



April 30, 2025

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

**Re: Self Storage Facility
151 Grove Street
Site Plan Application**

Dear Mr. Rondeau:

BETA Group, Inc. (BETA) has reviewed the revised documents for the project entitled “**Guardian Self Storage II**” located at 151 Grove Street in Franklin, Massachusetts. This letter is provided to update BETA’s findings, comments, and recommendations.

Basis of Review

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

- Letter to the Franklin Planning Board from Guerriere & Halnon, Inc., dated April 17, 2025, **RE: Comments from BETA Group 151 Grove Street, Self Storage Facility Site Plan, 2025**
- Plans (12 sheets) entitled: **Site Plan and Special Permit for Guardian Self Storage II**, dated January 08, 2025, revised April 10, 2025, prepared by Guerriere & Halnon, Inc. of Franklin, MA.
- Plan entitled “Sight Triangle Plan, Grove Street at Kenwood Circle and Site Driveway” by Vanasse & Associates Inc., undated.
- Architectural plans for proposed building (4 sheets) prepared by Designhaus Architecture, Auburn Hills, MI, undated.
- Long Term Operations and Maintenance Plan, dated April 10, 2025, prepared by Guerriere & Halnon, Inc. of Franklin, MA.
- Construction Period Pollution Prevention Plan and Erosion and Sedimentation Control Plan, dated April 10, 2025, prepared by Guerriere & Halnon, Inc. of Franklin, MA.
- **Stormwater Report** dated April 16, 2025, prepared by Guerriere & Halnon, Inc. of Franklin, MA.

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

- **Zoning Chapter 185 From the Code of the Town of Franklin**, current through November 03, 2021
- **Zoning Map of the Town of Franklin, Massachusetts**, amended November 24, 2020
- **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

1.0 SITE AND PROJECT DESCRIPTION

The project site includes one parcel no. 294-001, with a total area of 3.65 acres located along the westerly side of Grove Street in the Town of Franklin (the "Site"). The Site is located within the Industrial zoning district. All the surrounding lots are also located within the Industrial Zone. Kenwood circle is located on the opposite side of Grove Street at the northerly corner of the parcel. The parcel to the north, which abuts the northerly and westerly property line, is Owned by the Commonwealth of Massachusetts and is part of the Franklin State Forest.

The existing Site is an undeveloped parcel of land which consists primarily of woodlands. Topography at the Site is generally directed southeast towards a flagged bordering vegetated wetland along Grove Street. 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 Charlton-Hollis-Rock Outcrop Complex and Merrimac fine sandy Loam each with a Hydrologic Soil Group (HSG) rating of A (high infiltration potential).

The project proposes to construct a two-story climate controlled 36,100+ square foot building with a paved access driveway around the entire building. Access to the Site will be through a new 24.0' wide paved driveway from the northeast corner of the frontage along Grove Street. The driveway will be slightly north of the intersection with Kenwood Circle. Six parking spaces will be provided at the northeast corner of the building, including two accessible spaces. A 6' high chain link fence will be provided around the entirety of the developed portions of the site. In addition, two locked sliding gates will be provided across the driveway at each end of the building along the east face.

Sewer and water connections for the building will be provided at the proposed driveway connection with Grove Street. The sewer connection will be a 6" PVC which will tie into an existing 8" gravity sewer in Grove Street. Two water services will be provided, a 1-1/2" domestic water service and an 8" fire service. Each will be tapped directly into the existing main along the west side of Grove Street. The existing fire hydrant on Grove Street opposite Kenwood Circle will also be relocated to allow the driveway to be constructed. Stormwater management is proposed via a new subsurface infiltration structure along the southerly edge of the building and an infiltration basin at the northeast corner of the parcel adjacent to the entrance driveway. The current runoff pattern through the site towards the existing wetlands at the southeast corner of the parcel will be maintained.

2.0 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 controlled climate self-storage facility, which is an allowed use subject to a Special Permit from the Planning Board within the Industrial zoning district. All the abutting parcels are located within the same zoning district.

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

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

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

As noted in the application, the applicant is asking the Board for a determination that the parking spaces required for the proposed warehouse use be waived in their entirety. As shown, a 6-space parking lot at

the front right corner of the building is proposed to satisfy the parking requirements for the proposed office use. Since the proposed facility is a self-storage unit with no proposed outside storage, and gated vehicular access into the building, BETA has no issues with the request.

- Z1. Identify sight distances at the proposed entrance (§185-21.C.(7)(c)) and demonstrate compliance with MASSDOT 2006 Design Guide requirements.

G&H: *The entrance has been adjusted to line up with Kenwood Circle. Site distances will be provided by Vanasse and Associates.*

BETA: *The sight distances provided by Vanasse and Associates show that vegetation maintenance will be required outside the right of way. BETA recommends that the applicant demonstrate the ability to maintain the vegetation in this area.*

EARTH REMOVAL (§185-23)

The project is primarily a fill situation. The perimeter roadway along the south side of the building will require approximately 7' of fill to meet the proposed grade.

- Z2. Identify the proposed slab elevation for the structure.

G&H: *The proposed slab elevation has been added to the plan.*

BETA: **Comment addressed**

- Z3. Summarize the net cuts and fill on site.

G&H: *A cut/fill analysis was performed for the site: 5,011 C.Y. of cut and 9,811 C.Y. of fill results in a net fill of 4,800 C.Y. for the site. A table reflecting this information has been added to sheet 5.*

BETA: **Comment addressed.**

INDUSTRIAL DISTRICT PERFORMANCE CONTROLS ((§185-22)

In accordance with this section of the bylaw, no sound, noise, vibration, odor or flashing lights shall be perceptible within 400' from the boundaries of the parcel. Based upon the proposed use, it is not anticipated that there will be any objectionable conditions created by the use, however, the applicant should address the same. (See Z3 below)

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 data quantifying on-site generation of noise and odors (§185-31.C.(3).(r)).

G&H: *No significant noise or odors will be generated by this site. As a self-storage facility there will not be much activity on a daily basis, just a few customers coming to access their storage units or potential customers to access the office. As such, we are submitting a waiver for this requirement.*

BETA: **The noise levels associated with the proposed condensers which are shown on the north and south side of the proposed buildings should be quantified and addressed if needed.**

- Z5. Provide a photometric plan (§185-31.C.(3).(k)).

G&H: *A photometric plan has been added to the plan set, see sheet 7.*

BETA: **Comment addressed.**

3.0 TRAFFIC IMPACT AND ASSESSMENT

The Applicant has provided a Trip Generation Assessment for the proposed self-storage facility, prepared by Vanasse & Associates, Inc. BETA offers the following:

GENERAL TRAFFIC COMMENTS

T1. The Trip Generation Assessment was conducted in accordance with industry standards and practices, and MassDOT policies. The use of Land Use Code (LUC) 151 (Mini-Warehouse) is appropriate for the estimation of new trips.

G&H: Acknowledged.

SITE ACCESS AND CIRCULATION

Access to the Site is proposed via a new curb cut and driveway entrance connecting to Grove Street. The site entrance will connect to a new driveway with one-way circulation, counter-clockwise around the building. The driveway will direct incoming traffic to the office at the left front of the building. Access around the Building will be provided by a 30' wide paved driveway that will also allow users to temporarily park while using the site. At the rear of the building the driveway will widen to 40' which will allow users to back into the proposed exterior drive-up units along this face of the building. The 6 parking spaces proposed, which include 2-HP spaces, will be located at the front of the office at the left front corner of the building. Access around the building will be controlled by locking sliding gates at each end of the building. Pedestrian access into the building will be provided by doorways on the north and south ends of the buildings, while the storage at the rear of the building will be direct at grade access to 13 drive-up units. The truck turning plan provided with the traffic assessment indicates that the Franklin Fire truck will easily maneuver around the site.

PARKING AND LOADING

Required parking is defined by §185-21 of the Town Zoning Bylaw. The proposed development includes warehouse use (62,584 s.f.) and an associated office use (1,050 s.f.). Required parking is calculated as follows:

Use Designation	Criteria	Building Area	Required Parking
Other Office and Banks	1 space per 250 SF of floor area	1,050 Sq. Ft.	6 Spaces
Warehouse	1 Space per 1,000 SF of floor area	62,584 Sq. Ft.	63 Spaces
Total			69 Spaces

The project proposes 6 total parking spaces. Two (2) of the parking spaces are designed to be accessible, and each will be van accessible, in accordance with 521 CMR 23.2.1. The applicant has requested a parking determination from the Board to waive the requirement to install any of the required spaces for the proposed warehouse use.

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

T2. Clarify why the office component of the proposed development was not incorporated into the parking assessment. Furthermore, six (6) parking spaces results in a ratio of 0.10 parking spaces per 1,000 sf based on the square feet of the proposed self-storage facility.

G&H: *The office component of the proposed self-storage facility was incorporated into the parking assessment. Roughly 7-10 customers per month are expected to need use of these parking spaces. Customers accessing storage will park alongside the building. A 30' wide one-way drive aisle around the building will provide ample room for the minimal number of daily trips expected. A waiver for non-office parking is being requested.*

BETA: **As noted, the design of the site will provide 30' wide aisles on the side of the building and a 40' wide aisle at the rear for a total length of 650'. Based on their width, these lanes will provide the ability to parallel park without restricting vehicular access around the building. This parallel parking capability would equate to 29 spaces based upon a 22' long space. Based on the one-way movement, with only a minor increase in pavement width (2-4 feet), these lanes could provide 63 spaces in a traditional parking alignment perpendicular to the traveled way. Based on these facts, BETA agrees with the applicant that the equivalent parallel parking spaces provided should be adequate for the use and providing the additional paved surface width to provide a traditional parking layout does not seem warranted. Regardless, BETA will defer the issue of the waiver to the Board.**

- T3. The proposed driveway is located opposite Kenwood Circle and the centerline is offset approximately 9' to the north of the roadway. Recommend shifting the driveway to the south to provide a better alignment that is consistent with a conventional four-legged intersection.

G&H: *The entrance has been adjusted to line up with Kenwood Circle.*

BETA: Comment addressed

- T4. Vertical Granite Curbing is proposed at the entrance from Grove Street and the remainder of the site will utilize a modified Cape Cod berm. BETA will defer to the Board regarding the requirements of §185-29.

G&H: *Based on discussions at the Planning Board meeting, a waiver is requested to utilize a cape cod berm in the areas within the gates.*

BETA: BETA will defer this waiver request to the Board

- T5. Provide vehicle turning diagrams to illustrate that the proposed driveway and site circulation can accommodate the largest vehicle expected to access the site.

G&H: *An additional sheet has been added to the plan set to include vehicle showing the Town of Franklin's Fire Truck(s) are able to fully navigate about the site within the limits of pavement.*

BETA: Comment addressed. Fire truck is able to navigate the site.

- T6. Provide the accessibility parking space marking for the two parking spaces designated as HC should. Also, show the location of the proposed signage associated with these spaces on the plan.

G&H: *Revised as requested.*

BETA: Comments addressed.

- T7. Clarify the color of the proposed parking space pavement markings.

G&H: *The color of the proposed parking space pavement markings is to be white, a note has been added to sheet 4.*

BETA: No further comments

4.0 SIGNAGE AND LIGHTING

The project proposes a “business sign” at the site entrance as well as a stop sign to control egress from the Site. Accessible parking signs are proposed at applicable parking spaces.

SL1. Provide details and dimensions for proposed “business” sign (§185-31.C.(3)(j))

G&H: Details and dimensions have been provided as an addendum.

BETA: No further comments

A photometric plan has not been provided nor are there any proposed lights indicated on the site plans.

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

SL2. Provide a photometric plan for the site which documents the intensities required for the site (§185-31.C.(3)(l)).

G&H: A photometric plan has been added to the plan set (sheet 7A).

BETA: The photometric plan has been provided, and it does show some minor spillage along the northerly property line. At the entrance the spillage will extend across Grove Street. However, since the driveway does line up with Kenwood Circle, the intersection will be illuminated. Regardless, a waiver should be requested, and BETA will defer this issue to the Board.

5.0 UTILITIES

Proposed utilities depicted on the plans include domestic water, fire service, and sanitary sewer. Domestic water and fire service are proposed via new 1.5” and 8” services, respectively, connecting to the existing main at Grove Street. Sanitary sewer service is proposed via a new 6” PVC service which will connect to an existing sewer service in Grove Street just north of an existing sewer manhole which accepts flows from force mains both from Grove Street and Kenwood Circle. In addition to the new services, the existing fire hydrant at the front of the site will be relocated to the northerly property line along Grove Street.

U1. The hatch lines for the existing foundation are shown on sheet 6 of 10 just below the drain line from DMH 8 to FES 3 and should be removed for clarity.

G&H: Hatch lines have been removed from sheet 6.

BETA: Comment addressed.

U2. Coordinate with the DPW to determine if the existing fire hydrant should be relocated or replaced with new.

G&H: Per the DPW Director and Town Engineer, the existing fire hydrant is to be replaced with a new fire hydrant while utilizing the existing hydrant tee connection. A note has also been included on sheet 6 stating that the final location of the hydrant must have DPW confirmation prior to installation.

BETA: BETA will defer this issue to DPW.

U3. Clarify if vehicles will be able to enter the drive-up units and evaluate if floor drains and a gas trap are required.

G&H: Vehicles will not be allowed to enter the drive-up units. A sign detail regarding this has been included on sheet 7.

BETA: No further comments

6.0 LANDSCAPE TREATMENT & GRADING

The project proposes 17 trees and 12 shrubs around the proposed business sign at the entrance. New trees are generally proposed along driveways, around the site perimeter.

Based upon the required parking, per §185-21.C.(5), the project is required to provide 1 tree per 10 parking spaces. For 68 spaces, 7 trees are required. Although the applicant has requested a determination to reduce the parking to 6 spaces, the planting plan includes 17 trees to satisfy this requirement.

There are no abutting residential uses to the site and based upon aerial imagery, the areas to the north and west of the site are the State Forest which is heavily wooded. All the proposed loading will be at the sides and/or rear of the building where the security fencing will help to obscure the view from the street.

LA1. Indicate proposed seed mix and loam depth(§185-31.C.(3)(j)) for landscaped areas; use of native seeding is encouraged especially in areas which are not required to be a fine lawn.

G&H: Notes including the proposed seed mixes and loam depths have been included on sheet 7.

BETA: No further comments.

The project includes substantial grading throughout the project area. Most of the test pits encountered ledge at or less than 48" with a few encountering refusal up to 72". At the northwest corner of the parcel, the proposed grade will be approximately 9' below grade, thus, blasting for the removal of ledge can be anticipated. It can also be anticipated that ledge removal will be required for the construction of the northerly third of the proposed building slab. Although the site may be a net fill site, it may be questionable whether the blasted ledge could be reused which may necessitate a greater amount of construction traffic associated with the movement of construction materials. There are 2 retaining walls proposed on site. These walls are located at the northwest and southeast corners of the building and are needed to deal with the grade changes at these points. A proposed drainage swale will be shaped along the outside edges of the site around the building to direct runoff entering the site from the abutting property around the proposed development area.

LA2. Recommend providing a construction detail for the proposed swale to be shaped around the perimeter of the parcel.

G&H: A detail for the proposed swale has been included on sheet 9.

BETA: Comment addressed.

- LA3. The proposed trees along the southerly property line will be located within the proposed swale in this area. BETA recommends that these trees be relocated to another area on the site.

G&H: The proposed trees along the southerly property line have been relocated to the northern property line. The trees have been kept away from the western property line in order to avoid the same swale to the south.

BETA: BETA agrees that the trees should be removed from the swale. There has been an overall reduction in the number of trees from the original 17 to the 11 currently which remains in conformance with the requirements of the bylaws for a 68-space parking lot (7 required)

7.0 STORMWATER MANAGEMENT

The proposed stormwater management design consists of a new subsurface infiltration system proposed on the south side of the building and an infiltration basin at the front of the building. The Stormwater runoff will be conveyed to this system via a new closed drainage system consisting of catch basins, manholes, and roof drains. Ultimately, all the runoff from the site will discharge into the existing wetlands located along Grove Street at the southerly front corner of the parcel. Runoff entering this wetland area will be conveyed through the existing municipal system in Grove Street to the east.

GENERAL

- SW1. Clarify the size of the culvert from the wetlands in Grove Street. It is labeled as both 15" RCP and 18" RCP on the site plans

G&H: Labels have been revised to be consistent; the culvert size is 15".

BETA: Comment addressed.

- SW2. Most of the site development area is identified by NRCS-WSS as Charlton-Hollis-Rock Complex, 3-8% slope. Unfortunately, the soils map does not classify the layer. Rather it classifies each of the underlying soil types. Charlton is HSG A and Hollis is HSG C/D. For this site, the test pits conducted on site all indicated that the underlying mineral soil is SAND. In addition, only 3 of the 24 test pits encountered any redoximorphic features. Based upon these soil conditions, BETA does not consider the soils on site as HSG D (clay), rather they should be considered as HSG A which is the classification of the Charlton Soil Class. Accordingly, the analysis should be revised to reflect this soil classification.

G&H: Upon discussion with BETA, it has been agreed that a HSG B classification is appropriate.

BETA: No further comments.

- SW3. On the watershed plans, correct the HSG Rating for the Merrimac Soil group. It should be HSG A not D.

G&H: The HSG rating has been corrected as requested.

BETA: Comment addressed.

- SW4. The HydroCAD results for existing conditions is not included in the report.

G&H: The HydroCAD results for existing conditions has now been included in our latest submission.

BETA: Comment addressed.

SW5. The detail on sheet 9 of 10 shows a 30 Mil PVC liner to be placed at the bottom of the sediment forebay. The liner is not needed, nor can it be protected from damage during maintenance. BETA recommends that it be removed.

G&H: The liner has been removed from the detail.

BETA: Comment addressed.

STORMWATER MANAGEMENT REGULATIONS (CHAPTER 153)

The project proposes to disturb land in excess of one acre within the Town of Franklin. It is therefore subject to the Stormwater Management Regulations. Compliance with these regulations is outlined below and throughout the following sections.

SW6. Provide a description of construction and stockpile and/or excess materials removed from the Site expected to be stored on-site, including description of controls to reduce pollutants from these materials and other wastes (§153-12.L).

G&H: The stockpiling location is shown on Sheet 3, and additional descriptions of stockpile protection, erosion control, and stabilization has been provided in the revised standard 8 section of the stormwater report.

BETA: Comment addressed.

Additional requirements for stormwater management are outlined in §300-11 of the Town of Franklin Subdivision Regulations.

SW7. The proposed roof drain connection with the infiltration basin is a proposed HDPE culvert. BETA will defer to the Board if this should be RCP in accordance with the regulations. (§300-11.B(2.a)).

G&H: Acknowledged.

BEST DEVELOPMENT PRACTICES GUIDEBOOK

The project is required to comply with the requirements of the Town of Franklin 2021 Best Development Practices Guidebook (BDPG).

SW8. Indicate if proposed seed mix and plantings will reflect native vegetation, particularly outside the proposed perimeter fencing (BDPG Page 7).

G&H: Notes including the proposed seed mixes and loam depths have been included on sheet 7.

BETA: Comment addressed

MASSDEP STORMWATER STANDARDS

The project is subject to the Wetlands Protection Act and Town regulation §153-13 and therefore must comply with the Massachusetts Stormwater Standards as outlined by MassDEP. Compliance with these standards is outlined below:

LOW IMPACT DEVELOPMENT (LID) TECHNIQUES

Proposed LID measures include

- No disturbance to any wetland resource area
- Minimizing disturbance to existing trees and shrubs
- Use of Country Drainage
- Grass channel

SW9. Applicant should clarify why “minimizing disturbance to existing trees and shrubs, and use of country drainage are LID measures applicable to the Site.

G&H: *Country Drainage was considered but ultimately is not compatible with this site. Disturbance to existing trees and shrubs has been limited to the maximum extent possible. All areas that do not require grading or other inherently necessary features will not have any disturbance to the trees or shrubs.*

BETA: Comment remains. Remove the check-off in the MASS DEP Checklist.

NO UNTREATED STORMWATER (STANDARD NUMBER 1): *No new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth. The project proposes 3 new outfalls to the wetlands. Each will be provided with outlet protection and will be setback more than 25’ from the resource.*

SW10A A small portion of the driveway flows untreated towards Grove Street. Either provide treatment for this runoff or a “deminimus” calculation to demonstrate compliance with the standards.

POST-DEVELOPMENT PEAK DISCHARGE RATES (STANDARD NUMBER 2): *Stormwater management systems must be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates. The project proposes to mitigate increases to runoff rates with the use of a subsurface infiltration system and a subsurface detention system. Calculations indicate a decrease in peak discharge rate and peak runoff volume to all points of analysis.*

SW10. Correct the HSG Rating for both existing and proposed hydro-cad analysis. (See SW2&3 above)

G&H: *Corrected as requested.*

BETA: Comment addressed.

RECHARGE TO GROUNDWATER (STANDARD NUMBER 3): *Loss of annual recharge to groundwater should be minimized through the use of infiltration measures to maximum extent practicable.*

The site is in an area which is shallow to bedrock, and the NRCS soil maps indicate the presence of Charlton-Hollis-Rock Outcrop complex over most of the development area. The test pit results also confirm the presence that soils on site are generally a shallow layer of sand overlying the ledge. Although the site is shallow to bedrock, the soils do lend themselves to recharge.

Groundwater recharge is proposed via a new subsurface infiltration system and an infiltration basin just upgradient of the wetlands at the front of the site. The project is expected to provide a recharge volume in excess of what is required.

SW11. The required recharge volume should be revised to reflect the correct HSG rating. However, the Water Quality volume will control the static storage volume required in the basins. Thus, the change in soil rating will not impact the overall results.

G&H: *Revised as requested.*

BETA: Information provided, no further comments.

SW12. In accordance with the standards, the infiltration basin must be setback a minimum of 50’ from the waters of the commonwealth. In accordance with the interpretation of DEP, this setback measurement should be measured from the downstream slope level with the bottom of the basin.

Based upon this requirement, the infiltration basin should be moved approximately 8' north to achieve this setback.

G&H: *The basin now meets the setback as interpreted by DEP.*

BETA: Comment addressed.

TOTAL SUSPENDED SOLIDS (STANDARD NUMBER 4): *For new development, stormwater management systems must be designed to remove 80% of the annual load of Total Suspended Solids (TSS).*

The project is also subject to §153-16.B of the Town of Franklin Stormwater Management Regulations. As a new development, the project is required to meet the performance standards outlined in §153-16.B. The project will meet this requirement by retaining the volume of runoff equivalent to 1.0" multiplied by the total post-construction impervious surface area within the proposed infiltration systems.

The project includes the following treatment trains:

Treatment Train	SCM 1	SCM 2	Infiltration SCM	TSS Removal %
A	Deep Sump Catch Basin	Isolator Row	Subsurface Infiltration System	85%
B	Deep Sump Catch Basin	Sediment forebay	Infiltration Basin	85%

The project has been designed to provide at least 80% TSS removal for treated impervious areas. The proposed infiltration SCM has been sized to treat the required 1-inch water quality volume.

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

SW13. The isolator row meets the pretreatment requirements for the subsurface system; therefore, the deep sump catch basin should not be listed in the pretreatment analysis for the subsurface system.

G&H: *Deep sump catch basins have been removed from the pretreatment analysis, as requested.*

BETA: Comment addressed.

HIGHER POTENTIAL POLLUTANT LOADS (STANDARD NUMBER 5): *Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific stormwater management BMPs.*

The project is not a LUHPPL– **standard not applicable.**

CRITICAL AREAS (STANDARD NUMBER 6): *Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas.*

The project is not located in a critical area – **standard not applicable.**

REDEVELOPMENT (STANDARD NUMBER 7): *Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable.*

The project does not qualify as a redevelopment – **standard not applicable.**

EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8): *Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities.*

As the project proposes to disturb greater than one acre of land, a Notice of Intent will be required to file with EPA including development of a Stormwater Pollution Prevention Plan (SWPPP). A SWPPP was not provided with the submission; the narrative indicates a SWPPP will be issued prior to construction. Erosion control measures are depicted on the plans including compost filter tubes, stabilized construction entrance, inlet protection, and designated stockpile areas.

SW14. The use of the proposed infiltration basin as a temporary sediment basin is not allowed in accordance with the standards. As noted earlier, a significant portion of the westerly portion of the site will be exposed and blasted ledge with very little erosion potential. BETA recommends that the applicant use a second layer of 12" silt sock between the basin and the building area once the basin is shaped to protect the basin from any potential sediment from the development upgradient around the building.

***G&H:** An additional layer of erosion control has been added upgradient of the basin, running between the basin and the building/driveway areas.*

BETA: Although the layer is shown on sheet 3, BETA recommends that a note be added to the Construction Sequence plan to reference the timing and placement of the interim layer of erosion control.

SW15. Provide measures to protect open excavations for the subsurface infiltration structure during construction.

***G&H:** Additional layers of erosion control have been proposed encapsulating each subsurface basin.*

BETA: See SW14 above.

OPERATIONS/MAINTENANCE PLAN (STANDARD NUMBER 9): A Long-Term Operation and Maintenance Plan shall be developed and implemented to ensure that stormwater management systems function as designed. A Long-term Operation and Maintenance Plan was provided with the Stormwater Management Report.

SW16. O & M plan should be developed as a stand-alone document which can accompany the deed and signed by the Owner.

***G&H:** The O & M plan has been developed as a stand-alone document, as requested.*

BETA: Comment addressed.

SW17. Incorporate maintenance manual for cul tec system and Contech separators into the manual.

***G&H:** The maintenance manuals for Cultec system and Contech separators have been incorporated into the O & M plan, as requested.*

BETA: Comment addressed.

SW18. Provide map, drawn to scale, that shows the location of all stormwater BMPs in each treatment train and snow storage areas.

***G&H:** A plan has been included showing all the locations of stormwater BMPs in each treatment train and snow storage areas, as requested.*

BETA: Comment addressed.

SW19. Provide a budget and inspection form.

G&H: *A budget and inspection form has been provided.*

BETA: Comment addressed.

SW20. Include provision requiring a documentation submittal to the DPW confirming when maintenance has been satisfactorily completed (§153-18.B(6)).

G&H: *The provision requiring documentation submittal to the DPW confirming maintenance has been satisfactorily completed has been included, as requested, and can be found under Standard 9 under sections A and B.*

BETA: Comment addressed.

ILLICIT DISCHARGES (STANDARD NUMBER 10): *All illicit discharges to the stormwater management system are prohibited. A signed Illicit Discharge Compliance Statement was provided with the submission.*

8.0 SUMMARY

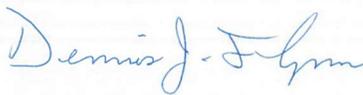
Based on our review of the Project documents and plans, the Applicant is required to provide additional information to the Planning Board to demonstrate compliance with the MassDEP Stormwater Management Standards, the Town of Franklin Regulations, and generally accepted engineering practices.

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

Very truly yours,
BETA Group, Inc.



Gary D. James, P.E.
Senior Project Manager



Dennis Flynn, PE PTOE
Associate