



December 15, 2021

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

**Re: Washington Street (Franklin Flex Space)  
Site Plan Peer Review Update**

Dear Mr. Rondeau:

BETA Group, Inc. has reviewed revised documents for the project entitled *Site Plan Washington Street* in Franklin, Massachusetts. This letter is provided to update findings, comments, and recommendations.

## **BASIS OF REVIEW**

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

- Plans (10 sheets) entitled: Site Plan Washington Street, dated June 28, 2021, revised to November 22, 2021, prepared by United Consultants, Inc. of Wrentham, MA.
- Drainage Analysis, dated June 28, 2021, revised November 22, 2021, prepared by United Consultants, Inc., supplemented by:
  - Operation and Maintenance Plan and Stormwater Facilities Plan
  - Watershed Plans
- Photometric Plan, dated August 25, 2021, prepared by SK & Associates of Canton, MA.
- Site Plan Approval Submittal, including:
  - Form P
  - Certificate of Ownership
  - Certified Abutters List
- Supplemental Documents, including:
  - Presto Geosystems – evaluation of Slope Protection System
  - Fujitsu Inverter Heat Driven Pump specifications
  - Contech Stormceptor Operation and Maintenance Guide
  - Contech CDS Operation and Maintenance Guide
- Response to Peer Review Comments, dated November 30, 2021, prepared by United Consultants, Inc.

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

**BETA GROUP, INC.**

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## COMPILED REVIEW LETTER KEY

BETA reviewed this project previously and provided review comments in a letter to the Board dated October 11, 2021 (original/previous comments in standard text), United Consultants, Inc. (UC) provided responses in a letter dated November 30, 2021 (responses in *italic* text). This letter provides BETA's updated comments on the status of each (latest status in **standard bold text**).

## INTRODUCTION

The project site includes a 5.257± acre parcel (#304-064) located along Washington Street in the Town of Franklin (the "Site"). The Site is located within the Industrial zoning district and the water resources overlay district. Parcels to the west are also within this zoning district and generally include undeveloped woodlands. Parcels to the east are within the Single Family Residential III district and generally include low-density residences. Spring Pond abuts the Site to the west.

The existing Site is primarily undeveloped woodlands. A gravel access road is present on the southern side of the Site which continues offsite to the west. A 50' Right-of-Way located on Parcel 305-004 abuts the Site to the southwest.

Topography at the Site is generally directed to the west towards Spring Pond. Bordering vegetated wetlands are located along the pond, and the 100-foot wetland buffer zone extends onto the Site. A FEMA- mapped 100-year floodplain (Zone AE) is present around Spring Pond. The Site is within a Zone II Wellhead Protection Area. The Site is not located within 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).

The project proposes to construct three industrial buildings with footprints of 15,000± sq. ft. each. Parking areas and driveways are proposed along the northern side of the buildings. The parking areas will connect to an access driveway which crosses the 50' ROW to connect to Washington Street near the existing gravel access road entrance. Additional Site alterations include tree clearing, grading, fencing, guardrails, retaining walls, signage, tree plantings, septic systems, propane tanks, and utilities (water, electric, telecommunications). Stormwater management is proposed via three subsurface infiltration systems. Runoff is directed to these systems via new catch basin and manholes connections, and overflows are directed west towards Spring Pond through new outfalls.

## FINDINGS, COMMENTS, AND RECOMMENDATIONS

### GENERAL

- G1. Confirm legal right to construct portions of the Site on land owned by the New England Power Company (Lot 305-004). *UC: The applicant and his attorney have been communicating with New England Power Company. The site plans will be filed with New England Power Company to obtain final approvals.* **BETA2: Information provided. BETA notes this is a private property matter; however, the Board may wish to note this in their findings if the project is approved.**
- G2. Provide typical section views and necessary installation details for proposed Geoweb areas adjacent to parking areas, guardrail, retaining walls, and fence. Notes included on Sheet 10 indicate that "tendons" will be installed, which may require work beyond the top of slope or easterly property line. In consideration that the supported 1:1 slopes are proposed adjacent to residential properties and wetland resources, the designer should clarify if there are any local

installations that confirm adequate long-term performance. Also clarify if final designs will require the stamp of a structural or geotechnical engineer. *UC: A Presto Geosystems document dated August 31, 2021 has been provided. The document has been provided in the supplemental documents.* **BETA2: As noted in the referenced documents, the provided design is for surface stability only and assumes that the underlying slope is stable against failure. If the Board elects to approve the project, BETA recommends a condition of approval that requires slope stability to be evaluated by a geotechnical engineer and that a representative of the Geoweb manufacturer is onsite during construction to ensure the system is installed as designed.**

- G3. Clearly identify the start and end of all proposed retaining walls. *UC: The retaining walls have been eliminated due to revisions.* **BETA2: Walls removed. Issue dismissed.**
- G4. Identify or adds note(s) on the Planting Plan to clarify the location of areas to be loamed and seeded. *UC: A general site planting note has been added to sheet 5.* **BETA2: Information provided. Issue resolved.**

## ZONING

The Site is located within the Industrial (I) Zoning District. The proposed uses include:

- Light manufacturing, permitted by right (P/SP)
- Warehouse, permitted by right (Y)
- Office, permitted by right (Y or P/SP)

Information has been provided indicating that the anticipated water use is not greater than 15,000 gallons per day. Therefore, a special permit from the Board of Appeals is not required.

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

The Site meets the requirements for lot area, frontage; front and rear yards; impervious coverage, and building height. The required depth is provided between the rear lot line and a section of frontage that is not part of the required continuous frontage. The Site does not meet requirements for lot width and a note has been provided to refer to Section §185-10.B. (Nonconforming Lots).

- Z1. Confirm with the Building Commissioner that the required lot depth does not need to be provided along the section of frontage associated with the required continuous frontage of the lot. *UC: The applicant's attorney is completing a zoning letter regarding this matter.* **BETA2: Information provided. Upon receipt of the letter, BETA will defer to the Building Commissioner and or Town Counsel on this issue.**
- Z2. Provide documentation confirming that the Site is exempt from the lot width requirements. BETA notes that Section §185-10 does not reference lot width; however, some exceptions are provided for lot width under §185-3. *UC: The applicant's attorney is completing a zoning letter regarding this matter.* **BETA2: Information provided. Upon receipt of the letter, BETA will defer to the Building Commissioner and or Town Counsel on this issue.**
- Z3. Provide proposed building height, in feet, to evaluate required yard widths to the extent applicable. Per §185 Attachment 9, Note 5, the required side and rear yard widths must be increased by the common building height of a structure when abutting a residential district or use. BETA notes the yard width provided along the eastern lot line is only 31', and this yard abuts a residential use. *UC: The proposed building height of 22' has been added to sheet 1.* **BETA2: Information provided. BETA has requested for the Building Commissioner to issue a**

**determination on the proposed development's conformance to the Bylaw and will provide the Board with an update upon receipt of correspondence.**

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

Access to the Site is proposed via a new 24'± wide driveway connected to Washington Street. The driveway will cross through an existing 50' right-of along the abutting Lot 305-004. The driveway will connect to several new parking areas located adjacent to the proposed buildings which will provide a total of 132 new parking spaces (revised to 144). Proposed parking spaces are 9' wide and 19' long, with 24' min. access aisles. The project will provide 4 accessible parking spaces (revised to 5), 2 of which will be van accessible, which is fewer than the required number of accessible spaces. The project requires the installation of 14 shade trees, which have been provided on the perimeter of the parking area.

Parking requirements for the Industrial Zoning District are defined by the Zoning Bylaw:

- Industrial buildings: 1 Space required per 400 sq. ft. of gross floor area.
- Offices: 1 space required per 250 sq. ft. of gross floor area.
- Warehouses: 1 space required per 1,000 sq. ft. of gross floor area.

For the proposed building layout, the total required parking is 125 spaces, and the provided parking layout satisfies this requirement.

- P1. Clarify if access will be maintained to the existing gravel road which extends west from the Site along the New England Power Company property. *UC: A curb cut has been proposed and the location is shown on sheet 3-6.* **BETA2: Plans revised. Issue resolved.**
- P2. Provide typical dimensions for driveway widths and parking spaces. *UC: Typical driveway and parking spaces dimensions have been added to sheet 3.* **BETA2: Information provided. Issue resolved.**
- P3. Provide one additional accessible parking space to satisfy ADA requirements. *UC: Five total handicap parking spaces have been provided. Sheet 3.* **BETA2: Space provided. Issue resolved.**
- P4. Provide a sign for the accessible parking at Building 2. *UC: A sign has been added on sheet 3.* **BETA2: Plans revised. Issue resolved.**
- P5. Revise location of accessible spaces so that they are located within 200 feet (preferably closer) of all accessible entrances or provide drop off areas in accordance with 521 CMR 23.3.3. Confirm that an accessible route is provided from accessible spaces to all building entrances. *UC: A handicap space is located within 200 feet of all accessible entrances on the parking lot side of the 3 proposed buildings.* **BETA2: Layout revised. Issue resolved.**
- P6. Provide calculations for sight distance at proposed entrance/exit ways (§185-21.C.7(a)). *UC: Sight distance calculations and information have been added to sheet 4.* **BETA2: Information provided. Issue resolved.**
- P7. Provide a detail for the proposed sidewalk and ramp(s) located to the south of Building 1, with detailed grading, as needed. The location of transition curbs should also be designated. *UC: A detail has been added to sheet 10.* **BETA2: Detail provided; however, grades indicate a running slope exceeding 5%. As such, this portion of the walkway is considered a ramp that requires handrails in accordance with 521 CMR 24.5.**

### **INDUSTRIAL DISTRICT PERFORMANCE CONTROLS (§185-22)**

The project is located in the Industrial District and must conform to this section.

- I1. Provide information quantifying sound, noise, vibration, odor, and flashing anticipated to be produced at the Site. Confirm that all such disturbances will not be perceptible at a distance 100 ft from the originating premises into the abutting residential district (§185-22.A). *UC: Notes to address the above have been added to sheet 4. BETA2: Note provided. BETA recommends for the Board to discuss options to ensure conformance with the referenced regulation, such as post-construction monitoring or including special conditions of approval.*

### **EARTH REMOVAL REGULATIONS (§185-23)**

The project proposes significant changes to existing grading and thus may be subject to this section.

- E1. The applicant is advised that anticipated earth removal must be quantified and, if necessary, a permit obtained from the Board of Appeals. *UC: A Special Permit has been applied for with the Zoning Board of Appeals. BETA2: Information provided. No further comment.*

### **FLOODPLAIN DISTRICT (§185-24)**

A portion of the Site is located within a FEMA-mapped 100-year flood zone (Zone AE) associated with the nearby Mine Brook and Spring Pond; however, proposed work within the flood zone is limited to the installation of a rip rap pad, which is anticipated to result in no net fill.

- FP1. Identify that a portion of the Site is within Flood Zone AE and note its associated elevation. *UC: The flood zone line is provided on sheets 2 - 6. The Zone AE designation and elevation have been added. It should be noted that the project revisions include filling and compensation of the flood plain. BETA2: Flood zone limits provided. BETA will provide evaluation of Flood Zone impacts as part of the Conservation Review.*

### **SIDEWALKS (§185-28)**

No sidewalks are present along Washington Street in the vicinity of the project, and as the Site is within an Industrial District no sidewalks are required along the frontage. Sidewalks within the site are limited to a section along the southern side of Building 1. Refer to Parking, Loading, and Driveway Requirements section for comments.

### **CURBING (§185-29)**

The project proposes vertical reinforced concrete curbing along the perimeter of paved areas.

- C1. Clearly identify the beginning and end of proposed curbing throughout the site. *UC: Curb labels have been added throughout the site. Sheet 3. BETA2: Design intent clarified. Issue resolved.*
- C2. Provide vertical granite curb within the Washington Street right-of-way. *UC: Vertical Granite Curb labels have been added. Sheet 3. A vertical granite curb detail has been added. Sheet 7. BETA2: Plans revised. Issue resolved.*

### **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. Depict limits of Zone II Wellhead Protection area and the Water Resources District (§185-31.1.C(3)(h)). *UC: The entire site is located within the Water Resource District. See note on page 1.* **BETA2: Information provided. Issue resolved.**
- SP2. The designer has requested a waiver from §185-31.1.C(4)(e), requiring that no illumination may extend beyond a Site's property line. The lighting plan shows illumination extending onto the eastern residences. The designer should evaluate if additional measures can be implemented to mitigate spillage, such as providing cutoffs, adjusting light locations, or lowering the mounting height to be equal to or lower than the top of the proposed screening fence. *UC: The site lighting has been revised. The waiver is still being requested for light spillage at the site entrance.* **BETA2: The lighting has been revised to eliminate spillage onto residentially used parcels and remaining spillage is limited to a portion of a vacant lot owned by the NE Power Co. BETA notes that the requested waiver appears reasonable and defers to the preference of the Board.**
- SP3. Indicate proposed limits of tree clearing (§185-31.1.C(3)(k)). *UC: Tree clearing labels have been added to sheet 4.* **BETA2: Information provided. Issue resolved.**
- SP4. Evaluate if the seven parking spaces that exceed what is required by the Bylaw are necessary for site operations. Reducing the number of parking spaces at the northern end of the site could potentially eliminate approximately 5,000 sq. ft. of pavement and portions of several retaining walls, which will reduce potential impacts on nearby resource areas (§185-31.1.C(4)(f)). *UC: The parking area has been reconfigured and the retaining walls have been eliminated. The parking count has been increased. The impervious areas have been located further away from the wetland resource areas.* **BETA2: Comment noted. BETA notes the reconfigured parking is located farther from the wetlands but does increase the overall impervious area. The proponent should clarify if the 19 parking spaces in excess of what is required by the Bylaw is necessary for site operations. Notes on the plan indicate that excess parking spaces will be used for snow storage.**

### **SCREENING (§185-35)**

The project proposes outdoor parking for 10 or more cars which must be screened in accordance with this section. Residential districts abut the property to the east, which are at a higher elevation than proposed parking areas.

The project proposes a six-foot high green vinyl stockade fence along the eastern property line to provide the required screening. Visibility of the majority of parking areas will further be mitigated by the proposed buildings, except for the southeastern lot.

A planting plan has been provided, which proposes the installation of American Elm, Red Maple, and White Birch.

- S1. Provide required greenbelt for Industrial districts located within 500 feet of an adjacent residential structure (§185-35.C). *UC: The property is located within an Industrial District and abuts a residential district which has single family residential houses. The single-family residential houses are an allowed use in the residential district. As such it does not appear that a greenbelt is necessary. It should be noted that the residential properties are screened from the industrial property by a six-foot-high solid stockade fence. Additional evergreen plantings have been added at the southeastern boundary.* **BETA2: It is BETA's interpretation that the greenbelt is required for uses in the business or industrial districts that are prohibited in the abutting residential district. The proposed uses of warehouse and light manufacturing are prohibited in the adjacent Single-Family III district, and office uses are generally prohibited or require a special permit. The**

**Board may wish to consider requesting a determination on the Bylaws intent from the Building Commissioner.**

- S2. Clearly indicate extents of proposed vinyl fence; the linework appears to overlap with that of the property line. Also, confirm the fence can be installed/maintained on the property line without encroachment onto the adjacent lot. *UC: The proposed fence will be located within 6" of the property boundary.* **BETA2: Clarification provided. Issue resolved.**
- S3. Extend screening to include the southeastern boundary of the Site to screen views from the adjacent residential uses across the street. *UC: We have added 15 arborvitae to the southeast boundary of the site.* **BETA2: Screening provided. Issue resolved.**
- S4. Provide proposed building heights and confirm if roof equipment, if proposed, will be readily visible from abutting residences. *UC: The proposed building height of 22 feet has been added to the zoning table. Sheet 1.* **BETA2: Height provided. The building roofs will be at approximate elevation 282', which exceeds the screening fence elevation of 278' to 280'. BETA recommends for the Board to require screening of rooftop equipment, if provided.**

**WATER RESOURCES DISTRICT (§185-40)**

The project is located within the Water Resources District and a Zone II Wellhead Protection District.

- WD1. Confirm that proposed manufacturing activities will not involve the manufacture, storage, or disposal of toxic or hazardous materials, including storage within the industrial wastewater holding tanks (§185-40.D.1(a)). *UC: A note has been added to sheet 4.* **BETA2: Note provided. Issue resolved.**
- WD2. The project proposes the underground storage of propane, which is considered a hazardous material; however, BETA notes that any leakage would become airborne and is not anticipated to be prohibited in the spirit of (§185-40.D.1(d)). *UC: Agreed.* **BETA2: No further comment.**
- WD3. Section §185-40.D.(1)(l)(ii) requires that the proposed groundwater recharge efforts must be approved by a hydrogeologist; however, the proposed stormwater management system will fully comply with the Massachusetts Stormwater Management Standards, including discharges to a Zone II, and no adverse impacts to groundwater are anticipated as a result of the project. BETA defers to the preference of the Board to require approval by a hydrogeologist. *UC: Agreed, the project has been designed to comply with the stormwater standards.* **BETA2: No further comment.**
- WD4. Provide calculations demonstrating conformance with §185-40.D.1(l) and (k). *UC: Calculations have been added to sheet 4.* **BETA2: Calculations provided. The proposed GPD is below the maximum allowed under this section. Issue resolved.**
- WD5. Indicate spill control measures to be implemented to protect the district against hazardous materials discharge (§185-40.E(1)). *UC: Spill control measures have been added to sheet 4.* **BETA2: Measures provided. Issue resolved.**
- WD6. The Applicant is advised that placement of construction fill in excess of 15 cubic yards must comply with §185-40.E(5) and a note should be placed on the plans indicating such. *UC: A note has been added to sheet 4.* **BETA2: Information provided. Issue resolved.**

## UTILITIES

The project proposes the following utilities:

- Water: 8" CLDI water main, 4" Fire service, and 2" domestic.
- Sanitary sewer: On-site septic system.
- Electric, Telephone, and CTV: Underground conduit, one utility pole, and transformer.
- Gas: Three underground 200-gallon propane tanks.

Detailed review of utilities and fire service is anticipated to be provided by the Department of Public Works, Fire Chief, and Board of Health, as applicable.

- U1. A note provided on the Site Layout Plan indicates that loading areas are to be provided within the building bays and it is anticipated that floor drains and oil separators will be required per plumbing code and or Title V regulations. BETA notes that the septic and sanitary systems will need to be approved by the Board of Health and a note on the Grading and Utility Plan indicates such. *UC: Agreed. BETA2: No further comment.*
- U2. Notes provided on the Grading and Utility Plan indicate that water systems (domestic and fire) are shown schematically. Clarify if any initial coordination has taken place with the Fire Chief regarding the potential need for on-site hydrants. The proposed layout should also indicate typical locations for gate valves and boxes. *UC: Additional gate valves, curb stops, and tee's have been added and labeled. Sheet 4. We have provided the hydrant location to the fire department. We anticipate an updated response from the fire department. BETA2: Information provided. BETA defers to the Fire Department on hydrant locations.*

## STORMWATER MANAGEMENT

Stormwater management is proposed via three subsurface infiltration systems. Runoff will be conveyed to these systems via trench drains and catch basin to manhole connections. Overflow from the systems will be discharged via three new outfalls into the wetland buffer zone to the west, where it will flow into Spring Pond. Several of the catch basins and manholes will also function as water quality units.

The project is subject to the Massachusetts Stormwater Management Standards outlined in the MA Stormwater Handbook (MSH). In addition, the proposed development will disturb greater than one acre; therefore, the project is subject to Chapter 153: Stormwater Management of the Town of Franklin Bylaws as well as Chapter 300-11 of the Town of Franklin Subdivision Regulations. Compliance with the standards, the bylaw, and best engineering practices is outlined in the following sections.

### GENERAL

- SW1. Provide calculations to demonstrate that the project will 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 (§153-16.A(1)(a)). *UC: Calculations have been added to sheet 9. BETA2: Information provided. Issue resolved.*
- SW2. Provide signature on MassDEP Stormwater Checklist. *UC: The MassDEP Checklist has been signed. BETA2: Signature provided. Issue resolved.*
- SW3. Clarify how runoff from the Site driveway will be directed to the stormwater management system. Proposed grading will direct flows through the proposed curb break on Lot 305-004. *UC: A gutter detail has been added to sheet 10. BETA2: Driveway revised to include a 3" lip. Issue resolved.*



- SW4. Clarify how roof runoff is intended to be directed to the trench drains, such as direct connection from roof leaders or overland. If it is the latter and the buildings will be without gutters, then crushed stone or riprap should be provided at the drip edge to prevent erosion. *UC: The roofs are not intended to have trench drains. Crushed stone has been added. A detail has been added to sheet 10.* **BETA2: Information provided. Issue resolved.**
- SW5. Review and revise invert of CB-2, as necessary, which is shown below inlet invert for DMH-1. *UC: The invert of CB-2 has been revised.* **BETA2: Invert revised. Issue resolved.**
- SW6. Provide detail for trench drains. *UC: A trench drain detail can be found on sheet 9.* **BETA2: Detail provided. Issue resolved.**
- SW7. Confirm pipe material proposed for trench drains, noted as PVC on the drainage table and as HDPE at the connection to RCP. *UC: The HDPE label has been added to the drainage table.* **BETA2: Pipe material clarified. Issue resolved.**

#### **MASSACHUSETTS STORMWATER MANAGEMENT STANDARDS:**

**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 three new outfalls which will discharge to the wetland buffer zone associated with Spring Pond. All runoff through these outfalls will first be treated by deep sump catch basins, subsurface infiltration systems, and, for some areas, water quality units. Riprap aprons are proposed at outlets to mitigate erosion.

- SW8. Evaluate how flows entering the site from Washington Street will be directed and discharged. If overland, discharges are anticipated to require energy dissipation to mitigate erosion potential. *UC: We have had discussions with the Town Engineer regarding the existing catch basin located to the north of the site drive. The entrance has been redesigned to allow for the existing catch basin to be located along the revised curb line. The watershed area was revised to allow for the additional flow from Washington Street.* **BETA2: Information provided. There appears to be a significant area of Washington Street directed to the basin and the designer should evaluate the grate's capacity vs. calculated peak flow rates. Any bypass flows must be incorporated into hydrologic models to ensure they will not adversely impact the proposed stormwater management systems.**

**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 an increase in overall impervious area and removal of existing woodlands. Three subsurface infiltration systems are proposed to control stormwater runoff. The provided calculations indicate a decrease in post-development peak discharge rates and total runoff volumes compared to pre-development conditions. All proposed infiltration systems will be located a minimum of 100 feet from residential property lines and would therefore meet required setbacks to private wells (100 feet) and septic systems (50 feet), if present.

- SW9. Expand watershed plans to include any runoff from Washington Street that enters the site in the existing and proposed conditions. The existing driveway entrance is at a low point and current flow patterns appear to discharge runoff from the street over a riprap pad. *UC: See response to SW8 above. The post development watershed map has not been revised to reflect the catch basin*

*at the proposed curb line and the Washington Street watershed contributing to the site storm-water system. **BETA2: Watershed plans revised. Issue resolved.***

SW10. Depict proposed tree line on the watershed plans. Review area of “Woods” used for model of Watersheds TR11, TR12 and TR13; Based on assumed tree clearing limits, the area depicted on the plans is significantly lower than that used in the model. *UC: The proposed tree line has been added to the post-development watershed plan. The areas were revised to reflect the proposed grassed slope. **BETA2: Areas revised. Issue resolved.***

SW11. Revise model for Watershed S17 to include the impervious area representative of the proposed retaining walls. Review area of Grass and Woods used for this watershed; it appears that the area used for Grass should actually be modelled as woodlands and vice-versa. *UC: The retaining walls have been eliminated. The Grass and Woods areas have been revised. **BETA2: Areas revised. Issue resolved.***

**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). Three subsurface infiltration systems are proposed to provide recharge in excess of what is required, and calculations have been provided showing that BMPs will drain within 72 hours.

The Applicant has conducted test pits at the Site, finding that the subsurface soils generally consist of Sandy Loam underlain by Sand & Gravel. In-situ hydraulic conductivity tests have been conducted to determine design exfiltration rates for stormwater BMPs and are based on one half of the lowest value determined in the field. BETA notes that test pits were conducted in June, outside of the seasonal period for high groundwater; however, due to the depth of the test pits, groundwater issues are not anticipated.

SW12. Provide relevant notes and specifications for fill materials to be placed around and below proposed infiltration systems. Portions of Pond 3 will be located significantly above the existing ground (6± feet) and fill materials must have an exfiltration capacity equal to or greater than the parent materials below. Restrictive A and B horizons must also be fully removed below the proposed system. *UC: Notes for soil removal and fill material specifications have been added to sheet 9. **BETA2: Notes provided indicating that proposed fill material is intended to reflect granular sand. 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 a treatment train consisting of deep sump catch basins, water quality units, and subsurface infiltration systems. The treatment train will provide the required TSS removal and water quality volume. As the project is within a wellhead protection area, treatment trains have been designed to provide the required 44% TSS pretreatment prior to infiltration.

**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 narrative claims that this standard does not apply. However, the project may qualify as a Land Use with Higher Potential Pollutant Load (LUHPPL) under the definition of a “light industrial activity.” The proposed BMPs are considered suitable for use in a LUHPPL.

SW13. Clarify if any of the potential industrial activities are subject to the NPDES Multi-sector permit or have the potential to be classified as a LUHPPL. If so, evaluate if additional BMPs are required and update narrative as necessary. If the project is approved, BETA recommends a condition that requires all industrial activities to take place entirely within the buildings. *UC: The owner will not be allowed to lease or sell units to tenants with industrial activities that are subject to the NPDES Multi-sector permit. All industrial activities will take place within the building. The applicant is amenable to this as a condition of approval.* **BETA2: Information provided. If the Board elects to approved the project, BETA recommends for the Board to include this as a condition of approval.**

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

The project proposed discharges to a Zone II Wellhead Protection area, which is a critical area. The project has been designed to provide 44% TSS pretreatment and infiltrate the 1.0-inch water quality volume. Proposed BMPs are considered suitable for use in a Zone II Wellhead Protection Area.

SW14. Provide source control and pollution prevention plan for industrial activities to ensure resource areas are protected. If potential tenants are unknown and the project is approved, BETA recommends a condition the requires source control and pollution plans to be submitted for each industrial tenant prior to occupancy. *UC: As tenants are not known, the applicant is amenable to this as a condition of approval.* **BETA2: Information provided. If the Board elects to approved the project, BETA recommends for the Board to include this as a condition of approval.**

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

The project is not a redevelopment - **not applicable.**

**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 greater 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 stabilized construction entrance.

**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.

SW15. Provide information from manufacturer regarding inspection and maintenance requirements for water quality units. *UC: The inspection and maintenance requirements have been provided in the supplemental documents packet.* **BETA2: Information provided. Issue resolved.**

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

The project narrative indicates that the owner will provide a signed illicit discharge statement during application for a stormwater permit.

SW16. If the project is approved, BETA recommends a condition that requires the signed statement to include a pollution prevention plan with measures to prevent illicit discharges to the stormwater management system, including wastewater discharges and discharges of stormwater

Mr. Anthony Padula, Chairman

December 15, 2021

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contaminated by contact with process wastes, raw materials, toxic pollutants, hazardous substances, oil, or grease. *UC: The applicant will provide a signed illicit discharge statement with the SWPPP.* **BETA2: Information provided. If the Board elects to approved the project, BETA recommends for the Board to include this as a condition of approval.**

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

December 16, 2021

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

**RE: Site Plan – Washington Street Flex Space**

Dear Mr. Chairman and Members:

We have reviewed the revised materials for the subject project and our previous comments have been addressed.

However, we would like to point out that while the site design has been modified from the previous submission, there are still significant 1 on 1 slopes around the perimeter of the site that range from 12 to 20 feet high. The plans call out for Geoweb slope reinforcement to be used in these areas, a detail for which is in the plans.

Our specific concern is the steepness and height of the slopes behind the proposed buildings and the fact that the top of these slopes start right at the property line for the abutting homes. There is also a six foot high vinyl fence to be installed at the top of this slope and we're also concerned about the stability of the fence over time.

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

Sincerely,

Michael Maglio, P.E.  
Town Engineer

# 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:** December 15, 2021  
**TO:** Franklin Planning Board  
**FROM:** Department of Planning and Community Development  
**RE:** Washington St  
Site Plan

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The DPCD has reviewed the above referenced Site Plan application for the Monday, December 20, 2021 Planning Board meeting and offers the following commentary:

### **General:**

1. The site is located on Washington St in the Industrial Zoning District (Assessors Map 304 Lot 064).
2. The applicant is proposing to construct three (3) buildings, access road with stormwater management system and septic.

### **Waivers:**

- To allow less than 42" of cover over the RCP drain pipe. Proposed use of Class V RCP
- To allow the use of HDPE pipe for the manifolds and Pond 1, Pond 2, Pond 3 and the Trench Drains
- To allow minimal spillage onto the abutting properties

### **Comments from October 4, 2021:**

1. Applicant still needs approval from the Conservation Commission.
2. Planning Board asked for a list of target tenants. Applicant has shown on the plans.
3. Planning Board asked hours of operation be on the plans. Applicant has shown on the Plans.
4. Planning Board may want to consider rules for outside storage.
5. The Applicant has added an additional parcel (Parcel B) to the site and abutters have been re-notified of the hearing.
6. The site abuts a residential zone. The Applicant is requesting a waiver for light spillage.
7. Still outstanding –
  - a. Conform with the Building Commissioner that the required lot depth does not need to be provided along the section of frontage associated with the required continuous frontage of the lot.
  - b. Provide documentation confirming that the Site is exempt from the lot width requirements. BETA notes that Section §185-10 does not reference lot width; however, some exceptions are provided for lot width under §185-3.