



December 1, 2022

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

**Re: 704 Washington Street  
Site Plan Peer Review**

Dear Mr. Rondeau:

BETA Group, Inc. is pleased to continue our engineering peer review services for the proposed "**Amego School**" group home located at 740 Washington Street in Franklin, Massachusetts. This letter is provided to outline findings, comments, and recommendations.

## **BASIS OF REVIEW**

In response to our 2nd review, the following documents were received by BETA on November 29, 2022 via email. The comments provided will be based upon this revised information as submitted.

- Drainage calculations entitled "**Stormwater Report for 704 Washington Street, Franklin, MA**" dated June 30, 2022, revised November 21, 2022 prepared by Level Design Group, L.L.C. of Plainville, MA.
- Plans (7 sheets) entitled: **Site Plan Amego Inc. 704 Washington Street**, dated July 19, 2022, revised November 21, 2022, prepared by Level Design Group of Plainville, MA.
- Landscape Plan entitled: **Amego Adult Homes, identified** as Progress Print November 16, 2022, revised November 21, 2022, prepared by Level Design Group of Plainville, MA.
- Letter from Level Design Group, LLC to the Town of Franklin Planning Board, RE: 704 Washington Street, LDG Proj. No. 2013.00, dated November 28, 2022.

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

- Site Visit
- **Zoning Chapter 185 From the Code of the Town of Franklin**, current through July 2021
- **Zoning Map of the Town of Franklin, Massachusetts**, attested to October 7, 2020
- **Stormwater Management Chapter 153 From the Code of the Town of Franklin**, Adopted May 2, 2007
- **Subdivision Regulations Chapter 300 From the Code of the Town of Franklin**, current through March 8, 2021
- **Wetlands Protection Chapter 181 From the Code of the Town of Franklin**, dated August 20, 1997
- **Town of Franklin Best Development Practices Guidebook**, dated September 2016

## **INTRODUCTION**

The project site includes one parcel, Lot 322-030, with a total area of 2.4 acres located at 704 Washington Street in the Town of Franklin (the "Site"). The Site is located within the Rural Residential I Zoning District. Lots surrounding the Site are also within this district. The Site is also located within the Water Resource District.

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The existing Site is a 1-story single-family dwelling with a detached 1-story barn. A driveway connects to Washington Street to the north and provides access to both the dwelling and barn. Associated site features include a retaining wall, a walkway, a shed, and landscaping. Beyond these features, most of the existing Site is a grassed lawn with some wooded area in the rear of the property. A sidewalk is present along both sides of Washington Street in this area.

Topography at the Site is generally directed south towards an area of vegetated wetlands. According to data available from MassGIS, this wetland resource area connects to Miscoe Brook further to the south. A portion of the Site is graded towards Washington Street to the north. The Site is located within a Zone II Wellhead Protection 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 fine sandy loam with a Hydrologic Soil Group (HSG) rating of A (high infiltration potential), Ridgebury fine sandy loam with an HSG of D (very low infiltration potential), and Canton fine sandy loam with HSG B (medium infiltration potential).

The project proposes to demolish existing site features and construct two 3500± sq. ft. one-story group homes. Associated site features will include a parking lot, vinyl fence, patio areas, landscaping, and 2 new septic systems.

The site design has been reconfigured since the last submission. The entrance driveway has been moved and is now east of the existing driveway opening. Which will require some additional work in Washington Street. The parking has been expanded and is now a 16-space lot in the front followed by a 7-space area in front of the second building. They have also added a driveway between the structures which will access doorway openings on the sides of the buildings. Vertical granite curbing is now proposed around the entirety of the parking lot except at the opening provided to allow runoff from the pavement to enter the stormwater features. A landscaping plan has also been prepared and submitted. Trees have been added, however some additional screening from Washington Street should be considered along the east edge of the front parking lot.

The stormwater design has been modified also. They will now be installing a bioretention basin followed by an infiltration basin. A drainage swale will be formed at the rear of the structures along the east edge of the parcel and discharge to the south towards the abutter. Except for a small strip along Washington Street, all the runoff from the site will follow the existing grades and flow south towards the wetlands which are identified on the plans approximately 140' from the property line. The revised stormwater design has resulted in several comments which were not relevant in the prior reviews.

To assist with the review, the response from Level Design Group to the 2<sup>nd</sup> review is identified as

***LDG: The information.....***

The response from BETA and the additional comments are all labeled

***BETA3: The information.....***



## FINDINGS, COMMENTS, AND RECOMMENDATIONS

### GENERAL

- G1. Overall, the site development will result in a disturbance of approximately 78,000 square feet. Since this is greater than 1.0 acre, the site development is subject to §153-1 of the Zoning by laws. In accordance with Article III. Post Construction Stormwater Management, a stormwater management plan which includes calculations is required. In accordance with Volume 1, Chapter 1, the site is also subject to the requirements of the Massachusetts Storm Water Standards. A stormwater design is provided however supporting calculations have not been submitted. These calculations including documentation of compliance with the standards and the bylaws is required.

**BETA2:** Overall disturbed area associated with the site development has been reduced but remains greater than an acre. Accordingly, the site remains subject to §153-1 of the by-laws. A stormwater report has been filed. Comments relative to the report are shown below. In addition, the limit of disturbance shown on the site does not encompass the proposed material stockpile area at the front of the site.

**LDG:** The limit of work has been revised to encompass all disturbance proposed by the revised design.

**BETA3:** The limit of disturbance will be approximately 66,000 square feet. As previously noted, it will remain subject to §153-1 of the by-laws and a stormwater permit will be required from the DPW.

- G2. The site is located within the Water Resource Protection District and is also located within the limits of a Zone II to a public water supply well. These should be noted on the plans. This is defined as a **Critical Area** as it relates to the stormwater standards. In addition, although this is primarily a Board of Health issue, it does qualify as a Nitrogen Sensitive zone as it relates to the subsurface sewage disposal system.

**BETA2:** The Water Resource Protection District is a Zoning overlay and therefore should be noted accordingly on the site plans and on the Zoning summary table. The drainage report incorrectly states that the site is not located within a Critical Area and none of the stormwater features required to Address this location have been included in the design.

**LDG:** The plans have been revised to include a bioretention Basin and the TSS removal calculations have been revised and are included in the report. Phosphorus removal calculation show 60% removal are included with this submittal.

**BETA3:** See stormwater design comments below.

- G3. There is a stone retaining wall along the frontage along Washington Street in front of the existing house. It is unclear from the drawings whether this wall will be removed. Based upon its proximity to the sidewalk, BETA recommends that this portion of the wall be maintained, and the grading adjusted accordingly.

**BETA2:** A portion of the wall is now shown to be removed in accordance with the letter to provide sight distance. The sight distance needed should be shown to identify the extent of the wall removal needed. In addition, the grading that would be needed once the wall is removed should

*be shown. A note should also be added that any damage to the sidewalk resulting from the removal of the wall will be repaired to the satisfaction of the DPW.*

*LDG: A note has been added to the plans for clarity.*

***BETA3: The sight distance line has been provided and is located outside of the wall. In addition, the driveway opening was moved so that the eye height of the driver is now above the wall. Regardless, the wall remains scheduled for removal. If the wall is to be removed than show the grading necessary to address the 3-4' of exposed grade that will remain if the wall is removed.***

- G4. Along the easterly property line, the applicant is proposing to grade to the property line. BETA recommends that this proposed grade be moved outside the limits of the existing vegetation to allow that vegetative buffer along the property line to be maintained.

***BETA2: The tree line shown on the plans as revised differs from the previous submission. Show the existing limit of vegetation and what impact will occur to the existing vegetation.***

*LDG: All portions of the existing tree line have been added to the Layout Plan and a note has been added for clarity.*

***BETA3: Existing tree line shown on sheet C-2.0 with note. No further comments***

- G5. The groundwater elevation reported at the proposed infiltration basin appears to be incorrect based upon the elevation of the bottom of the proposed leaching facilities for the subsurface sewage disposal system. The test pit logs as shown on the plan should be submitted to document the elevation reported.

***BETA2: test pit logs have not been submitted; comment remains.***

*LDG: Test pit logs for drainage are included with this submission and are shown on the Grading & Drainage Plan.*

***BETA3: Comment addressed.***

- G6. The elevation noted for the benchmark directly behind the westerly structure appears to be incorrect. The elevation noted is 2.5' below the surface.

***BETA2: Comment remains.***

*LDG: The benchmark has been removed from the plans.*

***BETA3: Comment addressed. Catch Basin Rim on Washington Street now identified as benchmark.***

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

As shown on the schedule on the Zoning table on Sheet 4 of the set, the Site meets the requirements for lot area, depth, frontage, width. The proposed building will meet the front, side, and rear yards and building height is also identified as 3 stories; calculations for impervious coverage within the Water resource district should be corrected as noted below.

- SCH1. Add a note to the plan that documents the percentage of lot coverage by the proposed impervious surfaces within the Resource District.

**BETA2:** Note has not been added comment remains.

**LDG:** A note has been added to the plans to address this comment.

**BETA3:** The Zoning Summary on Sheet C2.0 should be corrected. The Maximum Building coverage is 15% and Maximum Impervious coverage is 80%.

## **SIGNS (§185-20)**

Provide details, sizes, and locations of any proposed signs on site if applicable.

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

Access to the Site is proposed via a 42'+ long, 14' wide driveway connected to Washington Street 32± feet from the existing driveway opening. The parking lot is located between the 2 buildings. Sidewalk access is provided from the parking area to the buildings. No sidewalk access is proposed to Washington Street.

As part of the proposed work, the existing curb cut will be abandoned. The proposed driveway entrance is approximately 32 ft east of the existing driveway. The existing granite curbing on Washington street will be removed to establish this opening.

As defined by the bylaw, 1.0 parking space is required per guest. Thus, for the 20 guests, 20 spaces are required and have been provided. Proposed parking spaces are 9' wide and 22' long, with a 24' wide access aisle.

- P1. In accordance with the bylaws, the access driveway should be widened to 24'. If the waiver is requested, the minimum width should be 20' in accordance with NFPA requirements for fire and emergency vehicle access.

**BETA2:** The access driveway has been widened to 20' however, dimensions in the parking lot should be provided to show overall pavement dimensions. Waiver has not been requested.

**LDG:** Driveway dimensions have been added to the plans and a waiver will be requested. Though under the Dover Amendment, this is a local requirement which exempts applicants from complying with public health and safety requirements.

**BETA3:** comment addressed

- P2. For the proposed number of parking spaces, 1 space must be accessible.

**BETA2:** No HP space provided. Comment Remains.

**LDG:** A van accessible space has been added to the plans.

**BETA3:** Comment addressed.

- P3. Provide HP accessible crosswalk across driveway.

**BETA2:** The site plans have been revised to use the existing driveway, no further comments.

**LDG:** The proposed driveway has been revised to be further from the existing retaining wall to provide improved sight distance. A handicap accessible driveway apron has been provided.

**BETA3:** There is a detail on sheet C5.0 for the HP Accessible sidewalk transition through the driveway apron. BETA recommends that a note be added to the plan view referencing the detail.

- P4. In accordance with §185-21, C. (5). Parking lots for 20 or more cars shall contain or be bordered within 5' by at least one tree per 10 parking spaces, .... , with not less than 40 square feet of unpaved soil area per tree. Planting areas are identified between the pavement and the buildings, but no trees are identified.

**BETA2:** *All landscaping notes have been removed from the plans and are no longer shown. Comment remains.*

**LDG:** *A landscape Plan has been provided with this submission.*

**BETA3:** *6 trees are shown on the Landscape Plan which satisfy this criterion. No further comments.*

- P5. Show sufficient information on Washington Street, including existing driveway openings as required to document compliance with §185-21, C. (7) including sight distances at entrance.

**BETA2:** *Sight distances not identified on plans; comment remains.*

**LDG:** *Sight distance has been added to the plans.*

**BETA3:** *Comment addressed.*

- P6. Show whether the existing driveway opening will be closed off. BETA will defer this issue to the Franklin DPW if granite curbing should be set to close it off.

**BETA2:** *The site plans have been modified to use the existing opening. No further comments.*

**LDG:** *The proposed driveway has been revised and no longer uses the existing curb cut. Notes on closure have been added.*

**BETA3:** *Comment addressed.*

## **SIDEWALKS (§185-28)**

An existing 5' wide sidewalk is present along Washington Street. There is no proposed pedestrian connection from the site to the sidewalk on Washington Street.

- SI1. Provide detail for the reconstructed sidewalk at the entrance and designate proposed curb type, if applicable.

**BETA2:** *Sidewalk will not be modified as revised. Add note to plans to identify that any damage to the sidewalk in the construction process should be repaired to the satisfaction of the DPW.*

**LDG:** *A note has been added to the plans accordingly.*

**BETA3:** *Comment addressed.*

## **CURBING (§185-29)**

No curbing is proposed on site. The planting bed between the parking and the buildings ranges from 16'-22' wide. However, BETA recommends that as a minimum vertical concrete curbing be provided at the edge of the pavement between the spaces and the buildings to address safety concerns

**BETA2: As revised, the plan now shows vertical granite curbing around the parking lot. Comment addressed.**

## **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. Materials required for design review as provided in §185-31.2. Design Review Commission should be provided. (§185-31.1.C(3)(q)).

**BETA2: No further discussion required. BETA will defer this issue to the Board.**

SP2. Provide data quantifying on-site generation of noise and odors (§185-31.1.C(3)(r)).

**BETA2: Comment not addressed**

**LDG: There is no anticipated generation of noise or odor above levels at a standard residential property.**

**BETA3: BETA will defer this issue to the Board.**

SP3. Provide sight line information at the proposed entrance (§185-31.1.C(3)(t)).

**BETA2: Not provided, comment remains.**

**LDG: Sight distance has been added to the plans.**

**BETA3: Comment addressed.**

SP4. In accordance with §185-31.1.C(4)(a), the issue of traffic safety at the entrance into the site should be addressed by the Applicant to determine that it is protected. As noted in §185-31.1.C(3)(s), the description of traffic circulation, safety and capacity should be in sufficient detail for the board to make a determination of whether a traffic impact analysis is necessary.

**BETA2: Not addressed, comment remains**

**LDG: The existing property is a single-family house with approximately 9 daily vehicle trips. The proposed use will be residential with no personal vehicles. Daily vehicle trips are based on group home size with expected average daily vehicle trips between 18-20 with current traffic on Washington at over 2,000 peak hour this change is negligible.**

**BETA3: BETA does not anticipate any issues associated with the traffic, however we will defer this issue to the Board.**

SP5. In accordance with §185-31.1.C(4)(e) No site feature shall create glare or illumination which extends beyond a site's property lines and creates a hazard or nuisance to neighboring property owners. There are no exterior lights shown on the plans nor was a lighting plan submitted. The applicant should note if any lighting is proposed and provide intensity.

**BETA2: As noted on the site plans, all lighting on site will be provided by residential fixtures mounted on the face of the building. However, the nature of the fixtures nor the intensity of the lighting has been shown. Comment remains.**

**LDG: A lighting Plan and Photometrics plan has been included with this submission.**



**BETA3:** *This plan was not included in the information forwarded to BETA. In addition, the Landscape Plan shows lights along the parking lot yet there are none indicated in the site plans. The 2 plans should be coordinated.*

## SCREENING (§185-35)

The project proposes outdoor parking for 10 or more cars which must be screened in accordance with this section.

- S1. **BETA2:** *Existing vegetation along the outside of the lot will be removed and additional plantings should be shown in accordance with this section of the bylaws. Site plan should identify existing vegetation to be removed in conjunction with the proposed development.*

**LDG:** *Proposed plantings for screening have been added to the Landscape Plans.*

**BETA3:** *BETA recommends that some additional plantings be provided along the northerly edge of the 1<sup>st</sup> parking area to help screen the view from Washington Street and the residential properties across the street.*

- S2. **BETA3.** *The proposed grading identified on the planting plan behind the buildings is different than the Civil Design Plans and should be corrected to match.*

## UTILITIES

The site plans do not show any utility connections with the proposed structure. Nor does it show any of the existing utilities which are connected to the existing dwelling and barn. Each of these should be shown on the site plans.

**BETA2:** *Neither existing utilities nor proposed utility connections are shown on the site plans, comment remains.*

**LDG:** *Existing utilities and proposed utility connections have been added to the plans.*

**BETA3:** *Utility Plan sheet C4.0 has been added to the set. No further comments.*

## STORMWATER MANAGEMENT

Stormwater management for the proposed site development will be achieved through a proposed Infiltration basin that will be located along the westerly edge of the parcel parallel with the back building. Runoff from the parking lot will be graded through a gap in the vertical granite curbing. A shallow basin will be provided at the rear of the buildings and connected to the infiltration basin through an 8" HDPE culvert. Pretreatment will be provided by a sediment forebay. A small portion of the driveway will flow back towards Washington street. The following comments are provided as a guide for the designer to document compliance.

## GENERAL

- SW1. The site qualifies as a redevelopment and the untreated runoff back towards Washington Street should be shown to comply with this standard.

**BETA2:** *Documentation for compliance with Standard 4 is not shown. Comment remains.*

**LDG:** *The total and impervious area directing runoff onto Washington Street under proposed conditions is less than under existing conditions. The proposed design will be an improvement over*



*existing conditions which discharge untreated onto Washington Street from a larger impervious area than is proposed.*

**BETA3: BETA agrees that flow onto Washington Street will be reduced. However, a redevelopment checklist should be provided.**

SW2. The site is in a critical area. In addition, the soils have a high permeability rate. Accordingly, the pretreatment into the basin needs to be 44% to comply with the standards. The sediment forebay will only provide 25%, which is not sufficient. Additional pretreatment is required for the paved areas and the roof runoff that flows over the pavement into the forebay.

**BETA2: Comment remains. Pretreatment provided does not comply with the standards.**

**LDG: The sediment forebay has been replaced with a Bioretention Basin and Vegetated Filter strip, to provide 90% TSS removal.**

**BETA3: The bioretention basin will provide the pretreatment necessary for the infiltration basin provided it has been designed in accordance with the Handbook. BETA has the following comments relative to the bioretention basin design.**

- a. In accordance with Volume 2 Chapter 2 of the standards, the maximum ponding depth should be between 6-8". Adjust the spillway design elevation accordingly.**
- b. The storage in the media should not be included as part of the impoundment capabilities of the basin in the hydro cad analysis.**
- c. Exfiltration from the basin can be considered in the design.**
- d. Not all the watershed area identified as P2A in the hydrocad calculations flows into the infiltration basin. Separate out that portion east of the basin that will bypass the basin.**
- e. The entire watershed into the infiltration basin does not come solely from the bioretention basin. This watershed should be analyzed separately from the overland flow into the infiltration basin.**
- f. The water quality volume into the bioretention basin should be based upon all the impervious surfaces tributary, including the roof. Otherwise collect the roof runoff separately and pipe it directly into the infiltration basin as allowed in the handbook.**
- g. A planting scheme for the bioretention basin in accordance with the requirements of the handbook is required.**

SW3. The roof runoff as proposed will run onto the ground. The easterly building will flow overland to the basin. However, the roof runoff from the westerly building will be directed away from the basin towards the rear of the lot. It may qualify under the LID definition and should be discussed in the stormwater report.

**BETA2: The revised site design has eliminated this issue. No further comments.**

**LDG: No response.**

**BETA3: The issues associated with the original design have been reactivated in the revised drainage design. The roof runoff as proposed will run onto the ground. Along the front of the buildings, the roof runoff will flow onto the parking lot pavement and through the proposed treatment train. However, at the rear of the building no treatment is being provided. A stormwater BMP is needed to treat this flow.**

- SW4. The proposed infiltration basin will be used to meet the requirements of both Standards 2 Peak Rate attenuation and 3 Recharge. Since the bottom of the basin as proposed is less than 4' above groundwater, a mounding analysis will be required.

**BETA2: The input data in the mounding analysis is incorrect. Document how the saturated thickness of the aquifer is 288.55'. The percolation rate should be the Rawls rate as required in the Storm Water Standards.**

**LDG: The saturated thickness of 288.55' comes from the elevation at which redoximorphic features were observed during soil testing and represent the estimated seasonal high groundwater elevation for which the infiltration basin was designed. The percolation rate is the Rawls rate converted from inches per hour to feet per hour.**

**BETA3: BETA recommends that the design engineer review the software guidance for the groundwater mounding analysis. Specifically:**

- 1. The elevation of redoximorphic features does not represent the Initial Saturated Thickness of the underlying aquifer. BETA recommends that the design engineer conduct some research at the Board of Health to see if there are any wells in the area to help determine the actual aquifer thickness.**
- 2. Hydraulic Conductivity is normally 5-10x greater than the vertical percolation rate. BETA recommends that the design engineer research typical values based upon soil types.**
- 3. 24 hours represents a far greater volume than what exfiltrates as determined by HYDRO-CAD and should be adjusted.**

- SW5. As previously noted, the site development will be subject to the EPA Construction General Permit and a Notice of Intent will need to be filed with the EPA and a Storm Water Pollution Prevention Plan prepared. The applicant is reminded to file and obtain a permit from the Town of Franklin DPW for the same also.

**BETA2: No further discussion required.**

- SW6. The proposed infiltration basin has not been designed in accordance with the requirements of the standards. Specifically,

- a. The setback from the subsurface sewage disposal system is less than 50'.

**LDG: the infiltration basin and subsurface sewage disposal system have been revised to provide a minim 50' separation distance between them.**

**BETA3: the distance scales at 52'±. No further comments**

- b. The grading at the emergency spillway is shown incorrectly on the plan. The spillway is depicted at crest elevation 293.0 not 292.0 as shown in the calculations and the plan. In

addition, the spillway is shown below grade on the plans since it does not extend to the elevation 292 contour.

*LDG: A detail has been added for clarity.*

**BETA3: Provide the additional topography necessary to show that the discharge from the weir will continue down gradient to the discharge swale identified on the plans.**

- c. The dimensions for the spillway should be shown on the plan view.

*LDG: Dimensions have been added accordingly.*

**BETA3: Dimensions added no further comments.**

- d. The dimensions for the overflow weir from the sediment forebay should be shown.

*LDG: Dimensions have been added accordingly.*

**BETA3: Dimensions added no further comments.**

- e. The height of the embankment does not provide 1.0' of freeboard above the 100-year storm maximum water surface elevation. Show the top of the embankment.

*LDG: The design has been revised to provide a minimum of 1.0' of freeboard.*

**BETA3: Comment addressed, no further comments.**

- f. There is no low-level emergency dewatering capability.

*LDG: The basin will drawdown in less than 72 hours as shown in the stormwater report. So low level dewatering is not necessary.*

**BETA3: The ability of the basin to drawdown is not relevant. However, the basin as designed has no embankment that could be endangered by a diminished exfiltration rate. Therefore, the low-level outlet is not required. Comment dismissed.**

- g. There are no monitoring wells identified or shown

*LDG: A monitoring well has been added to the Bioretention Basin.*

**BETA3: The bioretention basin does not require a monitoring well. Relocate well to the infiltration basin.**

## 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 one new outfall from the infiltration basin. The site plan does not show the existing conditions far enough beyond the site to show what the impact of the outfall may be on abutting parcels.

- SW7. A portion of the roof on the rear building will bypass the proposed infiltration basin. Show what treatment process will be used for this proposed impervious surface, and that it meets the standards as designed.

*LDG: This impervious area consists of proposed building roof which does not require treatment.*

**BETA3: The runoff from the roof is exempt from pretreatment only and that is only if it is piped directly into the BMP. Once this runoff contacts the ground it is subject to all the requirements of the Standards like any other impervious surface. Comment remains.**

**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.

SW8. The CN values used for the existing conditions show the site is in fair condition. Yet, aerial photography of the site indicates that the vegetation on site is well established. CN values should be adjusted to reflect this condition.

*LDG: The CN values have been revised accordingly.*

**BETA3: No further comments.**

**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 on site is predominantly Merrimac fine sandy loam with HSG A (high infiltration).

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

SW9. The runoff from the parking lot will flow overland from the gap in the granite curbing to the sediment forebay. The plans should demonstrate that this design will not result in increased erosion on the slopes down into the forebay from the flow.

*LDG: The parking lot flow is designed to enter the bioretention basin over grassed level area in accordance with the Massachusetts Stormwater Handbook.*

**BETA3: In accordance with Volume 2, Chapter 2 of the Handbook, to receive TSS removal credit the filter strip should be "as wide as the area draining to the strip." That is not the case in this design. BETA recommends that the designer consider the use of a sediment forebay in lieu of the filter strip. Based upon the impervious area within the watershed tributary to this point the forebay needs only 145.4 cubic feet of storage to qualify.**

**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 proposed impervious surfaces on site using a bioretention basin in series with an infiltration basin.

The project is required to treat the 1.0-inch water quality volume (See Standard 6). The static storage provided in the 2 basins is certainly sufficient to meet the intent of the standards and by laws, however this is dependent upon the design of the pretreatment required by the handbook.

SW10. The pretreatment provided by the sediment forebay is not sufficient to meet the standards. In accordance with Volume 2, Chapter 1 of the standards, the pretreatment required would be 44% TSS Removal for a basin in a critical area and with highly permeable soils.

**LDG:** *The sediment forebay has been replaced with a Bioretention Basin and Vegetated Filter strip, to provide 90% TSS removal in accordance with the Massachusetts Stormwater Handbook.*

**BETA3:** *See SW9 above.*

SW11. The MASS DEP TSS Removal sheet shown in the report is incorrect. In accordance with the standards, the pretreatment is a requirement to achieve the 80% TSS removal rate for the infiltration basin. Accordingly, you cannot count the removal achieved by the pretreatment in the totals.

**LDG:** *The sediment forebay has been replaced with a Bioretention Basin and Vegetated Filter strip, to provide 90% TSS removal in accordance with the Massachusetts Stormwater Handbook.*

**BETA3:** *See SW9 above.*

**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. Site does not qualify as a LUHPPL. Not Applicable*

**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. Infiltration basins are considered recommended uses for a Zone II.*

SW12. The report should be revised to indicate that the site is in a critical area as defined by the standards.

**LDG:** *The report has been revised accordingly.*

**BETA3:** *Comment addressed*

**REDEVELOPMENT (STANDARD NUMBER 7):** *Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable. The project is partially a redevelopment. However, the design does not use the credits associated with the redevelopment.*

**CONSTRUCTION PERIOD EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8):** *Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities.*

The project will disturb an area greater than one acre of land; therefore, a Notice of Intent with EPA and a Stormwater Pollution Prevention Plan (SWPPP) is required. The project proposes the use of erosion control barrier (straw wattle), catch basin inlet protection, and stabilized construction entrance.

SW13. The applicant is reminded that a Stormwater permit from the DPW is required prior to the start of construction.

**LDG:** *A stormwater permit from the DPW will be submitted for final review of DPW as necessary after the Planning Board approval.*

**BETA3:** *No response required.*

Mr. Gregory Rondeau, Chairman

December 1, 2022

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**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.

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

SW14. Provide signed illicit discharge compliance statement.

**LDG:** *A signed illicit discharge compliance statement is included in the revised stormwater report*

**BETA3:** *Comment addressed.*

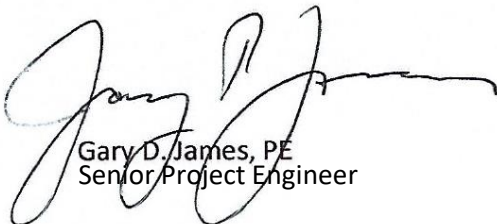
## SUMMARY

The plans have been revised in response to the prior review, with some additional expansion to the parking. Based upon the site location within the Water Resource Protection District, there are now several stormwater issues associated with the design that should be resolved to ensure compliance with the standards and the by-laws and protect the ground water and surface water quality within the district.

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

Very truly yours,

BETA Group, Inc.



Gary D. James, PE  
Senior Project Engineer

cc: Amy Love, Town Planner

# Town of Franklin

355 East Central Street  
Franklin, Massachusetts 02038-1352



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

## DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

**DATE:** November 30, 2022  
**TO:** Franklin Planning Board  
**FROM:** Department of Planning and Community Development  
**RE:** 704 Washington Street  
Site Plan

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The DPCD has reviewed the above referenced Site Plan application for the Monday, December 5, 2022 Planning Board meeting and offers the following commentary:

### **General:**

1. The site is located at 704 Washington Street in the Rural Residential I Zoning District (Assessors Map 322 Lot 030).
2. The applicant is proposing to demolish an existing house and construct 2 new group homes.
3. The Applicant is not required to file with the Conservation Commission.
4. The Applicant is exempt from Zoning, under the Dover Amendment, which would allow one residential structure on a lot in RRI.
5. Review letters have been received from BETA, DPW and Fire.

### **Comments from the August 8, 2022 meeting:**

1. Planning Board requested that snow storage be added. *Applicant has provided*
2. Details should be provided for curbing, landscaping and paving. *Applicant has provided*
3. The applicant will need to file with the Design Review Commission. *Applicant has received the recommendation.*
4. A lighting plan should be submitted showing the location of the lights.
5. Fire provided an updated letter.





November 28, 2022

Town of Franklin, Planning Board  
**Attn: Mr. Gregory Rondeau, Chair**  
**C/O Mrs. Amy Love, Planner**  
355 East Central Street  
Franklin, MA 02038

Re: 704 Washington Street  
Franklin, MA  
**LDG Proj. No.: 2013.00**

Mr. Rondeau and Members of the Board:

Level Design Group, LLC (LDG), on behalf of Amego, Inc., hereby submits the attached documentation for response to comments from Beta Group, Inc. of October 12, 2022.

#### GENERAL

G1. Overall, the site development will result in a disturbance of approximately 78,000 square feet. Since this is greater than 1.0 acre, the site development is subject to §153-1 of the Zoning by laws. In accordance with Article III. Post Construction Stormwater Management, a stormwater management plan which includes calculations is required. In accordance with Volume 1, Chapter 1, the site is also subject to the requirements of the Massachusetts Storm Water Standards. A stormwater design is provided however supporting calculations have not been submitted. These calculations including documentation of compliance with the standards and the bylaws is required.

BETA2. Overall disturbed area associated with the site development has been reduced but remains greater than an acre. Accordingly, the site remains subject to §153-1 of the by-laws. A stormwater report has been filed. Comments relative to the report are shown below. In addition, the limit of disturbance shown on the site does not encompass the proposed material stockpile area at the front of the site.

*Response: The limit of work has been revised to encompass all disturbance proposed by the revised design.*

G2. The site is located within the Water Resource Protection District and is also located within the limits of a Zone II to a public water supply well. These should be noted on the plans. This is defined as a **Critical Area** as it relates to the stormwater standards. In addition, although this is primarily a Board of Health issue, it does qualify as a Nitrogen Sensitive zone as it relates to the subsurface sewage disposal system.

BETA2: The Water Resource Protection District is a Zoning overlay and therefore should be noted accordingly on the site plans and on the Zoning summary table. The drainage report incorrectly states that the site is not located within a Critical Area and none of the stormwater features required to Address this location have been included in the design.

*Response: The plans have been revised to include a Bioretention Basin and the TSS removal calculations have been revised and are included in the report. Phosphorous removal calculations showing 60% phosphorous removal are included with this submittal.*

G3. There is a stone retaining wall along the frontage along Washington Street in front of the existing house. It is



unclear from the drawings whether this wall will be removed. Based upon its proximity to the sidewalk, BETA recommends that this portion of the wall be maintained, and the grading adjusted accordingly.

BETA2: A portion of the wall is now shown to be removed in accordance with the letter to provide sight distance. The sight distance needed should be shown to identify the extent of the wall removal needed. In addition, the grading that would be needed once the wall is removed should be shown. A note should also be added that any damage to the sidewalk resulting from the removal of the wall will be repaired to the satisfaction of the DPW.

*Response: A note has been added to the plans for clarity.*

G4. Along the easterly property line, the applicant is proposing to grade to the property line. BETA recommends that this proposed grade be moved outside the limits of the existing vegetation to allow that vegetative buffer along the property line to be maintained.

BETA2: The tree line shown on the plans as revised differs from the previous submission. Show the existing limit of vegetation and what impact will occur to the existing vegetation.

*Response: All portions of the existing treeline have been added to the Layout Plan and a note has been added for clarity.*

G5. The groundwater elevation reported at the proposed infiltration basin appears to be incorrect based upon the elevation of the bottom of the proposed leaching facilities for the subsurface sewage disposal system. The test pit logs as shown on the plan should be submitted to document the elevation reported.

BETA2: test pit logs have not been submitted; comment remains.

*Response: Test pit logs for drainage are included with this submission and are shown on the Grading & Drainage Plan.*

G6. The elevation noted for the benchmark directly behind the westerly structure appears to be incorrect. The elevation noted is 2.5' below the surface.

BETA2: Comment remains.

*Response: This benchmark has been removed from the plans.*

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

As shown on the schedule on the Zoning table on Sheet 4 of the set, the Site meets the requirements for lot area, depth, frontage, width. The proposed building will meet the front, side, and rear yards and building height is also identified as 3 stories; calculations for impervious coverage within the Water resource district should be corrected as noted below.

SCH1. Add a note to the plan that documents the percentage of lot coverage by the proposed impervious surfaces within the Resource District.

BETA2: Note has not been added comment remains.

*Response: A note has been added to the plans to address this comment.*

#### **SIGNS (§185-20)**

Provide details, sizes, and locations of any proposed signs on site if applicable.

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

Access to the Site is proposed via a 42'+ long, 14' wide driveway connected to Washington Street 32± feet from the existing driveway opening. The parking lot is located between the 2 buildings. Sidewalk access is provided from the parking area to the buildings. No sidewalk access is proposed to Washington Street.



As part of the proposed work, the existing curb cut will be abandoned. The proposed driveway entrance is approximately 32 ft east of the existing driveway. The existing granite curbing on Washington street will be removed to establish this opening.

As defined by the bylaw, 1.0 parking space is required per guest. Thus, for the 20 guests, 20 spaces are required and have been provided. Proposed parking spaces are 9' wide and 22' long, with a 24' wide access aisle.

P1. In accordance with the bylaws, the access driveway should be widened to 24'. If the waiver is requested, the minimum width should be 20' in accordance with NFPA requirements for fire and emergency vehicle access.

BETA2: The access driveway has been widened to 20' however, dimensions in the parking lot should be provided to show overall pavement dimensions. Waiver has not been requested.

*Response: Driveway dimensions have been added to the plans and a waiver will be requested. Though under the Dover amendment. This is a local requirement which exempts applicants from complying with public health and safety requirements.*

P2. For the proposed number of parking spaces, 1 space must be accessible.

BETA2: No HP space provided. Comment Remains.

*Response: A van accessible space has been added to the plans.*

P3. Provide HP accessible crosswalk across driveway.

BETA2: The site plans have been revised to use the existing driveway, no further comments.

*Response: The proposed driveway has been revised to be further from the existing retaining wall to provide improved sight distance. A handicapped accessible driveway apron has been provided.*

P4. In accordance with §185-21, C. (5). Parking lots for 20 or more cars shall contain or be bordered within 5' by at least one tree per 10 parking spaces, ....., with not less than 40 square feet of unpaved soil area per tree. Planting areas are identified between the pavement and the buildings, but no trees are identified.

BETA2: All landscaping notes have been removed from the plans and are no longer shown. Comment remains.

*Response: A Landscape Plan has been provided with this submission.*

P5. Show sufficient information on Washington Street, including existing driveway openings as required to document compliance with §185-21, C. (7) including sight distances at entrance.

BETA2: Sight distances not identified on plans; comment remains.

*Response: Sight distance has been added to the plans.*

P6. Show whether the existing driveway opening will be closed off. BETA will defer this issue to the Franklin DPW if granite curbing should be set to close it off.

BETA2: the site plans have been modified to use the existing opening. No further comments.

*Response: The proposed driveway has been revised and no longer uses the existing curb cut. Notes on closure are provided.*

### **SIDEWALKS (§185-28)**

An existing 5' wide sidewalk is present along Washington Street. There is no proposed pedestrian connection from the site to the sidewalk on Washington Street.

S11. Provide detail for the reconstructed sidewalk at the entrance and designate proposed curb type, if applicable.



BETA2: Sidewalk will not be modified as revised. Add note to plans to identify that any damage to the sidewalk in the construction process should be repaired to the satisfaction of the DPW.

*Response: A note has been added to the plans accordingly.*

### **CURBING (§185-29)**

No curbing is proposed on site. The planting bed between the parking and the buildings ranges from 16' - 22' wide. However, BETA recommends that as a minimum vertical concrete curbing be provided at the edge of the pavement between the spaces and the buildings to address safety concerns

BETA2: As revised, the plan now shows vertical granite curbing around the parking lot.

*No Response*

### **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. Materials required for design review as provided in §185-31.2. Design Review Commission should be provided. (§185-31.1.C(3)(q)).

BETA2: No further discussion required. BETA will defer this issue to the Board.

*No Response*

SP2. Provide data quantifying on-site generation of noise and odors (§185-31.1.C(3)(r)).

BETA2: Comment not addressed

*Response: There is no anticipated generation of noise or odor above levels at a standard residential property.*

SP3. Provide sight line information at the proposed entrance (§185-31.1.C(3)(t)).

BETA2: Not provided, comment remains.

*Response: Sight distance has been added to the plans.*

SP4. In accordance with §185-31.1.C(4)(a), the issue of traffic safety at the entrance into the site should be addressed by the Applicant to determine that it is protected. As noted in §185-31.1.C(3)(s), the description of traffic circulation, safety and capacity should be in sufficient detail for the board to make a determination of whether a traffic impact analysis is necessary.

BETA2: Not addressed, comment remains

*Response: The existing property is a single-family house with approximately 9 daily vehicle trips. The proposed use will be residential with no personal vehicles. Daily vehicle trips are based on group home size with expected average daily vehicles trips between 18-20 with current traffic on Washington at over 2,000 peak hour this change is negligible.*

SP5. In accordance with §185-31.1.C(4)(e) No site feature shall create glare or illumination which extends beyond a site's property lines and creates a hazard or nuisance to neighboring property owners. There are no exterior lights shown on the plans nor was a lighting plan submitted. The applicant should note if any lighting is proposed and provide intensity.

BETA2: As noted on the site plans, all lighting on site will be provided by residential fixtures mounted on the face of the building. However, the nature of the fixtures nor the intensity of the lighting has been shown.

Comment remains.

*Response: A Lighting Plan and Photometrics Plan has been included with this submission.*

## **SCREENING (§185-35)**

The project proposes outdoor parking for 10 or more cars which must be screened in accordance with this section.

**BETA2:** existing vegetation along the outside of the lot will be removed and additional plantings should be shown in accordance with this section of the bylaws. Site plan should identify existing vegetation to be removed in conjunction with the proposed development.

*Response: Proposed plantings for screening have been added to the Landscape Plans.*

## **UTILITIES**

The site plans do not show any utility connections with the proposed structure. Nor does it show any of the existing utilities which are connected to the existing dwelling and bar. Each of these should be shown on the site plans.

**BETA2:** Neither existing utilities nor proposed utility connections are shown on the site plans, comment remains.

*Response: Existing utilities and proposed utility connections have been added to the plans.*

## **STORMWATER MANAGEMENT**

### **GENERAL**

**SW1.** The site qualifies as a redevelopment and the untreated runoff back towards Washington Street should be shown to comply with this standard.

**BETA2:** Documentation for compliance with Standard 4 is not shown. Comment remains.

*Response: The total and impervious area directing runoff onto Washington St. under proposed conditions is less than under existing conditions. The proposed design will be an improvement over existing conditions which discharge untreated flows onto Washington Street from a larger impervious area than is proposed.*

**SW2.** The site is in a critical area. In addition, the soils have a high permeability rate. Accordingly, the pretreatment into the basin needs to be 45% to comply with the standards. The sediment forebay will only provide 25%, which is not sufficient. Additional pretreatment is required for the paved areas and the roof runoff that flows over the pavement into the forebay.

**BETA2:** Comment remains. Pretreatment provided does not comply with the standards.

*Response: The sediment forebay has been replaced with a Bioretention Basin and Vegetated Filter Strips to provide 90% TSS removal.*

**SW3.** The roof runoff as proposed will run onto the ground. The easterly building will flow overland to the basin. However, the roof runoff from the westerly building will be directed away from the basin towards the rear of the lot. It may qualify under the LID definition and should be discussed in the stormwater report.

**BETA2:** The revised site design has eliminated this issue. No further comments.

*No Response*

**SW4.** The proposed infiltration basin will be used to meet the requirements of both Standards 2 Peak Rate attenuation and 3 Recharge. Since the bottom of the basin as proposed is less than 4' above groundwater, a mounding analysis will be required.



BETA2: The input data in the mounding analysis is incorrect. Document how the saturated thickness of the aquifer is 288.55'. The percolation rate should be the Rawls rate as required in the Storm Water Standards.

*Response: The saturated thickness of 288.55' comes from the elevation at which redoximorphic features were observed during soil testing and represent the estimated seasonal high groundwater elevation for which the infiltration basin was designed. The percolation rate is equal to the Rawls rate converted from inches per hour to feet per hour.*

SW5. As previously noted, the site development will be subject to the EPA Construction General Permit and a Notice of Intent will need to be filed with the EPA and a **Storm Water Pollution Prevention Plan** prepared. The applicant is reminded to file and obtain a permit from the Town of Franklin DPW for the same also.

BETA2: No further discussion required.

*No Response*

SW6. The proposed infiltration basin has not been designed in accordance with the requirements of the standards. Specifically,

- a. The setback from the subsurface sewage disposal system is less than 50'.

*Response: The Infiltration basins and Subsurface sewage disposal system have been revised to provide a minimum 50' separation distance between them.*

- b. The grading at the emergency spillway is shown incorrectly on the plan. The spillway is depicted at crest elevation 293.0 not 292.0 as shown in the calculations and the plan. In addition, the spillway is shown below grade on the plans since it does not extend to the elevation 292 contour.

*Response: A detail have been added for clarity.*

- c. The dimensions for the spillway should be shown on the plan view.

*Response: Dimensions has been added accordingly.*

- d. The dimensions for the overflow weir from the sediment forebay should be shown.

*Response: Dimensions have been added accordingly.*

- e. The height of the embankment does not provide 1.0' of freeboard above the 100-year storm maximum water surface elevation. Show the top of the embankment.

*Response: The design has been revised to provide a minimum of 1.0' of freeboard.*

- f. There is no low-level emergency dewatering capability.

*Response: The basin will drawdown in less than 72 hours as shown in the stormwater report so low-level dewatering capability is not necessary.*

- g. There are no monitoring wells identified or shown

*Response: A monitoring well has been added to the Bioretention Basin.*

## 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 one new outfall from the infiltration basin. The site plan does not show the existing conditions far enough beyond the site to show what the impact of the outfall may be on abutting parcels.*

SW7. A portion of the roof on the rear building will bypass the proposed infiltration basin. Show what treatment process will be used for this proposed impervious surface, and that it meets the standards as designed.

*Response: This impervious area consists of proposed building roof which does not require treatment.*

**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.*

SW8. The CN values used for the existing conditions show the site is in fair condition. Yet, aerial photography of the site indicates that the vegetation on site is well established. CN values should be adjusted to reflect this condition.

*Response: The CN values have been revised accordingly.*

**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 on site is predominantly Merrimac fine sandy loam with HSG A (high infiltration).*

There are no logs provided for the test pits conducted in the basin.

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.

SW9. The runoff from the parking lot will flow overland from the gap in the granite curbing to the sediment forebay. The plans should demonstrate that this design will not result in increased erosion on the slopes down into the forebay from the flow.

*Response: The parking lot flow is designed to enter the bioretention basin over grassed level area in accordance with the Massachusetts Stormwater Handbook.*

**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 proposed impervious surfaces on site through the use of an infiltration basin.*

The project is required to treat the 1.0-inch water quality volume (See Standard 6). The static storage provided in the proposed infiltration basin will be approximately 3" of runoff from the impervious surfaces. Accordingly, the basin will provide the treatment required by the standards and the bylaws provided sufficient pretreatment is provided.

SW10. The pretreatment provided by the sediment forebay is not sufficient to meet the standards. In accordance with Volume 2, Chapter 1 of the standards, the pretreatment required would be 44% TSS Removal for a basin in a critical area and with highly permeable soils.

*Response: The sediment forebay has been replaced with a Bioretention Basin with a Vegetated Filter Strip to provide 90% TSS removal in accordance with the Massachusetts Stormwater Handbook.*

SW11. The MASS DEP TSS Removal sheet shown in the report is incorrect. In accordance with the standards, the pretreatment is a requirement to achieve the 80% TSS removal rate for the infiltration basin. Accordingly, you



cannot count the removal achieved by the pretreatment in the totals.

*Response: The sediment forebay has been replaced with a Bioretention Basin and a Vegetated Filter Strip and revised TSS calculations sheets are provided in the Stormwater Report.*

**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. **Site does not qualify as a LUHPPL. Not Applicable**

**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. Infiltration basins are considered recommended uses for a Zone II.

SW12. The report should be revised to indicate that the site is in a critical area as defined by the standards.

*Response: The report has been revised accordingly.*

**REDEVELOPMENT (STANDARD NUMBER 7):** Redevelopment of previously developed sites must meet the Stormwater Management Standards to the maximum extent practicable. The project is partially a redevelopment. However, the design does not use the credits associated with the redevelopment.

**CONSTRUCTION PERIOD EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8):** Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities.

The project will disturb an area greater than one acre of land; therefore, a Notice of Intent with EPA and a Stormwater Pollution Prevention Plan (SWPPP) is required. The project proposes the use of erosion control barrier, catch basin inlet protection, and stabilized construction entrance.

SW13. The applicant is reminded that a Stormwater permit from the DPW is required prior to the start of construction.

*The Stormwater Permit will be submitted for final Review of DPW as necessary after Planning Board approval.*

**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.

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

SW14. Provide signed illicit discharge compliance statement.

*Response: A signed illicit discharge statement is included in the revised Stormwater Report.*




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

Enclosed please find the following:

- Three (3) copies of revised site plans
- Three (3) copies of comment responses and supporting documentation

Truly yours,

**LEVEL DESIGN GROUP, LLC**



Daniel Campbell, P.E.  
Principal / Snr. Civil Engineer