

September 23, 2021

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

**Re: Factory Square Property Redevelopment
3, 5, & 7 Fisher Street
Site Plan Peer Review**

Dear Mr. Padula:

BETA Group, Inc. has reviewed revised documents for the project entitled “Factory Square Property Redevelopment 3, 5, and 7 Fisher Street” located in Franklin, Massachusetts. This letter is provided to update findings, comments, and recommendations.

BASIS OF REVIEW

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

- Plans (24 sheets) entitled: **Factory Square Property Redevelopment** revised to September 15, 2021, prepared by Level Design Group, LLC. of Plainville, MA and Joe The Architect of Somerville, MA.
- **Stormwater Report for Factory Square**, revised September 15, 2021, prepared by Level Design Group, LLC. of Plainville, MA.
- **Application for Approval of a Site Plan**, including:
 - *Project Cover Letter*
 - *Form P*
 - *Certificate of Ownership*
 - *Application Fee*
 - *Certified Abutters List*
 - *Letter from LSP of Record*
 - *Quitclaim Deed*
 - *Notice of Activity and Use Limitation*

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

- Site Visit
- **Zoning Chapter 185 From the Code of the Town of Franklin**, current through October 2019
- **Zoning Map of the Town of Franklin, Massachusetts**, attested to April 30, 2019
- **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 1, 2016
- **Wetlands Protection Chapter 181 From the Code of the Town of Franklin**, dated August 20, 1997
- **Town of Franklin Best Development Practices Guidebook**, dated September 2016

INTRODUCTION

The project site includes a single 14.75± acre parcel (#278-016) located on Fisher Street in the Town of Franklin (the “Site”). The Site is located within the Mixed Business Innovation zoning district. Areas to the west and south are also within this district, while areas to the north and east are within the Single-Family IV district.

Several existing buildings are present on the Site with mixed uses; two of these buildings are located on the northeastern side of the Site, while the other is located on the southwestern side. Associated paved parking and driveway areas are present around the buildings. The southeastern portion of the Site consists of landscaped grass and trees. The northwestern portion of the Site is woodlands. Site access is provided via Fisher Street, West Central Street, and Hayward Street. Additional existing Site features include utilities, lighting, chain-link perimeter fencing, and loading areas. Existing stormwater management is provided by a closed drainage system consisting of catch basins and manholes which discharges to the west.

Topography at the Site is highly influenced by the existing buildings and drainage system, but generally slopes to the west or south. An area of wetlands is present on the western portion of the Site, within the woodlands area. The Site is not located within a wellhead protection area, a FEMA-mapped flood zone, an NHESP-mapped estimated habitat of rare or endangered species, or any other critical area. NRCS soil maps indicate the presence of Hinckley Loamy Sand with a Hydrologic Soil Group (HSG) rating of A (high infiltration potential), Merrimac-Urban Land with HSG A, Udorthents, Sandy with HSG A, Swansea Much with HSG B/D (very low infiltration potential) and Urban Land with no assigned HSG rating.

The project proposes to redevelop the Site, retaining the southwestern building, demolishing portions of the northeastern buildings, and renovating the remainder. The existing southeastern landscaped area will be converted into a parking lot with landscaping islands. Additional parking areas will be constructed around the northern and eastern sides of the renovated buildings. Additional proposed site features include retaining walls, a patio area, concrete walkways, loading docks, tree plantings, lighting, and utilities. Post-development stormwater management is proposed by modifying the existing closed drainage system with additional catch basins and drainage manholes and a new subsurface drainage system is proposed within the new southeastern parking area.

FINDINGS, COMMENTS, AND RECOMMENDATIONS

GENERAL

- G1. As the property is a Massachusetts Department of Environmental Protection (MassDEP) listed disposal site, soil (and groundwater, if applicable) should be managed in accordance with the provisions of the Massachusetts Contingency Plan (MCP) including 310 CMR 40.1067 – Remedial Actions After a Permanent Solution Statement has been Submitted to the Department. *LDG: The site is monitored by an LSP who submitted a letter with the first round of review, a copy of which is attached, that there are no matters of concern with the development as proposed and that he will prepare all paperwork for the project as necessary. BETA2: The reference letter could not be located in the submission package provided to BETA and will be reviewed upon receipt.*

- G2. Revise limit of work to include the grading required along the northwestern property line to match proposed grades into existing topography. *LDG: The limit of work line has been modified accordingly.* **BETA2: Limit of work revised – issue resolved.**
- G3. Provide details for proposed retaining walls and any fall protection fencing, if required. *LDG: The wall details are prepared by other – I enclose as a separate attachment. The portion along Fisher Street is a modification of the building wall which currently exists, not a new wall as a whole and the details reflect this.* **BETA2: The reference details do not appear to be included in the submission package to BETA and will be reviewed upon receipt. The designer should review the proposed pavement (contour 153) and wall grades for the wall proposed near the southwest corner of Building 5.**
- G4. Evaluate the need for additional dumpster locations, particularly for the occupants on the east side of Building 5. *LDG: The owner has evaluated the need for dumpsters and the potential locations and feels that the current layout is adequate for their needs.* **BETA2: Recommend for the Board to discuss this issue. The single dumpster location is located 450 feet from a proposed restaurant use and would likely require was to be transported through the plaza and along sidewalks.**

ZONING

The Site is located within the Mixed Business Innovation (MBI) Zoning District. The proposed Site is multi-use including Business, Restaurant, Mercantile, Storage, and Factory uses. Restaurants are permitted as part of a mixed-use development. Warehouse uses are permitted in this district. Factory uses may or may not be permitted depending on the type of Factory.

- Z1. Clarify specific business, mercantile, and factory uses proposed, if known, at the Site to confirm compliance with zoning regulations. *LDG: The businesses currently being evaluated have been vetted for compliance with the Zoning, should any additional uses, which require a special permit be evaluated or proposed a modification will be required to the permit as it stands and the applicant will come back to Planning as necessary.* **BETA2: Information provided – issue resolved.**

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 side yards; building height; and impervious coverage. The Site does not meet the requirements for front, side, and rear yard width; however, these are existing nonconformity.

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

Access to the Site is proposed via five curb cuts at Fisher St, West Central St, and Hayward St. One existing curb cut along Fisher St will be closed. These site entrances will connect a series of driveways and parking lots located on all sides of the renovated buildings. The largest parking areas will be located on the northeast and southeast portions of the Site.

A total of 360 parking spaces will be provided at buildings 3, 5, and 7 and 19 existing spaces are to remain at building 29. Eight of these parking spaces are designed to be accessible, 4 of which are van accessible. Typical parking spaces are 19 feet wide and 9 feet long. Driveway widths are a minimum of 24 feet wide. It is anticipated that the Fire Chief will review turning movements for emergency vehicles throughout the site

Parking requirements for the Mixed Business Innovation District are defined by the Zoning Bylaw. For Industrial Uses, 1 space is required per 400 sq. ft. of floor area; for Retail/Medical/Legal Offices, 1 space is required per 200 sq. ft. of floor area; for Other Office uses, 1 space is required per 250 sq. ft. of floor area; for Restaurants, 1 space is required per 2.5 seats; for Warehouse uses, 1 space is required per 1,000 sq. ft. of floor area. The areas provided in the parking requirement summary result in a total required parking space count of 374 spaces. For this number of parking spaces, eight must be accessible spaces, two of which must be van accessible.

The provided 360 parking spaces do not satisfy the parking requirements. According to the site plans, the design intent is that the two restaurants will be open at different times of the day, and thus parking spaces can be shared between them.

- P1. Revise Use Group Plan to clarify which parking requirement is applicable to each use and confirm the areas provided on the plan are consistent with the zoning table. *LDG: Each area has been divided by the architect and the plan was attached, but the development space and thus parking was evaluated by the project engineer for the compliance with the Zoning Requirements. This is what makes up the parking requirements noted on the plan.* **BETA2: Information provided – issue dismissed.**
- P2. Due to the shared/interconnected nature of the Site, include Building 29 in the parking calculations. *LDG: Building 29 has been evaluated independently and permitted independently. The building itself was added as a separate line item in the zoning table for clarity.* **BETA2: Information provided – issue resolved.**
- P3. Confirm the total number of restaurants proposed. The zoning table indicates two while the Use Group Plan depicts five. *LDG: The Use Group Plan assigns different area to the same restaurant because of the internal use, architecturally and for building code purposes this may dictate sprinkler use or group category.* **BETA2: Information provided. In conjunction with comment P5 the Board may wish to reevaluate parking as tenants (and number of seats in a restaurant) are confirmed.**
- P4. Request approval for the reduced number of parking spaces in accordance with 185-21A.(4). *LDG: LDG requests approval through the submission for the reduction in parking spaces as provided on the site plans. The spaces will be adequate, and will generally over estimate the need based upon the business proposed.* **BETA2: BETA notes requested reduction is for at least 13 spaces (~3% less than required) but will likely be greater at times due to proposed snow storage within the parking areas. As indicated on the plans, some of the restaurants are intended to operate at different times, and the designer has indicated that parking needs are overestimated based on the businesses proposed. BETA recommends that estimated parking demand (such as through ITE) be provided for the Board’s consideration in granting a reduction in parking.**
- P5. The Board may wish to consider a condition of approval that requires parking to be reevaluated as tenants are confirmed. *LDG: A condition which would require that the parking be evaluated when 50% of the overall developable area is occupied for each incoming use would be acceptable, each use seems onerous for both the Planning Board or staff as well as the applicant.* **BETA2: BETA defers to the preference of the Board on this issue.**
- P6. Revise parking design as needed such that accessible parking spaces are nearest to the building(s) or entrance(s) they serve. *LDG: Parking spaces have been relocated into positions discussed during the public hearing for access.* **BETA2: Parking Spaces near Buildings 3 and 7 have been relocated,**

as discussed. Consider relocating several of the accessible spaces depicted in front of building 5D to the area of building 5Ca, to minimize travel distance (currently approximately 100 feet). Also, it is anticipated that an accessible parking space(s) will be required on the south side of the building to access building 5E.

- P7. Revise parking layout such that no off-street parking is within 10 feet of a street right-of-way (§185-21.C(1)) or request a waiver from the Board. *LDG: LDG would request a waiver for 12 parking spaces along Fisher Street to be within 10' of the Right-of-Way. There currently is parking in this area, pavement as well as used spaces, with the modification as proposed the spaces will be 'hidden' below a small retaining wall instead of at street level in the proposed plan. BETA2: BETA does not anticipate any safety issues associated with the proposed parking in this area and notes that complying with this section of the bylaw would result in the loss of approximately 12 additional parking spaces. BETA defers to the preference of the Board to grant this waiver.*
- P8. Review parking layout to determine the number of parking spaces located more than 300 feet from the building entrance they are meant to serve (§185-21.C(6)). Recommend depicting which parking spaces will serve each building occupant, accounting for any overlap due to alternating hours of operation. *LDG: The parking spaces as a whole have 16 total spaces which are not within 300' of a perspective entrance. These spaces however could be considered spaces for building 29 instead and that would then leave the spaces along the drive between the buildings with spaces less than 300'. A layout plan which delineates spaces would be unwieldy from a depiction and time standpoint. BETA2: Information provided. BETA notes that given the number distinct businesses it is anticipated that additional spaces will be located greater than 300 feet from the entrance they are intended to serve; however, due to site limitations relocated parking spaces closer is not practical.*
- P9. Provide and depict sight distances for all site entrances. *LDG: The sight distances have been placed on the plan as requested. However to note each of these entrances is currently in use, they are not manufactured entrances. BETA2: Information provided. Although the separation from the existing northerly curb cut on Fisher Street and West Central Street is less than desirable (~75 feet) BETA does not anticipate significant or adverse traffic or safety issues due to the expected low traffic volumes on Fisher Street.*
- P10. Indicate typical parking stall widths throughout the site. *LDG: Stall widths have been added throughout. The applicant is proposing compliant 9x19 spaces throughout. BETA2: Information provided – issue resolved.*
- P11. Provide detailed information on proposed site circulation. Consider providing designated truck and passenger vehicle routes with appropriate signing and/or striping to minimize potential conflicts. *LDG: The pathway has been provided; some additional signage has also been provided. BETA2: Signage restricting access to truck areas provided – issue resolved.*

SIDEWALKS (§185-28)

No public sidewalks are proposed under this project. A five-foot concrete walk is proposed along the eastern side of building 5, and a concrete patio area is proposed within the central area of the Site. Existing sidewalks to remain are present along West Central Street and Fisher Street.

- SI1. Clarify pedestrian and accessible routes throughout the Site with consideration for the following:

- a. The proposed sidewalk to the north of Building 3 terminates with no ramp or path to connect to the sidewalk west of the building. *LDG: Ramps have been added and a cross walk added as well.* **BETA2: Continuous path provided – issue resolved.**
 - b. The proposed accessible ramp near Building 7 appears to lead to a set of stairs for access to the building. Consider relocating the accessible spaces to the southerly corner of Building 3. *LDG: The HDCP spaces and ramp have been relocated as previously discussed.* **BETA2: Accessible spaces relocated – issue resolved.**
 - c. Recommend providing sidewalk connections to West Central and Fisher Streets so pedestrians can access the Site outside of driveway areas. **BETA2: What is anticipated to be an accessible route is provided to the site from the public sidewalk at the northerly Fisher Street entrance, which meets minimum ADA requirements. The designer is encouraged to consider proving a pedestrian route onto the site from West Central Street and the southerly entrance on Fisher Street, if practicable.**
- S12. Provide accessible ramps to sidewalks at the proposed accessible parking spaces east of Building 5. *LDG: The parking spaces have been provided a ramp and accessible pathway.* **BETA2: A depressed sidewalk has been proposed. Provide bollards or other means to protect pedestrians from vehicles, such as car stops, at the depressed sidewalk. Also, adjacent to Building 1 the ramp is not included as part of the accessible route at the access aisles as required by 521 CMR 23.4.6 and 23.5**
- S13. Provide accessible ramp details for all types proposed, such as sidewalk corners. *LDG: These details have been added as requested.* **BETA2: The provided details do not appear applicable to the ramps at the northwest corner of Building 3 or from the depressed sidewalk to the east of Building 5. The designer should also review details to ensure full ADA compliance, such as providing a level landing. BETA notes that the MassDOT Standard Details provide details for many scenarios where ramps are required.**
- S14. Clarify if any modifications are proposed for the southerly curb cut on Fisher Street and provide details and ramps, as applicable. *LDG: The curb cut will not be relocated no additional work is proposed at this time.* **BETA2: The limits of the existing curb cut are not apparent on the plans and the proposed curb line is shown extending into the Fisher Street sidewalk, where there are existing ramps. If the designer intends to leave the existing sidewalk unmodified (as is recommended by the Town Engineer) transition curbs will likely be required at the interface between proposed curb on-site and the ramps on the existing sidewalk.**
- S15. Clarify the limits of the proposed sidewalk at the northerly curb cut on Fisher Street and if a ramp is required to cross the driveway. *LDG: This entrance is existing as is the Fisher sidewalk.* **BETA2: The proposed curb line and limits of work extend beyond the site boundary in this area, presumably to match into or to reconstruct the existing ramp in the Fisher Street sidewalk. If the designer intends to leave the existing sidewalk unmodified (as is recommended by the Town Engineer) the location of the proposed sidewalk may need to be modified slightly to connect outside of the limits of the existing ramp.**
- S15A. Indicate on the plans that the proposed 5' sidewalk width excludes the width of the curb.

CURBING (§185-29)

The project proposes cape cod berm along driveways and parking lot perimeters.

- C1. Revise Cape Cod Berm to be granite or reinforced concrete curbing (§185-29). *LDG: The areas of CCB have been changed to CCC, which is cast in place 'extruded' concrete curb, a detail has been added. BETA2: Section §185-29 does not include any provisions for the use of extruded concrete curb and the Board does not permit its installation – issue remains outstanding.*
- C2. Provide detail for proposed "PCC" curb, as applicable. *LDG: A detail has been added. BETA2: Revise detail to include required reinforcement (steel).*
- C3. Provide curbing, as is typically required for parking spaces, for the ten parking stalls to the west of Building 5. *LDG: This curb will be cast in place concrete. BETA2: No curbing is depicted in this area and the Board may require additional curbing along the driveway boundary where pavement is being rehabilitated or reconstructed – issue remains outstanding. Refer to comment C1.*

SITE PLAN AND DESIGN REVIEW (§185-31)

The project has been submitted for Site Plan Review and is required to conform to the requirements of this section.

- SP1. Indicate abutting land uses and zoning data on the locus or vicinity map (§185-31.1.C(3)(d)). *LDG: I attach the 2003 site plan set which details the surrounding land uses in accordance with the regulations. BETA2: Information provided – issue resolved.*
- SP2. Clarify proposed snow storage areas (§185-31.1.C(3)(i)). The Erosion Control Plan shows a snow storage area in the footprint of the parking lot, but it is unclear if this is intended only for construction-period snow storage or post-development snow storage. *LDG: As with a shopping plaza there is snow storage in the parking lot to allow for proper removal. The areas selected will be the furthest away areas to allow for the machines to work in the removal operations. BETA2: Information provided – refer to comment P4.*
- SP3. Review planting plan to confirm and then provide note indicating that all proposed plantings will come from the Best Development Practices Guidebook (§185-31.1.C(3)(k)). *LDG: The planting plan has been modified. BETA2: In conjunction with Planting Note 9, provide an additional note that all proposed plantings will come from the Best Development Practices Guidebook.*
- SP4. Provide information (size, material, etc.) for proposed and existing water and sewer systems (§185-31.1.C(3)(m)). *LDG: The existing sewer has 3 exists from the building 7, 2 which tie directly to the sewer line in the loading court and one which exists directly to Fisher Street. Each of these is either 6 or 8 inch in diameter. There are two exists from 3 Fisher Street, both 4", the building 29 and front building are not being modified. Water has entrances throughout the existing 5 Fisher building. There are currently multiple entrances in approximately the locations necessary for the uses proposed, the same is true for the remaining buildings. If, during investigation there is a need to replace one of these lines, internally to the property, the applicant would work with DPW and the appropriate department to determine method and provide plans associated with that work. BETA2: Known utility information should be depicted on the plans.*
- SP5. Provide data quantifying on-site generation of noise and odors (§185-31.1.C(3)(r)). If rooftop mechanical/HVAC equipment will be utilized, it should be screened from view. *LDG: There is nothing proposed within the structures which requires a Special Permit which would be a use expected to be a larger generator of noise or similar which would need further evaluation during the permitting process. The roof top units are to be replaced in-kind but likely not moved to a*

great extent. If a unit is proposed to be moved the applicant will notify the Planner to determine if a minor modification should be applied for. The current noise on property far exceeds the noise on property after the redevelopment. BETA2: Information provided. Given that rooftop equipment is to be replaced and will be visible to residential abutters, provide screening at the discretion of the Planning Board.

- SP6. Revise lighting plan to eliminate spillage onto neighboring properties (§185-31.1.C(4)(e)). *LDG: The revised photometric is attached herein. BETA2: The Lighting Plan still shows minor light spillage onto adjacent residential properties. Although proposed plantings may help to further mitigate spillage, the designer should evaluate if additional measures, such as providing full cutoffs, can reduce impacts to abutters.*

SCREENING (§185-35)

The project proposes outdoor parking for 10 or more cars as well as loading docks which must be screened in accordance with this section. Residential districts are located to the northwest, north, east, and south of the Site. Residences are present in these areas, though existing vegetation may partially obstruct visibility of the Site.

Plantings are proposed along the southern and eastern property lines to provide screening. Dumpster enclosures will be surrounded by a fence to limit visibility. Additional plantings are provided within landscaping islands near the patio area and within the parking lot.

- L1. Depict existing tree line along the western side of the Site. *LDG: The treeline is shown on the attached plan. BETA2: Existing tree line provided – issue resolved.*
- L2. Confirm that trees and shrubs used for screening shall be 3' or more in height at the time of planting (§185-35.B). *LDG: Trees and shrubs will be in accordance with the Zoning by-law. BETA2: Information provided – issue resolved.*
- L3. Provide screening along the Site's frontage on West Central Street (outside of 10 feet from the right of way). *LDG: There is not a significant area to plant along this for screening, however the landscape plan has been modified accordingly and in accordance with the Zoning by-law. BETA2: There does not appear to be any landscaping changes in the referenced area from the original submission; however, BETA notes that two trees are proposed to supplement the two existing trees to remain. BETA recommends for the Board to discuss if strict compliance with section §185-35 is required at this location along the frontage.*
- L4. Provide information on existing vegetation to remain along northwestern property line to confirm that screening is adequate in this area. *LDG: There is no grading in this area in excess of the existing cleared area. BETA2: Information provided. BETA notes a portion of the residential property closest to West Central Street (~60 feet) will not be screened from the proposed parking area that will increase spaces to greater than 20. Although there is inadequate space for plantings, a screening fence could be provided. There is an existing fence in this location today but it does not provide screening.*
- L5. Provide screening for the parking spaces proposed between Building 5 and residences on Fisher Street. *LDG: Screen plantings in this area have been added. There is one area along the wall specifically where the wall itself screen the abutting properties from the potential headlights within the facility. The parking lot is lower than the roadway, protecting the neighboring properties. BETA2: Additional screening provided – issue resolved.*

- L6. Indicate means of protecting existing trees to remain near limit of work and within landscaping islands. *LDG: The notes have been added to the landscape plan.* **BETA2: Notes could not be located – issue remains outstanding.**
- L7. BETA recommends for the Board to discuss the applicability of a required greenbelt in accordance with §185-35.C. At a minimum, additional plantings should be considered along the southerly property line due to the presence of residences and the potential for headlight glare from the high use parking area. *LDG: The landscape plan has been modified in this area.* **BETA2: Plantings consisting of Norway Spruce and Green Giant Arborvitae are proposed and are anticipated to provide adequate screening as they mature; however, the young plants are not likely to fully mitigate headlight glare. Consider supplemental evergreen shrubs staggered between gaps in the current plantings or a solid fence.**

UTILITIES

The applicant proposes a new sanitary sewer line, including a grease trap, which will connect to the existing on-site sewer line. Otherwise, existing utilities will be retained. Detailed review of utilities is anticipated to be provided by the DPW and Fire Chief, as applicable.

- U1. Confirm that existing utilities (water, fire service, sewer, gas, electric, etc.) are adequate to service the proposed Site. Confirm that proposed demolition will not impair existing utilities. *LDG: The existing utilities have appropriate capacity for services to the property. The utilities have been extensively mapped within the structures and are not anticipated to be disturbed during construction/demolition.* **BETA2: Information provided – issue dismissed.**
- U2. Clarify disposition of all existing drainage, sewer, and water infrastructure. *LDG: The existing is to remain unless otherwise noted.* **BETA2: Information provided – issue dismissed.**
- U3. Provide grease traps for all proposed restaurant uses. *LDG: Currently the plans detail a grease trap for the portion of the building that a use which by plumbing code will need a grease trap is proposed. The remaining restaurant area may not need an external trap as proposed.* **BETA2: The designer is requested to provide additional information on the type of restaurant that would not require a grease trap to be installed and to consult the DPW for confirmation.**
- U4. Contact the DPW to evaluate if easements are needed for the existing drainage and sewer lines that cross the property. *LDG: The owner will discuss potential future easement with the DPW after permitting.* **BETA2: BETA2: Information provided. If the Board elects to approve the project BETA recommends a condition that requires all easements to be in place to the satisfaction of the DPW prior to the start of construction.**
- U5. If vehicle access will be provided to Building 5 through the drive-in door, an oil separator may be required in accordance with 248 CMR 10.09. *LDG: Noted.* **BETA2: BETA anticipates that floor drains and oil separators will be evaluated by the Plumbing Inspector during the building permit process – no further comment.**

STORMWATER MANAGEMENT

The project is a mix of new development and redevelopment that will result in an overall increase in site-wide impervious area. Stormwater management will be accomplished through a closed drainage system consisting of existing and proposed catch basins and manholes. Stormwater from the new parking area

will be conveyed to a new subsurface infiltration system. Stormwater from other areas of the Site will be conveyed to existing outfalls.

GENERAL

- SW1. Provide supporting calculations to demonstrate that all new and redevelopment areas meet the requirements of Chapter 153-16. **BETA2: No formal calculations have been provided as part of the revised submission, which should be included as part of a comprehensive revision to the stormwater report. A copy of recently approved amendments to Chapter 153-16 has been included for reference – issue remains outstanding.**
- SW2. Clarify how roof drainage will be handled at the site. *LDG: Roof drainage on property currently runs through internal lines and through existing outfalls. This will continue.* **BETA2: Information provided – issue resolved.**
- SW3. Revise Stormwater Checklist to indicate the project is a mix of New Development and Redevelopment. *LDG: The stormwater checklist is revised as attached.* **BETA2: Checklist revised – issue resolved.**
- SW4. Revise proposed drainage pipe to be RCP. Where cover is less than 42" provide Class V RCP (§300-11.B.(2)(a)). *LDG: The section detailed is within the subdivision rules and regulations, as a private project the piping is adequate for the traffic anticipated at the depths detailed.* **BETA2: The project will disturb greater than one acre and is subject to the Town of Franklin Stormwater Management Bylaw. Chapter 153-16 requires stormwater controls to meet the requirements of the Subdivision rules. Furthermore, the Board has required the use of RCP on all projects, both public and private except for direct connections to subsurface infiltration systems – issue remains outstanding.**
- SW5. Review grading at the entrance to the eastern parking area. It appears a 257' elevation contour is missing. *LDG: A 257 contour has been added.* **BETA2: Contour provided – issue resolved.**

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 will retain existing outfalls that discharge runoff outside of the nearby wetland buffer zone. Plans indicate an area of stone at the outfall to provide erosion control.

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 to construct a new parking area and redevelop portions of the existing Site. The project intends to mitigate increases in peak discharge rate via a new subsurface infiltration system and revegetating some existing impervious areas.

- SW6. Provide pre- and post-development calculations, including the 2, 10, and 100-year storms, for all areas in the limit of work to verify compliance with this standard. The analysis should also include a summary of runoff volumes to demonstrate compliance with Town Bylaws. *LDG: The attached HydroCAD and detail below provides the requested information.* **BETA2: Information provided indicating a reduction in peak runoff rates and volumes – issue resolved.**
- SW7. Provide hydraulic calculations for both existing and proposed pipes to confirm that anticipated flows can be conveyed. *LDG: LDG Evaluated the piping on-site however to complete the*

calculations requested the hydrology within 140 and Fisher Street would need to be evaluated. This survey would be approximately a mile of additional survey LDG is of the professional opinion that this is not necessary for the existing functional system. BETA2: BETA generally concurs with the designer's assertion, particularly where flow rates are not anticipated to have substantial change; however, calculations should be provided for new drainage lines or where flow rates may be increased substantially, such as the existing drain line to the south of Building 5. The size of the existing pipe should be labeled on the plans and total capacity compared to the increased flows from the site.

- SW8. Provide soil group boundaries and flow paths on the catchment plans. *LDG: The Soil Group and Boundaries have been added as requested. BETA2: BETA reviewed soil groups and time of concentration and found them to be acceptable; however, no catchment plan has been provided for the existing conditions and there are discrepancies between the proposed watershed areas depicted on the plans and those used in the HydroCAD model, including, but not limited to watershed 18S. Also, there are other watersheds (16S and 22S) that are not shown on the plan.*
- SW9. Ensure the catchment for the subsurface drainage system includes all areas that will drain to the BMP. *LDG: The catchment has been evaluated and modified as necessary. BETA2: Clarify the area intended to be directed to the subsurface infiltration system. The watershed plan includes impervious areas located adjacent to the south and east of Building 5; however, plans depict these areas being directed to an existing drainage line, rather than the proposed infiltration system.*

Recharge to groundwater (Standard Number 3): *Loss of annual recharge to groundwater should be minimized through the use of infiltration measures to maximum extent practicable.*

NRCS soil maps indicate the presence of Hinckley Loamy Sand with a Hydrologic Soil Group (HSG) rating of A (high infiltration potential), Merrimac-Urban Land with HSG A, Udorthents, Sandy with HSG A, Swansea Muck with HSG B/D (very low infiltration potential) and Urban Land with no assigned HSG rating.

The project proposes a subsurface infiltration system to provide recharge volume in excess of that which is required for the proposed parking lot. No formal recharge is proposed in redevelopment areas; however, a reduction in impervious area will improve existing conditions.

- SW10. Revise subsurface drainage system model to use invert elevations consistent with those depicted on the plans. *LDG: The model has been modified accordingly. BETA2: Model revised. Review sizing of system and include the overflow in the HydroCAD model. A peak elevation of 268.09 is shown for the 100-year storm event, which exceeds the surface of the parking lot (elevation ~257).*
- SW11. Complete test pits within the footprint of all proposed infiltration systems to support the proposed exfiltration rate of 8.27 in/hr and to confirm seasonal high groundwater elevations. *LDG: The infiltration pit is in an area which is treed it would be the request of the applicant and LDG to perform a test pit prior to construction. This site lends itself to this method so that machinery on-site for the redevelopment will be available and the trees which are proposed to be removed have been removed for safety. BETA2: Delaying required test pits until the construction phase is not typical practice and based upon field investigations there appears to be adequate open space in proximity to the proposed infiltration system to perform said test pits – issue remains outstanding.*

SW12. Provide calculations showing that recharge BMPs will drain within 72 hours. *LDG: 72 Hour Drawdown has been provided.* **BETA2: Information provided – issue resolved.**

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

The project proposes to direct runoff from the new parking area to a subsurface infiltration system for treatment. Runoff to this system will first be pre-treated via deep-sump catch basins, proprietary water quality units, or a combination of both. Runoff from other areas of the Site will receive no treatment.

A long-term pollution prevention plan was included as part of the Drainage Analysis.

SW13. Provide TSS Worksheet for all treatment trains in the limit of work, including the redevelopment area. *LDG: TSS Worksheets have been provided for each treatment train.* **BETA2: Worksheets have been provided for treatment trains directed through proprietary stormwater structures and to the subsurface infiltration system; however, there are two proposed catch basins (one to the south and one to the north of the existing building) that propose no additional treatment. Also, the impervious area located to the west of Building 5 proposes no formal treatment and should be documented. Provide third-party documentation supporting the 82% TSS removal rate used for the CDS units. In consideration of the commitment required to receive the credit for street sweeping it is recommended to remove this from the worksheets.**

SW14. Revise TSS Worksheets. Proprietary treatment is only provided for a portion of the proposed parking area. A separate worksheet should be provided for each treatment train. *LDG: TSS Worksheets have been provided for each treatment train. However, the new rear parking area is entirely fed through proprietary treatment prior to discharge to utilize the 44% pre-treatment before discharge model.* **BETA2: Refer to comment SW13.**

SW15. Revise subsurface system treatment train to provide a minimum of 44% TSS removal for all inlets that discharge to the infiltration system, as required for BMPs with rapid infiltration rates. *LDG: TSS Worksheets have been provided for each treatment train. However, the new rear parking area is entirely fed through proprietary treatment prior to discharge to utilize the 44% pre-treatment before discharge model.* **BETA2: Adequate pretreatment provided for all inlets – issue resolved.**

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

The project is a mixed-use development with a total parking lot size of 379 spaces. Portions of the development area defined as Industrial which may qualify as a land use with higher potential pollutant loads (LUHPPL), depending on the specific industry. Furthermore, LUHPPLs also include high intensity parking lots (1,000 vehicles trips per day or more) which may apply to the Site.

SW16. Provide additional information on proposed site uses to determine if the Site is a LUHPPL. *LDG: The industrial uses are warehousing in nature, the previous uses which are being abandoned created more traffic and additional areas of concern over the proposed redevelopment.* **BETA2: Information provided confirming proposed uses do not qualify site as a LUPPL – issue dismissed.**

SW17. Provide a basic trip generation to determine if the daily vehicle trips qualify the Site is a LUHPPL. *LDG: The use of the site is a mixed-use commercial. LDG evaluated the site using (931) quality restaurant, (150) Warehouse as the primary uses on property. There is a portion of Office, which is a small portion of the development. The ITE Generation for a quality restaurant is so small that they are not able to create a Fitted Curve development equation based upon total s.f., The ITE*

*manual then allows evaluation based upon the total seats, this also does not have a fitted Curve Equation. The ITE publications for Sit Down Restaurants has a technical paper which gives some data on the evaluation of a quality restaurant, which is defined as not fast food not high turnover and not a bar. That evaluation yields the results below. Total daily Trip ends: (931) N/A – ITE manuals yield 367 TDT; (150) 208 TDT; (710) 403 TDT. **BETA2: BETA notes that LUC 931 is typically associated with “fine dining” and that LUC 932 may be more appropriate for the proposed uses at the site, which is likely increase the total number of trips per day to greater than 1000 (designer’s current estimate is 978). As a LUHPPL, an oil/grit separator or other acceptable pretreatment detailed in the Stormwater Handbook, is required prior to infiltration.***

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

The project does not propose discharges to critical areas.

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

Portions of the project are considered a redevelopment and need only meet certain standards to the maximum extent practicable under the requirements of the Massachusetts Stormwater Management Standards.

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

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

SW18. Provide perimeter controls along the southerly limit of work. *LDG: Erosion control sock has been detailed as requested. **BETA2: Additional erosion controls provided – issue resolved.***

Operations/maintenance plan (Standard Number 9): *A Long-Term Operation and Maintenance Plan shall be developed and implemented to ensure that stormwater management systems function as designed.*

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

SW19. Provide Owner signature on the O&M Plan (153-18.B(5)). *LDG: Prior to Construction post approval when the applicant determines no additional changes are necessary a signed form will be provided as requested. **BETA2: If the Board elects to approve the project, BETA recommends that the signature on the O&M Plan is provided prior to endorsement.***

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

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

Mr. Anthony Padula, Chairman

September 23, 2021

Page 14 of 14

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

Very truly yours,
BETA Group, Inc.



Matthew J. Crowley, PE
Senior Project Manager



Stephen Borgatti, PE
Engineer

cc: Amy Love, Planner



TOWN OF FRANKLIN

DEPARTMENT OF PUBLIC WORKS

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

September 22, 2021

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

RE: Site Plan – Factory Square, 5 Fisher Street

Dear Mr. Chairman and Members:

We have reviewed the revised materials for the subject project and offer the following comments:

1. A specific “Response to Comments” was not received so many of the following comments have carried over from the previous submission.
2. A proposed grease trap is shown on the plan, sizing calculations should also be noted on the plan.
3. The assigned street numbers for the existing buildings should be shown on the plan for reference.
4. There is a note on the plan to “Convert 3 existing structures to a single trench drain...” It is unclear where these structures outlet, as well as the three CB’s along the side of the building facing West Central St.
5. Any missing easements for town utility lines that run across the site should be resolved as part of the approval process.
6. Test pit locations should be shown on the plan and test pit logs should be provided.
7. The Stormwater Report addresses how the design complies with the Massachusetts Stormwater Standards, but the applicant should indicate whether the design meets Franklin’s criteria for new and redevelopment projects:
 - 1) For new development sites all stormwater management systems shall be designed to:
 - a) Retain the volume of runoff equivalent to, or greater than, one (1.0) inch multiplied by the total post-construction impervious surface area on the site AND/OR

- b) Remove 90% of the average annual load of Total Suspended Solids (TSS) generated from the total post-construction impervious area on the site AND 60% of the average annual load of Total Phosphorus (TP) generated from the total post-construction impervious surface area on the site. Pollutant removal shall be calculated consistent with EPA Region 1's BMP Performance Extrapolation Tool or other BMP performance evaluation tool provided by EPA Region 1, where available. If EPA Region 1 tools do not address the planned or installed BMP performance any federally or State approved BMP design guidance or performance standards (e.g. State stormwater handbooks and design guidance manuals) may be used to calculate BMP performance.
- 2) For redevelopment sites stormwater management systems shall also improve existing conditions by be designed to the following criteria:
- a) Retain the volume of runoff equivalent to, or greater than, 0.80 inch multiplied by the total post-construction impervious surface area on the site AND/OR
- b) Remove 80% of the average annual post-construction load of Total Suspended Solids (TSS) generated from the total post-construction impervious area on the site AND 50% of the average annual load of Total Phosphorus (TP) generated from the total post-construction impervious surface area on the site. Pollutant removal shall be calculated consistent with EPA Region 1's BMP Performance Extrapolation Tool or other BMP performance evaluation tool provided by EPA Region 1 where available. If EPA Region 1 tools do not address the planned or installed BMP performance any federally or State approved BMP design guidance or performance standards (e.g. State stormwater handbooks and design guidance manuals) may be used to calculate BMP performance.
8. Any missing easements for town utility lines that run across the site should be resolved as part of the approval process.
9. Test pit locations should be shown on the plan and test pit logs should be provided.

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

Sincerely,



Michael Maglio, P.E.
Town Engineer



FRANKLIN PLANNING & COMMUNITY DEVELOPMENT

355 EAST CENTRAL STREET
FRANKLIN, MA 02038-1352
TELEPHONE: 508-520-4907
FAX: 508-520-4906

MEMORANDUM

DATE: September 22, 2021
TO: Franklin Planning Board
FROM: Department of Planning and Community Development
RE: 3, 5, 7 Fisher Street
Site Plan

The DPCD has reviewed the above referenced Site Plan application for the Monday, September 27, 2021 Planning Board meeting and offers the following commentary:

General:

1. The site is located at 3, 5, 7 Fisher Street in the Mixed Business Innovation Zoning District (Assessors Map 278 Lot 016) and consists of 14.7 acres.
2. The applicant is proposing a large scale redevelopment. Approximately 10,000 sq/ft of building and pavement will be removed and green space will be added. The remaining buildings will be modified and renovated. Additional parking will be added along with a stormwater system, and landscape.
3. The Applicant is not required to file with the Conservation Commission.
4. Applicant has not requested any waivers.
5. Letters have been received from DPW, Fire, Conservation and BETA is currently reviewing the plans.
6. Applicant has received recommendation from the Design Review Commission.

Comments from July 26, 2021:

1. Several of the proposed uses will require a Special Permit from the Planning Board. DCPD recommends a condition be added that the uses will file for a Special Permit once they are known.
2. Planning Board expressed concern with the Cape Cod Berm in the parking area. *Still outstanding*
3. Planning Board requested the applicant show site circulation. *Application has shown direction arrows on the plan.*
4. Planning Board asked the grease trap be shown on the Site Plan.



September 15, 2021

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

**Re: Factory Square Property Redevelopment
3, 5, & 7 Fisher Street
Site Plan Peer Review**

Dear Mr. Padula:

Level Design Group, LLC (LDG) on behalf of KCRES, LLC does hereby submit a response to comments for the above referenced project. The comments were peer review comments provided by BETA Engineering, dated July 25, 2021 and are answered in the same order as presented in that letter.

FINDINGS, COMMENTS, AND RECOMMENDATIONS

GENERAL

- G1. As the property is a Massachusetts Department of Environmental Protection (MassDEP) listed disposal site, soil (and groundwater, if applicable) should be managed in accordance with the provisions of the Massachusetts Contingency Plan (MCP) including 310 CMR 40.1067 – Remedial Actions After a Permanent Solution Statement has been Submitted to the Department.

The site is monitored by an LSP who submitted a letter with the first round of review, a copy of which is attached, that there are no matters of concern with the development as proposed and that he will prepare all paperwork for the project as necessary.

- G2. Revise limit of work to include the grading required along the northwestern property line to match proposed grades into existing topography.

The limit of work line has been modified accordingly.

- G3. Provide details for proposed retaining walls and any fall protection fencing, if required.

The wall details are prepared by other – I enclose as a separate attachment. The portion along Fisher Street is a modification of the building wall which currently exists, not a new wall as a whole and the details reflect this.

- G4. Evaluate the need for additional dumpster locations, particularly for the occupants on the east side of Building 5.

The owner has evaluated the need for dumpsters and the potential locations and feels that the current layout is adequate for their needs.

ZONING

- Z1. Clarify specific business, mercantile, and factory uses proposed, if known, at the Site to confirm compliance with zoning regulations.

The businesses currently being evaluated have been vetted for compliance with the Zoning, should any additional uses, which require a special permit be evaluated or proposed a



modification will be required to the permit as it stands and the applicant will come back to Planning as necessary.

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

The provided 360 parking spaces do not satisfy the parking requirements. According to the site plans, the design intent is that the two restaurants will be open at different times of the day, and thus parking spaces can be shared between them.

- P1. Revise Use Group Plan to clarify which parking requirement is applicable to each use and confirm the areas provided on the plan are consistent with the zoning table.

Each area has been divided by the architect and the plan was attached, but the development space and thus parking was evaluated by the project engineer for the compliance with the Zoning Requirements. This is what makes up the parking requirements noted on the plan.

- P2. Due to the shared/interconnected nature of the Site, include Building 29 in the parking calculations.

Building 29 has been evaluated independently and permitted independently. The building itself was added as a separate line item in the zoning table for clarity.

- P3. Confirm the total number of restaurants proposed. The zoning table indicates two while the Use Group Plan depicts five.

The Use Group Plan assigns different area to the same restaurant because of the internal use, architecturally and for building code purposes this may dictate sprinkler use or group category.

- P4. Request approval for the reduced number of parking spaces in accordance with 185-21A.(4).

LDG requests approval through the submission for the reduction in parking spaces as provided on the site plans. The spaces will be adequate, and will generally over estimate the need based upon the business proposed.

- P5. The Board may wish to consider a condition of approval that requires parking to be reevaluated as tenants are confirmed.

A condition which would require that the parking be evaluated when 50% of the overall developable area is occupied for each incoming use would be acceptable, each use seems onerous for both the Planning Board or staff as well as the applicant.

- P6. Revise parking design as needed such that accessible parking spaces are nearest to the building(s) or entrance(s) they serve.

Parking spaces have been relocated into positions discussed during the public hearing for access.

- P7. Revise parking layout such that no off-street parking is within 10 feet of a street right-of-way (§185-21.C(1)) or request a waiver from the Board.

LDG would request a waiver for 12 parking spaces along Fisher Street to be within 10' of the Right-of-Way. There currently is parking in this area, pavement as well as used spaces, with the modification as proposed the spaces will be 'hidden' below a small retaining wall instead of at street level in the proposed plan.

- P8. Review parking layout to determine the number of parking spaces located more than 300 feet from the building entrance they are meant to serve (§185-21.C(6)). Recommend depicting which parking spaces will serve each building occupant, accounting for any overlap due to alternating hours of operation.

The parking spaces as a whole have 16 total spaces which are not within 300' of a perspective entrance. These spaces however could be considered spaces for building 29 instead and that would then leave the spaces along the drive between the buildings with spaces less than 300'. A layout plan which delineates spaces would be unwieldy from a depiction and time standpoint.

- P9. Provide and depict sight distances for all site entrances.

The sight distances have been placed on the plan as requested. However to note each of these entrances is currently in use, they are not manufactured entrances.

- P10. Indicate typical parking stall widths throughout the site.

Stall widths have been added throughout. The applicant is proposing compliant 9x19 spaces throughout.

- P11. Provide detailed information on proposed site circulation. Consider providing designated truck and passenger vehicle routes with appropriate signing and/or striping to minimize potential conflicts.

The pathway has been provided; some additional signage has also been provided.

SIDEWALKS (§185-28)

No public sidewalks are proposed under this project. A five-foot concrete walk is proposed along the eastern side of building 5, and a concrete patio area is proposed within the central area of the Site. Existing sidewalks to remain are present along West Central Street and Fisher Street.

- SI1. Clarify pedestrian and accessible routes throughout the Site with consideration for the following:

- a. The proposed sidewalk to the north of Building 3 terminates with no ramp or path to connect to the sidewalk west of the building.

Ramps have been added and a cross walk added as well.

- b. The proposed accessible ramp near Building 7 appears to lead to a set of stairs for access to the building. Consider relocating the accessible spaces to the southerly corner of Building 3.

The HDCP spaces and ramp have been relocated as previously discussed.

- c. Recommend providing sidewalk connections to West Central and Fisher Streets so pedestrians can access the Site outside of driveway areas.

- SI2. Provide accessible ramps to sidewalks at the proposed accessible parking spaces east of Building 5.

The parking spaces have been provided a ramp and accessible pathway.

- SI3. Provide accessible ramp details for all types proposed, such as sidewalk corners.

These details have been added as requested.

- SI4. Clarify if any modifications are proposed for the southerly curb cut on Fisher Street and provide details and ramps, as applicable.

The curb cut will not be relocated no additional work is proposed at this time.

- SI5. Clarify the limits of the proposed sidewalk at the northerly curb cut on Fisher Street and if a ramp is required to cross the driveway.

This entrance is existing as is the Fisher sidewalk.



CURBING (§185-29)

- C1. Revise Cape Cod Berm to be granite or reinforced concrete curbing (§185-29).
The areas of CCB have been changed to CCC, which is cast in place 'extruded' concrete curb, a detail has been added.
- C2. Provide detail for proposed "PCC" curb, as applicable.
A detail has been added
- C3. Provide curbing, as is typically required for parking spaces, for the ten parking stalls to the west of Building 5.
This curb will be cast in place concrete.

SITE PLAN AND DESIGN REVIEW (§185-31)

The project has been submitted for Site Plan Review and is required to conform to the requirements of this section.

- SP1. Indicate abutting land uses and zoning data on the locus or vicinity map (§185-31.1.C(3)(d)).
I attach the 2003 site plan set which details the surrounding land uses in accordance with the regulations.
- SP2. Clarify proposed snow storage areas (§185-31.1.C(3)(i)). The Erosion Control Plan shows a snow storage area in the footprint of the parking lot, but it is unclear if this is intended only for construction-period snow storage or post-development snow storage.
As with a shopping plaza there is snow storage in the parking lot to allow for proper removal. The areas selected will be the furthest away areas to allow for the machines to work in the removal operations.
- SP3. Review planting plan to confirm and then provide note indicating that all proposed plantings will come from the Best Development Practices Guidebook (§185-31.1.C(3)(k)).
The planting plan has been modified.
- SP4. Provide information (size, material, etc.) for proposed and existing water and sewer systems (§185-31.1.C(3)(m)).
The existing sewer has 3 exists from the building 7, 2 which tie directly to the sewer line in the loading court and one which exists directly to Fisher Street. Each of these is either 6 or 8 inch in diameter. There are two exists from 3 Fisher Street, both 4", the building 29 and front building are not being modified.
Water has entrances throughout the existing 5 Fisher building. There are currently multiple entrances in approximately the locations necessary for the uses proposed, the same is true for the remaining buildings. If, during investigation there is a need to replace one of these lines, internally to the property, the applicant would work with DPW and the appropriate department to determine method and provide plans associated with that work.
- SP5. Provide data quantifying on-site generation of noise and odors (§185-31.1.C(3)(r)). If rooftop mechanical/HVAC equipment will be utilized, it should be screened from view.
There is nothing proposed within the structures which requires a Special Permit which would be a use expected to be a larger generator of noise or similar which would need further evaluation during the permitting process. The roof top units are to be replaced in-kind but likely not moved



to a great extent. If a unit is proposed to be moved the applicant will notify the Planner to determine if a minor modification should be applied for.

The current noise on property far exceeds the noise on property after the redevelopment.

- SP6. Revise lighting plan to eliminate spillage onto neighboring properties (§185-31.1.C(4)(e)).

The revised photometric is attached herein

SCREENING (§185-35)

- L1. Depict existing tree line along the western side of the Site.

The treeline is shown on the attached plan.

- L2. Confirm that trees and shrubs used for screening shall be 3' or more in height at the time of planting (§185-35.B).

Trees and shrubs will be in accordance with the Zoning by-law.

- L3. Provide screening along the Site's frontage on West Central Street (outside of 10 feet from the right of way).

There is not a significant area to plant along this for screening, however the landscape plan has been modified accordingly and in accordance with the Zoning by-law.

- L4. Provide information on existing vegetation to remain along northwestern property line to confirm that screening is adequate in this area.

There is no grading in this area in excess of the existing cleared area.

- L5. Provide screening for the parking spaces proposed between Building 5 and residences on Fisher Street.

Screen plantings in this area have been added. There is one area along the wall specifically where the wall itself screen the abutting properties from the potential headlights within the facility. The parking lot is lower than the roadway, protecting the neighboring properties.

- L6. Indicate means of protecting existing trees to remain near limit of work and within landscaping islands.

The notes have been added to the landscape plan.

- L7. BETA recommends for the Board to discuss the applicability of a required greenbelt in accordance with §185-35.C. At a minimum, additional plantings should be considered along the southerly property line due to the presence of residences and the potential for headlight glare from the high use parking area.

The landscape plan has been modified in this area.

UTILITIES

- U1. Confirm that existing utilities (water, fire service, sewer, gas, electric, etc.) are adequate to service the proposed Site. Confirm that proposed demolition will not impair existing utilities.

The existing utilities have appropriate capacity for services to the property. The utilities have been extensively mapped within the structures and are not anticipated to be disturbed during construction/demolition.

- U2. Clarify disposition of all existing drainage, sewer, and water infrastructure.



The existing is to remain unless otherwise noted.

- U3. Provide grease traps for all proposed restaurant uses.

Currently the plans detail a grease trap for the portion of the building that a use which by plumbing code will need a grease trap is proposed. The remaining restaurant area may not need an external trap as proposed.

- U4. Contact the DPW to evaluate if easements are needed for the existing drainage and sewer lines that cross the property.

The owner will discuss potential future easement with the DPW after permitting.

- U5. If vehicle access will be provided to Building 5 through the drive-in door, an oil separator may be required in accordance with 248 CMR 10.09.

Noted.

STORMWATER MANAGEMENT

GENERAL

- SW1. Provide supporting calculations to demonstrate that all new and redevelopment areas meet the requirements of Chapter 153-16.

- SW2. Clarify how roof drainage will be handled at the site.

Roof drainage on property currently runs through internal lines and through existing outfalls. This will continue.

- SW3. Revise Stormwater Checklist to indicate the project is a mix of New Development and Redevelopment.

The stormwater checklist is revised as attached>

- SW4. Revise proposed drainage pipe to be RCP. Where cover is less than 42" provide Class V RCP (§300-11.B.(2)(a)).

The section detailed is within the subdivision rules and regulations, as a private project the piping is adequate for the traffic anticipated at the depths detailed.

- SW5. Review grading at the entrance to the eastern parking area. It appears a 257' elevation contour is missing.

A 257 contour has been added.

- SW6. Provide pre- and post-development calculations, including the 2, 10, and 100-year storms, for all areas in the limit of work to verify compliance with this standard. The analysis should also include a summary of runoff volumes to demonstrate compliance with Town Bylaws.

The attached HydroCAD and detail below provides the requested information:

One singular control point was used in the analysis. This point was chosen as it is the outfall at the terminus of the on-site channel. There is an accumulation along the short path of the channel as depicted in the HydroCAD.

Control Point – R1



Storm	Pre-Dev. Flow (CFS)	Post-Dev. Flow (CFS)	Pre-Dev. Volume (af)	Post-Dev. Volume (af)
2-yr	30.12	26.74	0.041	0.038
10-yr	55.51	51.32	0.064	0.060
100-yr	126.84	119.71	0.117	0.112

The roadway included in the calculations is a constant, but the roadway area (estimated) contributes approximately 1/4 of the flow to each the pre and post development scenarios. The net peak discharge is controlled and does not increase at the control points for any of the evaluated design storms.

SW7. Provide hydraulic calculations for both existing and proposed pipes to confirm that anticipated flows can be conveyed.

LDG Evaluated the piping on-site however to complete the calculations requested the hydrology within 140 and Fisher Street would need to be evaluated. This survey would be approximately a mile of additional survey LDG is of the professional opinion that this is not necessary for the existing functional system.

SW8. Provide soil group boundaries and flowpaths on the catchment plans.

The Soil Group and Boundaries have been added as requested.

SW9. Ensure the catchment for the subsurface drainage system includes all areas that will drain to the BMP.

The catchment has been evaluated and modified as necessary.

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.*

SW10. Revise subsurface drainage system model to use invert elevations consistent with those depicted on the plans.

The model has been modified accordingly

SW11. Complete test pits within the footprint of all proposed infiltration systems to support the proposed exfiltration rate of 8.27 in/hr and to confirm seasonal high groundwater elevations.

The infiltration pit is in an area which is treed it would be the request of the applicant and LDG to perform a test pit prior to construction. This site lends itself to this method so that machinery on-site for the redevelopment will be available and the trees which are proposed to be removed have been removed for safety.

SW12. Provide calculations showing that recharge BMPs will drain within 72 hours.

72 Hour Drawdown has been provided.

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

The project proposes to direct runoff from the new parking area to a subsurface infiltration system for treatment. Runoff to this system will first be pre-treated via deep-sump catch basins, proprietary water quality units, or a combination of both. Runoff from other areas of the Site will receive no treatment.

A long-term pollution prevention plan was included as part of the Drainage Analysis.



SW13. Provide TSS Worksheet for all treatment trains in the limit of work, including the redevelopment area.

TSS Worksheets have been provided for each treatment train.

SW14. Revise TSS Worksheets. Proprietary treatment is only provided for a portion of the proposed parking area. A separate worksheet should be provided for each treatment train.

TSS Worksheets have been provided for each treatment train. However, the new rear parking area is entirely fed through proprietary treatment prior to discharge to utilize the 44% pre-treatment before discharge model.

SW15. Revise subsurface system treatment train to provide a minimum of 44% TSS removal for all inlets that discharge to the infiltration system, as required for BMPs with rapid infiltration rates.

TSS Worksheets have been provided for each treatment train. However, the new rear parking area is entirely fed through proprietary treatment prior to discharge to utilize the 44% pre-treatment before discharge model.

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

The project is a mixed-use development with a total parking lot size of 379 spaces. Portions of the development area defined as Industrial which may qualify as a land use with higher potential pollutants loads (LUHPPL), depending on the specific industry. Furthermore, LUHPPLs also include high intensity parking lots (1,000 vehicles trips per day or more) which may apply to the Site.

It is currently not anticipated that the current or proposed uses will cross the LUHPPL thresholds. The current proposed daily trips is approximately double the parking at 980.

SW16. Provide additional information on proposed site uses to determine if the Site is a LUHPPL.

The industrial uses are warehousing in nature, the previous uses which are being abandoned created more traffic and additional areas of concern over the proposed redevelopment.

SW17. Provide a basic trip generation to determine if the daily vehicle trips qualify the Site is a LUHPPL.

The use of the site is a mixed-use commercial. LDG evaluated the site using (931) quality restaurant, (150) Warehouse as the primary uses on property. There is a portion of Office, which is a small portion of the development. The ITE Generation for a quality restaurant is so small that they are not able to create a Fitted Curve development equation based upon total s.f., The ITE manual then allows evaluation based upon the total seats, this also does not have a fitted Curve Equation. The ITE publications for Sit Down Restaurants has a technical paper which gives some data on the evaluation of a quality restaurant, which is defined as not fast food not high turnover and not a bar. That evaluation yields the results below. Total daily Trip ends:

(931) N/A – ITE manuals yield 367 TDT

(150) 208 TDT

(710) 403 TDT

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

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



SW18. Provide perimeter controls along the southerly limit of work.

Erosion control sock has been detailed as requested.

Operations/maintenance plan (Standard Number 9): *A Long-Term Operation and Maintenance Plan shall be developed and implemented to ensure that stormwater management systems function as designed.*

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

SW19. Provide Owner signature on the O&M Plan (153-18.B(5)).

Prior to Construction post approval when the applicant determines no additional changes are necessary a signed form will be provided as requested.

Enclosed please find:

- 2 Full Size sets of plans
- 5 reduced (11x17) size sets of plans
- 7 copies of associated documentation

I look forward to meeting with the Board at the next meeting. If there are any questions prior to the hearing please do not hesitate to ask.

Truly yours,

LEVEL DESIGN GROUP, LLC

A handwritten signature in blue ink, appearing to read "Daniel Campbell", is written over the company name.

Daniel Campbell, P.E.

Principal

Attachments

Cc: KCRES
JtA
File