



November 02, 2023

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

**Re: 15 Liberty Way- Proposed Parking Expansion**

Dear Mr. Rondeau:

BETA Group, Inc. (BETA) has reviewed the revised documents for the project entitled: **Liberty Parking Expansion, 15 Liberty Way** in Franklin, MA. This letter is provided to present BETA's findings, comments, and recommendations.

## **BASIS OF REVIEW**

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

- Plans (8 sheets) entitled: **Liberty Parking Expansion**, dated January 13, 2023, revised October 17, 2023, prepared by Level Design Group of Plainville, MA.
- Letter to Gregory Rondeau, Chairman Franklin Planning Board **RE: 15 Liberty Way-Proposed Parking Expansion** dated October 17, 2023, prepared by Level Design Group.

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

- **Zoning Chapter 185 From the Code of the Town of Franklin**, current through January 1, 2015
- **Zoning Map of the Town of Franklin, Massachusetts**, attested May 1, 2015
- **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 January 9, 2012

BETA conducted a site walk of the parcel on March 01, 2023 to confirm the conditions indicated on the proposed plans and to identify issues that may be visible on site.

## **INTRODUCTION**

The project site includes one parcel, Lot 320-004, with a total area of 15 acres located at 15 Liberty Way in the Town of Franklin (the "Site"). The Site is located within the Industrial zoning district. Lots surrounding the Site to the north, east, and south are also within this district, while lots to the west are within the Single-Family III district. The Site is not located within the Water Resource District.

The existing Site is the location of a 1-story warehouse. Paved parking and loading areas are present to the east and west of the building, with driveways providing access from Liberty Way to the south. The northernmost and westernmost portions of the Site are woodlands. All proposed work is located within the portion of the Site to the north of the existing building.

Topography within the limit of work is generally directed west, from the top of a small hill, towards an existing on-site retention pond. Smaller sections of the work area are graded to the north, east or south. The Site is

not located within a wellhead protection area, a FEMA mapped 100-year floodplain, 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 (low infiltration potential when unsaturated).

The project proposes to clear the woodlands in the northern portion of the Site and construct a new 67-69,000± sq. ft. paved area. This area will connect to the existing driveways adjacent to the warehouse building. Stormwater management is proposed via a new subsurface detention system with overflow directed to the existing retention basin.

## **FINDINGS, COMMENTS AND RECOMMENDATIONS**

To assist with the review, the response to comments from Level Design Group to the BETA comments are identified as **LDG: The ....** and the response by BETA will be **BETA: The .....**

### **DRAWING REQUIREMENTS (§185-31)**

Drawings must be prepared in accordance with the Zoning Bylaw (§185-31).

DR1. All existing land and building uses on the lot should be included on the plan. (§185-31.C.(3).(e)).

***LDG:** There are no modifications to the existing building use, however, the building use, which is an existing warehouse, has been listed on the plans.*

***BETA:** No further comments.*

DR2. Existing topography for the entire site is required. In addition, earth removal quantities should be shown. (§185-31.C.(3).(f)).

***LDG:** As discussed during the initial Planning Board hearing, LDG has provided the enclosed aerial photo overlain with the proposed parking area to detail location on property. The entire property has not been resurveyed as part of the limited project.*

***BETA:** Existing topography and earthworks quantities have not been provided. Comment remains.*

DR3. Based upon the site visit, it appears that there may be wetland resources north and west of the site based on both standing water and vegetation. These areas should be confirmed with the Conservation Commission agent.

***LDG:** Resource area flags have been placed and have been added to the revised plans in accordance with the Conservation Commission.*

***BETA:** No further comments wetland flags are shown.*

DR4. In accordance with the requirements of §185-31.C.(3).(k), a Landscaping Plan should be provided.

***LDG:** A Landscape Plan is included with this submittal.*

***BETA:** The landscape plan is not in the sheet set. Comment remains.*

DR5. In accordance with §185-31.C.(3).(s) a detailed description of traffic circulation, safety and capacity in sufficient detail to allow the Board to make a determination of whether a traffic impact analysis is necessary should be provided.

**LDG:** LDG has prepared the attached turning analysis for the expected vehicle pathways within the new trailer storage parking area as requested. The revised submittal includes an Emergency Vehicle Parking Plan which shows the vehicle pathways and turning analysis.

**BETA:** The plan indicates a 20' wide fire lane to be striped on the proposed pavement. Emergency access through the entire site should be identified. Comment remains.

DR6. Provide data which shows that no site feature or activity will create glare or illumination which extends beyond the site's property line (§185-31.C.(4).(e).

**LDG:** A Photometric Plan is included with this submittal.

**BETA:** The Photometric plan is not in the sheet set. Comment remains.

### GENERAL COMMENTS

G1. In accordance with the test pits that were conducted on site, groundwater levels are generally 2.5-3.0' below the surface. In accordance with the grading plan, the proposed cut along the easterly side of the parking ranges from 7-10'. At the test pit 1 location the proposed surface will be 2.78' below groundwater. The design will essentially dewater the parking lot area and direct the flow through both proposed and existing Stormwater BMPs. At times, this groundwater flow is anticipated to overwhelm all existing stormwater improvements in the area and produce continued surface water flow where it does not exist today, potentially impacting the down gradient abutters. Provide additional test pit data along the easterly edge of the proposed parking and show that the swale along the easterly edge will not intercept groundwater.

**LDG:** Additional soil testing has been performed and the testing locations are shown on the revised plans. No soil testing was performed along the easterly edge of the parcel as the swale is intended to intercept groundwater.

**BETA:** BETA does not agree with the design intent to intercept groundwater and lower the groundwater table to allow the proposed improvements to penetrate below the groundwater level. The proposed swale will have an impact on flagged wetland resource areas both east and west of the site by modifying runoff patterns and groundwater movement patterns. BETA recommends that the grading be modified to stay above estimated seasonal high groundwater.

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

The Proposed Lot will comply with area, frontage, depth, yard dimensions, interior landscape and maximum impervious coverage.

Z1. The Zoning table provided on sheet 3 of 8 should be revised to identify both existing and proposed. It is understood that the only change in the use will be the additional Impervious Coverage, however, the proposed increase in area should be documented.

**LDG:** The Zoning Table has been revised accordingly.

**BETA:** No further comments.

- Z2. Provide a plan of the existing conditions on the lot which documents compliance with the zoning requirements.

**LDG:** *The proposed lot will have trailer parking, the plans detail and area of parking, and a clear area for fire apparatus movement. The intention of the lot is to provide access for the renter to move trailers safely, with maintained corridors for public safety this methodology should be adequate for design.*

**BETA:** *The proposed impervious coverage complies with Zoning. No further comments.*

#### **PARKING, LOADING AND DRIVEWAY REQUIREMENTS (§185-21) AND SCREENING (§185-35)**

The Project proposes to expand the parking at the rear of the site by providing an additional 67-69,000 sq. ft. of pavement that will tie directly into the existing paved edge of the perimeter roadway around the building. The proposed use of the additional pavement area is not indicated on the plans. The only note on the plan is a label “Proposed Truck Bituminous Concrete Pavement”. The area will be sloped at a 2.0+% slope from the northeast corner to the southwest corner.

BETA provides the following comments relative to the parking, loading access and landscaping:

- P1. The Zoning Table indicates that 96 spaces are required by Zoning which is satisfied by existing parking spaces on site. However, there are no plans which corroborate this notation. Provide a plan which documents the number of parking spaces on site.

**LDG:** *An Overall aerial Site Plan has been included with this submittal which shows the total number of parking spaces.*

**BETA:** *The Plan is difficult to read but does show 100 existing spaces. No further comments*

- P2. The proposed parking lot expansion will create an additional 67-69,000 square feet of pavement area on site. There are no proposed traffic signs, signals or painted lines indicated. BETA recommends that the designer at a minimum provide travel lane markings through the lot.

**LDG:** *The proposed lot will have trailer parking, the plans detail and area of parking, and a clear area for fire apparatus movement. The intention of the lot is to provide access for the renter to move trailers safely, with maintained corridors for public safety this methodology should be adequate for design.*

**BETA:** *The plan shows the minimum requested. No trailer parking spaces are identified. BETA recommends that trailer parking spaces be identified.*

- P3. Based upon the area of the expansion, BETA estimates that this is sufficient space to add an additional 175± parking spaces to the site. In accordance with §185-21.C.5. parking lots for 20 or more cars shall contain or be bordered within 5’ by at least one tree per 10 spaces... BETA recommends that a minimum of 18 trees be provided.

**LDG:** *The Landscape Plan has been revised accordingly.*

**BETA:** *The landscape plan is not in the sheet set. Comment remains.*

P4. In accordance with §185-35.C. “any use in an Industrial or Business District if located on premises within 500 feet of a residentially used structure in an adjacent residential district ..... Such uses shall provide a greenbelt along the portion of the lot which abuts the residential district or abutting lot cited above. Such greenbelt shall consist of an area not less than 15 feet wide containing a dense grouping of trees and shrubs providing a natural barrier between the lot and the adjacent premises.” The property line along the westerly edge of the parcel is not shown. Based upon the height differential of the abutting residential parcels above this site and the 6’ wooden fence at the crest of the hill behind the residences, BETA does not believe that this will be an issue, however, this property line should be shown to document that a greenbelt remains intact for the residential abutters in this area.

**LDG:** *The plans have been revised to show the western property line and that a minimum 15’ greenbelt area exists and will remain.*

**BETA:** *No further comments*

#### LANDSCAPING

There is no proposed landscaping plan. The Applicant should provide a landscaping Plan which demonstrates compliance with the screening requirements set forth by §185-21.C.5 and §185-35.

**LDG:** *A Landscape Plan is included with the revised submittal.*

**BETA:** *The landscape plan is not in the sheet set. Comment remains.*

#### LIGHTING (§185-31.C(4)(E))

No additional site lighting was indicated to be provided with the proposed expansion. If any lighting is proposed, photometric plans should be provided.

**LDG:** *A Photometric Plan is included with the revised submittal..*

**BETA:** *The Photometric plan is not in the sheet set. Comment remains.*

#### STORMWATER MANAGEMENT

The proposed stormwater management design is a new subsurface detention system along the westerly edge of the pavement area with an overflow directed to the existing detention basin. The infiltration system will be a subsurface chamber system that will be 13 rows of 16 Storm Tech SC 740 HDPE chambers with 6” of ¾” stone both below and above the chambers for a total height of 3.5’. Runoff from the pavement will be collected by 222’ of trench drain along the edge of the existing perimeter roadway and a double grated catch basin. Runoff collected in these structures will flow through a proprietary filter prior to discharge into the chambers. Overflow from the chambers will flow into an existing detention basin. An additional double grated catch basin will be provided along the outside edge of the existing perimeter roadway at the far southwest corner. This basin will be a proprietary treatment unit which will also discharge into the same detention basin as the overflow.

The Project is subject to the Massachusetts Stormwater Management Standards (Stormwater Regulations §153-16) and Stormwater Management Plan requirements (§153-15). The applicant has provided a

Stormwater Report, dated January 13, 2023, prepared by Level Design Group. Overall, the design concept should meet the intent of the stormwater standards, however, there are some significant issues that must be addressed before a complete review for compliance with the state standards and the bylaws can be completed. Specifically, the test pits conducted on site all indicated that the groundwater was only 2.5-3.0' below grade. The proposed detention system as proposed is 3-5.0' below existing grade.

The following comments are provided by BETA:

**SW1.** There are no soil observations located in the proposed subsurface detention system location. Based upon the size of the system (11,100± sq. ft.) and the requirements of the Stormwater Standards, a minimum of 4 additional test pits should be conducted in this area.

*LDG: Additional soil testing has been performed and the testing locations are shown on the revised plans.*

**BETA: The revised Stormwater report was not submitted, and I am assuming that the soil logs are in the report. BETA will wait for the revised report.**

**SW2.** There is no information regarding the design of the existing detention basin, including inlet and outlet configuration, design assumptions, treatment provided and ultimate discharge point.

*LDG: The Stormwater Report has been revised to show the information for the existing detention basin. As part of the design of the new stormwater system, the existing basin is used as a design point but does not affect the calculations for the proposed stormwater system.*

**BETA: The revised Stormwater report was not submitted, comment remains.**

**SW3.** All the existing stormwater BMP designs and locations on site should be identified and shown on the existing conditions plan.

*LDG: An aerial mapping Overall Site Plan has been provided.*

**BETA: The plan is not adequate to describe the stormwater system. In addition, in accordance with the bylaws, this qualifies as new development and the runoff from the entire site must be brought into compliance with the standards, not just the new development. (See SW7 below)**

**SW4.** The proposed expansion will disturb greater than 1.0 acre and is therefore subject to the EPA Construction General Permit. A Storm Water Pollution Prevention Plan will be required. The applicant is reminded that a stormwater permit from the DPW will be required for this site.

*LDG: A draft SWPPP will be prepared and provided prior to construction.*

**BETA: No further comments.**

**SW5.** The proposed proprietary stormwater treatment filters are each propose to be in line. In accordance with the standards, the manufacturer should provide the data necessary to document that the units will provide the treatment required by the design.

*LDG: The manufacturers specification sheets have been included in the revised Stormwater Report.*

**BETA: The revised Stormwater report was not submitted, comment remains.**

***In addition to the above comments, based on the revised design, BETA has the following additional comments.***

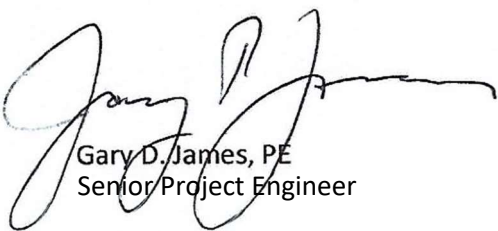
- SW6. Based on the groundwater elevations noted on the revised site plans, the bottom of the proposed subsurface infiltration system is greater than a foot below groundwater. In accordance with the standards, this system must be a minimum of 2' above groundwater. In addition, the system must also be setback a minimum of 50' from the wetlands. As designed, the system is in the wetlands resource areas as flagged. The system must be moved to comply with the standards.***
- SW7. As previously noted, the proposed additional pavement qualifies as new development under the bylaws. Thus, runoff from the entire site must be brought into compliance with the bylaws. Specifically, for a new Site, meet one of the following criteria (§153-16.B(1))***
- a. Retain the volume of runoff equivalent to, or greater than, 1.0 inch multiplied by the total post-construction impervious surface area on the Site; and/or***
  - b. Remove 90% of the average annual post-construction load of TSS and 60% of the average annual load of total phosphorus.***

## **WETLANDS PROTECTION (§181)**

The revised plans identify wetland resource areas within the limits of the proposed development which are to be altered in conjunction with the new pavement. Prior to completing the revised design in response to the above comments, BETA recommends that the applicant move forward with the Conservation Commission to determine if the commission will allow the resource alteration proposed in conjunction with the proposed pavement expansion prior to resubmission.

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

Very truly yours,  
BETA Group, Inc.



Gary D. James, PE  
Senior Project Engineer

cc: Amy Love, Town Planner

Job No: 10519.03

October 17, 2023

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

**Re: 15 Liberty Way- Proposed Parking Expansion**  
Franklin, MA  
LDG Project No. 2081.0

Dear Mr. Rondeau:

Level Design Group, LLC (LDG), on behalf of Oliver Street Capital, Inc., hereby submits the attached documentation for response to comments from Beta Group, Inc. on March 8, 2023.

## **BETA COMMENTS**

### **FINDINGS, COMMENTS AND RECOMMENDATIONS**

#### **DRAWING REQUIREMENTS (§185-31)**

Drawings must be prepared in accordance with the Zoning Bylaw (§185-31).

DR1. All existing land and building uses on the lot should be included on the plan. (§185-31.C.(3).(e).

*Response: There are no modifications to the existing building use, however the building use, which is an existing warehouse, has been listed on the plans.*

DR2. Existing topography for the entire site is required. In addition, earth removal quantities should be shown. (§185-31.C.(3).(f).

*Response: As discussed during the initial Planning Board hearing LDG has provided the enclosed Aerial photo overlain with the proposed parking area to detail location on property. The entire property has not been resurveyed as part of this limited project.*

DR3. Based upon the site visit, it appears that there may be wetland resources north and west of the site based on both standing water and vegetation. These areas should be confirmed with the Conservation Commission agent.

*Response: Resource area flags have been placed and have been added to the revised plans in accordance with the Conservation Commission.*

DR4. In accordance with the requirements of §185-31.C.(3).(k), a Landscaping Plan should be provided.

*Response: A Landscape Plan is included with this submittal.*

DR5. In accordance with §185-31.C.(3).(s) a detailed description of traffic circulation, safety and capacity in sufficient detail to allow the Board to make a determination of whether a traffic impact analysis is necessary should be provided.

*Response: LDG has prepared the attached turning analysis for the expected vehicle pathways within the new trailer storage parking area as requested. The revised submittal includes an Emergency Vehicle Parking Plan which shows the vehicle pathways and turning analysis.*



DR6. Provide data which shows that no site feature or activity will create glare or illumination which extends beyond the site's property line (§185-31.C.(4).(e)).

*Response: A Photometric Plan is included with this submittal.*

#### **GENERAL COMMENTS**

G1. In accordance with the test pits that were conducted on site, groundwater levels are generally 2.5- 3.0' below the surface. In accordance with the grading plan, the proposed cut along the easterly side of the parking ranges from 7-10'. At the test pit 1 location the proposed surface will be 2.78' below groundwater. The design will essentially dewater the parking lot area and direct the flow through both proposed and existing Stormwater BMPs. At times, this groundwater flow is anticipated to overwhelm all existing stormwater improvements in the area and produce continued surface water flow where it does not exist today, potentially impacting the down gradient abutters. Provide additional test pit data along the easterly edge of the proposed parking and show that the swale along the easterly edge will not intercept groundwater.

*Response: Additional soil testing has been performed and the testing locations are shown on the revised plans. No soil testing was performed along the easterly edge of the property as the swale is intended to intercept groundwater.*

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

The Proposed Lot will comply with area, frontage, depth, yard dimensions, interior landscape and maximum impervious coverage.

Z1. The Zoning table provided on sheet 3 of 8 should be revised to identify both existing and proposed.

It is understood that the only change in the use will be the additional Impervious Coverage, however, the proposed increase in area should be documented.

*Response: The zoning table has been revised accordingly.*

Z2. Provide a plan of the existing conditions on the lot which documents compliance with the zoning requirements.

*Response: The proposed lot will have trailer parking, the plans detail and area of parking, and a clear area for fire apparatus movement. The intention of the lot is to provide access for the renter to move trailers safely, with maintained corridors for public safety this methodology should be adequate for design.*

#### **PARKING, LOADING AND DRIVEWAY REQUIREMENTS (§185-21) AND SCREENING (§185-35)**

The Project proposes to expand the parking at the rear of the site by providing an additional 67-69,000 sq. ft. of pavement that will tie directly into the existing paved edge of the perimeter roadway around the building. The proposed use of the additional pavement area is not indicated on the plans. The only note on the plan is a label "Proposed Truck Bituminous Concrete Pavement". The area will be sloped at a 2.0+% slope from the northeast corner to the southwest corner.

BETA provides the following comments relative to the parking, loading access and landscaping:

P1. The Zoning Table indicates that 96 spaces are required by Zoning which is satisfied by existing parking spaces on site. However, there are no plans which corroborate this notation. Provide a plan which documents the number of parking spaces on site.

*Response: An Overall aerial Site Plan has been included with this submittal which shows the total number of parking spaces.*

P2. The proposed parking lot expansion will create an additional 67-69,000 square feet of pavement area on site.

There are no proposed traffic signs, signals or painted lines indicated. BETA recommends that the designer at a minimum provide travel lane markings through the lot.

*Response: The proposed lot will have trailer parking, the plans detail an area of parking, and a clear area for fire apparatus movement as well as a potential striping plan for the remainder. The intention of the lot is to provide access for the renter to move trailers safety, with maintained corridors for public safety this methodology should be adequate for design.*

P3. Based upon the area of the expansion, BETA estimates that this is sufficient space to add an additional 175± parking spaces to the site. In accordance with §185-21.C.5. parking lots for 20 or more cars shall contain or be bordered within 5' by at least one tree per 10 spaces... BETA recommends that a minimum of 18 trees be provided.

*Response: The Landscape Plan has been revised accordingly.*

P4. In accordance with §185-35.C. "any use in an Industrial or Business District if located on premises within 500 feet of a residentially used structure in an adjacent residential district Such uses shall provide a greenbelt along the portion of the lot which abuts the residential district or abutting lot cited above. Such greenbelt shall consist of an area not less than 15 feet wide containing a dense grouping of trees and shrubs providing a natural barrier between the lot and the adjacent premises." The property line along the westerly edge of the parcel is not shown. Based upon the height differential of the abutting residential parcels above this site and the 6' wooden fence at the crest of the hill behind the residences, BETA does not believe that this will be an issue, however, this property line should be shown to document that a greenbelt remains intact for the residential abutters in this area.

*Response: The plans have been revised to show the western property line and that a minimum 15' greenbelt area exists and will remain.*

#### **LANDSCAPING**

There is no proposed landscaping plan. The Applicant should provide a landscaping Plan which demonstrates compliance with the screening requirements set forth by §185-21.C.5 and §185-35.

*Response: A Landscape Plan is included with the revised submittal.*

#### **LIGHTING (§185-31.C(4)(E))**

No additional site lighting was indicated to be provided with the proposed expansion. If any lighting is proposed, photometric plans should be provided.

*Response: A Photometric Plan is included with the revised submittal.*

#### **STORMWATER MANAGEMENT**

SW1. There are no soil observations located in the proposed subsurface detention system location. Based upon the size of the system (11,100± sq. ft.) and the requirements of the Stormwater Standards, a minimum of 4 additional test pits should be conducted in this area.

*Response: Additional soil testing has been performed and the testing locations are shown on the revised plans.*

SW2. There is no information regarding the design of the existing detention basin, including inlet and outlet configuration, design assumptions, treatment provided and ultimate discharge point.

*Response: The Stormwater Report has been revised to show the information for the existing detention basin. As part of the design of the new stormwater system the existing basin is used as a design point but does not affect the calculations for the proposed stormwater system.*

SW3. All the existing stormwater BMP designs and locations on site should be identified and shown on the existing conditions plan.

*Response: An aerial mapping Overall Site Plan has been provided as detailed above.*

SW4. The proposed expansion will disturb greater than 1.0 acre and is therefore subject to the EPA Construction General Permit. A Storm Water Pollution Prevention Plan will be required. The applicant is reminded that a stormwater permit from the DPW will be required for this site.

*Response: A draft SWPPP will be prepared and provided prior to construction.*

SW5. The proposed proprietary stormwater treatment filters are each propose to be in line. In accordance with the standards, the manufacturer should provide the data necessary to document that the units will provide the treatment required by the design.

*Response: The manufacturer specification sheets have been included in the revised Stormwater Report.*

### **PLANNING BOARD COMMENTS**

1. Include the entire building with existing parking spaces on the site plan.

*Response: An Overall Site Plan has been added to the plan set which shows the entire building.*

2. Provide on the Site Plan the curbing details.

*Response: The previous submittal had a duplicate curbing detail reference which has been removed from the detail sheets. A Curbing Detail has been added to the plans.*

3. Provide parking lot details, such as travel ways and spaces on the new proposed lot.

*Response: The vehicle pathways, particularly for fire access, have been added to the Layout and Materials Plan and are shown on the Emergency Vehicle Access Plan which is included with this submittal.*

4. Provide snow storage.

*Response: Snow storage areas have been added to the Layout and Materials Plan.*

5. Provide the square footage of the new parking area and striping on the plans.

*Response: The area of the new parking lot has been added to the plans.*

6. Provide a diagram showing fire truck access.

*Response: Paint lines have been added to the plans which includes a 20' Access Aisle. An Emergency Vehicle Access plan using a Franklin Aerial fire truck turning template is included with this submittal.*

### **DEPARTMENT OF PUBLIC WORKS COMMENTS**

1. The narrative in the Stormwater Report addressing compliance with the Stormwater Standards references this as a redevelopment project. Whereas the expansion of the parking lot is on a previously undeveloped portion of the site resulting in new impervious area, the proposed improvements should be considered new development.

*Response: An Overall Site Plan has been added to the plan set which shows the entire building.*

2. In addition to the MADEP Stormwater Standards, the project must also comply with the standards under the Town's Stormwater Management bylaw 153-16.

*Response: The revised design complies with the town's Stormwater Management bylaw section 153-16. The calculations in the Stormwater Report have been revised to include Phosphorous Removal Calculations to show that the infiltration system will achieve greater than 60% Phosphorous removal in accordance with section 153-16.B.(1)(b). Additionally, the treatment train which will collect runoff from all of the proposed pavement and a portion of the existing pavement, will achieve 96% TSS Removal.*

3. In addition to not increasing the peak rate of stormwater runoff from the site, the proposal must also not increase the peak volume of runoff from a site. The applicant should include a table in the stormwater report comparing the pre- vs. post- runoff volumes to go along with the comparison of runoff flow rates.

*Response: The Stormwater Report has been revised accordingly.*

4. The proposed underground infiltration system appears to be designed to sit below the seasonal high groundwater based on the test pit data. While the design includes an impervious liner surrounding the system, we are concerned with the long-term water tightness of such a large system and its ability to safely separate the stored runoff from groundwater.

*Response: A curtain drain has been added to the plan to lower the high groundwater elevation in the area of the proposed subsurface infiltration system. The impermeable barrier has been removed and the system is now proposed to function as an infiltration basin. The use of curtain drains to lower groundwater was addressed in a Massachusetts Department of Environmental Protection – Office of Appeals and Dispute Resolution (OADR) court case between Elite Home Builders, LLC and the North Attleboro Conservation Commission (OADR Docket Nos. WET-2014-027 & 028). Lisa D. Eggleston testified on behalf of the North Attleboro Conservation Commission that it was improper to use curtain drains to lower groundwater to provide to required separation from the bottom of the infiltration system. It was determined that the Massachusetts Stormwater Regulations do not prohibit this. Dale MacKinnon of Tilton and Associates testified on behalf of Elite Home Builders LLC, that the use of curtain drains arose out of peer review process with the Conservation Commissions peer reviewer Weston and Sampson. It was determined that her testimony was not based on any guidance or regulation prohibiting the use of curtain drains. The curtain drain issues was just a portion of this case but the OADR ruled in favor of the Elite Home Builders to recommend that the DEP's commissioner issue a Final Order of Conditions that affirm and adopt the Superseding Order of Conditions.*

5. The designer indicates that no recharge is being proposed due to poor soil conditions, but also indicates that the test pits indicate Sand Loam soils which correspond to an infiltration rate of 1.02" per hour. MADEP Stormwater Standards require recharge unless the infiltration rate is lower than 0.17" per hour.

*Response: The impermeable barrier has been removed and the system is now proposed to function as an infiltration basin. The Stormwater Report has been revised to include infiltration volumes. Based on the soil survey data, the soils have an HSG rating of C. The stormwater model has been prepared using C Soils, therefore infiltration calculations are conservatively based on C soils and an infiltration rate of 0.27 inches/hour was used for infiltration modeling and calculations.*

## **FIRE DEPARTMENT COMMENTS**

- We would note that the plan did not show exactly how trucks will be strategically parked on the proposed



parking expansion. The Fire Department needs to have the ability to access all of the trucks on the lot in the event of a truck or trailer fire. If consideration can be given to how the trucks or trailers are parked for the reason mentioned.

*Response: The parking area will be designed with consideration to fire truck access and An Emergency Vehicle Access plan using a Franklin Aerial fire truck turning template is included with this submittal.*

I look forward to working with the Board for approval of the Site Plan. If there are any questions prior to the next hearing about this revised Site Plan or the paperwork contained herein please do not hesitate to ask.

Enclosed please find the following:

- Two (2) full size copies of revised Site Plans
- Five (5) reduced size (11x17) copies of revised Site Plans
- Two (2) copies of revised Stormwater Report

Truly yours,

**LEVEL DESIGN GROUP, LLC**

A handwritten signature in dark ink, appearing to read "Adam Hunt", is written over the printed name.

Adam Hunt, E.I.T.  
Civil Designer

# Town of Franklin

355 East Central Street  
Franklin, Massachusetts 02038-1352



Phone: (508) 520-4907  
www.franklinma.gov

## DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

**DATE:** October 31, 2023  
**TO:** Franklin Planning Board  
**FROM:** Department of Planning and Community Development  
**RE:** 15 Liberty Way  
Site Plan Modification

---

The DPCD has reviewed the above referenced Site Plan Modification application for the Monday, November 6, 2023 Planning Board meeting and offers the following commentary:

### **General:**

1. The site is located at 15 Liberty Way located in the Industrial Zoning District (Assessors Map 320 Lot 004).
2. The proposed project includes the construction of new pavement to expand the existing driveway and truck parking areas for the existing warehouse.
3. The Applicant has filed with the Conservation Commission.

### **Comments from the March 27, 2023 meeting:**

1. Include the entire building with existing parking spaces on the site plan.
2. Provide on the Site Plan the curbing details.
3. Provide parking lot details, such as travel ways and spaces on the new proposed lot.
4. Provide full landscaping plan, including landscaping plan for abutting property.
5. Provide the square footage of the new parking area and striping on the plans.
6. Provide a diagram showing fire truck access.