franklin Assessor's Parcel ID: Map 313 Lot 043-000 in Franklin, Massachusetts** (the Site). This letter provides BETA's peer review findings and comments as they relate to the Massachusetts Wetlands Protection Act (M.G.L. ch.131, §40) and its implementing regulations at 310 CMR 10.00 (collectively "the Act") and the Town of Franklin Wetlands Protection Bylaw (Chapter 181) and its implementing regulations (collectively "the Bylaw").

BETA performed a Site visit on June 16, 2025 to review the onsite Resource Area boundaries and confirm existing conditions as they relate to the ANRAD filing.

BETA's initial comments on the ANRAD filing pursuant to a review of submitted documents and the Site visit are further discussed below.

DOCUMENTS REVIEWED

- Submitted documents include:
 - WPA Form 4A;
 - Bordering Vegetated Wetland Determination Forms;
 - CAI Property Card;
 - Property Deed;
 - Local Forms; and
 - Abutter Information.
- Plan (3 Sheets) entitled **Conservation ANRAD Plan of Land**; dated May 5, 2025; prepared by Colonial Engineering, Inc.; stamped and signed by Anthony M Dellorco MA PLS No. 34303.

SCOPE SUMMARY

The Applicant is requesting that the Conservation Commission confirm the following Resource Area boundaries, as noted in the application materials and as delineated and depicted on the ANRAD plan:

- 3,625 linear feet (lf) of Bordering Vegetated Wetlands (BVW).

ADMINISTRATIVE REQUIREMENTS

The following provides an assessment of the plans in light of generally accepted existing conditions plan standards and the applicable plan requirements under Section 7.18 of the Bylaw Regulations:

Table 1 – ANRAD Plan Requirements

Plan Requirements	Yes	No
North Arrow (with reference)		✓ (Comment W1.b)
Registered PLS Stamp	✓	
Assessors' Reference	✓	
Abutting Property Assessors' Reference	✓	
Survey Benchmark		✓ (Comment W1.c)
Existing Conditions and Topography Sourced with date of survey		✓ (Comment W1.d)
Topography/Contours		✓ (Comment W1.e)
Lot Line Surveyed	✓	
Accurate Plan Scale	✓	
Resource Areas Identified and Labeled (including Buffer Zones)		✓ (Comment W1.f)

EXISTING CONDITIONS AND ONSITE RESOURCES

The 25.22-acre Site is located at 731 King Street and consists of one (1) parcel identified as Map 313 Lot 043-000 in Franklin, Massachusetts. The Site is bounded to the north and west by residential homes, undeveloped forest and a powerline easement, to the south by residential homes and King Street, and to the east by residential homes and Emilio Drive. The Site is primarily undeveloped with a single-family home and associated features located within the southern portion of the Site. The undeveloped portion of the Site consists of wetland complexes and upland hardwood forest with species including American beech (*Fagus grandifolia*), sassafras (*Sassafras albidum*), red maple (*Acer rubrum*), white oak (*Quercus alba*), and white pine (*Pinus strobus*). Several stone walls were observed throughout the Site.

MassGIS environmental data layers mapped within or near the Site include the following:

Table 2: MassGIS Environmental Data Layers

Mapped Resource On or Within Proximity to the Survey Area	Yes	No
Area of Critical Environmental Concern		✓
NHESP Certified Vernal Pool		✓
NHESP Potential Vernal Pool		✓
NHESP Estimated Habitat of Rare Wildlife		✓
NHESP Priority Habitat of Rare Species		✓
Outstanding Resource Waters		✓
FEMA Floodplain		✓
Surface Water Protection Area (Zone A, B, or C)		✓
Interim Wellhead Protection Area		✓
Zone I Wellhead Protection Area		✓
Zone II Wellhead Protection Area		✓

As depicted on the plan and described in the ANRAD application, the following Resource Areas exist within 100 feet of the Site:

- Bordering Vegetated Wetland (BVW).

Table 3 further details these Resource Areas.

Table 3 – Resource Areas and Act/Bylaw Jurisdiction (As identified by the Applicant)

Resource Area	Flag Series	Act	Bylaw
BVW/Freshwater Wetland	#2 to #68	✓	✓
BVW/Freshwater Wetland	#B-1 to #B-34	✓	✓

COMMENTS

W1. BETA offers the following administrative/plan comments after conducting a review of the submitted application and plans based on generally accepted existing conditions plan standards and the applicable plan requirements per the Bylaw Regulations:

a) The Project has been assigned a MassDEP File Number (No. 159-1316) with the following technical comments:

This Abbreviated Notice of Resource Area Delineation (“ANRAD”) requests the review of 3635 linear feet of Bordering Vegetated Wetlands (“BVW”) only. MassDEP recommends that the Commission field verify the accuracy of wetland resource area boundaries delineated in the ANRAD filing. MassDEP notes that the Applicant is not requesting Bank resource area confirmation on the WPA Form4A and that the site plans indicate the location of the “approximate intermittent stream.” The Commission may consider noting in the Order of Resource Area Delineation (“ORAD”) that Bank resource area was not confirmed. The Commission may request that resource area flagging be labelled on a revised site plan.

b) A North Arrow with a source reference should be provided on all plan sheets.

c) A survey benchmark with the referenced vertical datum should be provided on the plans.

d) The existing conditions survey source with date of survey should be provided on the plans.

e) Topographic contours should be provided on the plans.

f) All Resource Areas identified on the site should be labeled on the plan, including associated Buffer Zones. Currently, Resource Areas are labeled as “vegetated wetlands”; the wetlands should be labeled as either Bordering or Isolated Vegetated Wetlands.

W2. BETA concurs with the Applicant’s onsite delineation of the #B-1 to #B-34 Series wetland based on the presence of hydrophytic vegetation including skunk cabbage (*Symplocarpus foetidus*), cinnamon fern (*Osmundastrum cinnamomeum*), winterberry (*Ilex verticillata*), and red maple; indicators of hydrology including saturation, geomorphic position and surface water; and the presence of hydric soils consisting of dark surface underlain by depleted soils and muck.

W3. BETA generally agrees with the delineation of the #2 to #68 wetland based on the presence of hydrophytic vegetation including skunk cabbage, highbush blueberry (*Vaccinium corymbosum*), and cinnamon fern; indicators of hydrology including standing water, saturation, and geomorphic position; and the presence of hydric soils; with the exception of the following:

a) Hydric soils consisting of a dark surface underlain by depleted soils with redoximorphic concentrations and vegetation consisting of sweet pepperbush (*Clethra alnifolia*), highbush blueberry, and cinnamon fern were observed 10-15 feet upgradient of flag #22.

- b) Hydric soils consisting of a dark surface underlain by depleted soils with redoximorphic concentrations and vegetation consisting of cinnamon fern and highbush blueberry were observed 5-10 feet upgradient of flag #36.
 - c) Hydric soils consisting of a dark surface underlain by depleted soils with redoximorphic concentrations and vegetation consisting of royal fern (*Osmunda regalis*), highbush blueberry, red maple and cinnamon fern were observed 15-20 feet upgradient of flag #38A.
 - d) Hydric soils consisting of a dark surface underlain by depleted soils with redoximorphic concentrations and vegetation consisting of royal fern, highbush blueberry, and cinnamon fern were observed 15-20 feet upgradient of flag #43.
 - e) Hydric soils consisting of a dark surface underlain by depleted soils and vegetation consisting of cinnamon fern and red maples were observed 7-10 feet upgradient of flag #55.
- W4. Bank and Land Under Water (LUW) associated with the stream internal to the #2 to #68 wetland were not delineated as a part of this filing. It is recommended that the Conservation Commission explicitly exclude approval of Bank and LUW at the Site as part of the Order of Resource Area Delineation (ORAD) and include a finding that the Applicant has not provided sufficient evidence to demonstrate that the stream is intermittent.
- W5. BETA recommends that the Commission excludes the approval of flags located outside of the Site boundaries relevant to the ANRAD. These flags include B-15 and B-17.

Review Summary

Based on our review of the ANRAD submittal and plan, and the existing conditions at the Site, it is BETA's opinion that the comments above should be addressed to facilitate the issuance of an accurate ORAD.

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