



September 28, 2022

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

**Re: 175 East Central Street (Franklin Ford)
Site Plan and Special Permit Review**

Dear Mr. Rondeau:

BETA Group, Inc. (BETA) has reviewed the documents prepared in response to the 2nd review for the project entitled: **Franklin Ford** located at 175 East Central Street 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 will form the basis of the review:

- Plans (8 sheets) entitled: **Site Plan, 175 East Central Street, Franklin, Massachusetts** dated April 14, 2022, revised 09/12/2022, prepared by United Consultants, Inc. of Wrentham, MA.
- Drainage Analysis, dated April 14, 2022, revised September 12, 2022, prepared by United Consultants, Inc.
- Plan entitled **"Franklin Ford Dealership-Franklin, MA, Site Lighting Plan, Schedules & Specifications"**, prepared by SK& Associates, Canton, Mass., dated May 12, 2022.
- Plan entitled: **Stormwater Facilities Plan, 175 East Central Street, Franklin, Massachusetts** dated April 14, 2022, revised 08/04/2022, prepared by United Consultants, Inc. of Wrentham, MA.
- **Existing & Proposed Watershed Plans**, dated April 14, 2022, revised 09/12/2022, prepared by United Consultants, Inc. of Wrentham, MA.
- **Response letter** from United Consultants, Inc. to the Planning Board dated September 12, 2022.

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 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 two parcels, (#285-090 & 092) with a total area of 5.20 acres located at 175 East Central Street and 9 Chestnut Street in the Town of Franklin (the "Site"). The Site is located within the Commercial II zoning district. Lots to the east of the Site are within the Commercial I district, lots to the north and west of the Site are within the Single Family-IV district. The site has frontage on both East Central Street and Chestnut Street. The Site in its entirety is also located within the Water Resource District.

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The existing Site at Parcel 090 is the current location of the automobile dealership, Franklin Ford. The existing dealership building is a single story 19,100± sq. ft. structure. Associated site features include a paved parking lot which can be accessed from driveway openings on both East Central Street and Chestnut Street. There is a gravel parking area (19,600± sq. ft.) also behind the paved parking area. Approximately 1.0 acre of wetlands are located at the rear of the parcel. There is also a ledge outcrop along the southerly property line behind the single-family dwelling at the intersection of East Central and Chestnut Streets. The existing site at 9 Chestnut Street (parcel 92) is a single-family dwelling with 2 driveway openings on Chestnut Street and associated landscaping. There is a 20' wide water line easement that runs from Chestnut Street to the rear of the parcel at the edge of the flagged wetlands. Existing utility services (water, sewer, gas) are provided via connections to the mains beneath East Central Street. A sidewalk is present along both East Central Street and Chestnut Street, and a fire hydrant is in the far western corner of the parcel on Chestnut Street.

Topography at the Site is generally directed north towards the wetlands at the rear of the parcel. The current limits of the development are flat with grades that range from 2-5%. The wetlands at the rear of the site are 8' lower than the far edge of the gravel parking area. The Site is not located within 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 Merrimac-Urban land complex with a Hydrologic Soil Group (HSG) rating of A, Freetown muck with an HSG of B/D, and Urban Land with no assigned HSG rating.

The project proposes to construct a 7,600± sq. ft. addition to the existing building which will run parallel with Chestnut Street. The addition will have 10 garage access doorways, 6 at the front and 4 in the rear of the building. All the proposed improvements to the site will occur east of the existing dealership building. The existing single-family dwelling at Chestnut Street and all the infrastructure associated with the dwelling will be removed to allow for expansion of the paved parking area on this portion of the lot. The existing driveway openings along Chestnut Street will all be closed. A new opening will be provided at the east edge of the parcel. The existing gravel area at the rear of the parcel will be loamed and seeded. The parking lot will be regraded to drain towards 5 proposed catch basins. Runoff from these basins will be directed towards a subsurface infiltration structure located at the back right corner of the parking lot. The outfall from the infiltration structure will be directed east towards a swale on the abutting parcel associated with an 18" outfall from drainage on Chestnut Street. Based upon the drawings, the parking lot will be set up as a vehicle display area with the far easterly edge set just inside the existing edge of pavement. Vertical concrete curbing is proposed around the outside edge of the pavement. A 6' high stockade fence is proposed along the west property line along Chestnut Street. No interior landscaped space will be provided, and no additional landscaping is proposed along the east edge of the site. Lighting will also be added to the new parking area.

In order to help with the review, all previous comments which had been addressed were removed from the letter. The response to the comments from the 1st review are labeled **UCI2** and highlighted. The response from BETA is labeled **BETA2**.

FINDINGS, COMMENTS AND RECOMMENDATIONS

GENERAL

Z1. *Revise planset to distinguish between existing and proposed linework more clearly.*

UCI-The existing conditions line work has been screened and the proposed line work is generally a darker and wider line type.

BETA: The PDF drawings are easier to read although a 1"=20' scale drawing of the proposed redevelopment area could fit on a single sheet and would be much easier to see the detail required.

UCI2: We have added a drawing sheet which includes the proposed re-development area at a scale of 1"=20'

BETA2: No further comments

ZONING

The Site is located within the Commercial II (CII) Zoning District. The proposed Site will retain the existing use as an Automobile Dealership.

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

The Site meets the requirements for lot area, depth, frontage, width; front and rear yards; impervious coverage and building height.

The project does not meet requirements for required side yard. However, this is an existing nonconformity and the proposed building addition will meet side yard requirements.

DRAWING REQUIREMENTS (§185-31)

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

- Z2. *Indicate proposed snow storage areas (§185-31.C.(3).(h)). The planset notes that parking spaces above the required number of spaces shall be used for additional snow storage. This approach, however, may be impractical if these spaces are used for the display of vehicles.*

UCI: A snow storage area has been provided at the north end of the parking lot expansion area.

BETA: Proposed storage area is outside the pavement. Snow storage must be in an area where the runoff will be collected and treated by the proposed stormwater system

UCI2: Snow storage notes have been added to Sheet 3. Spaces 164-192 have been designated for snow storage.

BETA2: comment addressed

- Z3. *Provide sight line information at proposed entrance/exit ways (§185-31.C.(3).(t))*

UCI: Sight distance information has been added to sheet 4.

BETA: Notes are fine. BETA recommends that you add the triangle to the plan view and reference the notes.

UCI2: Sight triangles have been added and a reference to sight distance notes was also added on sheet 4.

BETA2: Comment addressed

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

The Project proposes an expansion to the existing building. The site planset indicates that the building will be separated into retail, office, and warehouse uses. The required parking for these uses is as follows:

Use	Area (SF)	Rate (Space / SF)	Required Parking
Retail	3,081	1 / 200 SF	16
Office	2,548	1/250 SF	11
Warehouse	23,702	1/1000 SF	24
<u>Total:</u>			<u>51</u>

Parking is proposed to the south and east of the existing/proposed building. A total of 195 parking spaces are provided. 64 of these spaces are proposed in the southwestern lot near the main building entrance, while the remaining 131 spaces are in the eastern lot.

Parking spaces are shown as nine (9) feet by 19 feet with a min. 24-foot access aisle. Americans With Disabilities Act (ADA) regulations require a minimum of three (3) ADA-accessible spaces for lots ranging from 51 to 75 spaces. One (1) shall be

van accessible with a 96-inch-wide access aisle and the remaining 3 parking spaces are to be served by a 60-inch-wide access aisle. The six (6) accessible spaces provided meet these requirements.

Access to the Site is proposed via two curb cuts: an existing curb cut at East Central Street and a new curb cut at Chestnut Street. Three existing curb cuts along Chestnut Street will be removed and the concrete sidewalk reconstructed.

The project will include repaving and expanding the eastern parking lot and restriping the western parking lot. Vertical Granite curbing will be provided around the perimeter of the eastern parking lot. Some landscaped areas are proposed around the west and eastern sides of the eastern parking lot.

Refer to the Screening and Landscaping section of this report for comments relating to parking lot screening requirements.

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

24. BETA notes that the project includes parking spaces within 10 feet of the East Central Street Right-Of-Way, which is not permitted (§185-21.C(1)). As this is an existing nonconformity, BETA defers to the Planning Board.

25. Indicate which percentage of proposed parking spaces are anticipated to be occupied by vehicles to be sold, and which percentage are to be reserved for employees and visitors.

***UCI:** Proposed parking spaces designated for vehicle display and employees and visitors have been listed on sheet 3.*

***BETA:** 52 spaces have been designated as vehicle display areas. The remaining 142 spaces are designated as employee & visitor spaces. BETA will defer this issue to the board.*

***UCI2:** No comment*

26. Review design of the southernmost parking spaces (Spaces 9 through 20). No access aisle is depicted to provide

***UCI:** Spaces 9 through 20 are for vehicle display. The employees will be able to move the cars located in spaces 21 through 31 to allow for the cars to be removed from the spaces.*

***BETA:** Since there is no direct access to these spaces and they are listed as a vehicle display area then in BETA's opinion they should not be counted in the total of spaces provided. The summary should be modified accordingly.*

***UCI2:** The Parking calculations have been revised to reflect the parking count without the spaces which do not have direct access.*

***BETA2:** Comment addressed; calculations modified.*

SCREENING (§185-35) AND LANDSCAPING

The project proposed twenty (20) tree plantings along the perimeter of the southeastern parking lot. Proposed trees include American Elm, Red Maple, and White Birch. The provided planting quantity is in accordance with those required for the proposed number of parking spaces.

§185-35(2) and (7) require that outdoor sales displays and outdoor parking for 10 or more cars be screened from adjacent residential district or uses. The residential Single Family IV district abuts the Site to the northwest, north, and east, and residential uses abut the Site to the south, west, and southeast. Existing vegetation is proposed to be retained to provide screening along the north and eastern perimeters of the Site. Existing vegetation along the southern property line will be removed to allow the proposed parking lot expansion. No additional screening is proposed beyond the 20 aforementioned tree plantings.

Z12. Provide required screening along the southern property line to screen the property from the abutting 183 E Central Street property. BETA notes that existing vegetation is present in this area, but its extent is not depicted on the Site plans.

UCI: The six-foot-high stockade fence has been extended along the south side of the property where it abuts the 183 East Central Street property. The area where the fence is proposed is approximately three feet higher than the Franklin Ford parking area. This will result in an approximately nine foot high from the parking area to the top of the fence.

BETA: In the past the Board has accepted the use of fencing as a visual screen. BETA will defer this issue to the Board

UCI2: No comment

Z13. Indicate limit of existing treeline and any proposed tree clearing along the perimeter of the property. BETA notes that trees along the eastern property line, which screen the property from an abutting residence, are primarily deciduous and may not form an effective buffer during winter.

UCI: The existing tree line has been added to the plans. The proposed tree clearing will be limited to the 9 East Central Street boundaries.

BETA: We are assuming that you are referring to the 9 Chestnut Street address. The proposed tree clearing is along the common property line. The fencing provided along the property line with 183 east central street is proposed to provide a visual screen and replace the vegetation that will be removed along the common property line between the former residence and the dealership site. No further comments.

UCI2: Corrected address. No further comment

BETA2: No further Comment

LIGHTING (§185-31.C(4)(E))

Project Lighting Plans (SL1) indicate that a total of 23 pole-mounted and 14 wall-mounted luminaires are proposed on the eastern portion of the Site. A photometric plan was provided.

The Illuminating Engineers Society of North America (IESNA) recommends the following for parking lots:

Level	Horizontal Illuminance (min)	Vertical Illuminance (min)	Uniformity Ratio (max/min)
Basic Maintained Illuminance	0.2	0.1	20/1
Enhanced Security Illuminance	0.5	0.25	15/1

Z14. BETA defers to the Town regarding approval of the waiver to allow light spillage onto Chestnut Street. This waiver must also be revised to include light spillage onto the abutting properties. (§185-31.C.(4).(e))

UCI: The site lighting has been revised and a waiver is requested to allow light spillage onto Chestnut Street.

BETA: BETA will defer this issue to the Board.

UCI2: we have discussed this issue with BETA as well as the Town Engineer. We defer this waiver request to the Planning Board.

BETA2: According to the new lighting plan, the light spillage has been reduced significantly. In reviewing the plan, it appears that the fixture intensities have been reduced where maximum intensities have now been reduced from 49.6 fc previously to 16.7 fc now. In addition, the spillage onto Chestnut Street has now been reduced to a maximum of 0.3fc.

Z15. *BETA recommends revising lighting design to reduce areas of high illuminance proposed throughout the eastern parking lot.*

UCI: *The site lighting has been revised.*

BETA: *The spillage beyond the property line has been eliminated except for Chestnut Street. BETA will defer this to the Board.*

UCI2: *we have discussed this issue with BETA as well as the Town Engineer. We defer this waiver request to the Planning Board.*

BETA2: *see comment above.*

WATER RESOURCE DISTRICT (§185-40)

The project is located within a Water Resources District and a Zone II Wellhead Protection Area. Refer to the Stormwater Management section of this report for the project's compliance with groundwater recharge requirements.

Z16. *Indicate if motor vehicle service or repair will occur within the proposed building extension, which is a prohibited use (§185-40.D.(1).(c)). BETA notes that the existing building includes a service area, though this is an existing nonconformity.*

UCI: *The applicant's Attorney has addressed this issue.*

BETA: *BETA will defer this issue to Town Council and the Board*

STORMWATER MANAGEMENT

The stormwater management design proposes a subsurface infiltration system to capture, store, and infiltrate stormwater runoff from the redesigned eastern parking lot. Stormwater runoff will be conveyed to this system via a new closed drainage system consisting of catch basins, drainage manholes, and a water quality unit. Overflow from the subsurface system will be conveyed to a new outfall which discharges to a low-lying area to the east upgradient of an existing wetland. Stormwater runoff from the proposed building extension roof will bypass the subsurface system and be conveyed via roof drains to a new outfall which discharges to a grassed area upgradient of the wetlands.

No modifications are proposed to the stormwater management design of the western parking lot.

STORMWATER MANAGEMENT REGULATIONS (CHAPTER 153)

The project proposes to disturb land in excess of once acre within the Town of Franklin. It is therefore subject to the Stormwater Management Regulations. The project is also required to comply with the Town of Franklin Best Development Practices Guidebook (BDPG) Compliance with these regulations is outlined below and throughout the following sections.

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

Additional requirements for stormwater management are outlined in §300-11 of the Town of Franklin Subdivision Regulations. The Applicant has requested a waiver to allow for the use of HPDE pipe and Class V RCP.

SW2. *Provide required headwall at outfalls (§300-11.B(2.b)).*

UCI: *The revised infiltration pond outlet will result in vegetation removal which has been labeled on sheet 4. The proposed area Q/ vegetation removal has been labeled on the proposed watershed plan.*

BETA: *See response below*

UCI2: *See below*

SW3. *The proposed discharge from the infiltration system is directly towards the abutting parcel. There is an easement in this area, however, the applicant should document that they have rights to discharge into this easement area. Otherwise, the discharge should be moved to discharge into the wetland buffer zone at the rear of the parcel.*

UCI: *The discharge has been relocated on sheet 4.*

BETA: *As noted, the discharge from the Infiltration Pond has been moved away from the easement on the abutting parcel. BETA recommends that the headwall should be moved back into the gravel area outside the 50' setback from the wetlands.*

The outlet invert is Elevation 82.75. The rip rap as shown extends down to the Elevation 78 contour, 5' lower. In addition, the pad as shown scales 16' long and the detail shows a 10' long pad. Correct the pad dimensions in the plan view and identify the proposed grades. Based upon these revisions, the overall vegetation removal could be limited to the top 5' of the slope down from the gravel rather than the 10' as shown. The vegetation removal area could be reduced from the 500 square feet shown to 60 square feet on the steep slope down from the gravel surface.

UCI2: *The pad dimension label on the detail has been revised to 10'. The headwall has been relocated, the pipe length and outlet invert has been revised. The 25' -50' buffer zone and tree clearing were increased by 43 square feet due to grading.*

BETA2: *The revised grading now properly identifies the grading required to provide the outfall. In addition, the grade at the toe of the apron now matches the existing grade rather than 5' differential in the earlier design. Comment addressed.*

MASSDEP STORMWATER STANDARDS

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

NO UNTREATED STORMWATER (STANDARD NUMBER 1): *No new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.* The project proposes two new outfalls. One of these outfalls, FES-2, is located within the 100-foot wetland buffer zone. Stormwater runoff will be treated by water quality units and a subsurface infiltration system prior to discharge. Riprap aprons are proposed at each outfall for erosion control.

SW5. *Provide calculations for sizing of riprap aprons. (Length, width, riprap depth, and riprap D50).*

UCI: *Rip rap sizing information can be found on sheet 8.*

BETA: *The proposed stone size is indicated on the sheet however there are no calculations indicating that the size is adequate. Comment remains*

UCI2: *Rip rap sizing calculations have been added to sheet 9.*

BETA2: *Comment addressed.*

SW6. *Based upon the site location within the limits of the water resource district, BETA recommends that the applicant review the site to determine if any minor revisions to the pavement behind the existing building could be made to collect and treat the runoff from this area.*

UCI: *Watershed CB 5 has been revised to include the area behind the existing building.*

BETA: *There is not enough information provided on the plans to show that the runoff from this area will flow to CB 5 without any pavement changes along the perimeter. BETA recommends that a 20-scale plan of this area with spot grades be provided to verify the flow direction.*

UCI2: A 20 scale sheet has been added which includes the requested spot grades. Sheet 5.

BETA2: Based upon the spot grades, the proposed site redevelopment will maximize the area to be directed through the proposed stormwater treatment system.

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 a net increase in impervious area and minor changes to site hydrology. Stormwater runoff will be mitigated via a new subsurface infiltration system. Calculations indicate a decrease in peak discharge rate and runoff volume to all watersheds.

SW10. Indicate source of rainfall data used in HydroCAD model. Revise 100-year storm event to use a 7" rainfall depth to comply with the Wetlands protection Act. To ensure the infiltration BMP is adequately sized, BETA recommends the use of NOAA Atlas-14 rainfall rates or NRCC Extreme Precipitation Estimates.

UCI: As requested we have revised the rainfall for the 100-year storm event.

BETA: 100-year rainfall increased to 7.0" in accordance with current regulations. NOAA Atlas 14 rates have not been adopted to date; however, BETA continues to recommend that the 100-year rainfall from this publication be run through the system to check on the results.

UCI2: The NOAA Atlas 14 100-year storm (8.18") was evaluated in the pre-development conditions and the rate of runoff was 16.16 cfs and volume was 1.213 acre-feet. Under the post development conditions the rate of runoff was 14.24 cfs and the volume of runoff was 0.532-acre feet.

BETA2: Comment addressed; system will convey and reduce increased rainfall without incident. No further comments.

Additional comments:

1. There is nothing indicated on the site plans what type of curbing will be used along the outside edge of the pavement to direct runoff towards the catch basins. This is especially true along the northerly and easterly edge of the pavement. The site lighting plans do show the curbing along the outside edge of the pavement, but it is not labeled.

UCI: Curb labels are provided on sheet 3. Also refer to the legend for curb types.

BETA: comment addressed.

2. BETA recommends that CB 5 be moved closer to the corner of the pavement for 3 reasons. First the slope of the parking lot could be reduced from the current 6-7% to a more reasonable 3-4% which is typical maximum design slope for a parking lot; 2nd, it would help with the inlet pipe angles into DMH 3: and 3rd, it does not appear that the site grading at the northeast corner of the lot can be implemented without impacting the existing slope down towards the abutters to the east.

UCI: Catch Basin 5 has been relocated and post development watersheds 4 & 5 have been revised. The proposed 90 contour is more than 6 feet from the existing 88 contour.

BETA: Comment addressed.

RECHARGE TO GROUNDWATER (STANDARD NUMBER 3): Recharge is proposed via a new subsurface infiltration system which will capture runoff from the eastern parking lot area. The project will provide groundwater recharge in excess of what is required.

SW13. BETA Recommends including an outlet control structure / drainage manhole at the subsurface infiltration system outlet similar to the inlet configuration. This would facilitate system maintenance, simplify transition to 18" RCP, and avoid the need for a pipe bend.

UCI: *The pipe has been revised and the bend is no longer proposed. Inspection ports are provided at the corners of the infiltration pond 1.*

BETA: *The revised location does eliminate the bend issue. However, system maintenance remains an issue and BETA recommends that an outlet control structure be added at the final pipe outfall from the pond to provide maintenance access to the system.*

UCI2: *The proposed pond will have inspection ports as shown.*

BETA2: *The proposed ports are appropriate for the design, no further comments*

Additional comments:

1A. *The dynamic sizing analysis is incorrect. In accordance with the standards, the storm to be routed is a 2-hour event not 24 hours.*

UCI: *the storm duration was 24 hours and has a start time of 11hours and an end time of 13 hours as required in Chapter 1, Volume 3.*

BETA: *No further comments.*

2A. *In accordance with the standards, Infiltration is across the bottom of the pond only not the wetted perimeter.*

UCI: *the infiltration has been revised to reflect the bottom area only.*

BETA: *Comment Addressed.*

TOTAL SUSPENDED SOLIDS (STANDARD NUMBER 4): *For new development, stormwater management systems must be designed to remove 80% (90% per Town Bylaw) of the annual load of Total Suspended Solids (TSS). The project includes treatment of the eastern parking lot via deep sump catch basins, a proprietary water quality unit, and a subsurface infiltration system. The resulting TSS removal rate are listed as 98.1%*

The project is required to treat the 1.0-inch water quality volume (See Standard 6). Water quality volume is provided via the proposed proprietary unit and the subsurface infiltration system in excess of what is required. At least 44% TSS removal is achieved prior to discharge to the infiltration BMP. A Long-Term Pollution Prevention Plan has been provided as part of the Operation and Maintenance Plan.

SW14. *Provide calculations for provided total phosphorus (TP) removal (§153-16.B(1.b)) and total nitrogen removal (TN) (BDPG).*

UCI: *Impervious area directed to infiltration pond $I = 91,215 \text{ sq. ft.} \times 0.0833 = 7,601 \text{ cubic feet}$
Pond Volume below invert 7,275 cubic feet or 95% Reference MA MS4 General Permit Appendix F Attachment 3.*

BETA: *In accordance with Massachusetts MS4 guidelines, nutrient removal rates are dependent upon overall storage within the infiltration pond. Once the design is verified and actual static storage capacity is confirmed, show removal rate. Regardless based upon the current design, phosphorous and nitrogen removal should be from 95-100% based upon the current storage volume.*

UCI2: *The volume in Pond 1 has been increased to accommodate the revised bottom area modeling. Refer to MS4 General Permit Appendix F attachment 3.*

BETA2: *Comment addressed.*

Additional Comments:

1. *Impervious area tributary to the catch basins is greater than 0.25 acres. Accordingly, they are not in accordance with the design guidelines from Volume 2 Chapter 2 of the standards and do not provide the 25% TSS Removal rate associated with the BMP.*

UCI: *The TSS Removal Sheets have been revised.*

BETA: *Comment addressed.*

HIGHER POTENTIAL POLLUTANT LOADS (STANDARD NUMBER 5): *Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific stormwater management BMPs. The project is considered a LUHPPL under the definition of a motor vehicle repair operation (310 CMR 22.20C(2)(i)). and is required to comply with this section. The project narrative notes that automobile maintenance will be completed within the building. Subsurface structures are considered recommended uses for a LUHPPL and the proposed hydrodynamic separator will provide adequate pretreatment.*

SW17. *Provide Source Control and Pollution Prevention Plan, accounting for the contingency that leaks and spills occurring within the building may migrate into the parking lot.*

UCI: *An automobile repair operational BMP's' have been added to sheet 6.*

BETA: *BETA recommends that this be a continuing condition of approval based upon the location within the Water Resource District*

UCI2: *The applicant is amenable to this as a condition of approval.*

BETA2: *No further comments.*

SW18. *Show current floor drain connection and discharge and show proposed connection for floor drains for proposed expansion.*

UCI: *The existing oil water separator (OWS) has been labeled and the connection to the building is shown. The connection of the floor drains in the proposed addition will be located within the building and is noted as such on sheet 4.*

BETA: *The floor drain design should eliminate any possibility for spills to exit the building. BETA will defer this to the Building Inspector's office.*

UCI2: *Agreed*

CRITICAL AREAS (STANDARD NUMBER 6): *Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas. The project is located within a Zone II Wellhead Protection Area which is a critical area. Subsurface structures are considered recommended uses for a Zone II and the proposed hydrodynamic separator will provide adequate pretreatment.*

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 with a net increase in impervious area.*

EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8): *Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities. As the project proposes to disturb greater than one acre of land, it will be required to file a Notice of Intent with EPA and develop a Stormwater Pollution Prevention Plan (SWPPP). Erosion control measures are depicted on the plans including compost sock for perimeter control.*

SW19. *Provide Stormwater Pollution Prevention Plan (SWPPP) and revise project narrative to indicate a NPDES Construction General Permit is required.*

UCI: *A Storm-water Pollution Prevention Plan will be completed prior to commencement of construction.*

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BETA: BETA will defer this issue to the DPW.

UCI2: The applicant will provide a copy of the SWPPP to the Franklin DPW as part of the Stormwater by Law Permit filing.

BETA2: BETA will defer this issue to the DPW.

SW20. Provide stabilized construction entrance with measures to ensure that all construction period traffic will be over this entrance.

UCI: The project consist of the construction of a building addition as well as a storm water system both of which will be mainly accessed from the existing paved parking lot. As such the construction vehicles will be traveling over existing paved surfaces prior to entering the public ways. Refer to O&M schedule for the Construction Phase note 2 located on sheet 6.

BETA: BETA agrees that the existing paved entrances off Chestnut Street will meet the requirements for construction access. However, based upon scheduling, will one remain intact as a construction access point? That will need to be addressed in the sequencing.

UCI2: A note has been added to the construction sequence.


BETA2: No further comments

WETLANDS PROTECTION

The Project proposes work within Areas Subject to Protection and Jurisdiction of the Franklin Conservation Commission, including the 100-foot Buffer Zone to a vegetated wetland. The applicant has received an Order of Conditions from the commission.

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, P.E.
Senior Project Manager

cc: Amy Love, Town Planner

Job No: 4830 - 84

Town of Franklin

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DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

MEMORANDUM

DATE: September 26, 2022
TO: Franklin Planning Board
FROM: Department of Planning and Community Development
RE: 175 East Central St
Special Permit & Site Plan Modification

General:

1. The site is located at 175 East Central St in the Commercial II Zoning District.
2. The applicant is proposing to construct additional parking and add additional bays for motor vehicle repair. A Special Permit is required in the Commercial II Zoning District, under 185 Attachment 3, Part II.2.6.a – Motor Vehicle Service, Repair.
3. The applicant has received approval from the Conservation Commission.

Waivers Requested:

1. To allow less than 42” of cover over the RCP drain pipe proposed class V RCP
2. To the use of HDPE pipe for the rood drain manifolds and pond 1.
3. To allow minimal light spillage onto Chestnut Street right of way.

Planning Board Comments:

- The Planning Board expressed concern with the light spillage.
 - Discussion was had to add a Special Condition for review of the light spillage 6 months of opening to determine if any changes need to be made.

ROLE CALL VOTE:

This determination shall be in addition to the following specific findings:

If you vote NO on any of the following, please state reason why you are voting NO:

(1) **Special Permit:** To allow under 185 Attachment 3, Part II.2.6.a – Motor Vehicle Service, Repair in the Commercial II Zoning District:

(a) Proposed project addresses or is consistent with neighborhood or Town need.

Gregory Rondeau	YES	NO	Jennifer Williams	YES	NO
Rick Power	YES	NO	Beth Wierling	YES	NO
William David	YES	NO			

(b) Vehicular traffic flow, access and parking and pedestrian safety are properly addressed.

Gregory Rondeau	YES	NO	Jennifer Williams	YES	NO
Rick Power	YES	NO	Beth Wierling	YES	NO
William David	YES	NO			

(c) Public roadways, drainage, utilities and other infrastructure are adequate or will be upgraded to accommodate development.

Gregory Rondeau	YES	NO	Jennifer Williams	YES	NO
Rick Power	YES	NO	Beth Wierling	YES	NO
William David	YES	NO			

(d) Neighborhood character and social structure will not be negatively impacted.

Gregory Rondeau	YES	NO	Jennifer Williams	YES	NO
Rick Power	YES	NO	Beth Wierling	YES	NO
William David	YES	NO			

(e) Project will not destroy or cause substantial damage to any environmentally-significant natural resource, habitat, or feature or, if it will, proposed mitigation, remediation, replication or compensatory measures are adequate.

Gregory Rondeau	YES	NO	Jennifer Williams	YES	NO
Rick Power	YES	NO	Beth Wierling	YES	NO
William David	YES	NO			

(f) Number, height, bulk, location and siting of building(s) and structure(s) will not result in abutting properties being deprived of light or fresh air circulation or being exposed to flooding or subjected to excessive noise, odor, light, vibrations, or airborne particulates.

Gregory Rondeau	YES	NO	Jennifer Williams	YES	NO
Rick Power	YES	NO	Beth Wierling	YES	NO
William David	YES	NO			

(g) Water consumption and sewer use, taking into consideration current and projected future local water supply and demand and wastewater treatment capacity, will not be excessive.

Gregory Rondeau	YES	NO	Jennifer Williams	YES	NO
Rick Power	YES	NO	Beth Wierling	YES	NO
William David	YES	NO			

The proposed use will not have adverse effects which overbalance its beneficial effects on either the neighborhood or the Town, in view of the particular characteristics of the site and of the proposal in relation to that site.

Gregory Rondeau	YES	NO	Jennifer Williams	YES	NO
Rick Power	YES	NO	Beth Wierling	YES	NO
William David	YES	NO			

United Consultants, Inc.

850 Franklin Street Suite 1 ID
Wrentham, MA 02093
508-384-6560 FAX 508-384-6566

September 12, 2022

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

RE: 175 East Central Street Site Plan and Special Permit

Dear Mr. Chairman and Board Members,

On behalf of the applicant Franklin Ford, LLC, we have provided a summary of the following review comments dated August 29, 2022 from BETA Group, Inc. Our responses are immediately following each comment and they have been italicized.

General Comments

Z1. Revise plan set to distinguish between existing and proposed line work more clearly.

The existing conditions line work has been screened and the proposed line work is generally a darker and wider line type.

BETA: The PDF drawings are easier to read although a 1" =20' scale drawing of the proposed redevelopment area could fit on a single sheet and would be much easier to see the detail required.

UCI: We have added a drawing sheet which includes the proposed re-development area at a scale of 1" = 20'.

Zoning

The Site is located within the Commercial II (CII) Zoning District. The proposed Site will retain the existing use as an Automobile Dealership.

Schedule of Lot, Area, Frontage, Yard and Height Requirements (S 185 Attachment 9)

The Site meets the requirements for lot area, depth, frontage, width; front and rear yards; impervious coverage and building height.

The project does not meet requirements for required side yard. However, this is an existing nonconformity and the proposed building addition will meet side yard requirements.

Drawing Requirements (S 185-31)

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

Z3. Indicate proposed snow storage areas (S 85-31.C.(3).(h)). The plan set notes that parking spaces above the required number of spaces shall be used for additional snow storage. This approach, however, may be impractical if these spaces are used for the display of vehicles.

A snow storage area has been provided at the north end of the parking lot expansion area.

BETA: Proposed snow storage area is outside the pavement. Snow storage must be in an area where the runoff will be collected and treated by the proposed stormwater system.

UCI: Snow storage notes have been added to sheet 3. Spaces 164 - 192 have been designates for snow storage.

Z4. Provide sight line information at proposed entrance/exit ways (S185-31.C

Sight distance information has been added to sheet 4.

BETA: Notes are fine. BETA recommends that you add the triangle to the plan view and reference the notes:

UCI: Sight triangles have been added and a reference to the sight distance notes was also added on sheet 4.

Z8. Indicate which percentage of proposed parking spaces are anticipated to be occupied by vehicles to be sold, and which percentage are to be reserved for employees and visitors.

Proposed parking spaces designated for vehicle display and employees and visitors have been listed on sheet 3.

BETA: 52 spaces have been designated as vehicle display areas. The remaining 142 spaces are designated as employee & visitor spaces. BETA will defer this issue to the board.

UCI: No comment.

Z9. Review design of the southernmost parking spaces (Spaces 9 through 20). No access aisle is depicted to provide vehicular access to these spaces.

Spaces 9 through 20 are for vehicle display. The employees will be able to move the cars located in spaces 21 through 31 to allow for the cars to be removed from the spaces.

BETA: Since there is no direct access to these spaces and they are listed as a vehicle display area then in BETA's opinion they should not be counted in the total spaces provided. The summary should be modified accordingly.

UCI: The parking calculations have been revised to reflect the parking count without the spaces which do not have direct access.

Screening (S 185-35) and _Landscaping

The project proposed twenty (20) tree plantings along the perimeter of the southeastern parking lot. Proposed trees include American Elm, Red Maple, and White Birch. The provided planting quantity is in accordance with those required for the proposed number of parking spaces.

5185-35(2) and (7) require that outdoor sales displays and outdoor parking for 10 or more cars be screened from adjacent residential district or uses. The residential Single Family IV district abuts the Site

to the northwest north, and east, and residential uses abut the Site to the south, west, and southeast Existing vegetation is proposed to be retained to provide screening along the north and eastern perimeters of the Site. Existing vegetation along the southern property line will be removed to allow the proposed parking lot expansion. No additional screening is proposed beyond the 20 aforementioned tree plantings.

Z12. Provide required screening along the southern property line to screen the property from the abutting 183 E Central Street property. BETA notes that existing vegetation is present in this area but its extent is not depicted on the Site plans.

The six foot high stockade fence has been extended along the south side of the property where it abuts the 183 East Central Street property. The area where the fence is proposed is approximately three feet higher than the Franklin Ford parking area. This will result in an approximately nine foot high from the parking area to the top of the fence.

BETA: In the past the Board has accepted the use of fencing as a visual screen. BETA will defer this issue to the Board.

UCI: No comment.

Z13. Indicate limit of existing tree line and any proposed tree clearing along the perimeter of the property. BETA notes that trees along the eastern property line, which screen the property from an abutting residence, are primarily deciduous and may not form an effective buffer during winter.

The existing tree line has been added to the plans. The proposed tree clearing will be limited to the 9 East Central Street boundaries.

BETA: We are assuming that you are referring to the 9 Chestnut Street address. The proposed tree clearing is along the common property line. The fencing provided along the property line with 183 east central street is proposed to provide a visual screen and replace the vegetation that will be removed along the common property line between the former residence and the dealership site. No further comment.

UCI: Corrected address. No further comment.

Lighting (§185-31).

Project Lighting Plans (SLI) indicate that a total of 23 pole-mounted and 14 wall-mounted luminaires are proposed on the eastern portion of the Site. A photometric plan was provided

The Illuminating Engineers Society of North America (IESNA) recommends the following for parking lots:

Level		Horizontal Illuminance (min)	Vertical Illuminance (min)	Uniformity Ratio (max/min)
Basic Maintained Illuminance		0.2	0.1	20/1
Enhanced	Security	0.5	0.25	15/1

Illuminance

- Z14. BETA defers to the Town regarding approval of the waiver to allow light spillage onto Chestnut Street. This waiver must also be revised to include light spillage onto the abutting properties.
(§185-31.C.(4).(e))

The site lighting has been revised and a waiver is requested to allow light spillage onto Chestnut Street.

BETA: BETA will defer this issue to the Board.

UCI: We have discussed this issue with BETA as well as the Town Engineer. We defer this waiver request to the Planning Board.

- Z15. BETA recommends revising lighting design to reduce areas of high illuminance proposed throughout the eastern parking lot.

The site lighting has been revised.

BETA: The spillage beyond the property line has been eliminated except for Chestnut Street. BETA will defer this issue to the Board.

UCI: We have discussed this issue with BETA as well as the Town Engineer. We defer this waiver request to the Planning Board.

Water Resource District (S 18540)

The project is located within a Water Resources District and a Zone II Wellhead Protection Area. Refer to the Stormwater Management section of this report for the project's compliance with groundwater recharge requirements.

- Z16. Indicate if motor vehicle service or repair will occur within the proposed building extension, which is a prohibited use (S 85-40.D.(1).(c)). BETA notes that the existing building includes a service area, though this is an existing nonconformity.

The applicant's Attorney has addressed this issue.

BETA: BETA will defer this issue to Town Council and the Board.

UCI: No additional response.

Stormwater Management

The stormwater management design proposes a subsurface infiltration system to capture, store, and infiltrate stormwater runoff from the redesigned eastern parking lot. Stormwater runoff will be conveyed to this system via a new closed drainage system consisting of catch basins, drainage manholes, and a water quality unit. Overflow from the subsurface system will be conveyed to a new outfall which discharges to a low-lying area to the east upgradient of an existing wetland. Stormwater runoff from the proposed building extension roof will bypass the subsurface system and be conveyed via roof drains to a new outfall which discharges to a grassed area upgradient of the wetlands.

No modifications are proposed to the stormwater management design of the western parking lot.

STORMWATER MANAGEMENT REGULATIONS (CHAPTER 153)

The project proposes to disturb land in excess of once acre within the Town of Franklin. It is therefore subject to the Stormwater Management Regulations. The project is also required to comply with the Town of Franklin Best Development Practices Guidebook (BDPG) Compliance with these regulations is outlined below and throughout the following sections.

SW1. Provide clear and definite delineation of any areas of vegetation or tree disturbance (S153-12.J).

The revised infiltration pond outlet will result in vegetation removal which has been labeled on sheet 4. The proposed area of vegetation removal has been labeled on the proposed watershed plan.

BETA: No comment provided.

UCI: No comment.

SUBDIVISION REGULATIONS STORMWATER MANAGEMENT REGULATIONS (5300-11)

Additional requirements for stormwater management are outlined in S300-11 of the Town of Franklin Subdivision Regulations. The Applicant has requested a waiver to allow for the use of HPDE pipe and Class V RCP.

SW2. Provide required headwall at outfalls (5300-11.B(2.b)).

A headwall has been added to sheet 4 and a detail has been added to sheet 9.

BETA: See response below.

UCI: See below.

SW3. The proposed discharge from the infiltration system is directly towards the abutting parcel. There is an easement in this area, however, the applicant should document that they have rights to discharge into this easement area. Otherwise, the discharge should be moved to discharge into the wetland buffer zone at the rear of the parcel.

The discharge has been relocated on sheet 4.

BETA: As noted, the discharge from the infiltration Pond has been moved away from the easement on the abutting parcel. BETA recommends that the headwall be moved back into the gravel area outside the 50' setback from the wetlands.

The outlet invert elevation is Elevation 82.75. The riprap as shown extends down to the Elevation 78 contour, 5' lower. In addition, the pad as shown scales 16' long and the detail shows a 10' long pad. Correct the pad dimension in the plan view and identify the proposed grades. Based upon these revisions, the overall vegetation removal could be limited to the top 5' of the slope down from the gravel rather than the 10' as shown. The vegetation removal area could be reduced from 500 square feet shown to 60 square feet on the steep slope down the gravel surface.

UCI: The pad dimension label on the detail has been revised to 10'. The headwall has been relocated, the pipe length and outlet invert has been revised. The 25' to 50' buffer zone and tree clearing were increased by 43 square feet due to the grading.

MASSDEP STORMWATER STANDARDS

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

NO UNTREATED STORMWATER (STANDARD NUMBER 1): No new stormwater conveyances, (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth. The project proposes two new outfalls. One of these outfalls, FES-2, is located within the 100-foot wetland buffer zone. Stormwater runoff will be treated by water quality units and a subsurface infiltration system prior to discharge. Riprap aprons are proposed at each outfall for erosion control.

SW4. Provide calculations for sizing of riprap aprons. (Length, width, riprap depth, and riprap D50).

Rip rap sizing information can be found on sheet 8.

BETA: The proposed stone size is indicated on the sheet however there are no calculations indicating that the size is adequate. Comment remains

UCI: Rip rap sizing calculations have been added to sheet 9.

SW6. Based upon the site location within the limits of the water resource district, BETA recommends that the applicant review the site to determine if any minor revisions to the pavement behind the existing building could be made to collect and treat the runoff from this area.

Watershed CB 5 has been revised to include the area behind the existing building.

BETA: there is not enough information provided on the plans to show that the runoff from this area will flow to CB5 without any pavement changes along the perimeter. BETA recommends that a 20-scale plan of this area with spot grades be provided to verify the flow direction.

UCI: A 20 scale sheet has been added which includes the requested spot grades. Sheet5.

POST-DEVELOPMENT PEAK DISCHARGE RATES (STANDARD NUMBER 2): Stormwater management systems must be designed so that post-development peak discharge rates do not exceed predevelopment peak discharge rates. The project proposes a net increase in impervious area and minor changes to site hydrology. Stormwater runoff will be mitigated via a new subsurface infiltration system. Calculations indicate a decrease in peak discharge rate and runoff volume to all watersheds.

SW10. Indicate source of rainfall data used in HydroCAD model. Revise 100-year storm event to use a 7" rainfall depth to comply with the Wetlands protection Act. To ensure the infiltration BMP is adequately sized, BETA recommends the use of NOAA Atlas-14 rainfall rates or NRCC Extreme Precipitation Estimates.

As requested, we have revised the rainfall for the 100-year storm event.

BETA: 100-year rainfall increased to 7.0” in accordance with current regulations. NOAA Atlas 14 rates have not been adopted to date: however, BETA continues to recommend that the 100-year rainfall from this publication be run through the system to check the results.

UCI: The NOAA Atlas 14 100 year storm (8.18 inches) was evaluated in the pre-development conditions and the rate runoff was 16.16 cfs and volume of runoff was 1.213 acre/feet. Under the post-development conditions the rate of runoff was 14.24 cfs and the volume of runoff was 0.532 acre feet.

SW11 . Indicate location of existing water lines which may be present within the water line easement and confirm existing utilities will not conflict with proposed drainage pipes.

The approximate location of the water line has been added to the site plans.

BETA: Water line shown, no further comments.

UCI: No additional comment.

BETA Additional Comments:

1. **There is nothing indicated on the site plans what type of curbing will be used along the outside edge of the pavement to direct runoff towards the catch basins. The site lighting plans do show the curbing along the outside edge of the pavement, but it is not labeled.**

UCI: Curb labels are provided on sheet 3. Also refer to the legend for curb types.

2. **BETA recommends that CB 5 be moved closer to the corner of the pavement for 3 reasons. First the slope of the parking lot could be reduced from the current 6-7% to a more reasonable 3-4% which is typical maximum design slope for a parking lot; 2nd, it would help with the inlet pipe angles into DMH 3: and 3rd, it does not appear that the site grading at the northeast corner of the lot can be implemented without impacting the existing slope down toward the abutters to the east.**

UCI: Catch basin 5 has been relocated and post development watersheds 4 and 5 have been revised. The site grading has also been revised. The proposed 90 contour is more than 6 feet from the existing 88 contour.

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 that soil in the area of proposed modifications is predominantly Merrimac-Urban Land complex with HSGR A (high infiltration) and Urban Land with no assigned HSGR.

The Applicant has conducted permeability testing in the area Q/ the proposed infiltration BMP indicating an infiltration rate 11.16 in/hr. In accordance with standard engineering practices, the rate used in the HydroCAD model is one-half this measured rate or 5.58 in/hr. Test Pits conducted at the Site indicate that subface soil in the area of the infiltration BMP is medium sand Groundwater was not observed in these test pits to an approximate excavation depth of 10' b.g. (Elevation 82' +/-)

Recharge is proposed via a new subsurface infiltration system which will capture runoff the eastern parking lot area. The project will provide groundwater recharge in excess of what is required

SW13. BETA Recommends including an outlet control structure / drainage manhole at the subsurface infiltration system outlet similar to the inlet configuration. This would facilitate system maintenance, simplify transition to 18" RCP, and avoid the need for a pipe bend.

The pipe has been revised and the bend is not longer proposed. Inspection ports are provided at the corners of the infiltration pond 1.

BETA: The revised location does eliminate the bend issue. However, system maintenance remains an issue and BETA recommends that an outlet control structure be added at the final pipe outfall from the pond to provide maintenance access to the system.

UCI: The proposed pond will have inspection ports as shown on the plan.

BETA Additional Comments:

1A. The dynamic sizing analysis is incorrect. In accordance with the standards, the storm to be routed is a 2-hour event not 24 hours.

UCI: The storm duration was 24 hours, and has a start time of 11 hours and an end time of 13 hours as required in Chapter 1 Volume 3.

2A. In accordance with the standards, Infiltration is across the bottom of the pond only not the wetted perimeter.

UCI: The infiltration has been revised reflect the bottom area only.

TOTAL SUSPENDED SOLIDS (STANDARD NUMBER 4): For new development, stomanagement systems must be designed to remove 80% (90% per Town Bylaw) of the annual load of Total Suspended Solids (TSS). The project includes treatment of the eastern parking lot via deep sump catch basins, a proprietary water quality unit, and a subsurface infiltration system. The resulting TSS removal rate are listed as 98.1%

The project is required to treat the 1.0-inch water quality volume (See Standard 6). Water quality volume is provided via the proposed proprietary unit and the subsurface infiltration system in excess of what is required. At least 44% TSS removal is achieved prior to discharge to the infiltration BMP. A Long-Term Pollution Prevention Plan has been provided as part of the Operation and Maintenance Plan.

SW14. Provide calculations for provided total phosphorus (TP) removal (S153-16.B(1.b)) and total nitrogen removal (TN) (BDPG).

Impervious area directed to infiltration pond $I = 91,215 \text{ sq. ft.} \times 0.0833 = 7,601 \text{ cubic feet}$

Pond Volume below invert 7,275 cubic feet or 95% Reference MA MS4 General Permit Appendix F Attachment 3.

BETA: In accordance with the Massachusetts MS4 guidelines, nutrient removal rates are dependent upon overall storage within the infiltration pond. Once the design is verified and actual static storage capacity is confirmed, show removal rate. Regardless based upon the design, phosphorus and nitrogen removal should be from 95-100% based upon current storage volume.

UCI: The volume in pond 1 has been increased to accommodate the revised bottom area modeling. Refer to MA MS4 General Permit Appendix F Attachment 3.

SW15. Roof runoff is exempt from pretreatment but still requires treatment prior to discharge. See SW 4 above.

The proposed addition roof runoff has been routed to the infiltration pond.

BETA: Comment addressed.

Additional Comment:

- 1. Impervious area tributary to the catch basins is greater than 0.25 acres. Accordingly, they are not in accordance with the design guidelines from Volume 2 Chapter 2 of the standards and do not provide the 25% TSS Removal rate associated with the BMP.**

UCI: The TSS removal sheets have been revised.

HIGHER POTENTIAL POLLUTANT LOADS (STANDARD NUMBER 5): Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific stormwater management BMPs. The project is considered a LUHPPL under the definition of a motor vehicle repair operation (310 CMR 22.20C(2)(i)). and is required to comply with this section. The project narrative notes that automobile maintenance will be completed within the building. Subsurface structures are considered recommended uses for a LUHPPL and the proposed hydrodynamic separator will provide adequate pretreatment.

SW17. Provide Source Control and Pollution Prevention Plan, accounting for the contingency that leaks and spills occurring within the building may migrate into the parking lot.

An automobile repair operational BMP's' have been added to sheet 6.

BETA: BETA recommends that this be a continuing condition of approval based upon the location within the Water Resource District.

UCI: The applicant is amenable to this as a condition of approval.

SW18. Show current floor drain connection and discharge and show proposed connection for floor drains for proposed expansion.

The existing oil water separator (OWS) has been labeled and the connection to the building is shown. The connection of the floor drains in the proposed addition will be located within the building and is noted as such on sheet 4.

BETA: The floor drain design should eliminate any possibility for spills to exit the building. BETA will defer this to the Building Inspector's office.

UCI: Agreed.

CRITICAL AREAS (STANDARD NUMBER 6): Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas. The project is located within a Zone II Wellhead Protection Area which is a critical area. Subsurface structures are considered recommended uses for a Zone II and the proposed hydrodynamic separator will provide adequate pretreatment.

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 with a net increase in impervious area.

EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8): Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities. As the project proposes to disturb greater than one acre of land, it will be required to file a Notice of Intent with EPA and develop a Stormwater Pollution Prevention Plan (SWPPP). Erosion control measures are depicted on the plans including compost sock for perimeter control.

SW19. Provide Stormwater Pollution Prevention Plan (SWPPP) and revise project narrative to indicate a NPDES Construction General Permit is required.

A Storm-water Pollution Prevention Plan will be completed prior to commencement of construction.

BETA: BETA will defer this issue to the DPW.

UCI: The applicant will provide a copy of the SWPPP to the Franklin DPW as part of the Storm-water Bylaw permit filing.

SW20. Provide stabilized construction entrance with measures to ensure that all construction period traffic will be over this entrance.

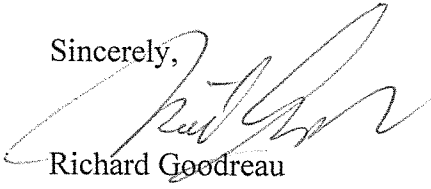
The project consist of the construction of a building addition as well as a storm water system both of which will be mainly accessed from the existing paved parking lot. As such the construction vehicles will be traveling over existing paved surfaces prior to entering the public ways. Refer to O&M schedule for the Construction Phase note 2 located on sheet 6.

BETA: BETA agrees that the existing paved entrances off Chestnut Street will meet the requirements for construction access. However, based upon scheduling, will one remain intact as a construction access point? That will need to be addressed in the sequencing.

UCI: A note has been added to the construction sequence.

We look forward to meeting with the Planning Board to discuss this project further.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Goodreau". The signature is fluid and cursive, with a large initial "R" and "G".

Richard Goodreau
Project Manger



Amy Love <alove@franklinma.gov>

RE: Project at 175 East Central Street

1 message

Daniel J. Vieira <dvieira@clozers.com>
To: Amy Love <alove@franklinma.gov>

Mon, Sep 19, 2022 at 5:09 PM

Yes. Thanks.

Daniel J. Vieira

Vieira & DiGianfilippo Ltd.

(508) 238-2510

DVieira@clozers.com

COVID – 19 – Our goals is minimize the risk of Covid-19 for the benefit of our attorneys, staff, clients and guests during the closing process. If you have been recently exposed to someone with Covid-19 or are not feeling well for any reason, please contact our office for an alternative method to complete your transaction. We continue to encourage seller(s) and third parties, including real estate agents and mortgage professionals, to reasonably avoid attending closings whenever possible by use of overnight mail or delivery of documents to our office prior to closing.

From: Amy Love <alove@franklinma.gov>
Sent: Monday, September 19, 2022 9:46 AM
To: Daniel J. Vieira <dvieira@clozers.com>
Subject: Project at [175 East Central Street](#)

Hi Dan,

I received a letter from you regarding the project at [175 East Central Street](#).

Have issues been resolved with the owner?

Thank you

[Amy Love, Town Planner II](#)

[Town of Franklin](#)

[355 East Central](#)

[Franklin, MA 02038](#)

[508-520-4907](#)

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