



# Guerriere & Halnon, Inc.

ENGINEERING & LAND SURVEYING

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October 14, 2025

Franklin Planning Board  
355 East Central Street  
Franklin, MA 02038  
Attn: Amy Love, Town Planner

RE: *Comments from Beta Group Adin Estates Definitive Subdivision*

Dear Members of the Board:

On behalf of our client, Calarese Properties, Guerriere & Halnon, Inc. (G&H) and Capital Environmental, LLC (CE) has prepared the following information to address the request for additional information from BETA and the Planning Board regarding potential impacts to the abutting blueberry farm, in accordance with §300-8D of the Franklin Subdivision rules and regulations. The requirements of §300-8D are shown below in **bold**, and our responses below are shown in *italics*, with the corresponding initials indicating the respondent (G&H or CE).

- (1) Impact upon ground- and surface water quality and level, including estimated phosphate and nitrate loading on groundwater and surface water from septic tanks, lawn fertilizer, toxic wastes, storage of petroleum products and other activities within the development. For all developments located in whole or in part within Water Resource Districts, this shall include analysis of open and closed drainage system alternatives, examining effects upon the basic water budget and upon the speed of transport of contaminants.**

*CE: Proper application techniques, such as using the correct amount, avoiding application before heavy rain, and cleaning up spills, if any, are typical methods for preventing impacts to the aquifer from common lawn fertilizers. The shallow aquifer in the Town of Franklin is on average 8 to 16 feet below ground surface. A proper loam layer at residential homes will absorb fertilizers before they leach to the aquifer. Depending on the loam composition, its mixture of sand, silt, and clay, helps the loam ability to hold water and nutrients. The clay particles provide cation exchange capacity (CEC) to hold positively charged nutrients, while the sand creates porosity for water and aeration. Overall, loam is considered ideal because it balances water and nutrient retention with good drainage and aeration. Proper loam placement is ideal for aquifer protection.*

*No toxic waste storage and/or generation will occur in this residential setting. These properties will not be used for commercial/industrial usage. The only petroleum on the parcels will be normal use of automobiles and lawn care equipment. This is considered normal-routine and non-impactful use of petroleum, common to all neighborhoods rural and/or urban.*

*The neighboring farm property is a possible source of future nutrient impacts to the new neighborhood development. Nutrient and pesticide runoff from the neighboring blueberry farm primarily involves excess*

*nitrogen and phosphorus from fertilizers washing into waterways and aquifers if not properly managed. This runoff from the neighboring berry farm can also potentially carry soil particles, as blueberry roots are poor at holding soil, which can damage the land and increase turbidity. To mitigate this, farmers should use practices like proper irrigation, soil management, and install buffer strips of trees and shrubs along waterways to absorb and filter nutrients before they reach the water.*

*The news homes will be heated by natural gas and will not have home-heating fuel deliveries or basement oil tanks. This is considered an environmentally friendly fuel source.*

**(2) Material effects upon important wildlife habitats, outstanding botanical features and scenic or historic environs.**

*CE: In Massachusetts, residential natural habitats are created by homeowners and community groups that support local biodiversity. Residents can transform their own yards, or "habitat patches," into vital oases for native wildlife by planting native vegetation and providing shelter. This five-home development will have landscaping that will support the current and future backyard habitat for animals common to the area. No adverse impact to wildlife is anticipated. The area of development is surrounded by residential parcels and this development will continue to support the native animal and aviary populations. This is not an area designated as "historical". No adverse historical impact will occur. The proposed homes will be designed to be scenic and pleasing for all to see and enjoy.*

**(3) Capability of soils, vegetative cover and proposed erosion control efforts to support proposed development without danger of erosion, silting or other instability.**

*CE: The planting beds, lawns and green spaces proposed for this development will control and prevent future erosion after construction is completed providing proper stability and longevity to the natural habitat in the neighborhood.*

*G&H: During construction, multiple erosion control measures will be implemented, including mulch sock erosion control barriers, sedimentation basins, phased disturbance schedule (no stumping/stripping of topsoil outside right of way until road is constructed), stabilized construction entrance, and protected stockpile areas. In addition, a NPDES SWPPP will be implemented, including additional measures and a strict inspection and reporting program coordinated with the Town of Franklin.*

*Soils on site consist of sand and loamy sand under a typical loamy top soil, with established grass, bush, and tree cover. The existing and proposed topography results in stormwater runoff flowing to the west and northeast, with very little flow directly to the existing blueberry farm. Finished soil cover in disturbed areas will be grass, established either through hydroseeding or with other stabilizing means to prevent erosion prior to germination. Erosion control measures will remain in place until the site is fully stabilized, and the road accepted by the town, whichever occurs last.*

**(4) Relationship to the requirements of MGL c. 131, §§ 40 and 40A, the Wetlands Protection Act and the Town of Franklin Wetlands Bylaw.**

*G&H: No local or state jurisdictional wetland resource areas are present on or adjacent to the site, and accordingly no impacts to such areas are anticipated. The project is compliant with all applicable state and local stormwater regulations.*

**(5) Impact upon the existing water supply and distribution systems and well capacity of the Town.**

*G&H: The site is proposed to be serviced by five private wells, no connection to Franklin's public water supply system is proposed. In addition, the site lies outside the Franklin Water Resource Overlay District (Zone II of public water supply wellhead protection area). Accordingly, no impacts to the existing public water supply and distribution systems, either direct or indirect, are anticipated. Nonetheless, the proposed land use is consistent with the surrounding area (single family residential homes), and the project will not be a source of new or disturbance of existing pollutants (see CE response to §300-8D(1) above).*

**(6) Pretreatment of waste materials considered by the Department of Environmental Quality Engineering to be hazardous to the public, including but not limited to the proper containment and handling of petrochemical substances.**

*G&H: The site is proposed to be developed as a five-lot single-family residential subdivision, and the project does not include the proposed storage of large quantities of petrochemical substances. This is consistent with the surrounding residential area. However, an extensive Long-Term Operation and Maintenance plan has been provided, including requirements for the safe operation of the site and storage/use of potential contaminants (herbicides/pesticides/fertilizer, sewage, pet waste, vehicle washing, solid waste/garbage, road salt/sand, etc), including requirements for inspections, spill prevention and response, and stormwater BMP maintenance. (see CE response to §300-8D(1) above).*

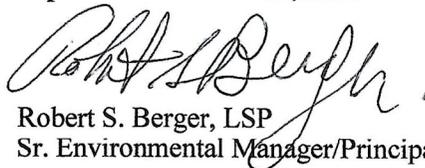
We believe these responses have addressed the concerns expressed by BETA Group from their review letter. Should you have any further questions or concerns, please contact our office.

Sincerely,  
**Guerriere & Halnon, Inc.**



Michael Hassett  
Project Engineer

**Capital Environmental, LLC**



Robert S. Berger, LSP  
Sr. Environmental Manager/Principal