



October 13, 2025

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

**Re: Lot 2 – Forge Parkway
MassDEP File No. 159-1318
Notice of Intent Peer Review #2**

Dear Mr. Paslaski:

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

BASIS OF REVIEW

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

- Letter entitled **Lot 2 Forge Parkway – Site Plan Peer Review**; prepared by United Consultants, Inc.; dated October 2, 2025.
- Narrative entitled **Invasive Species Management Plan**; prepared by Goddard Consulting; dated October 7, 2025.
- Variance Request entitled **Variance Request, Lot 2 Forge Parkway, Franklin, MA**; prepared by Goddard Consulting; dated October 8, 2025.
- Plans (10 Sheets) entitled **Site Plan, Lot 2 Forge Parkway**; prepared by United Consultants, Inc.; dated July 7, 2025 and revised on October 2, 2025; stamped and signed by Carol A Quintal MA P.E. No. 30812 and Andrew C Murphy MA PLS No. 35042.
- FEMA National Flood Hazard Layer FIRMette Figure

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

- Site Visit on August 15, 2025
- **Massachusetts Wetlands Protection Act 310 CMR 10.00** effective October 24, 2014
- **Massachusetts Stormwater Handbook** effective January 2, 2008 by MassDEP
- **Stormwater Management Chapter 153 From the Code of the Town of Franklin**, Adopted May 2, 2007
- **Wetlands Protection Chapter 181 From the Code of the Town of Franklin**, dated August 20, 1997
- **Town of Franklin Best Development Practices Guidebook**, dated September 2016

PEER REVIEW UPDATE—OCTOBER 13, 2025

The Applicant has provided revised materials and written comment responses pursuant to BETA's August 28, 2025 peer review letter. BETA's original comments from the August 28, 2025 peer review letter are

included in plain text. Comment responses attributed to United Consultant, Inc. (UCI), are provided in *italics* and are prefaced with “*UCI:*” BETA’s most recent responses are provided in **bold** and are prefaced with “**BETA2:**”.

BETA’s responses in this letter identify that the Applicant has generally demonstrated compliance with the Act and Bylaw; however, further information is required to describe proposed mitigation.

SITE AND PROJECT DESCRIPTION

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

Resource Areas Subject to Protection under the Massachusetts Wetlands Protection Act (M.G.L. ch.131 s.40) and its implementing regulations at 310 CMR 10.00 (collectively “the Act”), as well as the Town of Franklin Wetlands Protection Bylaw (Chapter 181) and its associated regulations (collectively “the Bylaw”) are present at the Site and include:

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

There are no Outstanding Resource Waters (ORWs) or Areas of Critical Environmental Concern (ACEC) present, and the most recent Natural Heritage and Endangered Species Program (NHESP) mapping does not depict any Priority Habitat of Rare Species or Estimated Habitat of Rare Wildlife at the Site. There are no NHESP-mapped Certified or Potential Vernal Pools located within 100 feet of the Site. The Site is not located within any Surface Water Protection Areas (Zone A, B, or C), or Zone I or Interim Wellhead Protection Areas. No Zone II is located on the site; however, a mapped Zone II is present directly north of the Site.

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

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

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

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

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

- 5,061 sf of impacts to the 25-50' Buffer Zone to BVW; and
- 17,271 sf of impacts to the 50-100' Buffer Zone to BVW.

BETA2: Impacts to Buffer Zone have increased due to the proposed planting and invasive species removal. As noted in the Variance request, the Project will result in:

- 7,600 sf of impacts to the 0-25-Foot Buffer Zone; and
- 5,061 sf of impacts to the 25-50-Foot Buffer Zone.

The impact numbers previously shown on the plans should be revised with these new value for impacts to the 0-25-foot Buffer Zone.

ADMINISTRATIVE AND PLAN COMMENTS

The plan set (as identified above) is missing information and requires additional information for clarity.

Table 1. NOI Plan

NOI Plan Requirements	Yes	No
Scale of 40'=1" or larger	✓	
North Arrow (with reference)	✓	
Topographic contours (2' intervals)	✓	
Existing Conditions Topography (with source and date of survey)	✓	
Proposed Topography	✓	
Existing and Proposed Vegetation		✓ (See Comment A2.a)
Existing Structures and Improvements	✓	
Resource Areas and Buffer Zones labeled	✓	
Location of Erosion Controls	✓	
Details of Proposed Structures	✓	
Construction Sequence and Schedule	✓	
Registered PLS Stamp (Existing Condition Plans Only)	✓	
Assessors' Reference	✓	
Abutting Property Assessors' Reference	✓ (BETA2)	
Survey Benchmark	✓	
Accurate Plan Scale	✓	

PLAN AND GENERAL COMMENTS

- A1. The Massachusetts Department of Environmental Protection (MassDEP) has not issued a DEP file number.

UCI: MassDEP has issued a file number for the project. DEP File #CE159-1318.

BETA2: MassDEP has issued a file number (No. 159-1318) with technical comments and UCI has provided the following responses to comments:

The site appears to include Riverfront Area (RA) associated with an offsite unnamed perennial stream which is not shown on the plans. RA should be shown to determine if work is proposed this wetland resource area.

UCI: 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.

UCI: 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 those areas. See Vol.2 Ch. 2 pg. 106 of the MA Stormwater Handbook. The Commission may consider that the erosion control plan sheet and future SWPPP be updated to include recommended measures.

UCI: Notes to protect the Underground Infiltration Area have been added to sheet 6.

The O&M Plan should be update to include activities specific for the subsurface infiltration system. The Commission may want to consider perpetual conditions for O&M activities.

UCI: Refer to the O&M Plan within the Drainage Analysis and on sheet 6 for underground infiltration area inspection and maintenance. The applicant is amendable to a perpetual condition regarding O&M activities.

- A2. The following plan elements are required:

- a. The proposed tree line and individual trees/shrubs with a diameter greater than 1" proposed for removal should be shown on the plans per Bylaw Regulation Section 7.18.1.5. It is BETA's understanding that the Commission generally increases the size threshold for tree location based on the Project and therefore defers to the Commission on this matter.

UCI: The requested additional information has been added to sheet 5.

BETA2: Comment partially addressed. The plan callouts now state that the limit of clearing is coincident with the limit of work; however, individual trees for removal are not shown. BETA defers to the Commission on this requirement and whether a tree survey should be conducted prior to construction.

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

UCI: The requested additional information has been added to sheet 3.

BETA2: Comment addressed.

WETLAND RESOURCE AREAS AND REGULATORY REVIEW

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

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

BETA2: The Applicant has provided supplemental information to further describe the Site, the work, and the proposed mitigation. However, details should be provided regarding invasive species management, the retaining wall, and impacts to the Buffer Zones at the Site should be quantified. BETA has also recommended multiple Special Conditions for the Commissions consideration throughout this letter.

RESOURCE AREA BOUNDARY COMMENTS

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

UCI: Wetland flag A-19R, A-20R and A-21R were added by Goddard Consulting. The revised flag locations have been added to the site plans.

BEAT2: Comment addressed. BETA agrees with the revised wetland delineation as depicted on the plans.

CONSTRUCTION COMMENTS

- W2. The Applicant should determine if the Project will disturb more than one (1) acre of land; if so, a Notice of Intent (NOI) must be submitted to the Environmental Protection Agency (EPA) under the Construction General Permit (CGP) and a Stormwater Pollution Prevention Plan (SWPPP) must be prepared. The Commission could consider a Special Condition within the Order of Conditions that requires the submission of the SWPPP for review and approval prior to the commencement of work.

UCI: The project disturbance area will exceed one acre. A NOI and SWPPP will be completed. The applicant is amendable to a condition to allow the Commission to review and approve the NOI and SWPPP documents.

BETA2: No further response required. See recommended Special Condition above.

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

UCI: The applicant's environmental consultant, Goddard Consulting, will be providing an invasive species management plan.

BETA2: The Applicant should provide details on how success of invasive species management will be assessed. The Applicant should also provide information regarding follow-up management as many of these species have an established seed bank and have a high likelihood of new plants sprouting after one year of management occurs.

BETA recommends the Commission include a Special Condition within the Order of Conditions requiring monitoring reports of the invasive species management area and plantings. Monitoring reports should include one (1) report once work has been completed and a monitoring report for two (2) consecutive growing seasons after management has occurred. BETA also recommends a Special Condition requiring the Applicant to submit information regarding who will be conducting the work including the name of the company and a copy of the Massachusetts Pesticide Certificates of all herbicide applicators prior to conducting the invasive species management work.

- W4. The location where snow will be stored during construction should be shown on the plans outside of Buffer Zones.

UCI: A construction period snow storage area has been added along with excess snow removal notes. See sheet 6.

BETA2: Comment addressed.

- 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.

UCI: The applicant will provide retaining wall plans. The crushed stone base and weep hole notes were added to sheet 5.

BETA2: A detail for the retaining wall should be added to the plans. The Commission could consider including a Special Condition that requires that the plans be revised with this information prior to construction.

- W6. It is not anticipated that groundwater will be encountered when excavating for the retaining wall; however, the Commission could include a Special Condition in the Order of Conditions requiring the submission and approval of a dewatering plan prior to discharge in the event that groundwater is encountered.

UCI: The applicant is amenable to the requested Special Condition with the Order of Conditions.

BETA2: No further comment.

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

UCI: The catch basins located with Forge Parkway and down gradient from the site entrance has a proposed silt sak. See sheet 6 CB #4.

BETA2: Comment addressed.

MITIGATION COMMENTS

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

UCI: The proposed plantings will be located within the invasive species removal area. See Goddard Consulting invasive species management plan for plantings.

BETA2: Plantings consisting of exclusively native species are now proposed within both the 0-25-foot and the 25-50-foot Buffer Zones. The proposed number of plantings has been provided; however, exact locations of plantings have not been provided and are anticipated to be determined during construction. The plans should be revised to outline the area in which this restoration work will occur; this could be considered as a condition of approval.

WPA PERFORMANCE STANDARDS COMMENTS

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

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

UCI: A copy of the FEMA Map, dated July 8, 2025, is 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 elevation has been shown and listed on the site plans.

BETA2: Comment resolved.

BYLAW REGULATORY COMMENTS

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

Per Section 7.13 of the Bylaw Regulations, the Applicant is required to provide an Alternatives Analysis, as the Project requires a Variance request for the construction of a structure that includes concrete, stone, or other impervious foundations. The Applicant provided a statement

regarding an Alternatives Analysis but did not provide an Alternatives Analysis that complies with the requirements set forth in the Act at 310 CMR 10.58(4) as required in the Bylaw Regulations.

UCI: The applicants Wetland Consultant, Goddard Consulting, will provide the Variance Request and Alternative analysis.

BETA2: The Applicant has provided a Variance request and Alternatives Analysis for work within the 0-25-foot and 25-50-foot Buffer Zone that appears to be in compliance with the requirements set forth in Section 4.3.1 and 5.3 of the Bylaw Regulations. BETA defers to the Commission on the acceptance of the Variance request and Alternatives Analysis.

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

UCI: The Vernal Pool Statement located on sheet 4 has been revised to include abutting properties within 100 feet of the locus property.

BETA2: Comment addressed.

STORMWATER MANAGEMENT REVIEW

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

REVIEW SUMMARY

Based on our review of the NOI submittal and Project plans, the Applicant should submit additional information to further describe proposed mitigation.

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

Very truly yours,
BETA Group, Inc.



Anna Haznar
Staff Scientist



Jonathan Niro, PWS
Project Manager

cc: Amy Love, Town Planner