

August 28, 2025

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

**Re: Lot 2 – Forge Parkway
MassDEP File No. Not Yet Issued
Notice of Intent Peer Review**

Dear Mr. Paslaski:

BETA Group, Inc. (BETA) has reviewed documents and plans for the Notice of Intent (NOI) seeking approval for the construction of an office, warehouse building, and other site features (the Project) at **0 Forge Parkway** in Franklin, Massachusetts (the Site). This letter is provided to present BETA's findings, comments and recommendations.

BASIS OF REVIEW

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

- Notice of Intent entitled **Notice of Intent, Site Plan, Lot 2 Forge Park**; prepared by United Consultants, Inc.; dated July 7, 2025. Inclusive of:
 - WPA Form 3;
 - Project Description;
 - Local Forms;
 - Abutters Information;
 - Wetland Border Report; and
 - Figures (USGS Locus, NHESP map, FEMA map, and NRCS Soil Survey map).
- Drainage report entitled **Drainage Analysis**; prepared by United Consultants, Inc.; dated July 7, 2025; stamped and signed by Carol A Quintal MA P.E. No. 30812.
- Plans (1 Sheet) entitled **Site Plan, Stormwater Facilities Plan**; prepared by United Consultants, Inc.; dated July 7, 2025; unstamped and unsigned.
- Plans (2 Sheets) entitled **Site Plan, Pre-Development Watershed Plan**; prepared by United Consultants, Inc.; dated July 7, 2025; unstamped and unsigned.
- Plans (10 Sheets) entitled **Site Plan, Lot 2 Forge Parkway**; prepared by United Consultants, Inc.; dated July 7, 2025; stamped and signed by Carol A Quintal MA P.E. No. 30812 and Andrew C Murphy MA PLS No. 35042.

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

- Site Visit on August 15, 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

SITE AND PROJECT DESCRIPTION

The 3.01-acre Site is located at 0 Forge Parkway as identified Map 272 Lot 001 in Franklin, Massachusetts. The Site is bounded to the north by West Central Street and an undeveloped lot, to the west by Forge Parkway and an undeveloped lot, to the south by train tracks, and to the east by commercial buildings. The Site is currently undeveloped and consists of wetland complexes and upland forest with species including black walnut (*Juglans nigra*), sassafras (*Sassafras albidum*), and red maple (*Acer rubrum*). Topographic relief at the Site generally follows an east-to-west orientation.

Resource Areas Subject to Protection 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”), as well as the Town of Franklin Wetlands Protection Bylaw (Chapter 181) and its associated regulations (collectively “the Bylaw”) are present at the Site and include:

- Bank (to intermittent stream);
- Bordering Vegetated Wetland (BVW);
- Land Under Water (LUW); and
- 25-foot Buffer Zone, 50-foot Buffer Zone, and 100-foot Buffer Zone.

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 Site is not located within any Surface Water Protection Areas (Zone A, B, or C), or Zone I or Interim Wellhead Protection Areas. No Zone II is located on the site; however, a mapped Zone II is present directly north of the Site.

Natural Resource Conservation Service (NRCS) soil maps indicate the presence of the following soil types at the Site: Freetown muck, 0 to 1 perfect slopes with a Hydrologic Soil Group (HSG) rating of B/D; Hollis-Rock outcrop-Charlton complex, 15 to 35 percent slope, with a HSG rating of A/D; and Udorthents, loamy with a HSG of A.

Proposed work includes the construction of an 11,200 square foot (sf) office and warehouse building, with associated site features including utilities, stormwater management system, retaining walls, parking areas, landscaping, and other site features. More specifically, proposed activities include:

- Installation of erosion and sedimentation controls;
- Clearing of vegetation and removal of stumps;
- Removal of loam and subsoil;
- Rough grading of the Site;
- Constriction of the stormwater management system;
- Installation of the retaining wall;
- Construction of the foundation;
- Construction of the building;
- Installation of utilities;
- Construction of the walkways and sidewalks;

- Construction and paving of the parking area;
- Installation of landscaping;
- Installation of site features including signs; and
- Stabilization of the Site.

No impacts are proposed to the onsite BVW, Bank, or LUW. Impacts are proposed within the 25-50-foot Buffer Zone and the 50-100-foot Buffer Zone. The following impacts are proposed to onsite Resource Areas:

- 5,051 sf of impacts to the 25-50' Buffer Zone to BVW; and
- 17,271 sf of impacts to the 50-100' Buffer Zone to BVW.

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		✓ (See Comment A2.a)
Existing Structures and Improvements	✓	
Resource Areas and Buffer Zones labeled	✓	
Location of Erosion Controls	✓	
Details of Proposed Structures	✓	
Construction Sequence and Schedule	✓	
Registered PLS Stamp (Existing Condition Plans Only)	✓	
Assessors' Reference	✓	
Abutting Property Assessors' Reference		✓ (See Comment A2.b)
Survey Benchmark	✓	
Accurate Plan Scale	✓	

PLAN AND GENERAL COMMENTS

- A1. The Massachusetts Department of Environmental Protection (MassDEP) has not issued a DEP file number.
- A2. The following plan elements are required:
- 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 7.18.1.5. 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.

- b. The Assessor's Reference for the abutting properties should be provided on the plans.

WETLAND RESOURCE AREAS AND REGULATORY REVIEW

BETA conducted an onsite review of existing conditions and proposed work areas on August 15, 2025. The Project proposes impacts to onsite areas Subject to Jurisdiction and Protection under the Act and the Bylaw including the 25-50' and 50-100' Buffer Zones.

The NOI application includes narrative information describing the Project, and the proposed impacts within Buffer Zone have generally been quantified and described. Proposed mitigation measures include the use of erosion controls and installation of Buffer Zone plantings. However, the NOI requires further information regarding construction details, plan information, and compliance with the Bylaw. Additional information is required to demonstrate compliance with the Bylaw, including submission of a variance request, alternative analysis, and a vernal pool statement. Further plan details are required including the location of the proposed snow storage and details regarding the proposed retaining wall. At one location, BETA observed wetland indicators upgradient of the delineated wetland boundary and the delineation should be revised in this area. All Act requirements have been met with the filing.

RESOURCE AREA BOUNDARY COMMENTS

- W1. Upgradient of flags A-20 through A-22, hydric soils were observed including a dark surface underlain by depletions and redoximorphic features, and hydrophytic vegetation was observed including sensitive fern (*Onoclea sensibilis*), skunk cabbage (*Symplocarpus foetidus*), and red maple (*Acer rubrum*). The delineation should be revised in this area.

CONSTRUCTION COMMENTS

- W2. The Applicant should determine if the Project will disturb more than one (1) acre of land; if so, 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.
- W3. Invasive species including bittersweet (*Celastrus orbiculatus*), bush honeysuckle (*Lonicera spp.*), Japanese barberry (*Berberis thunbergii*), and multiflora rose (*Rosa multiflora*) are present throughout the area proposed for construction. The Applicant should provide a plan detailing how material containing invasive species plant matter will be managed to ensure no further spread occurs as a result of this Project.
- W4. The location where snow will be stored during construction should be shown on the plans outside of Buffer Zones.
- W5. Provide further information on the construction of the proposed retaining wall including any required weep holes and whether stone/grading is required beyond the base of the wall.
- W6. It is not anticipated that groundwater will be encountered when excavating for the retaining wall; however, the Commission could include a Special Condition in the Order of Conditions requiring the submission and approval of a dewatering plan prior to discharge in the event that groundwater is encountered.

- W7. Inlet protection should be depicted on the Erosion Control Plan within the catch basins along Forge Parkway.

MITIGATION COMMENTS

- W8. The Applicant is proposing planting of native species at the Site; however, it is understood that each circle represents a woody planting, and these are located directly along the base of the retaining wall. The Applicant should confirm whether a greater setback between the wall and plantings is required.

WPA PERFORMANCE STANDARDS COMMENTS

The Project does not propose any work within Resource Areas Subject to Protection under the Act; however, the Project does propose work with the local Buffer Zone Resource Area. BETA notes the following:

- W9. The Applicant included Bordering Land Subject to Flooding (BLSF) as a Resource Area that exists on the property within the project narrative and has depicted BLSF on the plans. According to FEMA's most up-to-date mapping that was updated on July 8, 2025, no area of BLSF is present at the Site; only a Zone X - 500-year flood zone is present. The Applicant should revise the plans and provide a new FEMA Flood Plain Map to comply with the Bylaw Regulations set forth in Section 7.17.1.

BYLAW REGULATORY COMMENTS

- W10. The Applicant should submit a Variance request per Section 4.3.1 and 5.3 of the Bylaw Regulations for work proposed within the 25-50-foot Buffer Zone as the retaining wall, portions of the parking lot, and portion of the stormwater management system are proposed within the 25-50' Buffer Zone. BETA defers to the Commission on the issuance of this waiver.

Per Section 7.13 of the Bylaw Regulations, the Applicant is required to provide an Alternatives Analysis, as the Project requires a Variance request for the construction of a structure that includes concrete, stone, or other impervious foundations. The Applicant provided a statement regarding an Alternatives Analysis but did not provide an Alternatives Analysis that complies with the requirements set forth in the Act at 310 CMR 10.58(4) as required in the Bylaw Regulations.

- W11. A Vernal Pool Statement should be provided per Bylaw Regulations Section 7.7.

STORMWATER MANAGEMENT REVIEW

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

REVIEW SUMMARY

Based on our review of the NOI submittal and Project plans, the Applicant should submit additional information to support compliance with the Bylaw.

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

Tyler Paslaski, Permitting Specialist

August 28, 2025

Page 6 of 6

Very truly yours,
BETA Group, Inc.



Anna Haznar
Staff Scientist



Jonathan Niro, PWS
Project Manager

cc: Amy Love, Town Planner