



Garelick Farms Flooding Resiliency Improvements  
Franklin, Massachusetts

## Notice of Intent

1199 West Central Street

Dandreo Brothers General Contractors

September 2025

**Tighe&Bond**

1650990003.01.04  
October 2, 2025

Franklin Conservation Commission  
Municipal Building  
355 E Central Street  
Franklin, MA 02038

Re: **Notice of Intent**  
**Garelick Farms Flooding Resiliency Improvements**  
**1199 West Central Street, Franklin, MA**

Dear Members of the Conservation Commission:

On behalf of Dandreo Brothers General Contractors (the "Applicant") Tighe & Bond is pleased to submit a Notice of Intent (NOI) to the Town of Franklin Conservation Commission for the Garelick Farms Flooding Resiliency Improvements (referred to as "the Project"). The proposed Project entails the installation of an updated stormwater collection system with manholes and upgraded catch basins to improve stormwater flow at 1199 West Central Street, Franklin, MA.

The proposed Project activities will occur within inland wetland resource areas subject to protection under the MA Wetlands Protection Act (MA WPA) and the Franklin Wetlands Protection Bylaw (Franklin Code at Chapters 181 and 271) and Regulations including Riverfront Area and Buffer Zone. The application includes a request for a variance from full compliance with Sections 4.2.1 and 4.3.1 of the Franklin Wetlands Regulations to allow installation of a stormwater conveyance pipe and system outfall within the 25-foot No-Disturb Zone and 25- to 50-foot Buffer Zone to Bank and BVW

Two (2) copies of the NOI application, two (2) sets of full-sized Drawings, and seven (7) sets of half-scale Drawings are enclosed. An electronic copy of the application will be submitted to the Conservation Commission, the Department of Public Works, and Matthew Crowley of Beta Group, Inc. Filing fees to the Town of Franklin associated with the MA WPA and Franklin Wetlands Bylaw are enclosed. The state MA WPA share has been sent to the MA Department of Environmental Protection (MassDEP) Boston.

We believe the attached narrative is sufficient to allow the Commission to issue an Order of Conditions, as the work will not compromise the interests of the WPA or the Franklin Wetlands Protection Bylaw and Regulations.

We look forward to discussing the Project with you at the next Conservation Commission public meeting scheduled for October 16, 2025. If you have any questions regarding this application or if you require additional information, please contact me at 413-572-3238 or JEChristy@tighebond.com.

Very truly yours,  
**TIGHE & BOND, INC.**

  
Jean E. Christy P.E.  
Principal Engineer

Copy: MassDEP – Central Regional Office



**Tighe&Bond**

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# FORMS

# **MA WPA Form 3 – Notice of Intent**



**Massachusetts Department of Environmental Protection**  
Bureau of Resource Protection - Wetlands

**WPA Form 3 – Notice of Intent**

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:

MassDEP File Number

Document Transaction Number

Franklin

City/Town

**Important:**

When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Note:  
Before completing this form consult your local Conservation Commission regarding any municipal bylaw or ordinance.

**A. General Information**

1. Project Location (**Note:** electronic filers will click on button to locate project site):

1199 West Central Street

a. Street Address

Franklin

b. City/Town

02038

c. Zip Code

Latitude and Longitude:

275

f. Assessors Map/Plat Number

42.087541

d. Latitude

-71.445197

e. Longitude

275-023-000

g. Parcel /Lot Number

2. Applicant:

Robert

a. First Name

Dandreo

b. Last Name

Dandreo Brothers General Contractors

c. Organization

106 Oakville Avenue

d. Street Address

Lynn

e. City/Town

MA

f. State

01905

g. Zip Code

781-581-7719

h. Phone Number

i. Fax Number

rpdandreo@dandreo.com

j. Email Address

3. Property owner (required if different from applicant):  Check if more than one owner

Andrew

a. First Name

Brummel

b. Last Name

Dairy Farms of America, Inc.

c. Organization

1405 N 98th Street

d. Street Address

Kansas City

e. City/Town

KS

f. State

66111

g. Zip Code

h. Phone Number

i. Fax Number

j. Email address

4. Representative (if any):

Jean

a. First Name

Christy

b. Last Name

Tighe & Bond

c. Company

1 University Ave

d. Street Address

Westwood

e. City/Town

MA

f. State

02090

g. Zip Code

413-572-3238

h. Phone Number

i. Fax Number

JEChristy@tighebond.com

j. Email address

5. Total WPA Fee Paid (from NOI Wetland Fee Transmittal Form):

\$2,675

a. Total Fee Paid

\$1,325

b. State Fee Paid

\$1,350

c. City/Town Fee Paid



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## A. General Information (continued)

6. General Project Description:

The proposed Project entails the installation of an updated stormwater collection system with manholes and upgraded catch basins to improve stormwater flow.

7a. Project Type Checklist: (Limited Project Types see Section A. 7b.)

- 1.  Single Family Home
- 2.  Residential Subdivision
- 3.  Commercial/Industrial
- 4.  Dock/Pier
- 5.  Utilities
- 6.  Coastal engineering Structure
- 7.  Agriculture (e.g., cranberries, forestry)
- 8.  Transportation
- 9.  Other

7b. Is any portion of the proposed activity eligible to be treated as a limited project (including Ecological Restoration Limited Project) subject to 310 CMR 10.24 (coastal) or 310 CMR 10.53 (inland)?

1.  Yes  No      If yes, describe which limited project applies to this project. (See 310 CMR 10.24 and 10.53 for a complete list and description of limited project types)

2. Limited Project Type

If the proposed activity is eligible to be treated as an Ecological Restoration Limited Project (310 CMR10.24(8), 310 CMR 10.53(4)), complete and attach Appendix A: Ecological Restoration Limited Project Checklist and Signed Certification.

8. Property recorded at the Registry of Deeds for:

Norfolk

a. County

42281

c. Book

b. Certificate # (if registered land)

554

d. Page Number

## B. Buffer Zone & Resource Area Impacts (temporary & permanent)

- 1.  Buffer Zone Only – Check if the project is located only in the Buffer Zone of a Bordering Vegetated Wetland, Inland Bank, or Coastal Resource Area.
- 2.  Inland Resource Areas (see 310 CMR 10.54-10.58; if not applicable, go to Section B.3, Coastal Resource Areas).

Check all that apply below. Attach narrative and any supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.



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**B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)**

For all projects affecting other Resource Areas, please attach a narrative explaining how the resource area was delineated.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. <input type="checkbox"/> Bank	1. linear feet	2. linear feet
b. <input type="checkbox"/> Bordering Vegetated Wetland	1. square feet	2. square feet
c. <input type="checkbox"/> Land Under Waterbodies and Waterways	1. square feet	2. square feet
	3. cubic yards dredged	

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
d. <input type="checkbox"/> Bordering Land Subject to Flooding	1. square feet	2. square feet
	3. cubic feet of flood storage lost	4. cubic feet replaced
e. <input type="checkbox"/> Isolated Land Subject to Flooding	1. square feet	
	2. cubic feet of flood storage lost	3. cubic feet replaced
f. <input checked="" type="checkbox"/> Riverfront Area	Mine Brook (inland)	

2. Width of Riverfront Area (check one):

- 25 ft. - Designated Densely Developed Areas only
- 100 ft. - New agricultural projects only
- 200 ft. - All other projects

3. Total area of Riverfront Area on the site of the proposed project: 382,977 square feet

4. Proposed alteration of the Riverfront Area:

6,655 a. total square feet      6,398 b. square feet within 100 ft.      207 c. square feet between 100 ft. and 200 ft.

5. Has an alternatives analysis been done and is it attached to this NOI?       Yes  No

6. Was the lot where the activity is proposed created prior to August 1, 1996?       Yes  No

3.  Coastal Resource Areas: (See 310 CMR 10.25-10.35)

**Note:** for coastal riverfront areas, please complete **Section B.2.f.** above.



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**B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)**

Check all that apply below. Attach narrative and supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

Online Users:  
Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

<u>Resource Area</u>	<u>Size of Proposed Alteration</u>	<u>Proposed Replacement (if any)</u>
a. <input type="checkbox"/> Designated Port Areas	Indicate size under Land Under the Ocean, below	
b. <input type="checkbox"/> Land Under the Ocean	_____	
	1. square feet	
	_____	
	2. cubic yards dredged	
c. <input type="checkbox"/> Barrier Beach	Indicate size under Coastal Beaches and/or Coastal Dunes below	
d. <input type="checkbox"/> Coastal Beaches	_____	_____
	1. square feet	2. cubic yards beach nourishment
e. <input type="checkbox"/> Coastal Dunes	_____	_____
	1. square feet	2. cubic yards dune nourishment

	<u>Size of Proposed Alteration</u>	<u>Proposed Replacement (if any)</u>
f. <input type="checkbox"/> Coastal Banks	_____	
	1. linear feet	
g. <input type="checkbox"/> Rocky Intertidal Shores	_____	
	1. square feet	
h. <input type="checkbox"/> Salt Marshes	_____	_____
	1. square feet	2. sq ft restoration, rehab., creation
i. <input type="checkbox"/> Land Under Salt Ponds	_____	
	1. square feet	
	_____	
	2. cubic yards dredged	
j. <input type="checkbox"/> Land Containing Shellfish	_____	
	1. square feet	
k. <input type="checkbox"/> Fish Runs	Indicate size under Coastal Banks, inland Bank, Land Under the Ocean, and/or inland Land Under Waterbodies and Waterways, above	
	_____	
	1. cubic yards dredged	
l. <input type="checkbox"/> Land Subject to Coastal Storm Flowage	_____	
	1. square feet	

4.  Restoration/Enhancement  
If the project is for the purpose of restoring or enhancing a wetland resource area in addition to the square footage that has been entered in Section B.2.b or B.3.h above, please enter the additional amount here.

\_\_\_\_\_

a. square feet of BVW

\_\_\_\_\_

b. square feet of Salt Marsh

5.  Project Involves Stream Crossings

\_\_\_\_\_

a. number of new stream crossings

\_\_\_\_\_

b. number of replacement stream crossings



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## C. Other Applicable Standards and Requirements

- This is a proposal for an Ecological Restoration Limited Project. Skip Section C and complete Appendix A: Ecological Restoration Limited Project Checklists – Required Actions (310 CMR 10.11).

### Streamlined Massachusetts Endangered Species Act/Wetlands Protection Act Review

1. Is any portion of the proposed project located in **Estimated Habitat of Rare Wildlife** as indicated on the most recent Estimated Habitat Map of State-Listed Rare Wetland Wildlife published by the Natural Heritage and Endangered Species Program (NHESP)? To view habitat maps, see the *Massachusetts Natural Heritage Atlas* or go to [http://maps.massgis.state.ma.us/PRI\\_EST\\_HAB/viewer.htm](http://maps.massgis.state.ma.us/PRI_EST_HAB/viewer.htm).

- a.  Yes     No    **If yes, include proof of mailing or hand delivery of NOI to:**

**Natural Heritage and Endangered Species Program  
Division of Fisheries and Wildlife  
1 Rabbit Hill Road  
Westborough, MA 01581**

- August 2021  
b. Date of map

If yes, the project is also subject to Massachusetts Endangered Species Act (MESA) review (321 CMR 10.18). To qualify for a streamlined, 30-day, MESA/Wetlands Protection Act review, please complete Section C.1.c, and include requested materials with this Notice of Intent (NOI); *OR* complete Section C.2.f, if applicable. *If MESA supplemental information is not included with the NOI, by completing Section 1 of this form, the NHESP will require a separate MESA filing which may take up to 90 days to review (unless noted exceptions in Section 2 apply, see below).*

- c. Submit Supplemental Information for Endangered Species Review\*

1.  Percentage/acreage of property to be altered:
  - (a) within wetland Resource Area \_\_\_\_\_ percentage/acreage
  - (b) outside Resource Area \_\_\_\_\_ percentage/acreage

2.  Assessor's Map or right-of-way plan of site

2.  Project plans for entire project site, including wetland resource areas and areas outside of wetlands jurisdiction, showing existing and proposed conditions, existing and proposed tree/vegetation clearing line, and clearly demarcated limits of work \*\*
  - (a)  Project description (including description of impacts outside of wetland resource area & buffer zone)
  - (b)  Photographs representative of the site

\* Some projects **not** in Estimated Habitat may be located in Priority Habitat, and require NHESP review (see <https://www.mass.gov/endangered-species-act-mesa-regulatory-review>).

Priority Habitat includes habitat for state-listed plants and strictly upland species not protected by the Wetlands Protection Act.

\*\* MESA projects may not be segmented (321 CMR 10.16). The applicant must disclose full development plans even if such plans are not required as part of the Notice of Intent process.



Massachusetts Department of Environmental Protection  
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### C. Other Applicable Standards and Requirements (cont'd)

- (c)  MESA filing fee (fee information available at <https://www.mass.gov/how-to/how-to-file-for-a-mesa-project-review>).

Make check payable to “Commonwealth of Massachusetts - NHESP” and **mail to NHESP** at above address

*Projects altering 10 or more acres of land, also submit:*

- (d)  Vegetation cover type map of site

- (e)  Project plans showing Priority & Estimated Habitat boundaries

- (f) OR Check One of the Following

1.  Project is exempt from MESA review.  
Attach applicant letter indicating which MESA exemption applies. (See 321 CMR 10.14, <https://www.mass.gov/service-details/exemptions-from-review-for-projectsactivities-in-priority-habitat>; the NOI must still be sent to NHESP if the project is within estimated habitat pursuant to 310 CMR 10.37 and 10.59.)

2.  Separate MESA review ongoing. a. NHESP Tracking # \_\_\_\_\_ b. Date submitted to NHESP \_\_\_\_\_

3.  Separate MESA review completed.  
Include copy of NHESP “no Take” determination or valid Conservation & Management Permit with approved plan.

3. For coastal projects only, is any portion of the proposed project located below the mean high water line or in a fish run?

- a.  Not applicable – project is in inland resource area only      b.  Yes     No

If yes, include proof of mailing, hand delivery, or electronic delivery of NOI to either:

South Shore - Bourne to Rhode Island border, and  
the Cape & Islands:

Division of Marine Fisheries -  
Southeast Marine Fisheries Station  
Attn: Environmental Reviewer  
836 South Rodney French Blvd.  
New Bedford, MA 02744  
Email: [dmf.envreview-south@mass.gov](mailto:dmf.envreview-south@mass.gov)

North Shore - Plymouth to New Hampshire border:

Division of Marine Fisheries -  
North Shore Office  
Attn: Environmental Reviewer  
30 Emerson Avenue  
Gloucester, MA 01930  
Email: [dmf.envreview-north@mass.gov](mailto:dmf.envreview-north@mass.gov)

Also if yes, the project may require a Chapter 91 license. For coastal towns in the Northeast Region, please contact MassDEP’s Boston Office. For coastal towns in the Southeast Region, please contact MassDEP’s Southeast Regional Office.

- c.  Is this an aquaculture project?      d.  Yes     No

If yes, include a copy of the Division of Marine Fisheries Certification Letter (M.G.L. c. 130, § 57).



Massachusetts Department of Environmental Protection  
Bureau of Resource Protection - Wetlands

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**Online Users:**  
Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

**C. Other Applicable Standards and Requirements (cont'd)**

- 4. Is any portion of the proposed project within an Area of Critical Environmental Concern (ACEC)?  
 a.  Yes  No      If yes, provide name of ACEC (see instructions to WPA Form 3 or MassDEP Website for ACEC locations). **Note:** electronic filers click on Website.  
 b. ACEC

---

- 5. Is any portion of the proposed project within an area designated as an Outstanding Resource Water (ORW) as designated in the Massachusetts Surface Water Quality Standards, 314 CMR 4.00?  
 a.  Yes  No
- 6. Is any portion of the site subject to a Wetlands Restriction Order under the Inland Wetlands Restriction Act (M.G.L. c. 131, § 40A) or the Coastal Wetlands Restriction Act (M.G.L. c. 130, § 105)?  
 a.  Yes  No
- 7. Is this project subject to provisions of the MassDEP Stormwater Management Standards?  
 a.  Yes. Attach a copy of the Stormwater Report as required by the Stormwater Management Standards per 310 CMR 10.05(6)(k)-(q) and check if:
  - 1.  Applying for Low Impact Development (LID) site design credits (as described in Stormwater Management Handbook Vol. 2, Chapter 3)
  - 2.  A portion of the site constitutes redevelopment
  - 3.  Proprietary BMPs are included in the Stormwater Management System.
 b.  No. Check why the project is exempt:
  - 1.  Single-family house
  - 2.  Emergency road repair
  - 3.  Small Residential Subdivision (less than or equal to 4 single-family houses or less than or equal to 4 units in multi-family housing project) with no discharge to Critical Areas.

**D. Additional Information**

- This is a proposal for an Ecological Restoration Limited Project. Skip Section D and complete Appendix A: Ecological Restoration Notice of Intent – Minimum Required Documents (310 CMR 10.12).

Applicants must include the following with this Notice of Intent (NOI). See instructions for details.

**Online Users:** Attach the document transaction number (provided on your receipt page) for any of the following information you submit to the Department.

- 1.  USGS or other map of the area (along with a narrative description, if necessary) containing sufficient information for the Conservation Commission and the Department to locate the site. (Electronic filers may omit this item.)
- 2.  Plans identifying the location of proposed activities (including activities proposed to serve as a Bordering Vegetated Wetland [BVW] replication area or other mitigating measure) relative to the boundaries of each affected resource area.



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 Bureau of Resource Protection - Wetlands  
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MassDEP File Number

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**D. Additional Information (cont'd)**

3.  Identify the method for BVW and other resource area boundary delineations (MassDEP BVW Field Data Form(s), Determination of Applicability, Order of Resource Area Delineation, etc.), and attach documentation of the methodology.

4.  List the titles and dates for all plans and other materials submitted with this NOI.

Garelick Farms Flooding Resiliency Improvements

a. Plan Title

Tighe & Bond Jean Christy, P.E.

b. Prepared By c. Signed and Stamped by

September 2025 Varies

d. Final Revision Date e. Scale

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f. Additional Plan or Document Title g. Date

5.  If there is more than one property owner, please attach a list of these property owners not listed on this form.
6.  Attach proof of mailing for Natural Heritage and Endangered Species Program, if needed.
7.  Attach proof of mailing for Massachusetts Division of Marine Fisheries, if needed.
8.  Attach NOI Wetland Fee Transmittal Form
9.  Attach Stormwater Report, if needed.

**E. Fees\***

1.  Fee Exempt: No filing fee shall be assessed for projects of any city, town, county, or district of the Commonwealth, federally recognized Indian tribe housing authority, municipal housing authority, or the Massachusetts Bay Transportation Authority.

Applicants must submit the following information (in addition to pages 1 and 2 of the NOI Wetland Fee Transmittal Form) to confirm fee payment:

2. Municipal Check Number 3. Check date

---

4. State Check Number 5. Check date

---

6. Payor name on check: First Name 7. Payor name on check: Last Name

\*Please refer to the hard copy of the Notice of Intent for information on fee checks



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## F. Signatures and Submittal Requirements

I hereby certify under the penalties of perjury that the foregoing Notice of Intent and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge. I understand that the Conservation Commission will place notification of this Notice in a local newspaper at the expense of the applicant in accordance with the wetlands regulations, 310 CMR 10.05(5)(a).

I further certify under penalties of perjury that all abutters were notified of this application, pursuant to the requirements of M.G.L. c. 131, § 40. Notice must be made by Certificate of Mailing or in writing by hand delivery or certified mail (return receipt requested) to all abutters within 100 feet of the property line of the project location.

	
1. Signature of Applicant	2. Date <u>9/30/25</u>
	3. Date <u>9/30/25</u>
3. Signature of Property Owner (if different)	4. Date
	5. Date <u>9/30/2025</u>
5. Signature of Representative (if any)	6. Date

### For Conservation Commission:

Two copies of the completed Notice of Intent (Form 3), including supporting plans and documents, two copies of the NOI Wetland Fee Transmittal Form, and the city/town fee payment, to the Conservation Commission by certified mail or hand delivery.

### For MassDEP:

One copy of the completed Notice of Intent (Form 3), including supporting plans and documents, one copy of the NOI Wetland Fee Transmittal Form, and a **copy** of the state fee payment to the MassDEP Regional Office (see Instructions) by certified mail or hand delivery.

### Other:

If the applicant has checked the "yes" box in any part of Section C, Item 3, above, refer to that section and the Instructions for additional submittal requirements.

The original and copies must be sent simultaneously. Failure by the applicant to send copies in a timely manner may result in dismissal of the Notice of Intent.

# **NOI Wetland Fee Transmittal Form**



**Massachusetts Department of Environmental Protection**  
 Bureau of Resource Protection - Wetlands  
**NOI Wetland Fee Transmittal Form**  
 Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

**Important:** When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



**A. Applicant Information**

1. Location of Project:

1199 West Central Street  
 a. Street Address Franklin  
 b. City/Town  
 \$1,325  
 d. Fee amount  
 c. Check number

2. Applicant Mailing Address:

Robert  
 a. First Name Dandreo  
 b. Last Name  
 Dandreo Brothers General Contractors  
 c. Organization  
 106 Oakville Avenue  
 d. Mailing Address  
 Lynn MA 01905  
 e. City/Town f. State g. Zip Code  
 781-581-7719  
 h. Phone Number i. Fax Number  
 rpdandreo@dandreo.com  
 j. Email Address

3. Property Owner (if different):

Andrew Brummel  
 a. First Name b. Last Name  
 Dairy Farms of America, Inc.  
 c. Organization  
 1405 N 98th Street  
 d. Mailing Address  
 Kansas City KS 66111  
 e. City/Town f. State g. Zip Code  
 h. Phone Number i. Fax Number j. Email Address

To calculate filing fees, refer to the category fee list and examples in the instructions for filling out WPA Form 3 (Notice of Intent).

**B. Fees**

Fee should be calculated using the following process & worksheet. **Please see Instructions before filling out worksheet.**

**Step 1/Type of Activity:** Describe each type of activity that will occur in wetland resource area and buffer zone.

**Step 2/Number of Activities:** Identify the number of each type of activity.

**Step 3/Individual Activity Fee:** Identify each activity fee from the six project categories listed in the instructions.

**Step 4/Subtotal Activity Fee:** Multiply the number of activities (identified in Step 2) times the fee per category (identified in Step 3) to reach a subtotal fee amount. Note: If any of these activities are in a Riverfront Area in addition to another Resource Area or the Buffer Zone, the fee per activity should be multiplied by 1.5 and then added to the subtotal amount.

**Step 5/Total Project Fee:** Determine the total project fee by adding the subtotal amounts from Step 4.

**Step 6/Fee Payments:** To calculate the state share of the fee, divide the total fee in half and subtract \$12.50. To calculate the city/town share of the fee, divide the total fee in half and add \$12.50.



# **Application Process Signature Form**

## Town of Franklin Conservation Commission

### APPLICATION PROCESS SIGNATURE FORM

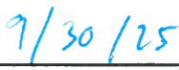
There are three different applications that can be submitted to undertake work in a jurisdictional area: a Notice of Intent (NOI), a Request for Determination (RDA) and a Minor Buffer Zone Activity (MBZA). All three applications have different criteria for submission and approval and the NOI and RDA are governed by both the state law and the local bylaw. The MBZA is issued under the local bylaw only.

When a potential applicant requests advice from the Conservation Agent on which application to file, the opinion of the Agent is based on the information given by the potential applicant and any other information available to the Agent, e.g. the town's GIS system. The Agent has no legal right to go onto private property at any time until after an application is filed or permission of the property owner is given.

It is important that all applicants understand that after an application is filed, additional information may come to light e.g. via a field inspection or a review of the application, that may impact the scope of the submitted application and the approval process. **Therefore, it is the ultimate responsibility of the applicant to decide which application to file.**

In light of the above, please sign below indicating an understanding of this policy and submit it with the application.

  
\_\_\_\_\_  
Signature of Property Owner

  
\_\_\_\_\_  
Date

# **Property Access Signature Form**

**Town of Franklin Conservation Commission**

**PROPERTY ACCESS SIGNATURE FORM**

I hereby request that the Franklin Conservation Commission review this NOI/RDA/ANRAD application. I (we) grant authority to the Franklin Conservation Commission members and agents to go onto my (our) property solely for purposes directly related to the inspection and approval of this application and for follow-up compliance with the permit conditions.



\_\_\_\_\_  
Signature of Property Owner

9/30/25

\_\_\_\_\_  
Date

# **Resource Area Impact Summary Form**

**Town of Franklin Conservation Commission**

**RESOURCE AREA IMPACT SUMMARY FORM**

**The Franklin Wetlands Protection Bylaw  
Franklin Town Code Section 181**

<b>Resource Area</b>	<b>Alteration Proposed</b>	<b>Mitigation Proposed</b>
Bordering Vegetated Wetland (SF)	N/A	N/A
Bank (LF)	N/A	N/A
Land Under Water Bodies (SF)	N/A	N/A
Isolated Wetland (SF)	N/A	N/A
Vernal Pool (SF)	N/A	N/A
Buffer Zone (SF)	7,492 SF (Temporary)	N/A
Riverfront (SF)	6,605 SF (Temporary) 50 SF (Permanent)	50 SF
100-Year Floodplain (CF)	N/A	N/A
(SF) = Square Feet (LF) = Linear Feet (CF) = Cubic Feet Flood Storage		

# **Local Filing Fee Calculation Worksheet**



**1.6. Commercial/Industrial  
(Resource Area includes Buffer Zone)**

Base Fee	\$600.00	\$ <u>600.00</u>
Infrastructure in Buffer Zone <b>or</b> Resource Area		
Roads	___ linear feet x \$2.00	= \$ <u>N/A</u>
*Drainage Structures	4 X \$25.00 each	= \$ <u>100.00</u>
Resource Area Disturbed	14,147 square feet x \$0.50	= \$ <u>7,073.50</u>
Buildings	___ X \$125 each	= \$ <u>N/A</u>
All Accessory Improvements	\$100.00	= \$ <u>N/A</u>

**2. REQUEST FOR DETERMINATION (RDA)**

Existing single family residence	\$50.00	\$ <u>N/A</u>
Other	\$100.00	\$ <u>N/A</u>

**3. MINOR BUFFER ZONE ACTIVITY (MBZA)**

Restoration projects	*No charge*	
All other projects	\$50.00=	\$ <u>N/A</u>

**4. ABBREVIATED NOTICE OF RESOURCE AREA DETERMINATION  
(ANRAD)**

\$0.50/foot/resource area: = \$ N/A

**5. CERTIFICATES OF COMPLIANCE**

Residential Certificate of Compliance Request	\$50.00	\$ <u>N/A</u>
Residential Certificate Re-Inspection	\$50.00	\$ <u>N/A</u>
Commercial Certificate of Compliance Request	\$100.00	\$ <u>N/A</u>
Commercial Certificate Re-Inspection	\$100.00	\$ <u>N/A</u>

**6. OTHER PERMITS/SERVICES**

Project Extension (includes Order of Conditions)	\$50.00	\$ <u>N/A</u>
Status Letter for Financial Institution	\$100.00	\$ <u>N/A</u>
Permit Amendment	\$100.00	\$ <u>N/A</u>

**7. FILING FEE CALCULATION**

<b>Town Share of State Fees</b> (See NOI Wetland Fee Transmittal Form) <b>(Check No.1)</b>	\$ <u>1,350</u>
<b>Local Filing Fee Calculated Above (Check No. 2)</b>	\$ <u>7,773.50</u>
<b>TOTAL Due Town of Franklin</b>	\$ <u>9,123.50</u>
<b>State Share of Filing Fee</b> (See NOI Wetland Fee Transmittal Form)	
<b>TOTAL Due DEP (Check No. 3)</b>	\$ <u>1,325.00</u>

**8. ADVERTISING FEE (Check No. 4) TBD**

The fee will be the exact amount the newspaper charges for that specific advertisement. Once the advertisement is placed with the paper, by the Conservation Commission, the applicant will be notified of the cost and will be expected to submit a check for that exact amount, payable to the Town of Franklin, to the Conservation Department prior to the first hearing.

\*Drainage structures: catch basins, manholes, leaching basins, gutter inlet or any other man-made structure (other than a pipe) for purposes of controlling drainage.

**Tighe&Bond**

**SECTION 1**

# **Section 1**

## **Introduction**

Project Name: Garelick Farms Flooding Resiliency Improvements

Project Location: 1199 West Central Street, Franklin, MA

Project Applicant: Dandreo Brothers General Contractors

On behalf of Dandreo Brothers General Contractors (the "Applicant"), Tighe & Bond is pleased to submit this Notice of Intent (NOI) to the Franklin Conservation Commission for the Garelick Farms Flooding Resiliency Improvements (the "Project") at the Garelick Farms facility located at 1199 West Central Street, Franklin, MA (the Site). Project activities will occur within wetland resource areas subject to protection under the Massachusetts Wetlands Protection Act (MA WPA; MGL c. 131 § 40) and its implementing regulations (310 CMR 10.00) and the Franklin Wetlands Protection Bylaw (Franklin Code at Chapters 181 and 271) and Regulations.

### **1.1 Project Background and Purpose**

The proposed Project entails the installation of a stormwater collection system that will assist in conveying stormwater from the southern portion of the Site to the wetland resource area located on the northeastern portion of the Site. This work will include installation of a 36" diameter stormwater conveyance pipe with a series of manholes. Several catch basins located within the Project Site will be replaced with deep-sump, hooded catch basins and connected to the proposed stormwater conveyance system.

On January 10, 2024, the Garelick Farms facility experienced widespread flooding of the property resulting in significant property damage. A majority of the stormwater runoff entering the Site enters through an existing culvert beneath Route 140, owned by the Massachusetts Department of Transportation (MassDOT), and the existing drainage infrastructure on the Site is not adequate to handle flows through the culvert even during small rain events. The proposed Project involves construction of a supplemental stormwater collection system to provide additional conveyance of stormwater runoff from entering the Garelick Farms property.

### **1.2 Overview of NOI**

This Notice of Intent (NOI) is being submitted pursuant to the Massachusetts Wetlands Protection Act (MA WPA; MGL c. 131 § 40) and its implementing regulations (310 CMR 10.00) and the Franklin Wetlands Protection Bylaw (Franklin Code at Chapters 181 and 271) and Regulations, as the proposed work will occur within resource areas (Riverfront Area). Work will also be conducted within the 100-foot Buffer Zone and local Buffer Zones. The NOI includes a request for a Variance for work in the 0-25 foot No-Disturb Zone and 25- to 50-foot Buffer Zone in accordance with Section 5 of the Franklin Wetlands Protection Regulations.

Figures showing existing conditions, site-specific environmental resources, land use, FEMA flood-levels, and other site features are provided in Appendix A. Project Drawings are provided in Appendix B. Site Photographs are provided in Appendix C. Abutter Information is provided in Appendix D. A Stormwater Management Report is provided in Appendix E (bound separately).

### **1.3 Schedule**

Permitting for the Project will occur in Fall 2025 with construction commencing in Winter 2025-2026.

**Tighe&Bond**

**SECTION 2**

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## Section 2

# Existing Environment

This section provides a site description and resource area characterization for the Project site. Wetland resource areas and land use in the general vicinity were determined based on direct observations made during site visits and review of information obtained from publicly available data through the Massachusetts Geographic Information System (MassGIS). The Project site is depicted on the figures in Appendix A.

### 2.1 General Site Description

#### 2.1.1 Project Location

As indicated above, the Project is located at the Garelick Farms property located in Franklin, MA, an approximately 52-acre parcel that is zoned for industrial use (Parcel ID 275-023-000). The Project Site is situated directly north of Route 140 (West Central Street) and south of the railroad tracks operated by Massachusetts Bay Transportation Authority (MBTA). The Site is bound to the east by a parking lot associated with the MBTA and is bound to the west by undeveloped, vegetated land. Beyond the railroad is additional trailer storage used by Garelick Farms and beyond Route 140 is a forested area with the West Central Street Pond.

#### 2.1.2 Project Locus and Project Site

The Project Locus consists of the Garelick Farms facility, developed with primarily a 210,000 SF building with associated parking, trailer storage, and auxiliary buildings. A wetland resource area is located on the northeastern portion of the Site with a perennial stream that travels through the wetland. The area is relatively flat and paved with some landscaped areas.

The Project Site/"limit of work" consists of approximately 1.04 acres located on the northeastern portion of the property and is defined as the extent of temporary and permanent disturbance to upland resource areas required for the installation of a stormwater collection system; as well as any associated equipment laydown/staging areas and areas proposed for temporary site access during construction.

The Project Site is located within and adjacent to jurisdictional resource areas as further described below.

### 2.2 Wetland Resource Areas

#### 2.2.1 Methodology of Resource Area Investigations

On-site wetland resource areas were delineated by a Tighe & Bond wetland scientist on April 25, 2025. The wetland delineation was conducted in conformance with the MA WPA; *Delineating Bordering Vegetated Wetlands under the MA Wetlands Protection Act* (1995) and *Northcentral and Northeast Region* (2012); and *Field Indicators for Identifying Hydric Soils in New England* (Version 4, 2018).

Resource area boundaries were delineated using pink 'Wetland Boundary' flagging tape.

Each flag location was determined using a sub-meter GPS unit. Wetland resource areas were named based on the wetland system number and alphabetical letter in the order in which they were observed, i.e. "1A-1" refers to the first resource area observed within wetland system 1. Representative site photographs are provided in Appendix C.

### 2.2.2 Description of Wetland Resource Areas

The following wetland resource areas identified within the Project Site are subject to jurisdiction under the Massachusetts Wetlands Protection Act (MA WPA; M.G.L. c. 131 § 40), the MA WPA Regulations (310 CMR 10.00), **and** the Franklin Wetlands Protection Bylaw and Regulations, effective October 2019:

- Inland Bank
- Bordering Vegetated Wetlands
- Land Under Water Bodies and Waterways
- Bordering Land Subject to Flooding
- Riverfront Area
- 100-foot Buffer Zone

The following additional wetland resource areas identified within the Project are also subject to jurisdiction under the Franklin Wetlands Protection Bylaw and Regulations **only**:

- 25-foot No-Disturb Zone
- 25- to 50-foot Buffer Zone
- 50- to 100-foot Buffer Zone

Descriptions of the jurisdictional wetland resource areas per the MA WPA and the Franklin Wetlands Protection Bylaw and Regulations are provided below. Jurisdictional wetland resource areas and Buffer Zones (local and state) are depicted on the Project Drawings in Appendix B.

#### 2.2.2.1 Inland Bank/ Mean Annual High Water (MAHW)

*Per 310 CMR 10.54(2)(a), a Bank is the portion of the land surface which normally abuts and confines a water body. It occurs between a water body and a vegetated bordering wetland and adjacent floodplain, or, in the absence of these, it occurs between a water body and an upland.*

*As further stated at 310 CMR 10.54(2)(a), Banks may be partially or totally vegetated, or comprised of exposed soil, gravel or stone.*

A perennial stream (Mine Brook) traverses the Project Site in a south/north direction. Mine Brook is depicted as perennial on the most recent USGS topographic map of the area. Mine Brook flows through a 60" x 36" box culvert beneath Route 140/ West Central Street and into a 48" Reinforced Concrete Pipe (RCP) located beneath an existing driveway within the southern portion of the Project Site. The stream is an open channel until it enters an existing pipe that is located beneath the existing building. The stream is piped for approximately 717 linear feet beneath the existing building before it outlets through a 48" RCP into the 1A-series BVW located in the northeastern portion of the Project Site.

For daylighted portions of the stream, flags were placed at the first observable break in slope which is coincident with bankfull conditions and the Mean Annual High Water (MAHW). The portion of inland Bank that consists of a pipe underneath the existing building was not flagged, and no GPS data was collected.

South of the existing building, Flags 1E-1 through 1E-10 delineate the western top of inland Bank and flags 1F-1 through 1F-8 delineate the eastern top of inland Bank. The stream is approximately 3 feet wide and 6 to 12 inches deep with a gravel substrate. This portion of the Bank is well defined and top of Bank consists of maintained lawn.

Flags 1B-1 to 1B-4 and flags 1C-1 through 1C-10 delineate the west and east sides of top of inland Bank for the portion of Mine Brook that is interior to a delineated BVW in the northeastern portion of the site. The stream is approximately 8 feet wide at the culvert outlet and narrows to approximately 2 feet wide, with a depth of approximately 6 inches. This portion of the Bank is well defined and vegetated with herbaceous species.

#### **2.2.2.2 Bordering Vegetated Wetlands (BVW)**

Per 310 CMR 10.55(2)(a), *Bordering Vegetated Wetlands are freshwater wetlands which border on creeks, rivers, streams, ponds and lakes. The types of freshwater wetlands are wet meadows, marshes, swamps and bogs. Bordering Vegetated Wetlands are areas where the soils are saturated and/or inundated such that they support a predominance of wetland indicator plants. The ground and surface water regime and the vegetational community which occur in each type of freshwater wetland are specified in M.G.L. c. 131, § 40.*

Flags 1A-1 through 1A-12 delineate a portion of the southern boundary of a palustrine, emergent marsh (BVW) within the northeastern portion of the Project Site. Common vegetation identified within the BVW includes skunk cabbage, broadleaf cattail, deer tongue grass, sensitive fern, and reed canary grass. Indicators of wetland hydrology that were used during the resource area delineation included saturated soil, saturated pockets of standing water and hydric soil. Mine Brook (Flags 1B-1 to 1B-4 and flags 1C-1 through 1C-10) flows interior to the BVW in a south/north direction from a culvert located between flags 1A-5 and 1A-6. No work is proposed within the limit of the BVW.

#### **2.2.2.3 Land Under Water Bodies and Waterways (LUW)**

Per 310 CMR 10.56(2), *Land Under Water Bodies and Waterways (LUW) is the land beneath any creek, river, stream, pond or lake. Said land may be composed of organic much or peat, fine sediments, rocks or bedrock.*

The daylighted portions of Mine Brook (a perennial stream) located south and north of the existing building contain LUW.

#### **2.2.2.4 Bordering Land Subject to Flooding (BLSF)**

Per 310 CMR 10.57(2)(a), *Bordering Land Subject to Flooding (BLSF) is an area with low, flat topography adjacent to and inundated by flood waters rising from creeks, rivers, streams, ponds or lakes. It extends from the banks of these waterways and water bodies; where a bordering vegetated wetland occurs, it extends from said wetland... The boundary of Bordering Land Subject to Flooding is the estimated maximum lateral extent of flood water which will theoretically result from the statistical 100-year frequency storm. Said boundary shall be that determined by reference to the most recently available flood profile*

*data prepared for the community within which the work is proposed under the National Flood Insurance Program.*

The Federal Emergency Management Agency's Flood Insurance Rate Map (FIRM) Community Panel Number 25021C0304F, effective July 8, 2025, shows a portion of the Project Site located within a Zone A (1% Annual Chance Flood), which is designated as a 100-year floodplain without base flood elevations, as shown in Figure 4 in Appendix A. According to the FEMA Flood Insurance Study (FIS) and FIRM, the approximate flood elevations are ~234.0' in the southern portion of the Site and ~214.0' in the northern portion. In the southern portion of the Site, BLSF extends from the top of Bank of Mine Brook and is located within the 200-foot Riverfront Area. In the northern portion of the site, the 1% Annual Chance Flood is mapped interior to the BVW. Therefore, there is no BLSF resource area in the northeastern portion of the Project Site.

#### **2.2.2.5 Riverfront Area**

Per 310 CMR 10.58 (2)(a), *Riverfront Area is the area of land between a river's mean annual highwater line and a parallel line measured horizontally. The riverfront area may include or overlap other resource areas or their buffer zones.*

The daylighted portions of Mine Brook (a perennial stream) located south and north of the existing building have an associated 200-foot Riverfront Area. Per the MA WPA Section 10.58(2)(a)(3), *"where a river runs through a culvert more than 200 feet in length, the riverfront area stops at a perpendicular line at the upstream end of the culvert and resumes at the downstream end"*. The portion of Mine Brook that is piped beneath the existing building does not have an associated Riverfront Area. Riverfront Area in the southern portion of the Project Site consists of existing paved parking, maintained lawn and the existing building. Riverfront Area in the northern portion of the Project Site consists of BVW, paved parking to the southeast, and an existing railroad to the northwest.

#### **2.2.2.6 100-Foot Buffer Zone**

Under the MA WPA and Franklin Wetlands Protection Bylaw and Regulations, areas extending 100 feet from certain areas subject to protection are considered Buffer Zone. The Buffer Zone extends landward from Inland Bank and BVW within the Project Site, as depicted on Project Drawings in Appendix B. The Buffer Zone overlaps with Riverfront Area and BLSF in the southern portion of the Project Site and with Riverfront Area in the northern portion of the Project Site.

#### **2.2.2.7 25-Foot No-Disturb Zone, 25- to 50-Foot Buffer Zone, and 50- to 100-Foot Buffer Zone (Franklin Wetlands Protection Regulations only)**

Pursuant to the Franklin Wetlands Protection Regulations, the Franklin Conservation Commission regulates a 25-foot No-Disturb Zone that extends 25 feet from delineated resource areas. Extensive work in this zone, particularly clearing of natural vegetation and soil disturbance, is likely to alter the physical characteristics of resource areas by changing their soil composition, topography, hydrology, temperature, and the amount of light received. As required by the Conservation Commission, no work or disturbance is permitted within the 25-foot No-Disturb Zone.

The Franklin Conservation Commission regulates the 25- to 50-foot Buffer Zone extending from defined/ delineated resource areas. No structures, including but not limited to concrete, stone, or other impervious foundations and/ or slabs may be proposed for construction purposes that for all intents and purposes would significantly increase runoff.

Alteration in the 25- to 50-foot Buffer Zone is limited to grading, tree clearing, stormwater management system components, lawns, gardens, and other low-impact uses as determined or approved by the Conservation Commission through variance procedures. Stormwater management systems or individual components, including drainage piping and construction of detention/retention ponds, shall be allowed by the Conservation Commission based on an alternative analysis and review of design and space limitations as indicated in the final approved plans.

The Franklin Conservation Commission regulates the 50- to 100-foot Buffer Zone that extends 50-100 feet from the defined/ delineated resource area. Alterations including structures are allowed in the Buffer Zone. The Conservation Commission may require additional mitigation offsets when the slope within the Buffer Zone is steeper than 10%.

### **2.3 Vernal Pool Statement**

MassGIS online mapping data was consulted during the preparation of this NOI. According to this source, and as shown on Figure 2 (Appendix A), no portion of the Site or direct abutting parcels are mapped Certified or Potential for vernal pools.

A parcel located within 300 feet of the Site (Parcel ID 275-022-000) is mapped as having Potential vernal pool habitat. This parcel is not a direct abutter to the Project Site and is owned by the Commonwealth of Massachusetts.

### **2.4 Rare Species**

The Massachusetts Endangered Species Act (MESA) is implemented by the Natural Heritage and Endangered Species Program (NHESP) to protect areas determined to contain endangered, threatened or species of special concern. These areas are designated as "Priority Habitats of Rare Species" or "Estimated Habitats of Rare Wildlife" under the MESA Regulations 321 CMR 10.00 and are delineated state-wide in the Massachusetts Natural Heritage Atlas.

The NHESP Atlas, 15<sup>th</sup> edition, effective August 2021, and MassGIS online mapping data were consulted during the preparation of this NOI. According to these sources, and as shown on Figure 2 (Appendix A), no portion of the Site is mapped Estimated and Priority Habitat for state-listed rare species.

**Tighe&Bond**

**SECTION 3**

## **Section 3 Alternatives Analysis**

This section provides a review of the alternatives considered for the Project at the Garelick Farms facility. These alternatives were developed and evaluated based on site-specific information for the potential strategies described below to ensure that the most appropriate options were recommended and to support the Applicant in the decision-making process. Within the context of achieving Project goals, criteria for assessing each alternative included, but were not limited to, design life, potential impacts to adjacent resource areas, maintenance of existing facility processes, constructability, and general construction/maintenance cost and frequency.

An evaluation of alternatives ranging from the “no-action” alternative to the construction of various above and below-ground runoff management facilities was performed based on the aforementioned screening criteria. The list of alternatives includes:

- No Action
- Construction of Subsurface Infiltration and/or Detention Facilities
- Construction of Open-air Infiltration and/or Detention Facilities
- Construction of New Conveyance Piping

### **3.1 Description of Alternatives**

#### **3.1.1 No Action Alternative**

The no action, or “do-nothing”, alternative assumes that the Applicant will not construct additional conveyance piping or drainage features on-site to remediate flooding concerns. There are no immediate impacts associated with taking no action, but future impacts resulting from continued flooding will likely cause additional, costly damage to the Garelick Farms facilities and utilities, as well as interrupt daily operations. With respect to concerns regarding the facility’s continued operation and potential future flood-related damages, the no action alternative was determined to be infeasible. This alternative would result in no resource area impacts.

#### **3.1.2 Construct Subsurface Infiltration and/or Detention Facilities**

This alternative includes the construction of subsurface infiltration and/or detention facilities on-site, including subsurface infiltration chambers or leaching pits. While this alternative may provide additional water quality treatment and peak rate mitigation to stormwater run-on to the project site, it was determined that the extensive system of existing subsurface utilities would prohibit its implementation. The relocation of existing utilities would be highly complex, disrupt plant operations significantly, and would be cost-prohibitive to the Applicant. As such, this alternative was not selected for advancement.

Resource areas impacted as part of this alternative are expected to have been more extensive than the preferred alternative, with additional earth excavation in the northern portion of the project required to install a subsurface infiltration system. Additionally, the system’s outfall elevation in this alternative is anticipated to be lower than that under the proposed alternative, potentially necessitating direct impacts to wetlands in order to achieve the required elevation differential.

### 3.1.3 Construct Open-air Infiltration and/or Detention Facilities

Similarly to the subsurface alternative above, this alternative includes the construction of infiltration and/or detention facilities on-site. The infiltration/detention facilities considered under this alternative are above-ground and include infiltration or detention basins. While this alternative may also provide additional water quality treatment and peak rate mitigation to stormwater run-on to the project site, it was determined that existing subsurface utilities would continue to present a challenge to the implementation of these features, even with their above-ground configuration. Additionally, such features would require a significant footprint in order to align the system with design guidance recommended within the Massachusetts Stormwater Handbook. Site personnel indicated that most of the project site is utilized during plant operations, and that open space for feature siting is extremely limited. For these reasons, this alternative was not selected for advancement.

Resource areas impacted as part of this alternative are expected to have been more extensive than the preferred alternative, with additional earth excavation in the northern area of the project required to install a surface infiltration basin. Additionally, the system's outfall elevation in this alternative is anticipated to be lower than that under the proposed alternative, potentially necessitating direct impacts to wetlands in order to achieve the required elevation differential.

### 3.1.4 Construct New Conveyance Piping (Preferred Alternative)

This alternative includes the construction of approximately 900 feet of 36" reinforced concrete conveyance drainage piping from the southern portion of the project site, where the Massachusetts Department of Transportation (MassDOT)-owned culvert outlets onto the property, toward the existing wetlands to the northeast. Additionally, this option proposes the installation of three deep-sump, hooded catch basins for total suspended solids (TSS) removal from runoff generated on-site.

This alternative is the preferred alternative as it addresses the primary concern of facility flooding most directly by prioritizing the conveyance of water away from critical plant infrastructure and toward the site's discharge point. In addition to being the most effective alternative, this option is understood to present the lowest financial burden to the Applicant of those discussed herein. Further, the constructability of this alternative is relatively high, as compared to alternatives described in 3.1.2 and 3.1.3, while the associated impacts to wetland resource areas are anticipated to be lower as compared to the aforementioned alternatives.

**Tighe&Bond**

**SECTION 4**

## **Section 4**

# **Project Description**

### **4.1 Proposed Activities**

#### **4.1.1 Stormwater Conveyance System**

The proposed project involves installation of stormwater piping to convey stormwater from the southern portion of the Site to the wetland resource area in the northeastern portion. In order to introduce redundancy into the stormwater conveyance system to reduce the opportunity of future flooding occurrences due to increased storm intensity and frequency, a parallel, redundant conveyance system is proposed. The existing 48" drain line under the Garelick Farms building will remain and continue to serve as the primary route for runoff from Rays Pond to the wetland north of the building. The proposed improvements include the installation of a 36" diameter reinforced concrete conveyance pipe (RCP) from the southern, smaller open basin to the wetland north of the building. The Project also includes installation of a headwall in the southern portion of the site, located within RFA, and an outfall in the northeastern portion of the site within the 100-foot Buffer Zone to inland Bank and BVW. The Project does not include the creation of any new impervious area.

To improve stormwater treatment on-site, three existing catch basins will be replaced with deep-sump, hooded catch basins and connected to the new 36" redundant conveyance pipe. These new catch basins will improve Total Suspended Solid (TSS) removal. Other existing stormwater collection and conveyance systems on-site will remain. This design has been prepared in accordance with the recommendations in the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Handbook.

### **4.2 Anticipated Construction Sequence**

The anticipated sequence of construction for the Project is generally outlined below. The actual sequence of construction is subject to the discretion of the selected contractor.

Due to construction safety concerns, the contractor will be responsible for providing public safety protection measures, including temporary construction fencing around the limit of work to ensure that the public stays at a safe distance from active equipment and does not enter potentially unsafe active work areas. Truck deliveries and site work will be performed within hours limited by the Town and the facility, or as further defined by Project specifications. Performing site work within hours specified by the Town work hour requirements will help mitigate construction-related noise impacts on neighbors.

The contractor will be required to maintain appropriate erosion and sedimentation controls at the downgradient side of all site work activities while working.

Construction sequencing is anticipated to occur as follows:

- Notify pertinent regulatory agencies and abutters of the construction schedule
- Install sedimentation and erosion controls / protective measures at work site perimeter

- Schedule and conduct site walks with pertinent regulatory agencies to inspect construction-phase BMPs
- Site mobilization and material staging
- Installation of drainage piping, catch basins and outfall. Backfill of excavated trenching. Repaving and stabilization of trenched excavation limits.
- Installation of headwall and tie-in to newly installed drainage piping.
- Cleaning and testing drainage piping.
- Perform final stabilization, restoration and mitigation of temporary impact areas, including installation of restoration plantings.
- With Conservation Commission authorization, remove erosion and sedimentation controls / protective measures at work site perimeter and entrance/exit locations and properly dispose off-site
- Demobilize and perform final site cleanup

### **4.3 Construction Methodology and Best Management Practices**

The following Best Management Practices (BMPs) will be implemented during construction to minimize the potential for impacts to jurisdictional resource areas. The Town and contractor will reserve the right to require supplemental and/or alternative construction BMPs during work depending on site and weather conditions. As noted below, in some instances specific construction means and methods will be determined by the contractor. However, the contractor will be restricted to the limit of work depicted on the Project Drawings.

#### **4.3.1 Erosion and Sedimentation Controls**

The contractor will be required to maintain appropriate erosion and sedimentation controls at the downgradient side of all construction activities.

Additional control measures to be used during the Project include the use of silt fences, straw wattles, and deep-sump, hooded catch basins. Catch basins provided throughout the Site collect stormwater runoff from the proposed parking areas and are connected to the Project's stormwater collection system. The deep-sump and hooded outlet provide runoff an opportunity to separate from solids and floatable pollutants prior to discharge and are used as a pretreatment device throughout the Project. Supplemental and/or alternative construction BMPs may be required during work, depending on site and weather conditions.

Erosion and sedimentation control measures will be installed between proposed areas of disturbance and resource areas as shown on Project Drawings and as deemed necessary. Use of non-biodegradable mesh materials will be avoided.

Supplemental and/or alternative construction BMPs may be required during work, depending on site and weather conditions. The contractor will be responsible for complying with permits issued for the Project. In addition:

- The contractor will be required to maintain a reserve supply of erosion and sedimentation control barriers on-site to make repairs, as necessary
- Protective measures will be inspected after significant precipitation events. Maintenance and repairs will be conducted, as necessary

At the conclusion of the Project, the erosion control barriers will be removed and properly disposed of off-site following the stabilization of disturbed areas and Conservation Commission authorization.

In accordance with Section 7.12 of the Franklin Wetlands Protection Regulations, the Applicant must list the names and phone numbers of all individuals that will be responsible for erosion control as well as the requirement that the erosion control be inspected weekly and after significant rain events. The individual(s) responsible for erosion control management are as follows:

- Robert Dandreo, Dandreo Brothers General Contractors (781) 581-7719

#### **4.3.2 Spill Prevention and Control**

The contractor will be required to conduct the work in an environmentally safe manner and in accordance with applicable regulations for the management of fuels, waste oils, and hazardous substances.

#### **4.4 Site Access and Staging**

All site access will be provided via the existing entrance at 1199 West Central Street (the Project Site). Construction vehicles and equipment will utilize this access point throughout the duration of the Project. A designated soil stockpile area will be located in the rear parking lot. Please refer to the Proposed Site Plan (Sheet C-201) in Appendix B.

#### **4.5 Site Stabilization and Restoration**

The areas of construction will remain in stable condition at the close of each construction day via the use of appropriate erosion and sedimentation control measures. Erosion control measures will be inspected at the close of each construction day and maintained or reinforced as necessary. All erosion and sedimentation control measures will be inspected, cleaned, or replaced during construction and will remain in place until permanent stabilization is achieved. Temporary construction access and staging areas will be restored to existing conditions following construction.

All disturbed areas will be stabilized and restored using native vegetation. Plant species will be selected based on the Plants Appendix of the Franklin Best Development Practices Guidebook. The proposed restoration planting will be conducted in compliance with 310 CMR 10.58(5)(f).

Existing surface treatments will be restored to proposed grades and elevations upon completion of work. These proposed conditions are depicted on the Project Drawings provided in Appendix B.

**Tighe&Bond**

**SECTION 5**

## Section 5

# Regulatory Compliance

This section of the application outlines the Project's compliance with applicable wetlands regulations including the MA WPA and Franklin Wetlands Protection Bylaw and Regulations.

### 5.1 Summary of MA WPA Jurisdictional Activities

Table 5-1 presents a summary of the resource area impacts from the proposed Project relative to existing conditions. Impact areas presented were calculated in AutoCAD using surveyed topography delineated resource areas, and other site features. The Project Drawings in Appendix B also depict the proposed activities and resource areas.

**Table 5-1 Summary of Resource Area Impacts**

Resource Area	Temporary Impacts (SF) <sup>1</sup>	Permanent Impact (SF)
Riverfront Area (RFA) <sup>1</sup>	6,605	50
100-Foot Buffer Zone <sup>2</sup>	7,492	50

1: Temporary impact associated with drainage pipe installation, including excavation and the repaving of disturbed pavement. Permanent activities associated with installation of a headwall.

2: Temporary impact associated with drainage pipe installation, including excavation and the repaving of disturbed pavement. Permanent activities associated with installation of an outfall.

The following section presents the MA WPA Performance Standards for each pertinent resource area (presented in *italic* font) and the compliance of the proposed activities with those standards (normal font). The Project Site contains BVW, Inland Bank, and BLSF but the Project does not propose work in these resource areas. The area of temporary impacts associated with the installation of the headwall and drainage pipe is located outside BLSF. As such, discussion with the applicable performance standards for those resource areas is not presented below.

#### 5.1.1 Riverfront Area

Per 310 CMR 10.58(5), redevelopment within a previously developed Riverfront Area is permitted, provided the proposed work results in an improvement of existing conditions. The Project Site includes areas "degraded" prior to August 7, 1996, by impervious surfaces from existing structures or pavement. A comparison of undeveloped and developed, or previously degraded RFA is presented on Figures 6 through 9 in Appendix A.

The criteria outlined at 310 CMR 10.58(5) are discussed below.

- a) *At a minimum, proposed work shall result in an improvement over existing conditions of the capacity of the riverfront area to protect the interests identified in M.G.L. c. 131 § 40. When a lot is previously developed but no portion of the riverfront area is degraded, the requirements of 310 CMR 10.58(4) shall be met.*

The proposed work will improve the capacity of the Riverfront Area to protect the interests of the Wetlands Protection Act by enhancing stormwater management on a previously developed site. The Project includes installation of a new stormwater conveyance system with a 36" diameter pipe, upgraded deep sump hooded catch basins, and manholes designed in accordance with the MassDEP Stormwater Handbook. These improvements will increase stormwater treatment and control, reducing pollutant loads and improving runoff quality before discharge to the adjacent wetland resource area. Portions of the work are located within the RFA and 100-foot Buffer Zone; however, the Project results in a net improvement over existing conditions and meets the performance standards of 310 CMR 10.58(5)(a).

- b) *Stormwater management is provided according to standards established by the Department.*

As presented in the Stormwater Checklist and Report in Appendix E, stormwater management has been designed according to the standards established by the Department. Standards 2, 3, 4, 5, and 6 are met to the extent practicable as required for a redevelopment project. As such, this standard has been satisfied.

- c) *Within 200 foot riverfront area, proposed work shall not be located closer to the river than existing conditions or 100 feet, whichever is less, or not closer than existing conditions within 25 foot riverfront areas, except in accordance with 310 CMR 10.58(5)(f) or (g).*

The proposed headwall is located closer to the bank of Mine Brook (a perennial stream) than in the existing conditions. The Project proposes 50 SF of permanent impacts to RFA associated with the installation of the headwall. It is not possible to locate the proposed work outside the 200-foot RFA due to the nature and purpose of the Project. As noted below, the Applicant proposes restoration in accordance with 310 CMR 10.58(5)(f) to address the impacts associated with the headwall.

- d) *Proposed work, including expansion of existing structures, shall be located outside the riverfront area or toward the riverfront area boundary and away from the river, except in accordance with 310 CMR 10.58(5)(f) or (g).*

The proposed headwall is located closer to the bank of Mine Brook (a perennial stream) than in the existing conditions. The Project proposes 50 SF of permanent impacts to RFA associated with the installation of the headwall. It is not possible to locate the proposed work outside the 200-foot RFA due to the nature and purpose of the Project. As noted below, the Applicant proposes restoration in accordance with 310 CMR 10.58(5)(f) to address the impacts associated with the headwall.

- e) *The area of proposed work shall not exceed the amount of degraded area, provided that the proposed work may alter up to 10% if the degraded area is less than 10% of the riverfront area, except in accordance with 310 CMR 10.58(5)(f) or (g).*

Tighe & Bond performed a desktop analysis of previously developed RFA on the Project Site using historic orthophotographs prior to August 7, 1996. As seen in Figures 6 through 9 in Appendix A, the total RFA on-site is 382,977 SF, of which 82,741 SF (approximately 21.6%) is previously developed and considered

degraded. The proposed work within the RFA totals 6,655 SF, which is less than the degraded area. Therefore, the Project complies with 310 CMR 10.58(5)(e), as the proposed work does not exceed the amount of degraded RFA.

- f) *When an applicant proposes restoration on-site of degraded riverfront area, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(5)(c), (d) or (e) at a ratio in square feet of at least 1:1 of restored area to area of alteration not conforming to the criteria. Areas immediately along the river shall be selected for restoration.*

50 SF of work in the RFA does not conform with the criterion of 10.58(c) or (d). The Applicant proposes to install 50 SF of common winterberry (*Ilex verticillate*), choke cherry (*Prunus virginiana*), lowbush blueberry (*Vaccinium angustifolium*), or similar native species appropriate for the Site's soil and hydrologic conditions.

restoration planting within the Riverfront Area in the southern portion of the Site, in accordance with 310 CMR 10.58(5)(f) to address the non-conformance.

- g) *When an applicant proposes mitigation on-site...in the riverfront area, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(c), (d) or (e) at a ratio in square feet of at least 2:1 of mitigation area to area of alteration not conforming to the criteria or an equivalent level of environmental protection where square footage is not a relevant measure.*

The Applicant is proposing restoration in accordance with 310 CMR 10.58(5)(f) to address the Project's non-compliance with 310 CMR 10.58(5)(c) and (d). Mitigation is not required.

- h) *The issuing authority shall include a continuing condition in the Certificate of Compliance for projects under 310 CMR 10.58(5)(f) or (g) prohibiting further alteration within the restoration or mitigation area, except as may be required to maintain the area in its restored or mitigated condition. Prior to requesting the issuance of the Certificate of Compliance, the applicant shall demonstrate the restoration or mitigation has been successfully completed for at least two growing seasons.*

The Project includes 50 SF of restoration within the RFA. No mitigation is proposed or required, in accordance with 310 CMR 10.58(5)(g). Prior to requesting a Certificate of Compliance, the Applicant will provide documentation demonstrating that the restoration area has been successfully established and maintained for at least two full growing seasons.

### **5.1.2 100-foot Buffer Zone**

The MA WPA regulations do not contain any performance standards specific to Buffer Zone. The proposed Project proposes approximately 7,492 SF of temporary work in the 100-foot Buffer Zone from Bank and BVW. We note that a majority of the Buffer Zone at the Site is currently developed. As described in this NOI, the Project has been designed to satisfy the requirements of 310 CMR 10.03(1)(a)(3). Further, as described in Section 3.3, construction-period erosion control barriers will be installed and maintained to protect wetland resource areas and define the limits of work.

## 5.2 Franklin Wetlands Protection Bylaw and Regulations

The Town of Franklin has established a Wetlands Protection Bylaw and Regulations, effective October 2019, regarding activities within their jurisdiction as well as administrative procedures relative to proposed Projects. Of the Commission's current regulations, the following are pertinent to the proposed activities.

### 5.2.1 Buffer Zone Protections

The Franklin Conservation Commission has established a 25-foot No-Disturb Zone (NDZ), 25- to 50-foot Buffer Zone, and 50- to 100-foot Buffer Zone. The Performance Standards for activities within the Buffer Zones are set forth at Sections 4.2-4.4 of the Franklin Wetlands Protection Regulations, and are addressed below.

- *Section 4.2.1: An applicant shall demonstrate that no work/disturbance including grading activities is proposed within the 0-25 foot buffer zone resource area. Any applicant proposing a project within the 0-25 foot buffer zone resource area will have an irrefutable presumption of significant adverse impact to the functions and characteristics of the resource area, unless otherwise determined by the Commission under the minor buffer zone activity criteria set forth in Section 2 of these regulations, or as approved by the Commission by the variance procedures set forth in Section 5 of these regulations.*

The proposed work includes 1,556 SF of temporary impacts within the 25-foot No-Disturb Zone associated with excavation for drainage pipe installation and repaving of previously disturbed pavement. Additionally, there will be 50 SF of permanent impacts within this NDZ limited to the installation of a system outfall. As this work occurs within the NDZ, the Applicant is requesting a Variance pursuant to Section 5 of the Regulations. Please refer to Section 5.2.2 for details supporting the Variance request.

- *Section 4.3.1: Any applicant proposing a project within the 25-50 foot buffer zone resource area shall indicate that there are no structures including but not limited to, concrete, stone, or other impervious foundations and/or slabs for construction purposes that for all intents and purposes would significantly increase runoff. Alteration in the 25-50 foot buffer zone resource area is limited to grading, tree clearing. Stormwater management system components, lawns, gardens, and other low impact uses as determined by the Commission or as otherwise approved by the Commission by the variance procedures set forth in Section XVII of these regulations. Footings for building structures, such as a deck, as opposed to slabs or foundations, shall be used when technically feasible. The Commission may condition the applicant to use Best Management Practices (BMP's) for stormwater management consistent with the most recent version of the Town of Franklin Best Development Practice Guidebook. Stormwater management systems or individual components including drainage piping, and construction of detention/retention ponds shall be allowed by the Commission based on an alternative analysis and review of design and space limitations as indicated in the final approved plans.*

The proposed work includes 2,903 SF of temporary impacts within the 25- to 50-foot Buffer Zone associated with excavation for stormwater drainage pipe installation and repaving of previously disturbed pavement. As this work occurs within 25- to 50-foot Buffer Zone, the Applicant is requesting a Variance pursuant

to Section 5 of the regulations. Please refer to Section 5.2.2 for details supporting the Variance request.

The Project is designed to comply with the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Management Standards under the Massachusetts Wetlands Protection Act, as well as the Town of Franklin Stormwater Management Regulations, to the maximum extent practicable. The proposed stormwater collection system addresses both the quantity and quality of stormwater discharge and incorporates BMPs such as deep-sump, hooded catch basins. Please refer to the Stormwater Management Report in Appendix E.

- *Section 4.3.2: Areas Disturbed Prior to June 29, 2006: When there is a pre-existing disturbance (disturbed as part of a previously recorded Certificate of Compliance or disturbed prior to the enactment of the Wetlands Protection Act and the Franklin Wetlands Protection Bylaw), and the work proposed is entirely within this previously disturbed area, an applicant may propose impervious surfaces or other uses such as pools, buildings, porches, and sheds within the 25-50 foot buffer zone resource area. The Commission shall evaluate the proposed uses based on the demonstration by the applicant that the functions and characteristics of the resource area will not be adversely impacted.*

The proposed work within the 25- to 50-foot Buffer Zone occurs entirely within areas previously disturbed prior to June 29, 2006, as documented by prior site conditions and review of historic orthophotographs. Please refer to Appendix A for historic figures. The Project includes the installation of drainage collection infrastructure and pavement repaving within this pre-existing disturbed area. No new impervious surfaces are proposed beyond the scope of restoring and improving existing infrastructure. The design ensures that the functions and characteristics of the resource area will not be adversely impacted by maintaining stormwater BMPs that meet MassDEP and Town of Franklin standards. Please refer to the Stormwater Management Report in Appendix E.

- *Section 4.4.1: Alterations including structures are allowed in the 50-100 foot buffer zone resource area. The Commission may require additional mitigation offsets when the slope within the buffer zone is steeper than 10%. Additionally, mitigation offsets may be required by the Commission when the applicant proposes that more than 30% of the 50-100 foot buffer zone resource area is proposed to be impervious surface.*

The proposed work involves 2,983 SF of temporary impacts within the 50- to 100-foot Buffer Zone associated with excavation related to drainage pipe installation and repaving of disturbed pavement. The slope within the northern portion of this Buffer Zone is approximately 1%, while slopes in the southern portion range from 9% to 30%. The Project includes mitigation plantings within the Buffer Zone in the northeastern portion of the Site to offset these impacts. Plant species will be selected based on the Plants Appendix of the Franklin Best Development Practices Guidebook. Furthermore, the Project does not propose any new impervious surfaces exceeding 30% of the 50- to 100-foot Buffer Zone.

- *Section 4.4.2: Mitigation offsets may include but are not limited to plantings, conversion of impervious to pervious surfaces, and other practices consistent with*

*the most recent version of the Town of Franklin Best Development Practice Guidebook.*

Project impacts to wetland resource areas have been avoided to the maximum extent feasible. Mitigation measures are consistent with the most recent version of the Town of Franklin Best Development Practice Guidebook. The Applicant proposes to install 50 SF of common winterberry (*Ilex verticillate*), choke cherry (*Prunus virginiana*), lowbush blueberry (*Vaccinium angustifolium*), or similar native species appropriate for the Site's soil and hydrologic conditions. The proposed plantings will be located within the Buffer Zone in the northeastern portion of the Site.

### **5.2.2 Variance**

Pursuant to the Franklin Wetlands Protection Regulations, the Franklin Conservation Commission may grant a Variance from the Regulations upon a showing by the Applicant that any proposed work, or its natural and consequential impacts and effects, will not have any adverse effect upon any of the interests protected in Chapter 181 of the Town of Franklin Wetlands Protection Bylaw.

In accordance with Section 5 of the Franklin Wetlands Regulations, the Applicant is seeking a Variance from full compliance with Sections 4.2.1 and 4.3.1 to allow installation of a stormwater conveyance pipe and system outfall within the 25-foot No-Disturb Zone and 25- to 50-foot Buffer Zone to Bank and BVW.

The property experiences frequent flooding during storm events, and the existing drainage system is inadequate, failing even during minor rainfall. The proposed work is necessary to redirect runoff and prevent continued flooding of the Garelick Farms property. Due to site constraints, portions of the system must be located within protected local Buffer Zones. The Project has been carefully designed to avoid and minimize impacts to wetland resource areas. Erosion and sedimentation controls will be implemented during construction, and stormwater BMPs will be incorporated to protect wetland functions and values both during and after construction. The Project will not result in significant adverse impacts to the functions or characteristics of the wetland resource areas. Please refer to Section 5.2.3 for more information on Project impacts on the functions and characteristics of floodplains and wetlands.

An alternatives analysis is provided in Section 3 demonstrating that no practicable alternatives exist that would allow the Project to meet its purpose while avoiding work in the local Buffer Zones.

### **5.2.3 Functions and Characteristics Statement**

The purpose of the Franklin Wetland Protection Bylaw is to regulate and control activities deemed to have a significant or cumulative effect on the functions and characteristics of floodplains and wetlands. In accordance with Section 7.10 of the Franklin Wetlands Protection Regulations, the following statements address each of the relevant functions and characteristics to demonstrate that the proposed Project will not result in adverse impacts.

### **Public Water Supplies**

According to MassMapper, the nearest public water supply is the community groundwater well (Well #12R, Source ID: 2025000-24G), located approximately one mile from the Garelick Farms Flooding Resiliency Improvements

Project Site in the Town of Bellingham. The Project Site lies outside any designated Zone I, Zone II, or Interim Wellhead Protection Area. As such, the proposed work is not anticipated to have an adverse effect on public drinking water supplies.

### **Private Water Supplies**

According to MassMapper, the nearest private water supplies include a monitoring well (Well Completion Report ID: 660354) and a test well (Well Completion Report ID: 253728), both located on the Project Site. The proposed work will not involve excavation or dewatering in the vicinity of these wells, and the stormwater conveyance system has been designed to prevent potential groundwater contamination. Therefore, no adverse effects to private water supplies are anticipated.

### **Groundwater**

According to MassMapper, there are no groundwater discharge points located on or near the Project Site. The estimated depth to groundwater is approximately 4 feet to 17 feet below ground surface. Encountering groundwater during construction of the new stream channel is not anticipated. Project operations, including the proposed stormwater collection system, has been designed to protect groundwater. Stormwater BMPs will be implemented to protect groundwater quality. As a result, no adverse effects to groundwater are anticipated.

### **Flood Control**

The Federal Emergency Management Agency's Flood Insurance Rate Map (FIRM) Community Panel Number 25021C0304F, effective July 8, 2025 shows a portion of the Project Site located within a Zone A (1% Annual Chance Flood), which is designated as a 100-year floodplain without base flood elevations, as shown in Figure 4 in Appendix A. The proposed work has been designed to avoid adverse impacts to flood storage and conveyance. No filling or grading is proposed within the floodplain that would reduce its capacity. As such, no adverse effects to flood control are anticipated.

### **Erosion and Sedimentation**

Erosion and sedimentation control measures include silt fences and straw wattles and will be installed between proposed areas of disturbance and resource areas as shown on Project Drawings and as deemed necessary. Supplemental and/or alternative construction BMPs may be required during work, depending on site and weather conditions. Please refer to Section 4.3.1 for information on erosion and sedimental controls.

### **Storm Damage Prevention**

The Project involves installation of stormwater piping to convey stormwater from the southern portion of the Site to the wetland resource area in the northeastern portion. The design improves stormwater conveyance and reduces the risk of storm-related damage by managing excess water more effectively, thereby preserving the wetland and floodplain's natural ability to minimize water and wind impacts during extreme storm events.

**Water Quality**

During construction, erosion and sediment controls will be used to prevent surface water degradation. Post-construction stormwater will be treated through BMPs designed to meet MassDEP Stormwater Standards, ensuring protection of surface water quality. Please refer to Section 4.3.5 and the Stormwater Report in Appendix E.

**Water Pollution Control**

No toxic or hazardous materials will be used or stored on-site. Stormwater BMPs will treat runoff to reduce pollutants before discharge. To improve stormwater treatment on-site, three existing catch basins will be replaced with deep-sump, hooded catch basins and connected to the new 36" redundant conveyance pipe. These new catch basins will improve Total Suspended Solid (TSS) removal. Supplemental and/or alternative construction BMPs may be required during work, depending on site and weather conditions. No adverse water pollution effects are anticipated.

**Fisheries**

Due to the urban nature of the stream, fishery resources are not anticipated to be present. The Project area will be monitored during construction and any fish will be relocated further downstream outside the LOW.

**Shellfish**

Not applicable.

**Wildlife Habitat**

The Project Site consists of the Garelick Farms facility, which consists primarily of a 210,000 SF building with associated parking, trailer storage, and auxiliary buildings. A BVW is located on the northeastern portion of the Site with a perennial stream that travels through the wetland. The area is relatively flat and paved with some landscaped areas. The proposed work is not anticipated to adversely affect wildlife habitat. Native vegetation will be preserved or restored post-construction. Restoration plantings are proposed within the Riverfront area in the southern portion of Site. No significant wildlife habitat impacts are anticipated.

**Rare Species Habitat**

According to the NHESP Atlas, 15<sup>th</sup> edition, effective August 2021, and MassGIS online mapping data, no portion of the Site is mapped as Estimated Habitats of Rare Wildlife or Priority Habitats of Rare Species.

**Agriculture**

The Project is located at the Garelick Farms property located in Franklin, MA, an approximately 52-acre parcel, and is zoned for industrial use (Parcel ID 275-023-000). The Project Site is not used for agricultural purposes and does not contain prime agricultural soils. As such, no adverse effects to agriculture are anticipated.

**Aquaculture**

Not applicable.

**Recreation**

The Project is located at the Garelick Farms property located in Franklin, MA, an approximately 52-acre parcel, and is zoned for industrial use (Parcel ID 275-023-000). The Project Site does not provide public recreational access. The proposed work will not affect any active or passive recreational uses.

**5.2.4 Mitigation**

Project mitigation has been conducted in accordance with Section 7.11 of the Franklin Wetlands Protection Regulations, with impacts to wetland resource areas avoided to the maximum extent feasible. The layout and design of the stormwater collection system was carefully planned to remain within previously disturbed areas and to limit the footprint of disturbance within Buffer Zones. Where avoidance was not possible, impacts were minimized by confining work to the smallest necessary area and employing construction BMPs to reduce disturbance. Temporary impacts within wetland resource areas are limited to installation of the drainage pipe and repaving disturbed pavement. The Project limits permanent impacts within the 25-foot No-Disturb Zone to a 50 SF area associated with the system outfall installation and 50 SF of permanent impacts to RFA associated with installation of a headwall, with the majority of work occurring outside this Buffer Zone or temporarily disturbed with immediate restoration planned.

Recognizing unavoidable impacts due to historic site constraints, the Project includes the installation of common winterberry (*Ilex verticillate*), choke cherry (*Prunus virginiana*), lowbush blueberry (*Vaccinium angustifolium*), or similar native species appropriate for the Site's soil and hydrologic conditions. The proposed plantings will be located within the Buffer Zone in the northeastern portion of the Site to restore and enhance resource area functions, consistent with the Town of Franklin's Best Development Practice Guidebook.

To protect resource areas during construction, the contractor will be required to implement and maintain appropriate erosion and sedimentation controls, such as silt fences and straw wattles, at all downgradient limits of work and as shown on Project Drawings. Additional stormwater management features include the use of deep-sump, hooded catch basins throughout the Project Site to treat runoff from paved surfaces. Please refer to the Stormwater Report in Appendix E for more information. Non-biodegradable mesh will not be used, preventing wildlife entanglement and aiding vegetation growth.

The Applicant will coordinate with the Commission to ensure that any additional mitigation requirements are addressed.

**5.2.5 Stormwater Management**

The Stormwater Management chapter of the Town of Franklin General Legislation states that control of stormwater runoff shall meet all federal and state requirements, including the Massachusetts Stormwater Handbook. Compliance with the Standards as described in the Massachusetts Stormwater Handbook is described in Sections 3.1-3.11 above.

Additional requirements for redevelopment projects within the Town of Franklin include that the proposed stormwater management system must also:

1. Retain the volume of runoff equivalent to, or greater than, 0.80 inch multiplied by the total post-construction impervious surface area on the site and/or
2. Remove 80% of the average annual post-construction load of TSS generated from the total post-construction impervious area on the site and 50% of the average annual load of Total Phosphorus (TP) generated from the total post-construction impervious surface area on the site.

It is not feasible to meet these requirements in full. The intent of the proposed project is to alleviate the Garelick Farms property of extensive flooding experienced during precipitation events, during which high volumes of stormwater runoff are conveyed onto the site through an existing culvert beneath Route 140, owned by MassDOT. The contributory area upstream of this culvert is significantly larger than that which encompasses the project site itself, and the management of resulting run-on presents a significant burden on the property owner. This unregulated inflow significantly increases both the rate and volume of run-on entering the site, making it infeasible to achieve the prescribed retention and pollutant removal requirements within available space and operational constraints.

Several on-site constraints prevent the installation of detention and recharge facilities for stormwater management, including the presence of an extensive network of subsurface utilities which limits available space for conventional stormwater treatment and retention structures. Additionally, routine plant operations and traffic circulation preclude the installation of above-ground stormwater detention or infiltration features. Given these limitations, the project proposes a stormwater management system that maximizes feasible treatment within the site's constraints.

Three catch basins are proposed to be replaced with deep-sump catch basins, which will provide an improvement to runoff from the project site in terms of water quality. The deep-sump within the proposed catch basin structures will provide an opportunity for TSS removal.

### **5.2.6 Abutter Notification**

Abutters within 300 feet of the subject parcel were notified in accordance with the MA WPA and Franklin Wetlands Regulations. The abutters list includes a certified list from the Town of Franklin and a list generated through ArcGIS to include abutters in the Town of Bellingham. The certified abutters list was received by the Town of Franklin Assessors on June 17, 2025, which included all abutters within 300 feet of the property in the Town of Franklin. A copy of the lists of abutters, abutter notification form, and Affidavit of Service are provided in Appendix D.

## **5.3 Other Pertinent Regulatory Programs**

### **5.3.1 Federal Permits**

#### **5.3.1.1 NPDES Construction General Permit (CGP)**

The Environmental Protection Agency (EPA) issues National Pollutant Discharge Elimination System (NPDES) Construction General Permits (CGP) as a part of the effort to minimize detrimental runoff caused by the clearing, grading, and excavating or general

construction activities on construction sites. Since the land disturbance will not exceed the CGP impact threshold of more than one acre of land, a NPDES CGP permit is not required.

### **5.3.1.2 Army Corps of Engineers Section 10 / 404 PCN**

The Project does not involved work below MHW and is not subject to jurisdiction under Section 10 of the Rivers and Harbors Act of 1899 or to jurisdiction under Sections 401 or 404 of the Clean Water Act.

## **5.3.2 State Permits**

### **5.3.2.1 Massachusetts Environmental Policy Act (MEPA) Review**

Massachusetts Environmental Policy Act (MEPA) review is required for projects that meet a MEPA review threshold at 310 CMR 11.03 and that involve a state agency action (i.e. permit, land transfer, or financial assistance). As proposed, the Project does not exceed any MEPA thresholds or involve a state action; therefore, MEPA review is not required.

### **5.3.2.2 Massachusetts Endangered Species Act (MESA)**

The Massachusetts Endangered Species Act (MESA) is implemented by the Massachusetts Natural Heritage and Endangered Species Program (NHESP) to protect areas determined to contain endangered, threatened or species of special concern. These areas are designated as "Priority Habitats of Rare Species" under the MESA Regulations (321 CMR 10.00) and are delineated state-wide in the Massachusetts Natural Heritage Atlas.

The Project is not located within mapped NHESP habitat area and does not require review under the MA WPA or MESA.

### **5.3.2.3 Massachusetts Historical Commission (MHC Review)**

A project is subject to review by the Massachusetts Historical Commission (MHC) / State Historic Preservation Officer (SHPO) if it requires funding, permits, or licenses from any state or federal agencies. MHC reviews projects requiring state agency action in compliance with 950 CMR 71.00 and, for projects that require state and federal permits, in compliance with Section 106 of the National Historic Preservation Act of 1966 (as amended). The Project does not require state or federal agency review and therefore MHC review is not required.

## **5.3.3 Local Permits**

No other local permits are required from the Town of Franklin.

**Tighe&Bond**

**APPENDIX D**

## **Town of Franklin Conservation Commission**

### **NOTIFICATION TO ABUTTERS**

#### **Under the Massachusetts Wetlands Protection Act And The Franklin Wetlands Protection Bylaw**

In accordance with the second paragraph of Massachusetts General Laws Chapter 131, Section 40, you are hereby notified of the following proposed project:

Dandreo Brothers General Contractors has filed a Notice of Intent with the Franklin Conservation Commission for the Garelick Farms Stormwater Improvements Project on October 2, 2025, under the Wetlands Protection Act (M.G.L c.131 §40).

Copies of the Notice of Intent may be examined during regular office hours at Please contact Jean Christy at JEChristy@tighebond.com or 413-572-3238 for additional information.

Copies may also be examined by contacting the Franklin Conservation Department located at 355 East Central Street, Franklin, MA, (508) 520-4929.

Notice of the public hearing including the date, time, and place will be published at least five (5) days in advance in the Milford Daily News.

Notice of the public hearing including the date, time, and place will be posted in the Franklin Town Hall at least forty eight (48) hours in advance of the public hearing.

The public hearing will be held on Thursday, October 16, 2025, 2025, at 7:00 pm at the Town Council Chambers, located on the Second Floor of the Municipal Building on 355 East Central Street. The meeting is also available via Zoom, and can be accessed through the Conservation Commission agenda for that night, which will be posted on the Town's website 48 hours prior to the meeting. Please call the Conservation Department at (508) 520-4929 if you have any questions.

You may also contact the Massachusetts Department of Environmental Protection, Central Regional Office, Worcester, MA at (508) 792-7650.

**Town of Franklin Conservation Commission**

**AFFIDAVIT OF SERVICE**

**Under the Massachusetts Wetlands Protection Act**

(To be submitted to the Massachusetts Department of Environmental Protection and the Franklin Conservation Commission when filing a Notice of Intent)

I, Jean Christy hereby certify under the pains and penalties of perjury that on October 2, 2025, I gave Notification to Abutters in compliance with second paragraph of Massachusetts General Laws Chapter 131, Section 40 in connection with the following matter:

A Notice of Intent filed under the Massachusetts Wetlands Protection Act by Dandreo Brothers General Contractors with the Franklin Conservation Commission on October 2, 2025 for property located on 1199 West Central Street, Franklin, MA.

The Notification to Abutters form and list of the abutters to whom it was given and their addresses are attached to the Affidavit of Service.



10/2/2025

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Signature

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Date



### 141412

### Abutter's List Request Form

Status: Active  
Submitted On: 6/13/2025

### Primary Location

1199 WEST CENTRAL ST Unit  
PLANT  
FRANKLIN, MA 02038

### Owner

DAIRY FARMERS OF AMERICA,  
INC  
1405 N 98TH ST KANSAS CITY,  
KS 66111

### Applicant

Hannah Bonvie  
 508-479-8641  
 hbonvie@tighebond.com  
 1 University Ave  
Westwood, MA 02090

## Abutter's List Request Form

Which Board/Commission is requiring this list?\*

Conservation Commission

What is the purpose for the request?\*

Requesting a Certified Abutters List for Conservation Commission NOI filing.

How would you like to receive this abutters list?\*

Emailed

What email address should we use to send you the abutters list?\*

HBonvie@tighebond.com

## General Parcel Information

Assessor's Parcel ID\*

275-023-000-000

Property Street Address\*

1199 West Central Street

### Property Owner Information

**Property Owner\***

Dairy Farms of America, Inc.

**Property Owner's Mailing Address\***

1405 N 98th Street

**Town/City\***

Kansas City

**Zip/Postal Code\***

66111

**State\***

KS

**Property Owner Telephone Number\***

816-801-6455

### Requestor's Information

**Requestor/Applicant same as Property Owner Information?\***

No

**Requestor's Name \***

Hannah Bonvie

**Requestor's Telephone Number**

508-479-8641

**Requestor's Address**

### Attachments

### Record Activity

Hannah Bonvie started a draft Record

06/13/2025 at 9:25 am

Hannah Bonvie submitted Record 141412	06/13/2025 at 9:29 am
OpenGov system altered payment step Abutters List Fee, changed status from Inactive to Active on Record 141412	06/13/2025 at 9:29 am
OpenGov system completed payment step Abutters List Fee on Record 141412	06/13/2025 at 9:32 am
OpenGov system altered approval step Assessors Department Review , changed status from Inactive to Active on Record 141412	06/13/2025 at 9:32 am
OpenGov system assigned approval step Assessors Department Review to Kevin Doyle on Record 141412	06/13/2025 at 9:32 am

## Timeline

Label	Activated	Completed	Assignee	Due Date	Status
📄 Abutters List Fee	6/13/2025, 9:29:49 AM	6/13/2025, 9:32:32 AM	Hannah Bonvie	-	Completed
✓ Assessors Department Review	6/13/2025, 9:32:32 AM	-	Kevin Doyle	-	Active
📄 Abutters List- Email	-	-	-	-	Inactive



# 300 feet Abutters List Report

Franklin, MA

June 17, 2025

## Subject Property:

Parcel Number: 275-023-000  
CAMA Number: 275-023-000-000  
Property Address: 1199 WEST CENTRAL ST

Mailing Address: DAIRY FARMERS OF AMERICA, INC  
1405 N 98TH ST  
KANSAS CITY, KS 66111

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## Abutters:

Parcel Number: 271-006-000  
CAMA Number: 271-006-000-000  
Property Address: GROVE ST

Mailing Address: NEW YORK CENTRAL LINES LLC C/O  
CSX TRANSPORTATION INC TAX  
DEPARTMENT  
500 WATER ST (C 910)  
JACKSONVILLE, FL 32202

Parcel Number: 272-007-000  
CAMA Number: 272-007-000-000  
Property Address: FORGE PKWY

Mailing Address: COMMONWEALTH OF  
MASSACHUSETTS HIGHWAY  
DEPARTMENT  
10 PARK PLAZA  
BOSTON, MA 02116

Parcel Number: 272-010-000  
CAMA Number: 272-010-000-000  
Property Address: 1112 WEST CENTRAL ST

Mailing Address: MASS BAY TRANSPORTATION AUTHOR  
  
45 HIGH STREET - 9TH FLOOR  
BOSTON, MA 02110

Parcel Number: 272-011-000  
CAMA Number: 272-011-000-000  
Property Address: WEST CENTRAL ST

Mailing Address: MASS BAY TRANSPORTATION AUTHOR  
  
45 HIGH STREET - 9TH FLOOR  
BOSTON, MA 02110

Parcel Number: 272-012-000  
CAMA Number: 272-012-000-000  
Property Address: WEST CENTRAL ST

Mailing Address: NEW ENGLAND POWER CO PROPERTY  
TAX DEPARTMENT  
40 SYLVAN RD  
WALTHAM, MA 02451-2286

Parcel Number: 272-015-000  
CAMA Number: 272-015-000-000  
Property Address: WEST CENTRAL ST

Mailing Address: NEW ENGLAND POWER CO PROPERTY  
TAX DEPARTMENT  
40 SYLVAN RD  
WALTHAM, MA 02451-2286

Parcel Number: 272-016-000  
CAMA Number: 272-016-000-000  
Property Address: WEST CENTRAL ST

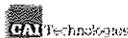
Mailing Address: 27 FORGE PARKWAY LLC  
27 FORGE PKWY  
FRANKLIN, MA 02038-3135

Parcel Number: 272-018-000  
CAMA Number: 272-018-000-000  
Property Address: WEST CENTRAL ST

Mailing Address: NEW ENGLAND POWER CO PROPERTY  
TAX DEPARTMENT  
40 SYLVAN RD  
WALTHAM, MA 02451-2286

Parcel Number: 272-019-000  
CAMA Number: 272-019-000-000  
Property Address: 1025 WEST CENTRAL ST

Mailing Address: RDA LLC  
21 BERKSHIRE DR  
FRANKLIN, MA 02038



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This information is believed to be correct but is subject to change and is not warranted.

6/17/2025

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# 300 feet Abutters List Report

Franklin, MA

June 17, 2025

Parcel Number: 273-001-000  
CAMA Number: 273-001-000-000  
Property Address: WEST CENTRAL ST

Mailing Address: BERNON LAND TRUST LLC  
PO BOX 70  
EAST GREENWICH, RI 02818

Parcel Number: 274-001-000  
CAMA Number: 274-001-000-000  
Property Address: 1256 WEST CENTRAL ST

Mailing Address: GTE FRANKLIN REALTY LLC  
PO BOX 2844  
BROCKTON, MA 02305

Parcel Number: 274-002-000  
CAMA Number: 274-002-000-000  
Property Address: 1280 WEST CENTRAL ST

Mailing Address: KAD HOLDINGS CORP  
1 CHARLESVIEW RD  
HOPEDALE, MA 01747

Parcel Number: 274-008-000  
CAMA Number: 274-008-000-000  
Property Address: 100 WOODVIEW WAY

Mailing Address: WEST CENTRAL STREET OWNER LLC  
C/O THE DSF GROUP  
341 NEWBURY ST SUITE 5  
BOSTON, MA 02115

Parcel Number: 274-013-000  
CAMA Number: 274-013-000-000  
Property Address: 1359 WEST CENTRAL ST

Mailing Address: BERNON LAND TRUST LLC  
PO BOX 70  
EAST GREENWICH, RI 02818

Parcel Number: 274-014-000  
CAMA Number: 274-014-000-000  
Property Address: 1331 WEST CENTRAL ST

Mailing Address: BERNON LAND TRUST LLC  
PO BOX 70  
EAST GREENWICH, RI 02818

Parcel Number: 274-015-000  
CAMA Number: 274-015-000-000  
Property Address: 1311 WEST CENTRAL ST

Mailing Address: BERNON LAND TRUST LLC  
PO BOX 70  
EAST GREENWICH, RI 02818

Parcel Number: 274-016-000  
CAMA Number: 274-016-000-000  
Property Address: 1301 WEST CENTRAL ST

Mailing Address: BERNON LAND TRUST LLC  
PO BOX 70  
EAST GREENWICH, RI 02818

Parcel Number: 275-009-000  
CAMA Number: 275-009-000-000  
Property Address: 38 FORGE PKWY

Mailing Address: NV FORGE OWNER LLC ATTENTION  
PETER CARBONE III  
265 FRANKLIN ST STE 1001  
BOSTON, MA 02110

Parcel Number: 275-010-000  
CAMA Number: 275-010-000-000  
Property Address: WEST CENTRAL ST

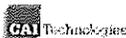
Mailing Address: COMMONWEALTH OF  
MASSACHUSETTS HIGHWAY  
DEPARTMENT  
10 PARK PLAZA  
BOSTON, MA 02116

Parcel Number: 275-012-000  
CAMA Number: 275-012-000-000  
Property Address: 33 FORGE PKWY

Mailing Address: MASSACHUSETTS INTERSCHOLASTIC  
C/O RICHARD NEAL  
33 FORGE PARKWAY  
FRANKLIN, MA 02038

Parcel Number: 275-013-000  
CAMA Number: 275-013-000-000  
Property Address: 27 FORGE PKWY

Mailing Address: 27 FORGE PARKWAY LLC  
27 FORGE PKWY  
FRANKLIN, MA 02038-3135



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6/17/2025

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# 300 feet Abutters List Report

Franklin, MA  
June 17, 2025

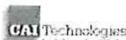
Parcel Number: 275-022-000  
CAMA Number: 275-022-000-000  
Property Address: 1122 WEST CENTRAL ST

Mailing Address: COMMONWEALTH OF  
MASSACHUSETTS HIGHWAY  
DEPARTMENT  
10 PARK PLAZA  
BOSTON, MA 02116

Parcel Number: 275-023-000  
CAMA Number: 275-023-000-000  
Property Address: 1199 WEST CENTRAL ST

Mailing Address: DAIRY FARMERS OF AMERICA, INC  
1405 N 98TH ST  
KANSAS CITY, KS 66111

*Kevin M. Doyle, 6-17-25*



[www.cai-tech.com](http://www.cai-tech.com)

This information is believed to be correct but is subject to change and is not warranted.

6/17/2025

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**Garelick Farms Flooding Resiliency Improvements - Bellingham Abutters List**

<b>Parcel ID</b>	<b>Parcel Address</b>	<b>Parcel Municipality</b>	<b>Owner Name</b>	<b>Owner Mailing Address</b>	<b>Owner City</b>	<b>Owner State</b>	<b>Owner Zip</b>
0047-0001-0000	419 MAPLE STREET	BELLINGHAM	SPIRIT REALTY LP	2727 N HARWOOD ST #300	DALLAS	TX	75201
0051-0016-0001	429 MAPLE STREET	BELLINGHAM	429 MAPLE STREET PLANT LLC	84 TOSCA DR	STOUGHTON	MA	02072
0052-0003-0000	206 MECHANIC ST	BELLINGHAM	BAS REALTY TRUST	6 BLACKSTONE ST	BELLINGHAM	MA	02019