



October 26, 2021

Mr. Anthony Padula, Chairman
355 East Central Street
Franklin, MA 02038

**Re: 15 Freedom Way
Site Plan Peer Review**

Dear Mr. Padula:

BETA Group, Inc. has reviewed revised documents for the project located at 15 Freedom Way in Franklin, Massachusetts. This letter is provided to outline findings, comments, and recommendations.

BASIS OF REVIEW

The following documents were received by BETA and formed the basis of the review:

- Plans (6 sheets) entitled: ***Site Development Plan of #15 Freedom Way***, revised October 19, 2021, prepared by Bay Colony Group, Inc of Foxborough, MA.
- ***Stormwater Analysis and Management Plan***, revised October 2021, prepared by Bay Colony Group, Inc of Foxborough, MA.
- Photometric Plan (1 sheet), dated October 26, 2021, prepared by Bay Colony Group, Inc of Foxborough, MA.
- Site Plan Approval Submittal, including:
 - Cover Letter
 - Form P
 - Certificate of Ownership
 - Business Entity Summary
 - 300-foot Abutters Map

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

- Site Visit
- ***Zoning Chapter 185 From the Code of the Town of Franklin***, current through July 2021
- ***Zoning Map of the Town of Franklin, Massachusetts***, attested to October 7, 2020
- ***Stormwater Management Chapter 153 From the Code of the Town of Franklin***, Adopted May 2, 2007
- ***Subdivision Regulations Chapter 300 From the Code of the Town of Franklin***, current through March 8, 2021
- ***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

INTRODUCTION

The project site includes a 20.0± acre parcel (#B-32) located at 15 Freedom Way in the Town of Franklin (the "Site"). The Site is located within the Industrial zoning district. Surrounding lots to the north, west, and east are also within this district, while those to the south are within the Rural Residential I district.

BETA GROUP, INC.

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The existing Site accommodates a 260,000 sq. ft., one-story warehouse. Associated parking areas and driveways are located along the west and north perimeter of the warehouse. The access driveways curve around the southern and eastern sides of the Site to provide access from Freedom Way. Additional site features include landscaping, lighting, utilities (water, sewer, electric) and fencing. Stormwater management is provided by an on-site closed drainage system consisting of catch basins and drainage manholes which discharges to a 42" RCP pipe to the northeast.

Topography at the Site is generally directed to the west and southwest. No wetland resource areas are known to be located in the vicinity of the Site. The Site is not located within a FEMA mapped 100-year floodplain, a wellhead protection area, an NHESP-mapped estimated habitat of rare or endangered species, or any other critical area. NRCS soil maps indicate the presence of Woodbridge Fine Sandy Loam with a Hydrologic Soil Group (HSG) rating of C/D (very low infiltration potential).

The Site is listed on the MassDEP database as RTN 2-4014483 with a status listed as Closed. Supporting documents indicate the RTN refers to a release of diesel fuel occurring circa 1999.

The Project proposes to construct an additional parking area on the northern side of the Site with 82 new spaces. The area north of the expanded parking lot will be re-graded to provide room for the proposed features. Stormwater management is proposed via new catch basin and drain manholes which will discharge into a new infiltration basin.

FINDINGS, COMMENTS, AND RECOMMENDATIONS

ZONING

- G1. Evaluate if any special provisions are required to construct and stabilize the proposed 2:1 slope on the west side of the site. *BCG: We have conducted soil evaluations on the hillside and it is our opinion that no special construction methods are necessary to construct the 2:1 slope. It should be noted that the Franklin subdivision regulations allow a 2:1 slope on roadways.* **BETA2: Information provided. BETA notes that 2:1 slopes are frequently constructed without special provisions – issue dismissed.**

ZONING

The Site is located within the Industrial (I) Zoning District. The proposed Site will retain the existing use as a Warehouse which is a permitted use in this district.

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

The Site meets the requirements for lot area, depth, frontage, width; front, side, and rear yards; and building height. No modifications are proposed to the building.

- SC1. Provide existing and proposed impervious coverage on the plans. **BETA2: Information provided indicating that proposed impervious coverage will remain below the allowable maximum – issue resolved.**

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

Access to the Site is proposed via a 28'± wide driveway connected to Freedom Way. The driveway runs south from Freedom Way around the northern, eastern, and southern, sides of the building before ending at the existing parking lot. The parking lot includes two sections: one directly south of the building and one directly west of the building.

The proposed Site design will expand the western parking lot approximately 75' to the north. No alterations are proposed to the existing parking lot except removal of a curb section and associated three parking spaces to access the new parking area. This new parking area will include 82 parking spaces. The project will retain 131 parking spaces from existing parking lots for a total post-development count of 213 spaces. The provided parking table indicates that 157 spaces were approved on the previous site plan. The existing Site also includes 25 tractor trailer loading spaces to remain.

Parking requirements for the Industrial Zoning District are defined by the Zoning Bylaw. For warehouses, 1 space is required per 1,000 sq. ft. of gross floor area; for office uses, 1 space is required per 250 sq. ft. of gross floor area. Therefore, the total required parking is 275 spaces. The provided 212 parking spaces do not satisfy this requirement, however it is an improvement over the existing 134 parking spaces, and the number noted to have been previously approved for the site.

Proposed parking spaces are 9' wide and 18' long, with 24' access aisles. No new accessible parking spaces are proposed; however, the existing parking lot includes 3 accessible parking spaces to remain. For the proposed number of parking spaces, 7 accessible spaces must be provided, 2 of which must be van accessible.

- P1. Clarify if there are any proposed changes in use or tenants for the building. If so, the proponent should provide information to support that the proposed parking is adequate for the existing and future needs of the facility. A waiver may be required for the proposed number of parking spaces. *BCG: There is no change in the use of the facility. It is the opinion of the owner that the proposed parking lot expansion will serve its foreseeable needs. A waiver will be necessary since the existing building received a waiver from the parking requirements in 1992 and the proposed 82-vehicle parking lot expansion, while an improvement, will not bring it into compliance. BETA2: Information provided. BETA defers to the preference of the Board on if a waiver is required; however, we note that the proposed parking addition will bring the site into greater conformity with the currently bylaw compared to the existing condition.*
- P2. Revise plans to indicate which existing parking spaces will be removed for the connection to the proposed parking lot and update total number of proposed on the parking table. *BCG: Sheet 3 has been revised to show where existing parking is being removed and the parking table has been updated. BETA2: Plan revised – issue resolved.*
- P3. Provide required number of accessible spaces, access aisles, and associated ramps to accessible routes. *BCG: Four HC accessible parking spaces, 2 of which are van accessible, have been added in the vicinity of the existing HC spaces and accessible route. The existing grades in the area meet the AAB regulations and no change is proposed to the accessible access to the building (Sheet 3). BETA2: Required accessible parking provided – issue resolved.*
- P4. Confirm widths of existing accessible parking space aisles. Aisles must be 8' wide for van accessible spaces, and 5' wide for standard accessible spaces. *BCG: See P3 response. BETA2: Widths confirmed – issue resolved.*

- P5. Revise proposed parking spaces to be 19' long (§185-21.C(9)). *BCG: The proposed parking space size has been revised to 19' long (Sheet 3).* **BETA2: Parking stalls revised – issue resolved. BETA notes that a revised plan was provided to BETA, dated October 26, 2021, which supersedes the plan submitted to the Board dated October 19, 2021, and BETA anticipates that this will be incorporated into the final plan set for endorsement.**

INDUSTRIAL DISTRICT PERFORMANCE CONTROLS (§185-22)

The project is located in the Industrial District and must conform to this section. The proposed scope of work is not anticipated to create any disturbances (sound, noise, vibration, odor, or flashing) that are not present in the existing Site.

SIDEWALKS (§185-28)

No new sidewalks or walkways are proposed under this project.

CURBING (§185-29)

The project proposes monolithic bituminous curbing along perimeter of the proposed parking area. Existing curbing throughout the site is identified as bituminous berm.

- C1. At the discretion of the Planning Board revise bituminous curb to be granite or reinforced concrete curbing (§185-29). *BCG: Reinforced concrete curbing has been added (Sheets 3 & 4).* **BETA2: Curbing revised – issue resolved.**

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.

- SP1. Indicate abutting land uses and zoning data on the locus or vicinity map (§185-31.1.C(3)(d)). *BCG: The abutting land uses and zones have been added to the locus plan (Cover sheet).* **BETA2: Information provided – issue resolved.**
- SP2. Indicate existing tree lines at the Site and proposed limit of clearing, if applicable. (§185-31.1.C(3)(k & t)). *BCG: The tree line on the south side is shown and there is no clearing proposed. There is no tree line in the area of the proposed parking lot. It was a filled area when the building was constructed and there is scrub in the area.* **BETA2: Information provided – issue dismissed.**
- SP3. Provide photometric plan showing illuminance values for proposed parking lot (§185-31.1.C(3)(l)). *BCG: A photometric plan dated 10/19/2021 has been prepared and is attached.* **BETA2: Photometric plan provided that indicates adequate light levels throughout the proposed parking area with no adverse spillage onto adjacent parcels – issue resolved.**

SCREENING (§185-35)

The project proposes outdoor parking for 10 or more cars which must be screened in accordance with this section. A residential district is present to the south; however, no alterations are proposed that are anticipated to be visible from this district.

- L1. Provide required tree plantings in accordance with §185-21.C(5) and ensure that all will come from the Best Development Practices Guidebook (§185-31.1.C(3)(k)). For the proposed 82

parking spaces, 9 trees are required. *BCG: Nine Red Oak trees have been added to the west of the parking area (Sheet 3).* **BETA2: Plantings provided – issue resolved.**

UTILITIES

The project proposes to retain existing utilities. No water, sanitary sewer, gas, or electric services are proposed except that existing post-indicator valves in the footprint of the expanded parking lot will be replaced with water gates and boxes.

- U1. Provide confirmation that the replacement of PIVs with gate boxes is acceptable to the Fire Chief. *BCG: The Owner has contacted the Deputy Fire Chief who finds this acceptable and will speak to the Town Engineer. He has also provided an email to the Planning Board that the design is acceptable.* **BETA2: BETA defers to the Deputy Fire Chief on this issue.**

STORMWATER MANAGEMENT

Stormwater management for the expanded parking lot will be accomplished through a closed drainage system consisting of deep sump catch basins and manholes which will convey flow to a new infiltration basin. Overflow from the basin will discharge to an existing drain manhole which connects to a 42" RCP directed north. The existing closed drainage system will be retained to manage the remainder of the Site, with the exception that an existing 15" RCP inlet pipe will be removed. The runoff captured by the 15" RCP will instead be directed to a new drain line consisting of 24" RCP and drain manholes that will discharge to the infiltration basin.

GENERAL

- SW1. Provide a stamped MassDEP Stormwater Checklist. *BCG: A stamped checklist is enclosed with the revised Storm Water Report.* **BETA2: Checklist provided – issue resolved.**
- SW2. Evaluate how the inlet to the infiltration basin will function. The proposed 36" pipe will enter the basin at an approximate 45° angle and the bottom of the basin is only four feet wide. *BCG: The design has been modified and the pipe and rip-rap are aligned (Sheet 3).* **BETA2: Orientation revised – issue resolved.**

MASSACHUSETTS STORMWATER MANAGEMENT STANDARDS:

The proposed development will disturb greater than one acre; therefore, the project is subject to Chapter 153: Stormwater Management of the Town of Franklin Bylaws and MassDEP Stormwater Management Standards.

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 does not propose any new untreated stormwater discharges to wetlands – **complies with standard.**

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 an increase in overall impervious area via an expanded parking lot. Runoff from this area is directed to a new infiltration basin for stormwater management. The provided calculations indicate a decrease in post-development peak discharge rates and total runoff volumes compared to pre-

development conditions, except for runoff volume during the 10- and 100-year storm events for the “Closed Drain” discharge point.

- SW3. Revise site design such that post-development runoff volume does not exceed pre-development runoff volume for the “Closed Drain” design point, as indicated on Table 2. *BCG: The drainage modification has resulted in a reduction at all design points (Storm Water Report).* **BETA2: Design revised – issue resolved.**
- SW4. Clarify how the limits of watershed FE#1 were determined. The watershed boundaries are not shown perpendicular to the contours on the watershed plan and based on aerial imagery, a portion of the abutting Owens & Minor Inc. building and parking area are within the area depicted; however, no impervious area is accounted for. Also, based on grading and field observations, a portion of this watershed is anticipated to flow onto the access road and be captured by catch basins instead of FES#1. *BCG: Section 3.0 of the Storm Water Report has been expanded to explain the methodology on how the watershed was determined.* **BETA2: Information provided. BETA notes that since the offsite flows are no longer routed to the proposed BMP the designer’s assumptions are reasonable – issue dismissed.**
- SW5. If watershed FES#1 is comprised entirely of pervious areas, as shown in the HydroCAD model, consider allowing these flows to bypass the proposed infiltration basin and route existing CBs 8 through 11 to the basin instead, which will significantly improve stormwater quality at the Site. *BCG: See response to SW4.* **BETA2: Refer to SW4 – issue dismissed.**
- SW6. Depict proposed infiltration basin on watershed plan and route area/runoff to the Closed Drainage design point instead of the Runoff #2 design point. *BCG: The basin is shown on the plan as a separate subarea and routed to the basin and then to the Closed Drainage point (Storm Water Report).* **BETA2: Model revised – issue resolved.**
- SW7. Model basin footprint as impervious water surface to avoid “double-counting” the potential exfiltration. *BCG: The basin has been modeled as requested (Storm Water Report).* **BETA2: Model revised – issue resolved.**
- SW8. Revise pipe size for Pond 19P in the HydroCAD model to be 24” RCP to match the site plans. *BCG: The pipe sizes have been revised to reflect the modified design (Sheet 3 & Storm Water Report)* **BETA2: Model revised – issue resolved.**
- SW9. Recommend to revise Mannings N value used for RCP pipe to be 0.013. *BCG: Change in N has been changed to 0.013 as requested.* **BETA2: N value revised – issue resolved.**

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 presence of Woodbridge Fine Sandy Loam with a Hydrologic Soil Group (HSG) rating of C/D (very low infiltration potential). An infiltration basin is proposed to provide recharge for the proposed expanded parking area. Calculations show that provided recharge is in excess of what is required and that BMPs will drain within 72 hours.

- SW10. Provide test pit logs and indicate location on plans (§153-15.A(6)). Note that textural class of soils in the A and B horizons may justify the use of a different HSG in the proposed work area for HydroCAD runoff calculations. *BCG: The test pit logs are shown on the basin profile and the worksheets have been added to Appendix D of the Storm Water Report. As shown in the basin profile, there are no A or B horizons.* **BETA2: Information provided – issue resolved.**

SW11. Provide data identifying estimated seasonal high groundwater elevation in the area of the basin (§153-15.A(9)). *BCG: See discussion in Section 2.0 of the Storm Water Report. BETA2: Information provided – issue resolved.*

SW12. Confirm the storage volume used in the drawdown calculations (0.052 ac-ft). The cumulative storage volume for Pond 67P is listed at 0.070 ac-ft in the HydroCAD model. *BCG: The cumulative storage volume for the infiltration basin before any outflow at el. 375' is approximately 0.35 ac-ft (Storm Water Report). BETA2: Calculation revised – issue resolved.*

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

The project proposes to direct runoff from the new parking area through a treatment train consisting of deep-sump catch basins and an infiltration basin. This treatment train is anticipated to provide the required TSS removal and water quality volume.

SW13. Provide a Long-term Pollution Prevention Plan, addressing the applicable items identified on Volume 1, Chapter 1, Page 9 of the MA Stormwater Handbook. *BCG: The Long-Term O&M Plan has been revised to address the additional items (Storm Water Report App. C). BETA2: Information provided – issue resolved.*

Higher Potential Pollutant Loads (Standard Number 5): *Stormwater discharges from Land Uses with Higher Potential Pollutant Loads require the use of specific stormwater management BMPs.*

The project is not a Land Use with Higher Potential Pollutant Load (LUHPPL).

Critical Areas (Standard Number 6): *Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas.*

The project does not propose discharges to critical areas.

Redevelopment (Standard Number 7): *Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable.*

The project is a mix of new development and redevelopment. The proposed expanded parking area is a new development and must fully meet these standards.

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

The project will disturb more than one acre of land; therefore, a Notice of Intent with EPA and a Stormwater Pollution Prevention Plan (SWPPP) are required. The project proposes the use of erosion control barrier (mulch filled silt sock) and catch basin inlet protection.

SW14. Correct project narrative to indicate that the Site will fall under the EPA Construction General Permit regulations as the area of disturbance (proposed pavement plus grading) is greater than 1 acre. *BCG: Revised as requested. BETA2: Narrative revised – issue resolved.*

SW15. Provide stabilized construction entrance with associated detail. *BCG: A detail has been added (Sheet 5). BETA2: Construction entrance provided – issue resolved.*

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 Long-Term Operation and Maintenance (O&M) Plan has been provided.

Mr. Anthony Padula, Chairman

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SW16. Revise catch basin operation/maintenance frequency to be four times per years in accordance with the MA Stormwater Handbook. **BETA2: O&M revised – issue resolved.**

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

An Illicit Discharge Compliance Statement was included in the Stormwater Management Report.

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

Very truly yours,
BETA Group, Inc.



Matthew J. Crowley, PE
Senior Project Manager



Stephen Borgatti, PE
Engineer

cc: Amy Love, Planner



TOWN OF FRANKLIN

DEPARTMENT OF PUBLIC WORKS

Franklin Municipal Building
257 Fisher Street
Franklin, MA 02038-3026

October 26, 2021

Mr. Anthony Padula, Chairman
Members of the Franklin Planning Board
355 East Central Street
Franklin, MA 02038

RE: Site Plan – Parking Expansion, 15 Freedom Way

Dear Mr. Chairman and Members:

We have reviewed the revised materials for the subject project and our previous comments have been addressed.

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Michael Maglio, P.E.
Town Engineer



**FRANKLIN PLANNING & COMMUNITY
DEVELOPMENT**

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

MEMORANDUM

DATE: October 26, 2021
TO: Franklin Planning Board
FROM: Department of Planning and Community Development
RE: 15 Freedom Way
Site Plan Modification

The DPCD has reviewed the above referenced Site Plan Modification application for the Monday, November 1, 2021 Planning Board meeting and offers the following commentary:

General:

1. The applicant has filed a Site Plan Modification to add 82 parking spaces. The Applicant has included a Stormwater Management report along with Site Plans.
2. Applicant is not required to file with the Conservation Commission.

Comments:

1. Applicant is providing a total of 216 parking spaces, while 275 are required.
2. The Applicant currently has 3 Handicap parking spaces. The required amount based on 216 parking spaces is 7 spaces. DPCD recommends adding 4 additional Handicap spaces by the front door. ***Applicant has provided 4 Handicap spaces.***
3. Per Zoning By-Law §185-31 C (3)(k), the applicant has not provided a Landscaping Plan. A Landscaping plan should be submitted. ***Applicant has added 10 trees to the Site Plan.***
4. The applicant needs to submit a photometric plan with sufficient illuminance values, to determine compliance with §185-31 C(4)(e), Site plan, Review Criteria per Zoning By-Law §185-31 C(3) (l). ***Applicant has provided a photometric plan***
5. Per Zoning By-Law §185-31 Section 3.1.C (s), the applicant has not provided a traffic study. The Planning Board will need to determine if a Traffic study is required for this specific project. ***Applicant has acknowledged that 26 spaces will be more than 300' from the entrance of the building. There is no change in use with the additional parking spaces.***

Bay Colony Group, Inc.

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October 25, 2021

Mr. Anthony Padula, Chairman
Franklin Planning Board
355 East Central Street
Franklin, MA 02038

RE: 15 Freedom Way Site Plan

Dear Mr. Padula:

We have reviewed the comments that we received from Beta Group, Inc. as well as comments from the Town's professional staff as well as input that we have received from the October 18th public hearing. The plan has been modified to address those issues and, for ease of review, the following lists the comments and our response.

Beta Group, Inc. Correspondence dated October 6, 2021

- G1. Evaluate if any special provisions are required to construct and stabilize the proposed 2:1 slope on the west side of the site. We have conducted soil evaluations on the hillside and it is our opinion that no special construction methods are necessary to construct the 2:1 slope. It should be noted that the Franklin subdivision regulations allow a 2:1 slope on roadways.
- P1. Clarify if there are any proposed changes in use or tenants for the building. If so, the proponent should provide information to support that the proposed parking is adequate for the existing and future needs of the facility. A waiver may be required for the proposed number of parking spaces. There is no change in the use of the facility. It is the opinion of the owner that the proposed parking lot expansion will serve its foreseeable needs. A waiver will be necessary since the existing building received a waiver from the parking requirements in 1992 and the proposed 82-vehicle parking lot expansion, while an improvement, will not bring it into compliance.
- P2. Revise plans to indicate which existing parking spaces will be removed for the connection to the proposed parking lot and update total number of proposed on the parking table. Sheet 3 has been revised to show where existing parking is being removed and the parking table has been updated.
- P3. Provide required number of accessible spaces, access aisles, and associated ramps to accessible routes. Four HC accessible parking spaces, 2 of which are van accessible, have been added in the vicinity of the existing HC spaces and

- accessible route. The existing grades in the area meet the AAB regulations and no change is proposed to the accessible access to the building (Sheet 3).
- P4. Confirm widths of existing accessible parking space aisles. Aisles must be 8' wide for van accessible spaces, and 5' wide for standard accessible spaces. See P3 response.
- P5. Revise proposed parking spaces to be 19' long (§185-21.C(9)). The proposed parking space size has been revised to 19' long (Sheet 3).
- C1. At the discretion of the Planning Board revise bituminous curb to be granite or reinforced concrete curbing (§185-29). Reinforced concrete curbing has been added (Sheets 3 & 4).
- SP1. Indicate abutting land uses and zoning data on the locus or vicinity map (§185-31.1.C(3)(d)). The abutting land uses and zones have been added to the locus plan (Cover sheet).
- SP2. Indicate existing tree lines at the Site and proposed limit of clearing, if applicable. (§185-31.1.C(3)(k & t)). The tree line on the south side is shown and there is no clearing proposed. There is no tree line in the area of the proposed parking lot. It was a filled area when the building was constructed and there is scrub in the area.
- SP3. Provide photometric plan showing illuminance values for proposed parking lot (§185-31.1.C(3)(l)). A photometric plan dated 10/19/2021 has been prepared and is attached.
- L1. Provide required tree plantings in accordance with §185-21.C(5) and ensure that all will come from the Best Development Practices Guidebook (§185-31.1.C(3)(k)). For the proposed 82 parking spaces, 9 trees are required. Nine Red Oak trees have been added to the west of the parking area (Sheet 3).
- U1. Provide confirmation that the replacement of PIVs with gate boxes is acceptable to the Fire Chief. The Owner has contacted the Deputy Fire Chief who finds this acceptable and will speak to the Town Engineer. He has also provided an email to the Planning Board that the design is acceptable.
- SW1. Provide a stamped MassDEP Stormwater Checklist. A stamped checklist is enclosed with the revised Storm Water Report.
- SW2. Evaluate how the inlet to the infiltration basin will function. The proposed 36" pipe will enter the basin at an approximate 45° angle and the bottom of the basin is only four feet wide. The design has been modified and the pipe and rip-rap are aligned (Sheet 3).
- SW3. Revise site design such that post-development runoff volume does not exceed pre-development runoff volume for the "Closed Drain" design point, as indicated on Table 2. The drainage modification has resulted in a reduction at all design points (Storm Water Report).
- SW4. Clarify how the limits of watershed FE#1 were determined. The watershed boundaries are not shown perpendicular to the contours on the watershed plan and based on aerial imagery, a portion of the abutting Owens & Minor Inc. building and parking area are within the area depicted; however, no impervious area is accounted for. Also, based on grading and field

observations, a portion of this watershed is anticipated to flow onto the access road and be captured by catch basins instead of FES#1. Section 3.0 of the Storm Water Report has been expanded to explain the methodology on how the watershed was determined.

- SW5. If watershed FES#1 is comprised entirely of pervious areas, as shown in the HydroCAD model, consider allowing these flows to bypass the proposed infiltration basin and route existing CBs 8 through 11 to the basin instead, which will significantly improve stormwater quality at the Site. See response to SW4.
- SW6. Depict proposed infiltration basin on watershed plan and route area/runoff to the Closed Drainage design point instead of the Runoff #2 design point. The basin is shown on the plan as a separate subarea and routed to the basin and then to the Closed Drainage point (Storm Water Report).
- SW7. Model basin footprint as impervious water surface to avoid “double-counting” the potential exfiltration. The basin has been modeled as requested (Storm Water Report).
- SW8. Revise pipe size for Pond 19P in the HydroCAD model to be 24” RCP to match the site plans. The pipe sizes have been revised to reflect the modified design (Sheet 3 & Storm Water Report).
- SW9. Recommend to revise Manning’s N value used for RCP pipe to be 0.013. Change in N has been changed to 0.013 as requested.
- SW10. Provide test pit logs and indicate location on plans (§153-15.A(6)). Note that textural class of soils in the A and B horizons may justify the use of a different HSG in the proposed work area for HydroCAD runoff calculations. The test pit logs are shown on the basin profile and the worksheets have been added to Appendix D of the Storm Water Report. As shown in the basin profile, there are no A or B horizons.
- SW11. Provide data identifying estimated seasonal high groundwater elevation in the area of the basin (§153-15.A(9)). See discussion in Section 2.0 of the Storm Water Report.
- SW12. Confirm the storage volume used in the drawdown calculations (0.052 ac-ft). The cumulative storage volume for Pond 67P is listed at 0.070 ac-ft in the HydroCAD model. The cumulative storage volume for the infiltration basin before any outflow at el. 375’ is approximately 0.35 ac-ft (Storm Water Report).
- SW13. Provide a Long-term Pollution Prevention Plan, addressing the applicable items identified on Volume 1, Chapter 1, Page 9 of the MA Stormwater Handbook. The Long-Term O&M Plan has been revised to address the additional items (Storm Water Report App. C).
- SW14. Correct project narrative to indicate that the Site will fall under the EPA Construction General Permit regulations as the area of disturbance (proposed pavement plus grading) is greater than 1 acre. Revised as requested.
- SW15. Provide stabilized construction entrance with associated detail. A detail has been added (Sheet 5).

Franklin DPW Correspondence dated October 12, 2021

1. Applications that will need to be filed with the Franklin Department of Public Works may include, but are not necessarily limited to Water and Sewer Permits and a Soil Erosion and Sediment Control Permit. Acknowledged
2. We note that while the proposed storm water design does not increase overall flow rates or volumes off the site, there is an increase in runoff volume to the closed drainage system that runs off site and eventually discharges to the industrial park's drainage system. The designer should ensure that the downstream drainage detention ponds can handle the increased volume. The design has been modified so that runoff volume at all points is equal to or less than the existing condition (Table 2 Storm Water Report)
3. The Stormwater Report addresses how the design complies with the Massachusetts Stormwater Standards, but the applicant should indicate whether the design meets Franklin's criteria for new projects (the new parking lot would be considered new development):
 - 1) For new development sites all stormwater management systems shall be designed to:
 - a) Retain the volume of runoff equivalent to, or greater than, one (1.0) inch multiplied by the total post-construction impervious surface area on the site AND/OR
 - b) Remove 90% of the average annual load of Total Suspended Solids (TSS) generated from the total post-construction impervious area on the site AND 60% of the average annual load of Total Phosphorus (TP) generated from the total post-construction impervious surface area on the site. Pollutant removal shall be calculated consistent with EPA Region 1's BMP Performance Extrapolation Tool or other BMP performance evaluation tool provided by EPA Region 1, where available. If EPA Region 1 tools do not address the planned or installed BMP performance any federally or State approved BMP design guidance or performance standards (e.g. State stormwater handbooks and design guidance manuals) may be used to calculate BMP performance.

The design retains 0.35 ac-ft of volume in the proposed infiltration basin, which is more than the volume of runoff developed by 1" of rain over the proposed parking area (0.0534 ac-ft).

Franklin Planning & Community Development Correspondence dated October 13, 2021

1. Applicant is providing a total of 216 parking spaces, while 275 are required. No response necessary.

2. The Applicant currently has 3 Handicap parking spaces. The required amount based on 216 parking spaces is 7 spaces. DPCD recommends adding 4 additional Handicap spaces by the front door. Four HC accessible parking spaces have been added (Sheet 3).
3. Per Zoning By-Law §185-31 C (3)(k), the applicant has not provided a Landscaping Plan. A Landscaping plan should be submitted. Nine Red Oak trees have been added to the west of the parking area (Sheet 3).
4. The applicant needs to submit a photometric plan with sufficient illuminance values, to determine compliance with §185-31 C(4)(e), Site plan, Review Criteria per Zoning By-Law §185-31 C(3) (l). Will additional lighting be installed. Additional lights will be installed on the light poles east of the new parking lot. A photometric plan is attached.
5. Per Zoning By-Law §185-31 Section 3.1.C (s), the applicant has not provided a traffic study. The Planning Board will need to determine if a Traffic study is required for this specific project. Since there is no increase in the size of the facility and no change in the use and the project is in a commercial development, we do not anticipate any change in Levels of Service or an issue with roadway capacity and request that the Board waive this requirement.

Based on the discussion with the Board we request that you find that circumstances justify that parking being counted toward fulfillment of parking requirements be allowed more than 300' from the from the building entrance. Under Zoning By-Law §185-21 Section C (6), parking spaces more than 300' from the main entrance may not be counted toward fulfillment of parking requirements. Twenty-six of the This parking lot is for employees only and the topography of the site makes it impractical to construct all the future parking withing 300' of the existing entrance. Twenty-six of the 82 parking spaces proposed for the parking lot are more than 300' from the employee entrance. Due to the topography of the site, which drops off significantly along to the west and south lot lines it is impractical to construct those 26 additional spaces within 300' of the entrance.

Thank you for your consideration.

Very truly yours,

BAY COLONY GROUP, INC.

A handwritten signature in black ink, appearing to read 'Will Buckley', with a stylized flourish at the end.

William R. Buckley, Jr., P.E.
Project Manager

