FRANKLIN PLANNING & COMMUNITY DEVELOPMENT



355 EAST CENTRAL STREET, ROOM 120 FRANKLIN, MA 02038-1352 TELEPHONE: 508-520-4907

Fax: 508-520-4906

February 17, 2015

Franklin Conservation Commission 355 East Central Street Franklin MA 02038

Re:

Notice of Intent, Demolition of Building II at Former Nu-Style Property

The Town of Franklin (applicant) has plans to demolish a former industrial building at 87 Grove Street adjacent to Mine Brook. The Order of Conditions resulting from the subject NOI will be included with a request for quotes scheduled to be distributed in March/April 2015. If funding is available the work will take place in Spring/Summer 2015.

This Notice of Intent was developed by the Town's Planning and Engineering Departments after consultation with the Conservation Agent.

The NOI only covers demolition of the building, removal of asphalt pavement driveway just to the west and south of the building, and related site grading and stabilization work. Further development of the site will require additional filings. Please note the Town of Franklin is exempt from local and State filing fees.

Please contact me at btaberner@franklin.ma.us or 508-520-4907 if you have questions or require additional information.

Sincerely,

Bryan W. Taberner, AICP

Director of Planning and Community Development

Cc: Jeffrey D. Nutting, Franklin Town Administrator

Michael Maglio, Town Engineer

RESOURCE AREA IMPACT SUMMARY

The Franklin Wetlands Protection By-Law Franklin Town Code Section 181

Demolition of Building II at Former Nu-Style Property

Resource Area	Alteration Proposed	Mitigation Proposed
Bordering Vegetated Wetland (SF)	0	
Bank (LF)	0	
Land Under Water Bodies (SF)	0	
Isolated Wetland (SF)	0	,
Vernal Pool (SF)	0	
Buffer Zone (SF)	4,700 (see Note 1)	
Riverfront (SF)	4,700 (see Note 1)	
100 YR Floodplain (CF)	500 (see Note 2)	
(SF) = Square Feet (LF) = Linear Feet (CF) = Cubic Feet Flood Storage		

Notes:

- 1.) The whole Project Site is within the 100 ft buffer zone, however the project will result in much less impervious coverage a the site, increases in groundwater infiltration, and fewer negative impacts to Mine Brook's water quality.
- 2.) Alterations to the site from the Proposed Project will increase the flood storage capacity of bordering land subject to flooding.



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.





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

A. General Information

87 Grove Street, B	uilding II	Franklin	02038
a, Street Address		b. City/Town	c. Zip Code
Latitude and Longi	tudo:	42.087122 N	71.428178 W
_	iede.	d. Latitude	e. Longitude
276		022-000	
f. Assessors Map/Plat N	lumber	g. Parcel /Lot Number	
Applicant:			
Jeffrey		Nutting	
a. First Name		b. Last Name	
Town of Franklin		and the state of t	the state of any distriction of the state of
c. Organization			
355 East Central S	treet		
d, Street Address		6 d A	
Franklin		<u>MA</u>	02038
e. City/Town	FOO FOO 1000	f. State	g. Zip Code
508-520-4949 h. Phone Number	508-520-4903 i. Fax Number	jnutting@franklin.ma.us j. Email Address	
a. First Name		b. Last Name	
c. Organization		b. Last Name	
		b. Last Name	
c. Organization Town of Franklin		b. Last Name	g. Zip Code
c. Organization Town of Franklin d. Street Address	i, Fax Number		g. Zip Code
c. Organization Town of Franklin d. Street Address e. City/Town		f. State	g. Zip Code
c. Organization Town of Franklin d. Street Address e. City/Town n. Phone Number		f. State	g. Zip Code
c. Organization Town of Franklin d. Street Address e. City/Town h. Phone Number Representative (if a		f. State j. Email address	g. Zip Code
c. Organization Town of Franklin d. Street Address e. City/Town h. Phone Number Representative (if a		f. State j. Email address	g. Zip Code
c. Organization Town of Franklin d. Street Address e. City/Town h. Phone Number Representative (if a a. First Name c. Company		f. State j. Email address	g. Zip Code
c. Organization Town of Franklin d. Street Address e. City/Town h. Phone Number Representative (if a a. First Name c. Company d. Street Address		f. State j. Email address b. Last Name	
c. Organization Town of Franklin d. Street Address e. City/Town h. Phone Number Representative (if a a. First Name c. Company d. Street Address e. City/Town h. Phone Number	i. Fax Number	f. State j. Email address b. Last Name f. State j. Email address	
c. Organization Town of Franklin d. Street Address e. City/Town n. Phone Number Representative (if a a. First Name c. Company d. Street Address e. City/Town h. Phone Number	iny):	f. State j. Email address b. Last Name f. State j. Email address	

5.



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A. General Information (continued)

	,						
6.	General Project Description: The project consists of demolition of a former industrial facility that abuts Mine Brook, and filling and						
	grading the site. The project is directly adjacent to anoth	er building demolition project that was					
	considered by Franklin Conservation Commission in July	/ 2011.					
_							
7a.	7a. Project Type Checklist: (Limited Project Types see Sect	Ion 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 Demolition						
7b.	Restoration Limited Project) subject to 310 CMR 10.24 (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 No Secribe 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	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						
	•	b. Certificate # (if registered land)					
		d. Page Number					
ᆸ.	3. 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; f Coastal Resource Areas). 	☑ 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 support of will meet all performance standards for each of the standards requiring consideration of alternative project defined to the standards.	e resource areas altered, including					



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

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

	Resou	rce Area	Size of Proposed Alteration	Proposed	Replacement (if any)			
	а. 🛚	Bank	0 1. linear feet	2. linear fee				
For all projects affecting other	b. 🛭	Bordering Vegetated	0	2	•			
Resource Areas, please attach a	3. <u>2.3</u>	Wetland	1. square feet	2. square fe	et			
narrative explaining how the resource	с. 🗌	Land Under Waterbodies and Waterways	1. square feet	2. square fe	et			
area was delineated.		,	3, cubic yards dredged					
	Resou	rce Area	Size of Proposed Alteration	Proposed	Replacement (if any)			
	d. 🔀	Bordering Land	500					
		Subject to Flooding	1. square feet 2. square feet 0 See Note 1 below.		et			
		lastula del card	3. cubic feet of flood storage lost	4. cubic feet	replaced			
	e. 📙	Isolated Land Subject to Flooding	1. square feet					
			2. cubic feet of flood storage lost	3. cubic feet	replaced			
	f. 🔀	Riverfront Area	Mine Brook					
	i. <u>i</u>	Riveriioni Area	Name of Waterway (if available)					
	2. Width of Riverfront Area (check one):							
		25 ft Designated D	Densely Developed Areas only					
	100 ft New agricultural projects only							
		200 ft All other pro	ejects					
	3. 7	Total area of Riverfront Are	ea on the site of the proposed proje	/T	930+/-			
	4, F	Proposed alteration of the	Riverfront Area: See Note 2 be	•	34,5 7551			
	4,7	00	4.700	٥				
		otal square feet	b. square feet within 100 ft.	c. square feet be	etween 100 ft, and 200 ft.			
	5. h	las an alternatives analys	is been done and is it attached to the	is NOI?	⊠ Yes ☐ No			
	6. V	Vas the lot where the activ	rity is proposed created prior to Aug	just 1, 1996?	⊠ Yes ☐ No			
3	. 🗌 Coa	stal Resource Areas: (See	∋ 310 CMR 10.25-10.35)					

Notes:

- 1.) The proposed alterations to Bordering Land Subject to Flooding includes demolition of a building. There will be no negative impact on flood storage.
- 2.) The proposed alterations in the Riverfront Area will decrease impacts to Mine Brook. There will be no increase in stormwater runoff.



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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.

Resource Area		Size of Proposed Alteration	Proposed Replacement (if anv)
а. 🔲	Designated Port Areas	Indicate size under Land Ur	nder the Ocean, below
b. 🔲	Land Under the Ocean	1. square feet	
		2. cubic yards dredged	_
c. 🔲	Barrier Beach	Indicate size under Coastal B	Beaches and/or Coastal Dunes below
d. 🗌	Coastal Beaches	1. square feet	2. cubic yards beach nourishment
e. 🗌	Coastal Dunes	1. square feet	cubic yards dune nourishment
		Size of Proposed Alteration	Proposed Replacement (if any)
f	Coastal Banks Rocky Intertidal	1. linear feet	
	Shores	1. square feet	
h. 🗍	Salt Marshes	1. square feet	2. sq ft restoration, rehab., creation
i. []	Land Under Salt Ponds	1. square feet	_
		2. cubic yards dredged	_
j. 🔲	Land Containing Shellfish	1. square feet	SALVANIA.
k. 🔲	Fish Runs		anks, inland Bank, Land Under the nder Waterbodies and Waterways,
		1. cubic yards dredged	_
l. 🔲	Land Subject to Coastal Storm Flowage	1. square feet	· .
if the p	storation/Enhancement roject is for the purpose of footage that has been ent	restoring or enhancing a wetlan	d resource area in addition to the bove, please enter the additional
a. square	e feet of BVW	b. square feet o	of Salt Marsh
☐ Pro	oject Involves Stream Cros	sings	
a. numbe	er of new stream crossings	b. number of re	placement stream crossings

4.

5.



Pro	vided by MassDEP:
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	Document Transaction Number
	Franklin

M	NPA Form 3 – Notice of Intent	
	Assachusetts Wetlands Protection Act M.G.L. c. 131, §40	Document Transaction Number Franklin City/Town
C	. Other Applicable Standards and Requirement	<u> </u>
	This is a proposal for an Ecological Restoration Limited Project complete Appendix A: Ecological Restoration Notice of Intent – 10.11).	
St	treamlined Massachusetts Endangered Species Act/Wetland	s Protection Act Review
1.	Is any portion of the proposed project located in Estimated Habitat of the most recent Estimated Habitat Map of State-Listed Rare Wetland Natural Heritage and Endangered Species Program (NHESP)? To vie Massachusetts Natural Heritage Atlas or go to	

wpaform3.doc • rev. 11/24/2014

^{*} Some projects not in Estimated Habitat may be located in Priority Habitat, and require NHESP review (see <u>inttp://www.mass.gov/dfwele/dfw/nhesp/nhesp.htm</u>, regulatory review tab). 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.



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

	Make	www.mass.	ng fee (fee information ava gov/dfwele/dfw/nhesp/reg ble to "Commonwealth of	<u>llatory_revie</u>		
	Project	ts altering 10	or more acres of land, also	submit:		
	(d)	Vegetatio	n cover type map of site			
(e) Project plans showing Priority & Estimated Habitat boundaries					•	
	(f) Ol	R Check On	e of the Following			
	1.	Attach ap http://www the NOI m	exempt from MESA review plicant letter indicating white with the work of the w	ich MESA ex esp/regulator	ry review/mesa/r	nesa exemptions.htm;
	2. 🔲	Separate N	1ESA review ongoing.	a. NHESF	Tracking #	b. Date submitted to NHESF
	3.	Include co	MESA review completed. py of NHESP "no Take" d h approved plan.	etermination	or valid Conserv	ation & Management
3. For coastal projects only, is any portion of the proposed project located below the mean high line or in a fish run?					the mean high water	
	a. Not applicable – project is in inland resource area only					
	b. 🗌 Yes	□ No	If yes, include proof of m	nailing or han	d delivery of NO	to either:
			South Shore - Cohasset to Island, and the Cape & Isla		North Shore - Hul	to New Hampshire:
			Division of Marine Fisheries Southeast Marine Fisheries Attn: Environmental Review 1213 Purchase Street – 3rd New Bedford, MA 02740-6	Station ver I Floor	Division of Marine North Shore Office Attn: Environment 30 Emerson Aven Gloucester, MA 0	e al Reviewer ue

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.



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

	4.	Is any portion of the proposed project within an Area of Critical Environmental Concern (ACEC)?
Online Users: Include your document		a Yes No
transaction		b. ACEC
number (provided on your receipt page) with all	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?
supplementary		a. 🗌 Yes 🗵 No
information you submit to the Department.	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: Demolition (see Narrative)
		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. Sign 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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D	. Add	litional Information (cont'd)		
	3.	Identify the method for BVW and other res Field Data Form(s), Determination of Appli and attach documentation of the metho	ource area boundary delineations (MassDEP B' cability, Order of Resource Area Delineation, et dology	VV. :c.),
	4. 🛛	List the titles and dates for all plans and ot	ner materials submitted with this NOI.	
			emolish Building #2 Former Nu-Style Facility	
		Plan Title wn of Franklin Engineering		
		Prepared By	c. Signed and Stamped by	
		7/15	1" = 20'	
	d. F	inal Revision Date	e. Scale	
	f. A	dditional Plan or Document Title	g. Date	-,
	5.	If there is more than one property owner, p listed on this form.	lease attach a list of these property owners not	
	6. 🗌	Attach proof of mailing for Natural Heritage	and Endangered Species Program, if needed.	
	7.	Attach proof of mailing for Massachusetts I	Division of Marine Fisheries, if needed.	
	8. 🔲	Attach NOI Wetland Fee Transmittal Form		
	9. 🛚	Attach Stormwater Report, if needed.		
	Fees			
1			P-6-3-	,
	1. 🗵		d for projects of any city, town, county, or distric I Indian tribe housing authority, municipal housi portation Authority.	
	Applica Fee Tra	nts must submit the following information (in insmittal Form) to confirm fee payment:	addition to pages 1 and 2 of the NOI Wetland	
	2. Municip	pal Check Number	3. Check date	
	4. State C	Check Number	5. Check date	

7. Payor name on check: Last Name

E.

6. Payor name on check: First Name



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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 deliver) or certified mail (return receipt requested) to all abutters within 100 feet of the property line of the project location.

2/17/15

Vallat T	2/17/15
1. Signature/of Applicant	2. Date
3. Signature of Property Owner (if different)	4. Date
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.



Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

A. Introduction

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





A Stormwater Report must be submitted with the Notice of Intent permit application to document compliance with the Stormwater Management Standards. The following checklist is NOT a substitute for the Stormwater Report (which should provide more substantive and detailed information) but is offered here as a tool to help the applicant organize their Stormwater Management documentation for their Report and for the reviewer to assess this information in a consistent format. As noted in the Checklist. the Stormwater Report must contain the engineering computations and supporting information set forth in Volume 3 of the Massachusetts Stormwater Handbook. The Stormwater Report must be prepared and certified by a Registered Professional Engineer (RPE) licensed in the Commonwealth.

The Stormwater Report must include:

- The Stormwater Checklist completed and stamped by a Registered Professional Engineer (see page 2) that certifies that the Stormwater Report contains all required submittals. This Checklist is to be used as the cover for the completed Stormwater Report.
- Applicant/Project Name
- Project Address
- Name of Firm and Registered Professional Engineer that prepared the Report
- Long-Term Pollution Prevention Plan required by Standards 4-6
- Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan required by Standard 82
- Operation and Maintenance Plan required by Standard 9

In addition to all plans and supporting information, the Stormwater Report must include a brief narrative describing stormwater management practices, including environmentally sensitive site design and LID techniques, along with a diagram depicting runoff through the proposed BMP treatment train. Plans are required to show existing and proposed conditions, identify all wetland resource areas, NRCS soil types. critical areas, Land Uses with Higher Potential Pollutant Loads (LUHPPL), and any areas on the site where infiltration rate is greater than 2.4 inches per hour. The Plans shall identify the drainage areas for both existing and proposed conditions at a scale that enables verification of supporting calculations.

As noted in the Checklist, the Stormwater Management Report shall document compliance with each of the Stormwater Management Standards as provided in the Massachusetts Stormwater Handbook. The soils evaluation and calculations shall be done using the methodologies set forth in Volume 3 of the Massachusetts Stormwater Handbook.

To ensure that the Stormwater Report is complete, applicants are required to fill in the Stormwater Report Checklist by checking the box to indicate that the specified information has been included in the Stormwater Report. If any of the information specified in the checklist has not been submitted, the applicant must provide an explanation. The completed Stormwater Report Checklist and Certification must be submitted with the Stormwater Report.

¹ The Stormwater Report may also include the Illicit Discharge Compliance Statement required by Standard 10. If not included in the Stormwater Report, the Illicit Discharge Compliance Statement must be submitted prior to the discharge of stormwater runoff to the post-construction best management practices.

² For some complex projects, it may not be possible to include the Construction Period Erosion and Sedimentation Control Plan in the Stormwater Report. In that event, the issuing authority has the discretion to issue an Order of Conditions that approves the project and includes a condition requiring the proponent to submit the Construction Period Erosion and Sedimentation Control Plan before commencing any land disturbance activity on the site.



Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

B. Stormwater Checklist and Certification

The following checklist is intended to serve as a guide for applicants as to the elements that ordinarily need to be addressed in a complete Stormwater Report. The checklist is also intended to provide conservation commissions and other reviewing authorities with a summary of the components necessary for a comprehensive Stormwater Report that addresses the ten Stormwater Standards.

Note: Because stormwater requirements vary from project to project, it is possible that a complete Stormwater Report may not include information on some of the subjects specified in the Checklist. If it is determined that a specific item does not apply to the project under review, please note that the item is not applicable (N.A.) and provide the reasons for that determination.

A complete checklist must include the Certification set forth below signed by the Registered Professional Engineer who prepared the Stormwater Report.

Registered Professional Engineer's Certification

I have reviewed the Stormwater Report, including the soil evaluation, computations, Long-term Pollution Prevention Plan, the Construction Period Erosion and Sedimentation Control Plan (if included), the Long-term Post-Construction Operation and Maintenance Plan, the Illicit Discharge Compliance Statement (if included) and the plans showing the stormwater management system, and have determined that they have been prepared in accordance with the requirements of the Stormwater Management Standards as further elaborated by the Massachusetts Stormwater Handbook. I have also determined that the information presented in the Stormwater Checklist is accurate and that the information presented in the Stormwater Report accurately reflects conditions at the site as of the date of this permit application.

Re	egistered Professional I	Engineer Block and Signature
		·
		Signature and Date
		Checklist
	pject Type: Is the appli levelopment?	cation for new development, redevelopment, or a mix of new and
	New development	Daniel Maria (Francisco Control Contro
\boxtimes	Redevelopment	Demolition of former manufacturing building and removal of pavement.
	Mix of New Developm	ent and Redevelopment



Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

Checklist (continued)

LID Measures: Stormwater Standards require LID measures to be considered. Document what environmentally sensitive design and LID Techniques were considered during the planning and design of the project:

\boxtimes	No disturbance to any	Wetland Resource Areas	No negative impacts.
	Site Design Practices (e.g. clustered development,	reduced frontage setbacks)
\boxtimes	Reduced Impervious A	rea (Redevelopment Only)	Demolition and removal of pavement.
\boxtimes	Minimizing disturbance	to existing trees and shrubs	No tree removal is anticipated.
	LID Site Design Credit	Requested:	
	Credit 1		
	Credit 2		
	Credit 3		
	Use of "country drainag	e" versus curb and gutter co	nveyance and pipe
	Bioretention Cells (inclu	ides Rain Gardens)	
	Constructed Stormwate	er Wetlands (includes Gravel	Wetlands designs)
	Treebox Filter		
	Water Quality Swale		
	Grass Channel		
	Green Roof		
\boxtimes	Other (describe):		d and pavement removed the property will be ill be covered with erosion control seed blankets.
Sta	ndard 1: No New Untre	ated Discharges	
X	No new untreated disch	arges	
	Outlets have been design Commonwealth	gned so there is no erosion o	r scour to wetlands and waters of the
	Supporting calculations	specified in Volume 3 of the	Massachusetts Stormwater Handbook included.



С	hecklist (continued)
St	andard 2: Peak Rate Attenuation
	Standard 2 waiver requested because the project is located in land subject to coastal storm flowage and stormwater discharge is to a wetland subject to coastal flooding. Evaluation provided to determine whether off-site flooding increases during the 100-year 24-hour storm.
	Calculations provided to show that post-development peak discharge rates do not exceed pre- development rates for the 2-year and 10-year 24-hour storms. If evaluation shows that off-site flooding increases during the 100-year 24-hour storm, calculations are also provided to show that post-development peak discharge rates do not exceed pre-development rates for the 100-year 24- hour storm.
Sta	andard 3: Recharge
	Soil Analysis provided.
	Required Recharge Volume calculation provided.
	Required Recharge volume reduced through use of the LID site Design Credits.
	Sizing the infiltration, BMPs is based on the following method: Check the method used.
	☐ Static ☐ Simple Dynamic ☐ Dynamic Field ¹
	Runoff from all impervious areas at the site discharging to the infiltration BMP.
	Runoff from all impervious areas at the site is <i>not</i> discharging to the infiltration BMP and calculations are provided showing that the drainage area contributing runoff to the infiltration BMPs is sufficient to generate the required recharge volume.
	Recharge BMPs have been sized to infiltrate the Required Recharge Volume.
	Recharge BMPs have been sized to infiltrate the Required Recharge Volume <i>only</i> to the maximum extent practicable for the following reason:
	☐ Site is comprised solely of C and D soils and/or bedrock at the land surface
	M.G.L. c. 21E sites pursuant to 310 CMR 40.0000
	Solid Waste Landfill pursuant to 310 CMR 19.000
	Project is otherwise subject to Stormwater Management Standards only to the maximum extent practicable.
	Calculations showing that the infiltration BMPs will drain in 72 hours are provided.
	Property includes a M.G.L. c. 21E site or a solid waste landfill and a mounding analysis is included.

¹ 80% TSS removal is required prior to discharge to infiltration BMP if Dynamic Field method is used.



C	ecklist (continued)		
St	ndard 3: Recharge (continued)		
(white)	The infiltration BMP is used to attenuate peak flows during storms greater than or equal to the 10-year 24-hour storm and separation to seasonal high groundwater is less than 4 feet and a mounding analysis is provided.		
	Documentation is provided showing that infiltration BMPs do not adversely impact nearby wetland Note: Once the proposed project is complete the site will not contain impervious surfaces.		
	Long-Term Pollution Prevention Plan typically includes the following: Good housekeeping practices; Provisions for storing materials and waste products inside or under cover; //ehicle washing controls; Requirements for routine inspections and maintenance of stormwater BMPs; Spill prevention and response plans; Provisions for maintenance of lawns, gardens, and other landscaped areas; Requirements for storage and use of fertilizers, herbicides, and pesticides; Provisions for operation and management of septic systems; Provisions for operation and management; Show disposal and plowing plans relative to Wetland Resource Areas; Winter Road Salt and/or Sand Use and Storage restrictions; Street sweeping schedules; Provisions for prevention of illicit discharges to the stormwater management system; Documentation that Stormwater BMPs are designed to provide for shutdown and containment in the event of a spill or discharges to or near critical areas or from LUHPPL; Training for staff or personnel involved with implementing Long-Term Pollution Prevention Plan; ist of Emergency contacts for implementing Long-Term Pollution Prevention Plan.		
	Long-Term Pollution Prevention Plan is attached to Stormwater Report and is included as an ttachment to the Wetlands Notice of Intent. Treatment BMPs subject to the 44% TSS removal pretreatment requirement and the one inch rule for alculating the water quality volume are included, and discharge: is within the Zone II or Interim Wellhead Protection Area is near or to other critical areas		
	is within soils with a rapid infiltration rate (greater than 2.4 inches per hour)		
	involves runoff from land uses with higher potential pollutant loads.		
	he Required Water Quality Volume is reduced through use of the LID site Design Credits.		
	alculations documenting that the treatment train meets the 80% TSS removal requirement and, if oplicable, the 44% TSS removal pretreatment requirement, are provided.		





Bureau of Resource Protection - Wetlands Program

Checklist for Stormwater Report

Checklist (continued)

		ard 7: Redevelopments a practicable	and Other Projects Subject to the Standards only to the maximum
	The	-	Stormwater Management Standards only to the maximum Extent
		Limited Project	
	□ □ wifi	provided there is no disc	ts: 5-9 single family houses or 5-9 units in a multi-family development harge that may potentially affect a critical area. ts: 2-4 single family houses or 2-4 units in a multi-family development
		Marina and/or boatyard p	provided the hull painting, service and maintenance areas are protected ow, snow melt and runoff
		Bike Path and/or Foot Pa	ath
	\boxtimes	Redevelopment Project	Note: Demolition of building and pavement removal. Existing site conditions will improve. There will be no increase in stormwater runoff.
		Redevelopment portion of	f mix of new and redevelopment.
	exp The imp in V the and	Certain standards are not fully met (Standard No. 1, 8, 9, and 10 must always be fully met) and an explanation of why these standards are not met is contained in the Stormwater Report. The project involves redevelopment and a description of all measures that have been taken to improve existing conditions is provided in the Stormwater Report. The redevelopment checklist found in Volume 2 Chapter 3 of the Massachusetts Stormwater Handbook may be used to document that the proposed stormwater management system (a) complies with Standards 2, 3 and the pretreatment and structural BMP requirements of Standards 4-6 to the maximum extent practicable and (b) improves existing conditions.	
Sta	nda	rd 8: Construction Perio	d Pollution Prevention and Erosion and Sedimentation Control
		truction Period Pollution Pig information:	revention and Erosion and Sedimentation Control Plan must include the
	•		ation and Maintenance Plan; ty Responsible for Plan Compliance;

- Construction Period Pollution Prevention Measures;
- Erosion and Sedimentation Control Plan Drawings;
- Detail drawings and specifications for erosion control BMPs, including sizing calculations;
- Vegetation Planning;
- Site Development Plan;
- · Construction Sequencing Plan;
- · Sequencing of Erosion and Sedimentation Controls;
- Operation and Maintenance of Erosion and Sedimentation Controls;
- Inspection Schedule:
- Maintenance Schedule;
- Inspection and Maintenance Log Form.

A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan containing
the information set forth above has been included in the Stormwater Report.



Checklist (continued)		
	tandard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control onlinued)	
	The project is highly complex and information is included in the Stormwater Report that explains why it is not possible to submit the Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan with the application. A Construction Period Pollution Prevention and Erosion and Sedimentation Control has not been included in the Stormwater Report but will be submitted before land disturbance begins.	
\boxtimes	The project is <i>not</i> covered by a NPDES Construction General Permit.	
	Stormwater Report.	
	The project is covered by a NPDES Construction General Permit but no SWPPP been submitted. The SWPPP will be submitted BEFORE land disturbance begins.	
Standard 9: Operation and Maintenance Plan		
	The Post Construction Operation and Maintenance Plan is included in the Stormwater Report and includes the following information:	
	Name of the stormwater management system owners;	
	☐ Party responsible for operation and maintenance;	
	☐ Schedule for implementation of routine and non-routine maintenance tasks;	
	☐ Plan showing the location of all stormwater BMPs maintenance access areas;	
	Description and delineation of public safety features;	
	Estimated operation and maintenance budget; and	
	Operation and Maintenance Log Form.	
	The responsible party is not the owner of the parcel where the BMP is located and the Stormwater Report includes the following submissions:	
	A copy of the legal instrument (deed, homeowner's association, utility trust or other legal entity) that establishes the terms of and legal responsibility for the operation and maintenance of the project site stormwater BMPs;	
	A plan and easement deed that allows site access for the legal entity to operate and maintain BMP functions.	
Sta	ndard 10: Prohibition of Illicit Discharges	
	The Long-Term Pollution Prevention Plan includes measures to prevent illicit discharges;	
	An Illicit Discharge Compliance Statement is attached;	
	NO Illicit Discharge Compliance Statement is attached but will be submitted <i>prior to</i> the discharge of any stormwater to post-construction BMPs.	

Notice of Intent

Demolition of Building II Former Nu-Style Property 87 Grove Street, Franklin, MA

Vernal Pool Statement

There are no Vernal Pools or Potential Vernal Pools on or near the site based upon the 2008 Natural Heritage maps (see attached).

Project Narrative

Introduction and Site History. The Town of Franklin has plans to demolish a dilapidated former manufacturing facility adjacent to Mine Brook at 87 Grove Street. The property (parcel 276-022-000), which is located in the rear portion (west end) of 87 Grove Street, is a 0.228+/- acre parcel located in a mixed industrial, commercial and residential area. The former manufacturing facility was utilized throughout its history for a variety of industrial uses, including textile and paint manufacture, vehicle repair, and most recently jewelry manufacturing. The last documented industrial usage of the site occurred in 1989, with the closure of the Nu-Style jewelry manufacturing company.

The property is part of a larger "Former Nu-Style Facility" site, which included several buildings in the Grove Street area. Two parcels and related industrial facilities, Lot 22 (the subject property) and Lot 27 (directly adjacent to the east), were acquired by the Town of Franklin via tax-title foreclosure. In 2005 both buildings were formally condemned by the local Building Commissioner. Since 2006 the Town has worked with consultants and the EPA to remove underground storage tanks, assess and remediate contaminated soil and groundwater, demolish the dilapidated buildings, and prepare the parcels for reuse/redevelopment. Nu-Style Building I, which was located east of the Project Site on the adjacent Lot 27, was demolished in May 2012.

<u>Site Conditions</u>. The former manufacturing facility proposed for demolition, currently known as Nu-Style Building II, was originally constructed circa 1945 and expanded with a series of additions in the 1950s and 1960s.

The building consists of two distinct older and newer constructed sections. The older front area and the garage portion of the newer additions have collapsed. The newest portion of the building is starting to show substantial deterioration.

Building II shares a common cement block wall with a privately owned building on Lot 28; the building on Lot 28 is occupied and will not be demolished.

On the east edge of the property is a gravel road right-of-way (former roadway). Between Building I and Mine Brook (south and west of building) is an asphalt paved driveway and very limited vegetation.

At one time a mill race ran under Building I and Building II and emptied into Mine Brook west of the buildings. There are remnants of the mill race within and directly to the east of Building II.

<u>Site Access</u>. The Project Site (Lot 22) can be accessed through a right of way from Grove Street through Lot 27. The structural integrity of an old bridge adjacent to the Project Site that spans Mine Brook has not been assessed; therefore the bridge will not be used to access the site with trucks and other heavy equipment.

<u>Resource Area Impacts</u>. Demolition of the building and removal of asphalt paving will have positive impacts on the Site's and adjacent property's natural resources. All impervious coverage will be removed and pervious materials will be installed. This will provide additional areas for bordering wetland vegetation to thrive, and remove obstacles (building foundation) that could impact the flow of flood waters in future storms. The property's increased pervious surface will allow the majority of stormwater to infiltrate instead of flowing directly into Mine Brook.

<u>Scope of Work</u>. The Town's demolition consultant (FLI Environmental) has developed a Demolition and Segregation Plan (January 2015), which will provide a Town-procured demolition contractor and the Town with guidance during the Proposed Project. The Proposed Project consists of the following:

- The contractor will install erosion controls and wetland protection measures according to Project Plans.
- The contractor will mark and secure the limits of work. Securing the site will consist of, at a
 minimum, the erection of six-foot chain link fences with asbestos barrier tape around all
 accessible portions of the site
- The contractor will secure a DigSafe permit number prior to the commencement of any excavation work performed at the site.
- Prior to any demolition work, abatement of floor tile and window glazing in the newer rear portion of the building area will be completed.
- The contractor will demolish and live load the front building and garage area to be disposed
 as asbestos contaminated waste. Demolition will be completed under wet conditions to
 minimize any emissions from the area.
- Water runoff shall be controlled to ensure the capture and containment of any asbestos contaminated water. All captured water will be processed through a five (5) micron filter. All filters will be disposed of as asbestos waste.
- Upon completion of asbestos containing material (ACM) demolition, the Project Monitor shall perform a visual inspection. If any visible ACM is present on the ground surface, the Contractor will excavate the ACM and an additional six inches of soil around the ACM. The soil shall be disposed of as asbestos contaminated material.
- Once all ACM has been removed from the site the Demolition Contractor will demolish and live load the remainder of the structure.
- All materials will be segregated and containerized for salvage, reuse, or removal and off-site disposal at a licensed receiving facility.
- Asphalt pavement south and west of the building will be removed and disposed of.
- Clean brick, concrete and masonry will be crushed on site and may be utilized as backfill.
 The site will be covered with appropriate soil and erosion control blankets (or seed mats) will be installed. Additional seed mix (native grasses/perennials) will be applied along the site's edges to assist with the site's stabilization.
- During the Project the site will be cleaned of debris at the end of each working day.

No permanent construction will take place at the site as part of the Proposed Project. This NOI only covers demolition of the building, removal of asphalt pavement driveway just to the west and south of the building, and related site grading and stabilization work. Further development of the site will require additional filings.

Function and Characteristics

- **1. Public Water Supplies -** The closest town well is over 4,000 feet away from the site. The Public water supply will not be affected by the removal of this building.
- 2. Private Water Supplies One of the houses on the other side of Mine Brook has a private well. The distance from the back edge of the property to the closest edge of the property with the private well is over 100 feet. Additionally, due to the inferred hydraulic divide created by Mine Brook, the water supply is not inferred to be significantly influenced by conditions related to the site or the building.
- 3. Groundwater Soil borings and monitoring wells were completed at the site during previous environmental assessment activities. The depth to groundwater is generally similar to the depth of bedrock, which is approximately 10 feet below on-site grade in this area. Groundwater is not expected to be negatively impacted by the Proposed Project.
- **4. Flood Control -** Demolition of the building and adjacent asphault paving will result in reduced impervious coverage, which will allow more stormwater to penetrate the ground, reducing the risk of flooding at the site. Removal of the building from the riverfront is expected to increase the property's flood storage capabilities.
- **5. Erosion and Sedimentation -** Erosion and sedimentation will be controlled during demolition activities and until soil is permanently stabilized with vegetation.
- 6. Storm Damage Prevention The site has been abandoned for several years. Stormwater has caused the building to deteriorate over this time. The removal of this building and the installation of a permeable backfill material is anticipated to reduce storm-related impacts at the site. Demolition debris piles will be covered at the end of each working day to prevent windblown dust or waterborne transport of the materials.
- 7. Water Quality Runoff from the site presently includes water which has passed through portions of the building via its damaged roof, and therefor has been in contact with the internal components of the building. Removal of these building components, which include hazardous materials, asbestos, and lead painted surfaces, will mitigate water quality conditions related to the site. The Proposed Project will reduce risks to water quality in the vicinity of the site.
- **8. Water Pollution Control** As mentioned above the Proposed Project will mitigate water quality conditions related to the site. Runoff from the site will be cleaner than current conditions.
- 9. Fisheries The risk of material falling into the brook will be reduced by the removal of the building. Much of the existing structure has presumed lead based paint on it and runoff from the site may be contaminated due to contact with lead. Pollutant loads associated with urban runoff will be reduced. Runoff from the site after the Proposed Project will be cleaner than current conditions.
- 10. Shellfish Not Applicable in Franklin.
- **11. Wildlife Habitat -** The site is a commercial site and does not house significant wildlife. Any wildlife will migrate to the adjacent areas where there is more vegetative cover.
- **12.** Rare Species Habitat The site is not within a designated rare species area as shown on the 2008 Natural Heritage maps.
- 13. Agriculture There is no agriculture on site or on any abutting site.
- **14. Aquaculture** To date there are no aquaculture operations in Franklin.

15. Recreation - There will be no negative impacts to recreation resources from the Proposed Project. The building as it exists today is a public safety hazard, and has been condemned by the building inspector. The removal of the building will start a process to reclaim the area and make it a viable property for development.

Mitigation Plan

There is no mitigation planned to reduce negative impacts from the Proposed Project, as there are no negative impacts expected.

The Proposed Project is actually a mitigation plan which will reduce impacts to the environment as well as reduce risks to public safety.

Erosion and Sedimentation Control Plan

Erosion and sedimentation will be controlled during and following the demolition work in the following ways:

- 1. Erosion will be controlled by installing a double row of compost-filled wattles a few feet from the stream bank. The second row of wattles will trap sediment that has overwhelmed the first row, preventing sediment from entering the water. Wattles will be 100% biodegradable.
 - a. During the Proposed Project wattles will be checked daily to assure they are functioning properly. Accumulated silt will be cleared regularly.
- 2. A floating silt curtain will be installed a short distance downstream from the Project Site, which will prevent debris from polluting water resources.
 - a. During the Proposed Project the floating silt curtain will be checked daily to assure it is functioning properly. Accumulated silt and debris will be cleared regularly. The floating silt curtain will be removed once the building is demolished, asphalt paving is removed, and all debris has been removed from the site.
- 3. Once the building is demolished and asphalt paving is removed, the Town will backfill the location of demolished foundation with crushed brick/concrete and sand/gravel, cover with appropriate soil, and grade the site.
- 4. Once the site is graded the Town will immediately install erosion control matting and or seed mats to stabilize the sloped areas.
- 5. The Town will seed edges of site with appropriate native grass/perennial plants. The seeding will help to establish a riparian buffer strip between Mine Brook and the gravel roadway on the east edge of the Project Site (Lot 22).

Alternatives Analysis

There are three alternatives for the building on this site; the following is a brief discussion of each alternative:

- 1. The first alternative is "no action." Building II was condemned due to its structural condition and potential risk to public safety. Conditions at the site continue to worsen; therefore, if no corrective action is taken, the site will continue to pose a risk to public safety. The building is located adjacent to Mine Brook and bordering wetland vegetation, and structural damage or collapse could impact these important resources. In addition, given that the building shares a common wall with a neighboring business (Lot 28), structural damage to the building could impact neighboring property owners and businesses. Therefore, the "no action" alternative is not suitable for the site.
- 2. A second alternative is rehabilitation of the existing building. The building was condemned by the Building Inspector nearly 10 years ago. Since that time the building has continued to degrade, and major portions of the building have collapsed Therefore, rehabilitation of the building is not a feasible alternative for the site.
- 3. The third alternative is the proposed demolition of the building. As stated previously, the proposed removal of the building will increase pervious area, limit runoff from the site, remove a public safety hazard, and limit the Town's liability with regard to the neighboring property. Therefore, this alternative has been selected as the appropriate course of action for the site.

Replication Plan

Since no resource areas will be filled as part of this project, no replication plan has been submitted.

Construction Sequence and Schedule

<u>Construction Sequence</u>. The following will be added to the Order of Conditions and Project Plans, and included by reference in the project specifications:

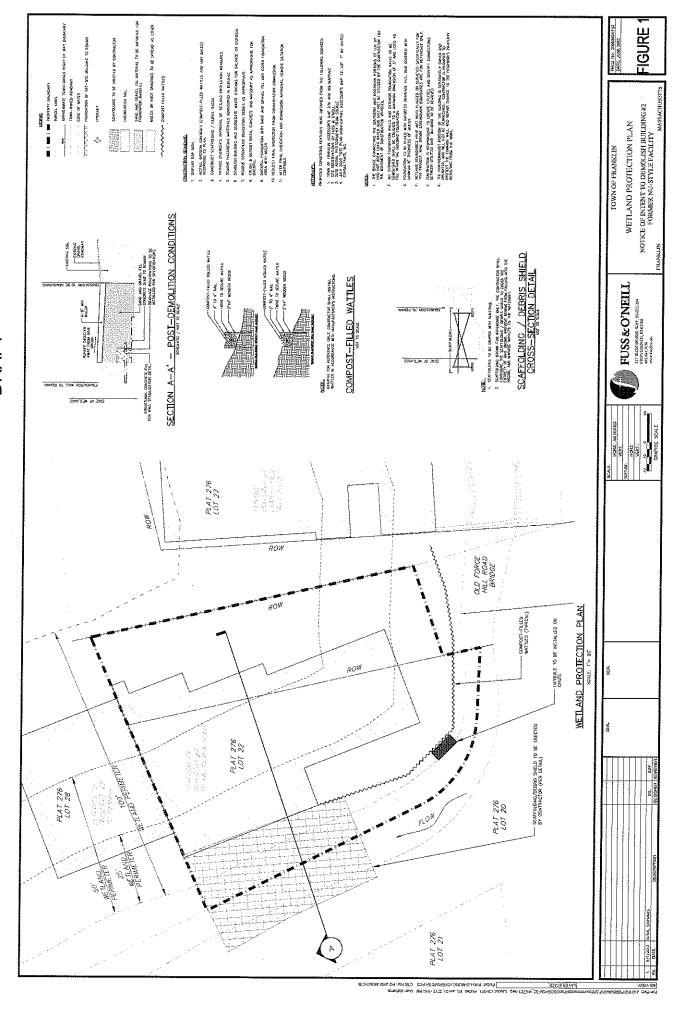
- 1. Display DEP sign
- 2. Install erosion controls and wetland protection measures (compost-filled wattles and floating silt curtain over Mine Brook) according to Project Plans.
- 3. Provide engineer's approval of wetland protection measures.
- 4. Secure the site, including installation of perimeter fencing.
- 5. Construction of temporary truck wash on adjacent Town owner property (Lot 27)
- 6. Remove hazardous materials abandoned in building.
- 7. Remediate hazardous materials within building that can be safety removed.
- 8. Demolish building including foundation, and segregate waste streams for salvage or disposal.
- 9. Remove stockpiled demolition debris as appropriate.
- 10. Crush brick, concrete and masonry as appropriate for backfill.
- 11. Remove floating silt curtain from Mine Brook.
- 12. Backfill location of demolished foundation with crushed brick/concrete, sand and gravel.
- 13. Cover site with appropriate soil and immediately install erosion control blankets or seed mats, and seed edges of site with appropriate native grass/perennial plants.
- 14. Final inspection from Conservation Commission.
- 15. After final inspection and Commission approval, remove siltation controls.

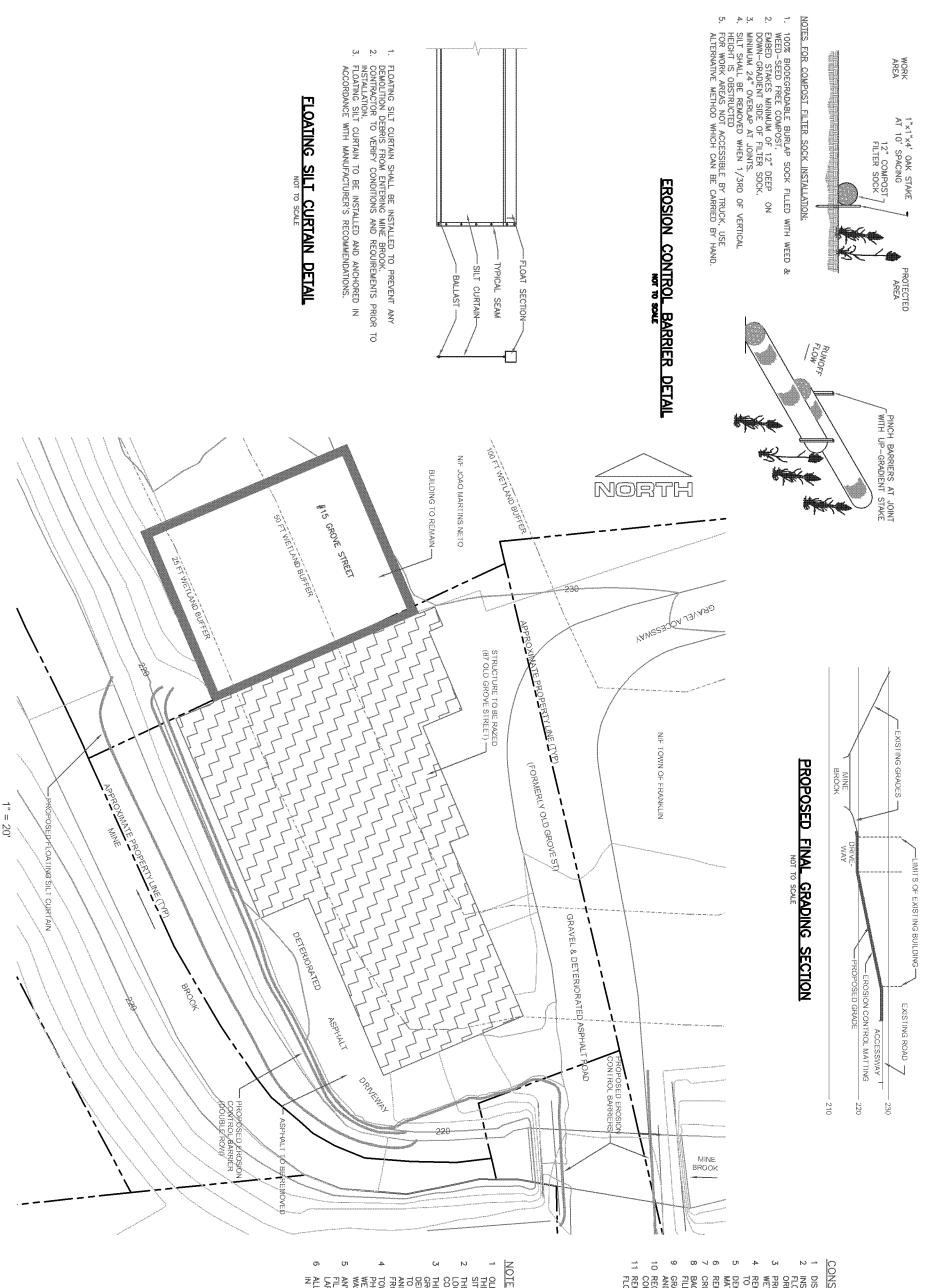
<u>Project Schedule</u>. The Order of Conditions resulting from the subject NOI will be included with a request for quotes scheduled to be distributed in March/April 2015. If sufficient funding is available the work will take place in Spring/Summer 2015. Demolition of the building and stabilization of the site is estimated to occur over a 2 to 3 week period.

Drainage Report

A specific drainage report has not been prepared for this site. However, the following general conditions pertain to drainage at the site, and summarize the proposed project's impacts to onsite drainage:

- The site consists primarily of impervious area, including the building, a packed bare gravel road right-of-way to the east of the building, and a bituminous asphalt driveway to the south and west of the building. Therefore, infiltration at the site is limited by the ground cover conditions, and the majority of the precipitation is inferred to run to the southwestern corner of the site, to a bend in Mine Brook.
- The proposed demolition project includes the removal of a formal industrial building (approximately 4,036 SF footprint) and perimeter bituminous asphalt driveway, and installation of pervious materials (crushed brick/concrete, sand and gravel fill, and soil and erosion control blankets or seed mats to stabilize the site).
- Removal of the impervious surfaces and installation of pervious material will reduce runoff from the building footprint.





CONSTRUCTION SEQUENCE

- DISPLAY DEP SIGN.
 INSTALL EROSION CONTROL BARRIERS AND
 FLOATING SILT CURTIAIN IN ACCORDANCE WITH
 ORDER OF CONDITIONS AND PLAN.
 PROVIDE ENGINEERS APPROVAL LETTER FOR
 WETLANDS PROTECTION.

- REMOVE HAZARDOUS MATERIALS FROM BUILDING TO BE RAZED.

- DEMOLISH BUILDING AND SEPERATE SALVAGEABLE MATERIAL AND WASTE FOR DISPOSAL.
 REMOVE STOCKPILES AND DEBRIS AS APPROPRIATE.
 CRUSH CONCRETE AND MASONRY AS APPROPRIATE.
 BACKFILL AND/OR GRADE SITE WITH APPROVED FILL MATERIALS.
- 10 REQUEST FINAL INSPECTION FROM CONSERVATION COMMISSION. GRADE AND COVER DISTURBED AREAS WITH LOAM AND SEED AND EROSION CONTROL MATTING
- REMOVE EROSION CONTROL BARRIERS AND FLOATING SILT CURTAIN.

NOTES

- 1 OLD GROVE STREET BRIDGE BRIDGE (SOUTH OF THE SITE) HAS NOT BEEN LOAD RATED. ACCESS SITE VA GROVE STREET TO THE EAST.

 2 THE CONTRACTOR IS RESPONSIBLE TO IDENTIFY, LOCATE AND DISCONNECT UTILITIES AND INTER—CONNECTIONS BETWEEN BUILDINGS. LABELED AS 15 GROVE ST, IS PRIVATELY OWNED AND NOT TO BE DEMOLISHED. THE CONTRACTOR IS RESPONSIBLE, TO PROTECT COMMON WALLS, RESTORE DAMAGE, AND TO EFFECT NECESSARY REPAIRS RESULTING FROM WORK ON THE NEIGHBORNG BUILDING.
- ANY CONCRETE OR MASONRY TO BE USED AS FILL SHALL BE CRUSHED TO BE NO LARGER LARGER THAN THREE INCHES.

 ALL DISTURBED AREAS TO BE FILLED AND GRADED IN ACCORDANCE WITH PLAN. TOWN OF FRANKLIN GIS DATA, BASED ON AERAL PHOTOGRAMMETRY, WAS UTILIZED TO ESTABLISH WETLANDS OFFSETS, FLAGGING FOR THIS PROJECT WAS NOT PERFORMED.



ENGINEERING DIVISION TOWN OF FRANKLIN

DEPARTMENT OF PUBLIC WORKS

B.TABERNER Notice of Intent to Demolish Building #2 Former Nu-Style Facility 02.17.2015

MM/WG

WG B

MM