

November 29, 2023

Mr. Gregory Rondeau, Chairman
Franklin Planning Board
355 East Central Street
Franklin, MA 02038

**Re: Proposed Upper Union Solar Project
Site Plan Peer Review**

Dear Mr. Rondeau:

BETA Group, Inc. is pleased to provide updated engineering peer review services for the proposed project entitled **Upper Union Solar Project** in Franklin, Massachusetts. This letter is provided to outline findings, comments, and recommendations.

BASIS OF REVIEW

The following documents were received by BETA in response to our comments from August 04, 2023 and formed the basis of the review:

- Plans (10 sheets) entitled: **Site Development Plans for Upper Union Solar Project, Franklin Massachusetts** dated June 30, 2023, revised November 10, 2023, prepared by Atlantic Design Engineers stamped by Richard J. Tabacynski, PE No. 33746 and Edwin H. Gless, PLS No. 39045
- Stormwater Addendum #1 for Upper Union Solar Project, dated November 10, 2023.
- Letter from Atlantic Design Engineers to the Planning Board dated November 10, 2023 **RE: Noise Attenuation Analysis, Upper Union Solar Project-Franklin, MA**, signed by Simon B. Thomas, P.E.
- Letter from Atlantic Design Engineers to the Planning Board dated November 10, 2023, **RE: Response to BETA Site Plan Peer Review Comments, August 03, 2023, Upper Union Solar Project-Franklin, MA**, signed by Richard J. Tabacynski, PE No. 33746
- Letter from Atlantic Design Engineers to the Planning Board dated November 10, 2023, **RE: Waiver Request List from Site Plan and Design Review Bylaw Site Plan Approval Submittal, Upper Union Solar Project, 9 Upper Union Street-Franklin, MA (Parcel ID 319-009-000-000)**, signed by Richard J. Tabacynski, PE No. 33746
- **Construction Sequence & Schedule**, Upper Union Solar Project, Franklin, Massachusetts, November 10, 2023.

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

- Site Visit
- **Zoning Chapter 185 From the Code of the Town of Franklin**, current through March 01, 2016
- **Zoning Map of the Town of Franklin, Massachusetts**, amended July 13, 2016
- **Stormwater Management Chapter 153 From the Code of the Town of Franklin**, Adopted May 02, 2007
- **Wetlands Protection Chapter 181 From the Code of the Town of Franklin**, current through August 20, 1997
- **Subdivision Regulations Chapter 300 From the Code of the Town of Franklin**, current through January 01, 2016

- MassDEP Wetlands Program Policy 17-1: Photovoltaic System Solar Array Review, dated September 23, 2017

INTRODUCTION

The project site is a 6.2±-acre parcel on the east side of Upper Union Street, just north of Ribero Drive at 0 Upper Union Street, (Parcel 009 on the Town of Franklin Assessor Map 319). The property is comprised of partially cleared areas and undeveloped woodland with a 325' wide New England Power Easement running through the center of the site. Access to the site will come from frontage along Upper Union Street along a 20' wide paved driveway. The driveway will run east approximately 550' directly behind the existing abutting residential dwellings along Ribero Street.

The proposed development is a ground mounted Photovoltaic Power System. The limit of work for this system will be approximately 3.4 acres. Except for the Easement area, the entirety of the site is wooded currently. The site is located within the Industrial Zoning District. The southerly property line of the parcel forms the Zone line between the Industrial Zone and Rural Residential 1 Zone. The land to the north of the site is within the Industrial Zone. The project is not located within a FEMA mapped flood zone (area of 1% chance flood). NRCS soil maps indicate the soils at the site are of Charlton-Hollis -Rock outcrop complex, (fine sandy loam,) and Woodbridge fine sandy loam. The Charlton-Hollis-Outcrop complex is rated in Hydrologic Soil Group (HSG) A (high Infiltration potential), while the Woodbridge is rated C (low infiltration potential).

The project proposes to develop the site with approximately 2.5 acres of ground mounted solar modules, a separate equipment area at the entrance composed of inverters, cabinets, and transformers, 7' high security fencing, and a 20' wide gravel access driveway from Upper Union Street across the easement up to the solar modules. All the modules will be mounted on the east side of the Easement.

Except for the entrance driveway, there are no impervious surfaces proposed within the limits of the proposed development except those surfaces associated with the accessory equipment. Stormwater management will deal primarily with conformance with Standard 2 for peak flow rate attenuation. Stormwater management features proposed include the construction of a stormwater detention basin along the northerly edge of the access driveway at the western edge of the easement, a second detention basin at the far easterly edge of the parcel and an infiltration trench and deep sump catch basin at the entrance. The project as currently depicted will disturb more than one acre of land and is required to prepare a Stormwater Pollution Prevention Plan (SWPPP) and file a Notice of Intent with EPA. As currently shown, the wetlands on site are located on the southern portion of the site inside the easement which are supported by a stormwater discharge culvert from the roadway surface at Ribero Drive. The access driveway and the lower southeast portion of the array project area will be located within the limits of the buffers to these existing wetland resource areas. A Notice of Intent has been filed with the Franklin Conservation Commission.

FINDINGS, COMMENTS, AND RECOMMENDATIONS

GENERAL

- G1. The existing grade across the proposed panel array area ranges from 10-20%. The array area as proposed will cover 2.29± acres, with runoff travel paths exceeding 300' across the disturbance area. BETA recommends that interim erosion control measures be implemented to reduce the travel paths to less than 200'.

ADE: An additional interim row of erosion control barriers are proposed within the array

field on the revised site plans.

BETA: No further comments

ZONING

The Site is located within the industrial (I) Zoning District. The proposed use is a Large-Scale Ground-Mounted Solar Energy System, which is permitted within this district following Planning Board Site Plan Review.

SCHEDULE OF LOT, AREA, FRONTAGE, YARD, AND HEIGHT REQUIREMENTS (§185 ATTACHMENT 9)

As shown on the schedule on the Zoning table on Sheet 5 of 9, the Site meets the requirements for lot area, depth, frontage, building height, and impervious area coverage. The lot width does not conform, however as noted in the bylaws, any lot created prior to May 20, 1998, is exempt from the current definition. The design engineer has indicated that the lot was created in 1995 prior to the bylaw and is therefor grandfathered.

- S.1 BETA recommends that a copy of the recorded plan be submitted to confirm the grandfather status of the lot regarding lot width.

ADE: *A copy of the recorded plan #624 of 1995 is enclosed.*

BETA: Comment addressed, no further comments

PARKING, LOADING AND DRIVEWAY REQUIREMENTS (§185-21)

The project proposes to construct a 20' wide access driveway from Upper Union Street to the gate at the entrance to the array area. A hammerhead turn around will be provided in front of the gate. The driveway will have a 50' long paved apron at the entrance and be gravel the remainder of the way to the gate which will measure approximately 900'. The driveway will be located directly behind the existing residential lots on Ribero Drive and proceed east for approximately 600' until it turns northeast across the easement to the array. The driveway will follow an existing 20' wide right of way easement that extends from Upper Union Street to an existing gravel roadway in the easement.

The project does not propose a residential or nonresidential building; therefore, no parking is required. BETA anticipates that there is adequate space along at turnaround areas for maintenance vehicles to temporarily park without disrupting access.

- P1. BETA recommends the Applicant consult with the Town of Franklin Fire Department to determine required driveway width, grade, and alignment.

ADE: *The applicant has reviewed the driveway design with the Deputy Fire Chief Joseph Barbieri and has received a sign-off email (see attached).*

BETA: No further comments

- P2. Around the perimeter of the array, the grade will range from 12-20%. BETA recommends that the applicant coordinate with the Fire Department to confirm that the perimeter access is acceptable.

ADE: *The Deputy Fire Chief has indicated that he only requires access up to the break in panels in the middle of the array.*

BETA: BETA will defer this to the Fire Chief. No Further comments.

- P3. The proposed access gate is located at the end of a 900+ foot long driveway with little opportunity for turnaround until they reach the gate. BETA recommends providing another turnaround area near the proposed detention basin 450' in.

ADE: *An additional turnaround area is provided on the revised site plans near the southwest detention basin.*

BETA: *Turn around provided approximately 420' from the entrance. No further comments.*

INDUSTRIAL DISTRICT PERFORMANCE CONTROLS (§185-22)

The project is located within an Industrial District and therefore must conform to these requirements. Given the nature of the project, BETA does not anticipate vibration, odor, or flashing related impacts.

- I1. As noted in previous solar array hearings, the inverter noise levels will be approximately 65 decibels. In accordance with §185-22.
- A. *Disturbances. No sound, noise, vibration, odor or flashing (except for warning devices, temporary construction or maintenance work, parades, agricultural activities or other special circumstances) shall be perceptible without instruments more than 400 feet from the boundaries of the originating premises within an Industrial District or more than 200 feet inside the boundaries of a commercial or business district or more than 100 feet inside the boundaries of a residential district.*

Based on the proximity of the invertors to the property line and the lack of a vegetative buffer, the noise from the invertors will be heard within the setbacks noted in the bylaws. BETA recommends that the applicant provide a noise barrier design which will comply with this section of the bylaws.

ADE: *Refer to the Noise Attenuation Analysis dated 11/10/2023 by Atlantic Design Engineers, which addresses noise impacts from the invertors and shows compliance with this section of the bylaws.*

BETA: *The invertors have been moved and the noise levels at the residential zone line have been reduced but will remain perceptible. The abutters are greater than 400' from the source and should not be impacted by the noise. No further comments.*

EARTH REMOVAL REGULATIONS (§185-23)

The project includes significant disturbance which may result in earth removal greater than 15 cubic yards.

- E1. Indicate approximate earth removal volume to determine compliance with this section.

ADE: *The limited amount of excavation required for the project will allow the excavated material to remain and be re-used as fill on the site. No earth removal is anticipated.*

BETA: *BETA recommends that Construction Note 20 on Sheet 8 of 10 be expanded to note that no earth will be removed from the site.*

SIDEWALKS (§185-28) AND CURBING (§185-29)

No sidewalks are proposed under this project. As a solar facility, pedestrian access to the Site is not required. The project proposes to provide a 50' long paved apron in the proposed driveway entrance. A cape cod berm is proposed on the northerly edge of the driveway. BETA will defer to the Planning Board whether vertical granite or precast concrete curbing should be provided at the entrance.

ADE: *A Cape Cod berm at the short, paved apron at the entrance is sufficient to convey any stormwater from the paved area into the proposed catch basin and infiltration chamber. Curbing is not required.*

BETA: *BETA will defer to the Planning Board on this matter.*

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 submitted plan set appears to be in compliance with all drawing requirements and review criteria, pending further review by the Fire Department to determine access requirements.

STORMWATER MANAGEMENT

The stormwater management design proposes two detention basins to capture stormwater runoff from the arrays and the gravel roadway. A catch basin is proposed at the entrance which will discharge to a subsurface infiltration trench beneath the driveway. Outfalls from this basin are proposed to convey captured stormwater runoff to the east. The remainder of the Site will generally follow pre-development flow patterns with no stormwater BMPs proposed.

- G1. The grading for the embankment that forms the detention basin at the northwest corner of the parcel is incorrect. The top width is shown incorrectly. Since the crest elevation is 405.5 with 3h:1v side slopes, the distance between the elevation 405 contours should be 9'. It is depicted on the plans as 4'.

ADE: *The basin berm has been regraded on the revised site plans and the basin detail has been revised to clarify the crest elevation.*

BETA: *The grading for the crest width has been corrected, however, the slope of the embankment at the down gradient edge of the basin has been increased to 2.5h:1v. Where this basin has been converted to an infiltration basin, BETA recommends that the slope be reduced to 3h:1v in accordance with Volume 2, Chapter 2 of the handbook.*

- G2. The grading for the embankment that forms the detention basin at the north of the entrance driveway 450' from Upper Union Street is also incorrect. The top width is shown incorrectly. Since the crest elevation is 459.5 with 3h:1v side slopes, the distance between the elevation 459 contours should be 9'. It is depicted on the plans as 5'.

ADE: *The basin berm has been regraded on the revised site plans and the basin detail has been revised to clarify the crest elevation.*

BETA: *The grading has been corrected, no further comments*

- G3. the nature of the flow onto the abutting parcel. Specifically, because of the proximity to the property line, the flow will not have the opportunity to replicate natural flow patterns. BETA recommends that the outfall be setback a sufficient distance for a natural flow pattern to develop or obtain an easement.

ADE: *The basin has been converted to an infiltration basin, based upon the favorable soil and groundwater conditions found in the test pits. The outlet pipe has been eliminated from the design. Therefore, any flow off the site will occur only under emergency overflow conditions. The toe of the basin has been shifted 20-feet away from the property line. A 50-foot long level*

spreader is provided at the base of the emergency spillway to replicate natural flow patterns in the unlikely event of an emergency overflow.

BETA: *As noted, the basin will not discharge on to the abutting parcel except during a rainfall event greater than a 100-year frequency rainfall. Therefore, the issues with the discharge onto the abutting parcel are no longer an issue. However, because the basin serves both purposes of recharge and peak flow rate attenuation, a mounding analysis is required (Chapter 3, Volume 1)*

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.

- SW1. Provide test pit data in the area of the proposed basins to determine Estimated Seasonal High Groundwater levels (§153-15.A(9)).

ADE: *Refer to the soil evaluated test pit logs provided in the Stormwater Addendum. These logs are also provided on the revised detail sheets and the test pit locations are shown on the revised site plans.*

BETA: *Test pits provided, no further comments.*

- SW2. Proposed seed mix for all disturbed areas should include native vegetation to the maximum extent practicable and should be specified on the plans. (BDPG Pg 6).

ADE: *The seed mix for all disturbed areas is shown on the revised plans.*

BETA: *No further comments.*

SUBDIVISION REGULATIONS - STORMWATER MANAGEMENT REGULATIONS (§300-11)

Additional requirements for stormwater management are outlined in §300-11 of the Town of Franklin Subdivision Regulations.

- SW3. Provide the design elevations for the catch basin at the entrance including the piping from the proposed catch basin into the Cul-tec chamber system. This piping should be identified as reinforced concrete pipe as required by the subdivision standards. (§300-11.B(2.a)).

ADE: *The rim, inverts, pipe sizes and slopes are provided on Sheet 6 of the revised site plans. The pipe has been identified as Class V RCP.*

BETA: *No further comments*

MASSDEP STORMWATER STANDARDS

The project is subject to the Massachusetts Stormwater Standards as outlined by MassDEP. Compliance with these standards is outlined below:

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 two infiltration basins and a Cul-tec 100 HD Chamber system at the entrance.

- SW4. The paved driveway section which flows toward Upper Union Street must be treated in accordance with the standards. Provide calculations that document compliance with the standards.

ADE: *Refer to the Water Quality, Recharge and TSS removal calculations for the 1,137 SF asphalt area in the Miscellaneous Calculations section of the Drainage Addendum.*

BETA: *Since the infiltration rate qualifies as a higher rate, pretreatment must be 44% and should be documented.*

- SW5. Construction details for the proposed infiltration trench at the entrance should also be included on the plans including design elevations and layout dimensions.

BETA: *There are no design elevations provided for the proposed Cul-tec system at the entrance. In addition, it appears that the system will be less than 4' above ESHGW and a mounding analysis will be required.*

- SW6. The runoff from the proposed equipment pad should be treated in accordance with the standards. Provide calculations which document that the treatment and pretreatment requirements for this impervious surface is being met.

ADE: *Refer to the Water Quality and Recharge calculations for the 640 SF of equipment pad in the Miscellaneous Calculations section of the Stormwater Addendum. The equipment pad is subject to foot traffic only so TSS removal is not required.*

BETA: *In accordance with Volume 1, Chapter 1 of the handbook, the equipment pad is subject to the Maximum Extent Possible. The infiltration basin at the northwest corner of the site will certainly provide the treatment and recharge required for this small area. Document TSS Removal based upon all the measures provided.*

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 changes to site hydrology and ground cover which will impact stormwater flow to the analyzed design points. Stormwater runoff will be mitigated via the 2 proposed detention basins. Calculations indicate a decrease in peak discharge rates.

- SW7. The CN values for the Woodbridge soils should be based upon HSG C conditions not HSG D.

ADE: *The CN values have been revised in the Stormwater Addendum.*

BETA: *No further comments*

- SW8. In watershed 1S, the Tc for the proposed conditions is incorrectly reported greater than existing conditions. The slope on the final leg of the calculation for the existing conditions analysis is incorrect.

ADE: *The Tc calculations for watershed 1S have been revised in the Stormwater Addendum.*

BETA: *BETA recommends that the designer review the Tc calculations since the Tc for proposed is greater than existing. In addition, the hydrograph should be routed through the cul-tec trench.*

- SW9. In watershed 4S, the Tc for the proposed conditions is incorrectly reported greater than existing conditions. The watershed where the Tc is calculated for proposed conditions is unchanged and therefore should be the same for existing conditions.

ADE: *The Tc calculations for watershed 4S have been revised in the Stormwater Addendum.*

BETA: *No further comments.*

- SW10. The CN Values for the Hollis-Charlton-Rock Complex should be based upon HSG A conditions not HSG D. There are no conditions on site that would indicate that runoff characteristics associated with the soil conditions are this extreme. The 400 square feet of ledge outcrop reported by the surveyor is not sufficient to justify the assumed HSG condition.

ADE: *The CN values have been revised in the Stormwater Addendum.*

BETA: *No further comments.*

- SW11. In the proposed conditions, the watershed delineation between areas 4S and 6A is incorrect. The grading shown around the equipment pads is not sufficient to completely modify the delineation. (See SW5 above)

ADE: *The grading and watershed plans have been revised to clarify the watershed delineation at the equipment pad.*

BETA: *No further comments.*

- SW12. The Tc calculation for watershed 5S & 6S in the existing conditions are incorrect. The slopes for the sheet flow should be 0.02 for each watershed and should be corrected.

ADE: *The Tc calculations for watershed 5S & 6S have been revised in the Stormwater Addendum.*

BETA: *No further comments.*

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 the soils at the site are of Charlton-Hollis -Rock outcrop complex, (fine sandy loam,) and Woodbridge fine sandy loam. The Charlton-Hollis-Outcrop complex is rated in Hydrologic Soil Group (HSG) A (high Infiltration potential), while the Woodbridge is rated HSG-C (low infiltration potential).

The project proposes new impervious surfaces on the site which must be treated in accordance with the requirements of the standards and the bylaw.

- SW13. At the rear of the site, the soils are HSG A and the recharge volume should be 0.6" of runoff from the impervious surfaces. Correct the analysis.

ADE: *The Recharge Calculations have been revised in the Stormwater Addendum.*

BETA: *No further comments.*

- SW14. In accordance with §153-16.A. of the bylaws, control of stormwater runoff must comply with §300-11,(3) which reads "Post-development conditions may not increase the peak rate and volume of stormwater flow, or increase the contaminant burden from stormwater flows." Provide the information needed to document compliance with this section of the bylaws.

ADE: *The Pre & Post-development volume comparisons have been added to the tables in the Stormwater Addendum.*

BETA: *No further comments.*

SW15. Provide a minimum of 2 test pits in the area of each of the proposed detention basins and the infiltration measures required for the proposed impervious surfaces to establish Estimated Seasonal High Groundwater.

ADE: *Refer to the soil evaluated test pit logs provided in the Stormwater Addendum. These logs are also provided on the revised detail sheets and the test pit locations are shown on the revised site plans.*

BETA: *No further comments.*

TOTAL SUSPENDED SOLIDS (STANDARD NUMBER 4): *For new development, stormwater management systems must be designed to remove 80% (90% per Town Bylaw) of the annual load of Total Suspended Solids (TSS). The project is required to treat the 1.0-inch water quality volume per Town Bylaws.*

SW16. For a new development Site, meet one of the following criteria (§153-16.B(1))

- a. Retain the volume of runoff equivalent to, or greater than, 1.0 inch multiplied by the total post-construction impervious surface area on the Site; and/or
- b. Remove 90% of the average annual post-construction load of TSS and 60% of the average annual load of total phosphorus.

ADE: *Calculations are provided in the Miscellaneous Calculations section of the Stormwater Addendum that show that greater than 1" times the impervious areas on the site is being retained/infiltrated on the site.*

BETA: *Calculated water quality volumes do not include runoff from the roof areas on the adjacent residential lots which are tributary to the infiltration measures which should be included unless they qualify for LID Credits. It should also be noted that because of the higher infiltration rate, the required pretreatment for all the impervious surface runoff should be 44% and documented accordingly.*

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. The project is not considered a LUHPPL – not applicable.*

CRITICAL AREAS (STANDARD NUMBER 6): *Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas. The project is not in a critical area as defined by the standards– not applicable.*

REDEVELOPMENT (STANDARD NUMBER 7): *Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable. The project is not considered a redevelopment– 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, it will be required to file a Notice of Intent with EPA and develop a Stormwater Pollution Prevention Plan (SWPPP). Erosion control measures are depicted on the plans include compost sock, silt fence, hay bales, inlet protection, stabilized construction entrance, dust control, erosion control blankets, filter bags for dewatering, and stockpile controls. A construction sequencing plan is included on Sheet C-608.

SW17. Provide expected date clearing will begin and estimate duration of exposure of cleared areas (§153-12.M).

ADE: See attached Construction Sequence and Schedule by Atlantic Design Engineers, Inc. dated 11/10/2023.

BETA: No further comments.

SW18. Remove hay bales from the proposed erosion control plan (BDPG Pg. 11)

ADE: The hay bale detail has been removed from the revised site plans.

BETA: No further comments.

SW19. Provide construction scheduling plan (BDPG Pg. 11)

ADE: See attached Construction Sequence and Schedule by Atlantic Design Engineers, Inc. dated 11/10/2023.

BETA: No further comments.

SW20. Provide dust control plan (BDPG Pg. 11)

ADE: Dust control notes are provided on Sheet 8 of the revised site plans.

BETA: No further comments.

SW21. Based upon the steep grades on site, BETA recommends that special conditions be identified for stabilization of disturbed areas prior to placement of the panels.

ADE: Additional interim rows of erosion control barriers are proposed within the array field, particularly in the steeper areas. In addition, erosion control notes have been added to limit the time of exposed soil prior to stabilization.

BETA: Additional rows added, no further comments.

SW22. Indicate if existing topsoil is to be retained and/or stockpiled and screened for re-use.

ADE: A note indicating that the existing topsoil is to be retained and/or stockpiled and screened for re-use is provided on the revised site plans.

BETA: No further comments.

SW23. The applicant is reminded that a Stormwater permit from the Franklin DPW is required based upon the size of the disturbance.

ADE: The Stormwater Permit request was included in the original Planning Board submittal.

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.

SW20. Provide owner's signature (§153-18.B(5)).

ADE: *The Post-Construction Long Term Stormwater O&M Plan has been revised accordingly in the Stormwater Addendum.*

BETA: *No further comments.*

SW21. Indicate the stormwater system owner(s) for the stormwater management system following construction.

ADE: *The Post-Construction Long Term Stormwater O&M Plan has been revised accordingly in the Stormwater Addendum.*

BETA: *No further comments.*

SW22. Indicate the party or parties responsible for maintenance.

ADE: *The Post-Construction Long Term Stormwater O&M Plan has been revised accordingly in the Stormwater Addendum.*

BETA: *No further comments.*

SW23. Provide BMP location map.

ADE: *The Post-Construction Long Term Stormwater O&M Plan has been revised accordingly in the Stormwater Addendum.*

BETA: *No further comments.*

SW24. Catch basins should be inspected four times a year. Change schedule noted in plan.

ADE: *The Post-Construction Long Term Stormwater O&M Plan has been revised accordingly in the Stormwater Addendum and the note on the site plans has been revised accordingly as well.*

BETA: *No further comments.*

SW25. Based upon the grades on site, BETA recommends that regular inspection and maintenance of drip edges to mitigate creation of rills and gullies be added to the O & M Plan.

ADE: *The Post-Construction Long Term Stormwater O&M Plan has been revised accordingly in the Stormwater Addendum.*

BETA: *No further comments.*

ILLCIT DISCHARGES (STANDARD NUMBER 10): *All illicit discharges to the stormwater management system are prohibited. An Illicit Discharge Compliance Statement was provided with the submission.*

SW26. Provide signature of owner on the illicit discharge compliance statement.

ADE: *The Applicant's signature is provided in the illicit discharge statement in the revised Post-Construction Long Term O & M Plan.*

BETA: *No further comments.*

Mr. Gregory Rondeau, Chairman

November 29, 2023

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WETLANDS PROTECTION

The Project proposes work within Areas Subject to Protection and Jurisdiction of the Franklin Conservation Commission, including the 100-foot Buffer Zones to a vegetated wetland. Work within these areas includes portions of the solar array, fencing, gravel access drives, grading, tree clearing, and equipment pad. Therefore, the Applicant is required to submit an NOI to the Town of Franklin Conservation Commission and must obtain an Order of Conditions to complete the proposed work.

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

Very truly yours,

BETA Group, Inc.

A handwritten signature in blue ink, appearing to read "Gary D. James".

Gary D. James, P.E.

Senior Project Engineer

cc: Amy Love, Town Planner