

# United Consultants, Inc.

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October 2, 2025

Mr. Gregory Rondeau, Chair  
And Members of the Franklin Planning Board  
Mr. Mark LePage, Chair  
And Members of the Franklin Conservation Commission  
355 East Central Street  
Franklin, MA 02038

## **Re: Lot 2 Forge Parkway - Site Plan Peer Review**

Chairman Rondeau, Chairman LePage, Planning Board Members, Conservation Commission Members,

On behalf of the applicant, Camford Property Group, Inc., we have provided a summary of the following comments from The Town Planner, Town Engineer, Franklin Fire Department, BETA Group, Inc. – Site Plan BETA Group, Inc. – Notice of Intent Massachusetts Department of Environmental Protection. We have also provided comments received from the Town of Franklin Planning Board and Conservation Commission at the Public Hearing. Our responses immediately follow each comment and they have been italicized.

### **Town Planner**

#### **General:**

1. The site is at Forge Parkway in the Industrial Zoning District. *The site is located in a Business Zoning District.*
2. The applicant is proposing to construct a warehouse building, including office space with stormwater and utility connections. *Agreed, no additional response.*
3. Applicant has filed with the Conservation Commission. *The Conservation Commission review is ongoing.*
4. BETA has provided a review letter. *BETA letter has been received and responses are included in this response letter.*

#### **General:**

1. Provide an area for snow storage. *Refer to snow storage note which indicates snow storage will be located on the landscape areas. See sheet 5.*
2. *Given the use as a warehouse, where will the trucks load and unload. Trucks will be directed to the rear of the building and will access the building through the two proposed 16' Over Head Doors (ODH). See Tetra Tech traffic memo.*

### **Town Engineer**

1. Applications that will need to be filed with the Franklin Department of Public Works may include but are not necessarily limited to a Water and Sewer Permit, ROW Excavation Permit, Public Way Access Permit and Soil Erosion Permit. *The applicant will file for all the necessary permits prior to commencing with construction.*

2. The project includes three retaining walls which range in height from 10' to 16', two of which are adjacent to the existing railroad. Additional wall details should be provided to ensure the walls can support the railroad live loads and be constructed adjacent to the property lines without the need for tie-backs or other soil reinforcing. *The applicant will provide wall designs with the future submission.*

### **Franklin Fire Department**

1. At the meeting with the Deputy Fire Chief, it was requested that an additional fire hydrant be added. *An additional hydrant has been added near the rear building corner area.*

### **BETA Group, Inc. - Planning Board**

- Z1. The side yard as proposed will be 9'. In accordance with the bylaws, the required side yard setback is 20'. In this instance, the Applicant is depending upon the language of §185-25 which states that ***“In commercial and industrial areas, side yard and or rear yard requirements .... shall be waived where said lots are adjacent to an existing railroad.”*** Because the underlying Zone is Business, and is not specifically noted in the bylaws, BETA will defer this issue to the Board whether the bylaw applies to the zone or is the application of the bylaw specific to the use. *We have had discussion with the Town Planner regarding this matter and the site has been determined to be in an Industrial Area and thus the setback has been met.*

#### Parking, Loading and Driveway Requirements (§185-21)

See Section 5 below.

#### Earth Removal (§185-23)

As previously noted, the project will require extensive earth moving activities in the development area. Three (3) retaining walls will be required which will essentially encapsulate the entirety of the development area. Overall, as noted on Sheet 4, the site will require a net 5,177 cubic yards of fill. (7,037 fill-1,860 cuts)

#### Sidewalks (§185-28) and Curbing (§185-29)

The project is located within the Business zone and thus sidewalks are required along street frontage. There is an existing sidewalk along the front of the lot on Forge Parkway. Sidewalks on site will be limited to the west and south face of the building to provide access to building entrances at the office area.

- Z2. Based upon the construction details on sheet 9, it appears that precast vertical concrete curbing will be used around the paved areas. BETA recommends that the curbing be labeled on sheet 3 to eliminate any confusion. *Curb labels have been added to sheet 3.*

#### Site Plan and Design Review (§185-31)

The project has been submitted for Site Plan Review and is required to conform to the requirements of this section. The submission complies with this section except as noted below:

- Z3. BETA recommends that a description of traffic circulation, safety and capacity be provided in sufficient enough detail for the Board to make a determination of whether a traffic impact analysis is necessary (§185-31. C.(3)(s)). *The applicant is having Tetra Tech prepare a traffic memo which is expected to address the traffic circulation, safety and capacity for the proposed project.*
- Z4. Sight line information at the entrance should be provided (§185-31. C.(3)(t)). BETA also recommends that the applicant look at the issue associated with the existing grades (6.66% slope) in Forge Parkway at the proposed entrance. *Sight lines have been added to sheet 4. The accessible site frontage (which would not require a wetland filling or work within the 25' undisturbed buffer zone is approximately 6.6%. To avoid environmental issues the proposed entrance would need to be located within this slope area. Tetra Tech will provide the sight distance requirements.*
- Z5. An engineered design for the retaining walls should be provided prior to approval. *The applicant will provide wall designs with the future submission.*

## Landscaping and Screening (§185-35)

Refer to Landscape and Grading section below.

## Traffic Impact and Assessment

No traffic data or site assessment was provided with the filing.

### Site Access and Circulation

Access to the Site will come from the north bound side of Forge Parkway. Forge Parkway is a divided roadway and there are no openings in the Middle Island that will allow traffic to access the site from the south bound side. The nearest island opening is approximately 500' south at 2 Forge Parkway. Interior access will proceed either around the front of the building to the parking spaces in front of the office or to the north of the building which will access the loading docks at the rear of the structure. All access aisles to the parking spaces will be 24' wide. Beyond the parking spaces at the rear of the building, the driveway width will be reduced to 20' and over 100' of pavement will be provided behind the overhead doors for maneuvering.

A stop sign and right-turn only sign is proposed at the driveway entrance.

- T1. Confirm that the proposed configuration has been reviewed by the Town Fire Department. *See Franklin Fire Department memorandum dated September 4, 2025.*
- T2. The access aisle for the front parking lot is located within 8'± of the property line at the front southwest corner of the parking lot. The applicant should either revise the layout or request the waiver from §185-21.C.(1) for off street parking within 10' of the right of way. *The parking space areas are greater than 10 feet from the Right of Way. The driveway area is located within 10 feet of the Right of Way (8.5 feet). A waiver has been requested to address this issue. if determined to be necessary.*
- T3. Include turning exhibit for WB-67 semi-trailer or largest expected vehicle through the Site. *The applicant is having Tetra Tech provide truck sizing and turning information.*

## Parking And Loading

Required parking is defined by §185-21.B of the Town Zoning Bylaw. The parking summary for the proposed building is as follows.

Use Designation	Criteria	Building Area	Required Parking
Office	1 space per 250 SF of floor area	4,000 Sq. Ft.	16 Spaces
Warehouse/Loading	1 space per 1,000 SF of floor area	9,200 Sq. Ft.	10 Spaces
Total			26 Spaces

The project proposes 26 parking spaces, including two (2) spaces designed to be van accessible, in accordance with 521 CMR 23.2.1.

Parking spaces are 9 feet wide and 19 feet long: aisle widths are 24' except at the southeast corner of the building where the driveway width is reduced to 20'.

No areas have been designated for trailer parking. Two (2) overhead doors provide at-grade access into the building at the rear of the structure.

## Signage and Lighting

The project proposes various signs including accessible parking signs, van accessible designation, and a stop sign. Details are provided for these 3 signs. However, no detail for the right turn only sign has been provided.

A photometric plan has been provided indicating six (6) wall mounted fixtures on the building and one pole mounted fixture at the rear of the site.

The Illuminating Engineers Society of North America (IESNA) recommends the following illuminance for parking lots:

Level	Horizontal Illuminance (Min)	Vertical Illuminance (Min.)	Uniformity Ratio (Max/Min)
Basic Maintained Illuminance	0.2	0.1	20/1
Enhanced Security Illuminance	0.5	0.25	15/1

Luminance within the parking lot is generally consistent with the above table.

SL1. *Provide detail for “Right Turn Only” sign. The proposed right turn only sign has been eliminated based on the addition of the proposed two way access.*

#### Utilities

Proposed utilities depicted on the plans include domestic water, fire service, including one new hydrant, and sewer service. An MDC Gas Trap is shown on the plan to treat runoff from the floor of the warehouse. There are no references on the plan regarding electric, gas and telecommunications connections. However, there is an existing transformer and meter pad on the front southwest corner of the lot.

U1. Since the existing gas main in Forge Parkway is on the opposite side of the right of way, the plans should indicate if a gas service will be brought onto the site. *The proposed gas service and notes have been added to the plans. Sheet 4.*

#### Landscape Treatment & Grading

The project proposes three (3) deciduous trees and several areas of naturalized plantings around the perimeter of the disturbance area. The trees will be set in the landscaped islands and along the outside edge of the pavement.

Per §185-21.C.(5), the project is required to provide 1 tree per 10 parking spaces. For 26 spaces, 3 trees are required. The landscaping plan includes 3 trees, which will satisfy this requirement.

The project includes outdoor parking for 10 or more cars and loading docks and is thus required to provide screening in accordance with §185-35. There is no residential use within 500’ of the proposed development area, thus this portion of the bylaw is not applicable to the site.

The outer slopes to the south and east will be planted with a conservation seed mix. All the landscape islands and foundation edging will be mulched.

#### Stormwater Management

The proposed development will be a new development. As outlined in the Hydro-CAD analysis, the development will result in overall impervious surfaces totaling 38,126 sq. ft.

The proposed stormwater management design consists primarily of a single subsurface infiltration system, which will infiltrate and treat all the runoff from the proposed impervious surfaces associated with the development area.

Roof runoff will be collected and piped directly to the subsurface system in two locations at the front and rear of the building. All the runoff from the paved surfaces will be collected by 4 catch basins located around the site. Each of these basins will be proprietary separators that will provide the pretreatment needed for the subsurface infiltration system. The subsurface system will be located along the northerly edge of the building beneath the parking lot.

## General

SW1. It appears that the proposed infiltration system layout is partially within the 50' buffer from the limit of the bordering vegetated wetlands. In accordance with the stormwater standards, all infiltration systems must be setback a minimum of 50' from the waters of the Commonwealth, which includes wetlands. BETA recommends that the designer reconfigure the proposed infiltration system to meet this setback. *The proposed infiltration system layout has been revised and a 5' diameter connector pipe was added. The total length of 5' diameter perforated pipe has remained at 444 L.F.*

## Stormwater management regulations (chapter 153)

The project proposes to disturb land in excess of one acre within the Town of Franklin. It is therefore subject to the Stormwater Management Regulations. The project is also required to comply with the Town of Franklin Best Development Practices Guidebook (BDPG). Compliance with these regulations is outlined below and throughout the following sections.

### Subdivision regulations - stormwater management regulations (§300-11)

Additional requirements for stormwater management are outlined in §300-11 of the Town of Franklin Subdivision Regulations. The Applicant has requested several waivers from these regulations.

SW2. BETA defers to the Town regarding the waiver from §300-11. B.(2)(a) to allow use of SDR 35 PVC (roof drains) and HDPE drainage pipe (connection to subsurface system) instead of reinforced concrete pipe and to allow less than 42" of cover over the top of the pipe when using Class V RCP. *The applicant defer the waiver request to the Planning Board.*

## Best Development Practices Guidebook

The project is required to comply with the requirements of the Town of Franklin 2021 Best Development Practices Guidebook (BDPG). Notes have been added to the Landscape Plan which indicate that all plantings are in accordance with the Town of Franklin Best Development Practices Handbook.

### Massdep Stormwater Standards

The project is subject to the Town regulation §153-14.A and therefore must comply with the Massachusetts Stormwater Standards as outlined by MassDEP. Compliance with these standards is outlined below:

#### Low impact development (lid) techniques

No LID measures are proposed.

No Untreated Stormwater (Standard Number 1): *No new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.*

The project proposes one new outfall from the proposed subsurface infiltration system. A rip rap apron is proposed at this outfall to prevent any erosion.

Post-Development Peak Discharge Rates (Standard Number 2): *Stormwater management systems must be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates.*

The project proposes to mitigate increases to runoff rates with the use of a subsurface infiltration system. The proposed infiltration system will discharge to the wetlands at the peak of the 100-year frequency rainfall only. Calculations show a decrease for all other rainfall events.

Recharge To Groundwater (Standard Number 3): *Loss of annual recharge to groundwater should be minimized through the use of infiltration measures to maximum extent practicable.*

NRCS soil maps indicate that the development area is primarily composed of human transported materials. Test pits conducted across the site indicate that the site is underlain by Class I soils with groundwater levels ranging from 45" to greater than 134" at the rear of the site. Design exfiltration rates were based on actual in-situ testing results.

Groundwater recharge is proposed for all runoff from the proposed new site development area. The static storage volume provided exceeds what is required for all the impervious areas on site, which includes the existing parking and building roof area.

Drawdown Calculations have not been provided, however, based upon the exfiltration rate and depth of the system, this is not a concern.

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

The project is also subject to §153-16 of the Town of Franklin Stormwater Management Regulations which stipulates treatment requirements for new development projects. The project will retain the volume of runoff equivalent to 1.0” x the total impervious surface area (§153-16.B.1(a)). 100% of the impervious surface area is tributary to the infiltration measures. Pretreatment for flow into the infiltration systems will be 45% TSS Removal based upon the treatment provided by the proprietary separators.

The project includes the following treatment trains:

Treatment Train	SCM 1 Pretreatment	SCM 2	TSS Removal %
Pond 1	Separator (Contech CDS 1515-3)	Subsurface infiltration system	80%

In accordance with the EPA guidelines, the project has been designed to provide at least 90% TSS removal and at least 100% total phosphorus and nitrogen removal for all the new impervious surface areas.

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

Higher Potential Pollutant Loads (Standard Number 5): *Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific stormwater management BMPs. (Not applicable)*

Critical Areas (Standard Number 6): *Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas. (Not applicable)*

Redevelopment (Standard Number 7): *Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable. (Not applicable)*

Erosion And Sediment Controls (Standard Number 8): *Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities.*

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

SW3. The applicant is reminded that in accordance with the bylaws, a Soil Erosion and Sediment Control plan and Stormwater Management plan must be approved by the DPW prior to the start of construction. *The applicant acknowledges that a Soil Erosion and Sedimentation Control Plan and Stormwater Management plan are required to be filed with the DPW prior to commencing with construction.*

Operations/Maintenance Plan (Standard Number 9): *A Long-Term Operation and Maintenance Plan shall be developed and implemented to ensure that stormwater management systems function as designed. A Stormwater Operation and Maintenance Manual was provided with the Stormwater Management Report.*

SW4. Provide signature of owner on the O&M Plan (§153-18.B.5). *The applicant will provide a signed O&M plan with the application for the Stormwater Permit Application submission to the DPW. It is anticipated that the applicant will be the owner at the time of application.*

SW5. Provide brief description of maintenance requirements for each stormwater SCM, including all paved and landscaped areas. The requested information has been provided in the Operation and Maintenance Plan - Yearly Inspection and Maintenance Log. The requested information has also been added to sheet 6.

Illicit Discharges (Standard Number 10): *All illicit discharges to the stormwater management system are prohibited.*

SW6. The Illicit discharge statement should be signed by the Owner. However, the statement indicates that it will be signed and submitted with the SWPPP and the Town of Franklin stormwater permit application. BETA will defer this to the DPW. *The applicant defer to the DPW and Planning Board.*

### **BETA Group, Inc. – Conservation Commission**

A1. The Massachusetts Department of Environmental Protection (MASSDEP) has not issued a DEP file number. *MASS DEP has issued a file number for the project. DEP File# CE159-1318*

A2. The following plan elements are required:

- a. The proposed tree line and individual trees/shrubs greater than 1” proposed for removal should be shown on the plans per Bylaw Regulation Section 7.18.1.5. It is BETA’s understanding that the Commission generally increases the size threshold for tree location based on the Project and therefore defers to the Commission on this matter. *The requested additional information has been added to sheet 5.*
- b. The Assessor’s Reference for the abutting properties should be provided on the plans. *The requested additional information has been added to sheet 3.*

W1. Upgradient of flags A-20 through A-22, hydric soils were observed including a dark surface underlain by depletions and redoximorphic features, and hydrophytic vegetation was observed including sensitive fern (*Onoclea sensibilis*), skunk cabbage (*Symplocarpus foetidus*), and red maple (*Acer rubrum*). The delineation should be revised in this area. *Wetland flags A-19R, A-20R and A-21R were added by Goddard Consulting. The revised flag locations have been added to the site plans.*

W2. The applicant should determine if the project will disturb more than one (1) acre of land. If so, a Notice of Intent (NOI) must be submitted to the Environmental Protection Agency (EPA) under the Construction General Permit (CGP) and a Stormwater Pollution Prevention Plan (SWPPP) must be prepared. The Commission could consider a Special Condition with the Order of Conditions that requires the submission of the SWPPP for review and approval prior to commencement of work. *The project disturbance area will exceed one acre. A NOI and SWPPP will be completed. The applicant is amenable to a condition to allow the Commission to review and approve the NOI and SWPPP documents.*

W3. Invasive species including bittersweet (*Celastrus orbiculatus*), bush honeysuckle (*Lonicera* spp.), Japanese barberry (*Berberis thunbergii*), and multiflora rose (*Rosa multiflora*) are present throughout the area proposed for construction. The Applicant should provide a plan detailing how material containing invasive species plant matter will be managed to ensure no further spread occurs as a result of the Project. *The applicant's environmental consultant, Goddard Consulting, will be providing an invasive species management plan.*

W4. The location where snow will be stored during construction should be shown on the plans outside of Buffer Zone. *A construction period snow storage area has been added along with excess snow removal notes. See sheet 6.*

W5. Provide further information on the construction of the proposed retaining wall including any required weep holes and whether stone/grading is required beyond the base of the wall. *The applicant will provide retaining wall plans. The crushed stone base and weep hole notes were added to sheet 5.*

W6. It is not anticipated that groundwater will be encountered when excavating for the retaining wall; However, the Commission could consider a Special Condition in the Order of Conditions requiring the submission and approval of a dewatering plan prior to discharge in the event that groundwater is encountered. *The applicant is amenable to the requested Special Condition within the Order of Conditions.*

W7. Inlet protection should be depicted on the Erosion Control Plan within the catch basin along Forge Parkway. *The catch basing located within Forge Parkway and down gradient from the site entrance has a proposed silt sak. See sheet 6 CB#4.*

W8. The applicant is proposing planting of native species at the Site; however, it is that each circle represents a woody planting, and these are located directly along the base of the retaining wall. The Applicant should confirm whether a greater setback between the wall and plantings is required. *The proposed plantings have been removed from the plans. The proposed plantings will be located within the invasive species removal area. See Goddard Consulting invasive species management plan for plantings.*

W9. The Applicant included Bordering Land Subject to Flooding (BLSF) as a Resource Area that exists on the property within the project narrative and has depicted BLSF on the Plans. According to FEMA's most up-to-date mapping that was updated on July 8, 2025, no area of BLSF is present at the Site; only a Zone X – 500 year flood zone is present. The Applicant should revise the plans and provide a new FEMA Flood Plain Map to comply with the Bylaw Regulations set forth in Section 7.17.1 *A copy of FEMA Map, dated July 8, 2025, is being provided. The FEMA Map shows the Lot being within the Zone X and the 500 year flood zone. The map also provides the 100 year flood zone AE which is elevation 194.4. This Zone AE elevations has been shown and listed on the site plans.*

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

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

W11. A Vernal Pool Statement should be provided per Bylaw Section 7.7. *The Vernal Pool Statement located on sheet 4 has been revised to include abutting properties within 100 feet of the locus property.*

## **MASS DEP**

- The site appears to include Riverfront Area (RA) associated with an offsite unnamed perennial stream which is not shown of the plans. RA Should be shown to determine if work is proposed within this wetland resource area. *The riverfront area has been added to the site plans.*

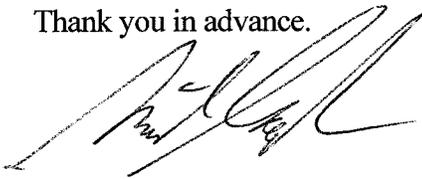
- As shown, a portion of the subsurface infiltration system is located within 50 ft of the BVW. Infiltration BMPs are required to be set back a minimum of 50 ft from a surface water as identified in V.2 Ch.2 of the MA Stormwater Handbook. *The proposed infiltration system layout has been revised and a 5' diameter connector pipe was added. The total length of 5' diameter perforated pipe has remained at 444 L.F.*
- The location of the proposed subsurface infiltration basins should be restricted during construction to avoid soil compaction which could decrease the effectiveness of the future infiltration structures. Stockpiling of materials and vehicles and equipment should be restricted from these areas. See Vol. 2 Ch.2 pg. 106 of the MA Stormwater Handbook. The Commission may consider that the erosion control plan sheet and the future SWPPP be updated to include recommended measures. Notes to protect the *Underground Infiltration Area have been added to sheet 6.*
- The O&M plan should be updated to include activities specific for the subsurface infiltration system. The Commission may want to consider perpetual conditions for O&M Activities. *Refer to the O&M Plan within the Drainage Analysis and on sheet 6 for underground infiltration area inspection and maintenance. The applicant is amenable to a perpetual conditions regarding O&M Activities.*

### **Planning Board Comments**

- Setback for railroad siding. *The applicant is working with the MBTA to address this matter.*
- Large Vehicles to site. Site Traffic. *The applicant has engaged Tetra Tech to address the site and project area traffic. We anticipate the Tetra Tech memo will address these items.*
- Divided road cut through. *A cut through of the existing island has been proposed and added to the plans.*

We look forward to meeting with the Planning Board and the Conservation Commission to discuss this project further.

Thank you in advance.



Richard Goodreau  
Project Manager