



April 4, 2023

To: Ms. Breeka Li Goodlander, Agent
Town of Franklin Conservation Commission
355 East Central Street
Franklin, MA 02038

A&M Project #: 2712-02
Re: 25 Forge Parkway
Industrial/Warehouse
Response to
Review Comments

Copy: TMC Holdings & Development 2, LLC

Dear Ms. Goodlander,

Allen & Major (A&M) is in receipt of review comments for the above referenced project from BETA Group, Inc., dated March 29, 2023. Please find A&M's responses to these comments below. The initial comments are provided along with A&M's responses in **bold**. Comments that have been addressed have been omitted for ease of review.

A1. A file number has not yet been issued by the Massachusetts Department of Environmental Protection (MassDEP) as of March 28, 2022.

A&M Response: As of the date of this letter, the NOI is listed on the Mass DEP data portal, but no DEP file number has been issued.

A2. Include the date(s) and method(s) of the topographic survey in the plan notes.

A&M Response: The topographic survey is the result of an actual on the ground survey performed on or between April 1, 2021 and February 15, 2023. The vertical datum is NAVD 88, established using RTK GPS observation. This information is noted on the Existing Conditions, sheet V-101 in the upper right corner with the surveyor's certification.

A3. While the proposed topography is shown on Sheet C-103, the existing contours and labels are not all legible. In addition, all proposed contours should be labeled.

A&M Response: Contour labels have been revised and added on sheet C-103 to address this comment.

A4. While the buffer zones are labeled on all sheets, they are hard to identify on C-101 through C-103.

Recommend more clearly depicting the buffer zones on these sheets.

A&M Response: The appearance of the buffer zone lines has been revised and additional notation has been added to address this comment.

A5. Provide a Construction Schedule and Sequence in the plan notes, as required under Section 7.18.1.14. of the Bylaw.

A&M Response: These notes have been added to sheet C-101 as requested.

A6. Include assessors' references of the abutting properties.

A&M Response: The map and lot numbers for the abutters to address this comment.

A7. Provide the Erosion and Sedimentation Control Notes, as discussed in the Drainage Report, in the plan notes, as required under Section 7.12.1. of the Bylaw.

A&M Response: Erosion control notes have been added as requested, see sheet C-001.

W1. BETA concurs with the Applicant's identification of the W1-W9 Series as an IVW. Additionally, the boundary flagging of the W1-W9 Series appeared accurate, and all flags were found in the field.

No response required.

W2. The Wetland Border Report included within the Notice of Intent indicates that the GC 1-30 Series is the boundary of Bank/BVW. Based on field observations, the GC 1-30 Series generally delineates the Bank/Mean Annual High-Water Mark (MAHW), whichever is higher, per the Bylaw's definition of Bank. While the GC 1-30 Series accurately delineates the boundary of protected Resource Areas, the delineation report does not differentiate between flags that delineate Bank from BVW. It is recommended that the Commission approve the flagged boundary for this filing only, with a recommendation that if any future Projects are proposed onsite, an updated delineation will be required.

No response required.

W3. The stream located east of the Site is referred to as intermittent within the NOI narrative. The Applicant should provide proof of the stream's status as intermittent using the Stream Stats method identified in 310 CMR 10.58 (2)(a)1.c.i. to ensure that the stream does not meet the definition of a River/perennial stream.

A&M Response: We have reviewed StreamStats and confirmed that the stream is intermittent. Flow during the 99 Percent Duration is undefined, which is less than the 0.01 CFS for perennial, and the Drainage Area is 0.0579 square miles, which is less than the required 0.5 square miles. The StreamStats Report is included in the appendix of the Notice of Intent.

W4. The proposed erosion control boundary does not extend along the eastern limit of work. The Applicant should extend the erosion controls around the perimeter of the Site.

A&M Response: The erosion control boundary has been revised as requested.

W5. Installation of the proposed drainage network east of the building will require a trench depth of approximately ten feet. The Applicant should confirm there is sufficient space to install the drainage network along the eastern limit of work to ensure no additional clearing will be required.

A&M Response: The tree clearing line has been revised to ensure that it will accommodate the trenching required for the drainage installation.

W6. Given the depth of excavation for installation of the drainage network (Comment W5), the Applicant should indicate whether dewatering is anticipated for construction. If dewatering is anticipated, the plans should be revised to include a dewatering detail and to depict the dewatering discharge location.

A&M Response: Dewatering may be required for the construction of the building addition and trenching. A dewatering location has been added to sheet C-101 to address this comment. Any dewatering will be kept on site using a temporary recharge pit within the limit of disturbance.

W7. Given the slope of the proposed riprap along the northwestern limit of work, supplemental erosion controls are recommended at the limit of work.

A&M Response: An additional row of tubular barriers has been added to the Site Preparation Plan, sheet C-101, in the vicinity of the rip rap slope, as requested.

W8. Detail 4 on Sheet C-503 depicts a 3-foot-wide riprap toe along the bottom of the riprap slope, however, this is not depicted along the toe-of-slope in plan-view on Sheet C-103. The plans should be updated to depict the limit of proposed riprap.

A&M Response: The riprap hatching has been revised to include the 3-foot wide toe along the bottom of the slope, as requested.

W9. The Applicant should note the proposed methods of post-construction stabilization on the Plan Set.

A&M Response: All disturbed areas shall be loamed and seeded. This has been noted on the Landscape Plan, sheet L-101.

W10. Although generally outside of the Commission's jurisdiction, the Applicant should note the method of stabilization within the "Snow Storage" area northeast of the paved contractor yard on the plans. Consideration should be given to the use of a conservation seed mix for stabilization in these areas.

A&M Response: Conservation seed mix has been included on the Landscape Plan, sheet L-101.

W11. The Project complies with the local 25-foot No-Disturbance and 50-foot No-Structure performance standards.

No response required.

W12. The Applicant has provided calculations pursuant to Section 4.4.1 of the Bylaw Regulations indicating that less than 30% of the 50-100 foot buffer zone is proposed to be impervious. To confirm these calculations are accurate, the Applicant should depict the areas included in the calculations on a plan.

A&M Response: A figure depicting the areas described in the comment above has been added to the appendix of the Notice of Intent, to address this comment.

W13. While the Resource Area Impact Summary Form has been submitted pursuant to Section 7.1.4 of the Bylaw Regulations, the impacts quantified appear to only include the proposed area of impervious surface. The alteration to buffer zone should include all impacts, including areas of clearing, grading, and the proposed riprap slope.

A&M Response: The Resource Area Impact Summary Form has been revised as requested.

W14. The following materials must be submitted per the submission requirements of the Bylaw Regulations:

a. A Construction Sequence and Schedule (Section 7.15); and

A&M Response: These notes have been added to sheet C-101 as requested.

b. A Functions and Characteristics Statement (Section 7.10)

A&M Response: This statement has been added to the Notice of Intent report.

Very Truly Yours,

ALLEN & MAJOR ASSOCIATES, INC



Brian D. Jones, PE
Senior Project Manager

Attachments:

1. Site Development Plans, revised as of April 4, 2023
2. Notice of Intent report, revised as of April 4, 2023