



May 9, 2024

Ms. Amy Love  
Planning Department  
Franklin Municipal Building  
355 East Central Street  
Franklin, MA 02038

SUBJECT: Response to comments on Site Plan and Special Permit Application, Proposed Parking Lot, 19 Cottage Street, submitted via email and hard copy on March 18, 2024.

Dear Ms. Love:

Responses to comments received on the subject application are provided below. As requested by the Planning Board on April 22, 2024, the proposed parking has been revised to utilize the available space in both Lots 217 and 17. Assuming a waiver request for a 1-foot reduction in required parking space length is approved, all proposed travel lanes will be a minimum 22-foot wide to accommodate two-way travel, all current parking spaces on existing Lot 17 will be increased to 18 feet in length, and three (3) ADA-complaint parking spaces will be provided adjacent to the existing access ramp. Per your instruction via email dated April 27, the proposed re-painting and incidental work on Lot 17 is included in this submission to the Planning Board as an ANR plan.

Please email me or call if you have any questions or need additional information.

Respectfully,

Stephen Dunbar, PE, PMP  
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eCopy Furnished:

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Attachments:

- Response to Comments
- Revised Plan Set for Proposed Parking Lot, 19 Cottage Street
- Operation and Maintenance Plan (includes Long Term Pollution Prevention Plan, Illicit Discharge Compliance Statement, and HydroCAD report)
- ANR Plan for Re-painting of existing Lot 279-017, 4 East Central Street

**Comments from BETA Group dated April 16, 2024 and received via email April 17, 2024:**

**General Comments**

G1. Recommend expanding plan viewport to include the existing restaurant and identifying its main building entrance.

*Response: The entrance and ADA access to The Rome restaurant has been added to Existing and Proposed plan views.*

**TOWN OF FRANKLIN ZONING REQUIREMENTS**

Z1. BETA defers to the Town regarding the proposed special permit.

*Response: As requested by the Planning Board on April 22, 2024, the proposed parking has been revised to utilize the available space in both Lots 217 and 17. Assuming the waiver request for a 1-foot reduction in required parking space length is approved, all proposed travel lanes will be a minimum 22-foot wide to accommodate two-way travel, all current 15-16 foot long parking spaces on existing Lot 17 will be increased to 18 feet in length, and three (3) ADA-complaint parking spaces will be provided adjacent to the existing access ramp. The proposed re-painting and incidental work on Lot 17 is submitted with this response package to the Planning Board as an ANR plan.*

Z2. Consider combining the subject parcel with the adjacent lot which it will serve to comply fully with the Zoning Requirements.

*Response: Please see the response to Comment Z1.*

Z3. Revise parking lot design such that the portion of the front yard within 10' of the street lot line is free from parking and fully landscaped (§185-12).

*Response: The revised plan increases the grassed area to meet the 10-foot offset from the street lot line.*

Z4. Indicate north arrow on all plan views (§185-31.C.(3).(b)).

*Response: North arrows have been added to all plan views.*

**TRAFFIC ASSESSMENT AND IMPACT**

T1. Revise pavement detail to include depth of compacted gravel subbase.

*Response: Details have been revised to show a 12" compacted gravel base.*

T2. Provide detail for reconstructed sidewalk areas. The DPW should be consulted to confirm current Town design standards.

*Response: I contacted the Franklin DPW via telephone on April 22, 2024 and was transferred to the Town Engineer, Mike Maglio. Mr. Maglio indicated the detail provided was adequate. I have Note 2 to the Details Sheet 24-03 referencing Town of Franklin Construction Standards for pavement and sidewalks.*

T3. Confirm that the proposed configuration has been reviewed by the Town Fire Department.

*Response: The required Fire Department plan set and fee were provided to the Planning Department on March 18, 2024. As of the date of this letter I have not received comments from the Fire Department.*

T4. Provide turning exhibits to show that typical vehicles, including a waste collection vehicle (refer to comment T10), can complete the turn into the abutting parking lot and continue to the egress point.

*Response: The revised parking configuration has all spaces perpendicular to a minimum 22-foot wide two-way travel lane.*

T5. Work proposed along the site frontage, including the relocated driveway entrance (consistent with detail), sidewalks, and curbing should be clearly shown in the plan view.

*Response: As noted in the Response to Comment T2, the Town Engineer indicated the curb cut detail provided was adequate. I have added limits and labels to the PROPOSED plan to show the limits of the existing curb cut and the proposed extension.*

T6. Include new or reset curbing and new sidewalk along Cottage Street at the existing curb cut to be removed. Identify extent of sidewalk reconstruction on the plans.

*Response: See response to Comment T5.*

T7. Depict the existing driveway entrance on the plans for comparison to proposed entrance location.

*Response: I have added limits and labels to the PROPOSED plan to show the limits of the existing curb cut and the proposed extension.*

T8. Proposed one-way circulation is dependent on use of an abutting lot. Although both lots are currently under the same ownership means of ensuring the parking lot will remain usable in the future should be provided, such as an easement.

*Response: See response to Comment Z1.*

T9. Clarify the linework for the rectangular blocks located in the rear of the property, presumed to be dumpsters. Indicate anticipated path of travel trash disposal vehicles if applicable.

*Response: Dumpsters have been labeled and an enclosure provided. The revised parking plan calls for a minimum 22-foot wide two-way travel lane which will allow trash disposal vehicles to get into position. The owner also indicated that the trash collection occurs early in the morning when the parking lot is empty.*

T10. Confirm the total number of spaces in both lots and provide one additional accessible parking space, as required. Include an Accessible route per 521 CMR 20 from the proposed accessible parking space to the building entrance.

*Response: See response to Comment Z1. The revised plan provides 19 new parking spaces on Lot 17 and re-painting on Lot 217 to provide 35 spaces, three of which are accessible spaces and one which is van accessible. The revised plan provides a total of 54 spaces and a net increase of 19 spaces. The Parking Legend on the DEVELOPMENT PLAN Sheet 24-01 has been updated to reflect this information.*

T11. BETA recommends that the applicant revise the existing accessible spaces to comply with 521 CMR 23.4.

*Response: The revised plan provides three accessible parking spaces adjacent to the existing access ramp with one space van accessible space. Signage has also been added.*

T12. Revise design such that no off-street parking area is located within 10 feet of a street right-of-way (§185-21.C(1)).

*Response: The plan has been revised to meet this requirement*

T13. Provide turning moment to show that a vehicle can exit parking spaces P1, P2, P16, and P17 without backing into a public way (§185-21.C(3)).

*Response: The revised parking configuration has all spaces perpendicular to a minimum 22-foot wide two-way travel lane. Since two-way travel is permitted, backing into a public way can be avoided.*

T14. BETA defers to the Town regarding compliance with §185-21.C(7)(a). Although the parking lot proposes fewer than 20 spaces, it is part of a larger parking lot with greater than 20 spaces. The proposed entrance and existing egress are within 150' of other parking lot entrances and exits on the same side of the street.

*Response: At the April 22 Planning Board Meeting, the Planning Board acknowledged Lot 17 as a separate lot and requested that Lot 17 be submitted as a separate ANR plan so that the two lots (217 & 17) could be combined for parking configuration only. Since there are only 19 full spaces proposed for Lot 217, I believe the regulation cited in the comment does not apply.*

T15. Revise compact parking spaces to be at least 19 feet in length (§185-21.C(9)(a)).

*Response: Compact parking spaces have been removed from the revised plan. All proposed new spaces are 18 feet long. In order to achieve the 10% pervious area and the requested 22-foot wide two-way travel lane on this narrow lot, a waiver for a one foot reduction from the 19 foot requirement is requested.*

T16. Identify snow storage areas for the parking lot.

*Response: Snow storage area has been added to the PROPOSED plan.*

T17. In conjunction with other comments provided in this section, evaluate if the two adjoining parking areas can be reconfigured/restriped into a single parking area with improved circulation.

*Response: The revised plan incorporates this suggestion. Assuming the waiver request for a 1-foot reduction in required parking space length is approved, all proposed travel lanes will be a minimum 22-foot wide to accommodate two-way travel, all current parking spaces on existing Lot 17 will be increased to 18 feet in length, and three (3) ADA-complaint parking spaces will be provided adjacent to the existing access ramp.*

## **SIGNAGE AND LIGHTING**

SL1. Include signage designating one-way movement through the parking lot.

*Response: One-way movement is no longer proposed.*

SL2. Provide required sign for accessible parking space (See parking and loading section).

*Response: Accessible signage exists for the two existing spaces (including "van accessible"). A third sign will be added as labeled on the PROPOSED plan. The R7-8 sign detail was added to the DETAILS Sheet 24-03.*

SL3. Indicate treatment of existing “Rome customer parking only” sign present at the site entrance.  
*Response: The existing “The Rome ENTRANCE ONLY” and “The ROME EXIT ONLY” signs will be removed. New “The ROME PARKING ONLY” signs are proposed at both two-way access points. The PROPOSED plan has been updated to reflect this.*

SL4. Indicate if a new sign similar to the existing “The Rome Restaurant Enter Only” sign on the abutting lot will be proposed.  
*New “The ROME PARKING ONLY” signs are proposed at both two-way access points. The PROPOSED plan has been updated to reflect this.*

SL5. Clarify if any lighting is provided for the existing parking lot to ensure safe pedestrian movement to the restaurant.  
*Response: The existing parking lot on Lot 17 is illuminated by a flood light mounted to a utility pole adjacent to the west corner of the restaurant.*

SL6. Revise lighting design such that no illumination extends beyond the site’s property lines. (§185-31.C(4)(e)). A waiver may be appropriate for illumination that extends onto the existing parking lot and to the Cottage St sidewalk.  
*Response: During the April 22 Planning Board meeting, the Planning Board indicated that the small amount of light shown spilling past the property line is acceptable because it adds some measure of additional safety to all adjacent properties.*

SL7. Clarify if proposed luminaire is directed downward and/or shielded to mitigate light pollution.  
*Response; The proposed luminaire is directed downward. The proposed fixture would be ordered with integral louver has improved back light control. Cutsheets are attached.*

## **UTILITIES**

U1. Indicate if any existing utilities associated with the former building remain on-site that may interfere with the proposed work.  
*Response: The contractor who razed the previous building on Lot 217 (Dirtworks Excavating, Franklin) stated that water and electric ran into the building at the front near the street and that those utilities were disconnected. I have added a label to the EXISTING plan to show where those shutoffs are located. The notes on the DEVELOPMENT plan still require the contractor to notify DIGSAFE to verify all existing utilities.*

## **LANDSCAPE TREATMENT & GRADING**

LA1. Evaluate if the proposed parking area will be visible from any residential uses (e.g. 28 Cottage Street) to determine if screening in accordance with §185-35 is required.  
*Response: There are several condominiums across Cottage street from Lot 217 which currently view a large portion of the Downtown Commercial District already, including areas beyond the RR property westerly down West Central Street. All abutters within 300 feet of Lot 217 were notified of the April 22 Planning Board meeting to review this site plan and there were no resident concerns expressed. The revised plan proposes an 11-foot wide grassed area along the front of the property. Any plantings to establish screening would not significantly reduce the visibility of this lot by nearby property owners in the Downtown Commercial District but it would have a significant negative impact on site distance (and thus safety) of drivers exiting this lot.*

LA2. BETA defers to the Town regarding whether the project need comply with §185-21.C(5) regarding bordering trees. Although the project proposes fewer than 20 spaces, it will be part of a larger parking lot with greater than 20 spaces.

*Response: See response to Comment T14.*

LA3. It appears that two dumpsters will be located near the rear of the site. They are not proposed on concrete pads with screened enclosures, as is typically required by the Board.

*Response: A 8-foot high chain-link fence enclosure with privacy slatting has been added to the PROPOSED plan on Sheet 24-01. The existing dumpsters have always been on bituminous pavement and the cost of a concrete pad is a substantial added cost to the property owner's already-significant investment in site improvements and stormwater management.*

### **STORMWATER MANAGEMENT**

SW1. Provide printouts of HydroCAD report discussed on Sheet 2, Note 23.

*Response: The requested HydroCAD report was provided via email on April 22, 2024 and approved by BETA just prior to the Planning Board Meeting that evening. Design revisions to meet the required 10-foot offset from the street ROW reduced the total runoff to the front catch basin to an area less than 100 square feet, so that catch basin has been eliminated and the stormwater design has been modified to send all runoff to the catch basin at the back corner of the lot. The revised HydroCAD report is provided as an Exhibit to the Operation and Maintenance Plan submitted with this response package.*

SW2. Include measures to adjust, add inlet stone at discretion of DPW, or replace existing grate (e.g. 3-flange) at the existing catch basin located at the proposed driveway entrance.

*Response: I mentioned this suggestion during my April 22 telcon with Town Engineer Mike Maglio. He indicated that no additional notes were necessary, that the DPW will work coordinate with the contractor during the permitting process.*

SW3. Provide calculations referenced on Sheet 2, Note 23 for pre- and post-development peak discharge rates and to confirm the subsurface system is adequately sized.

*Response: See response to Comment SW1. As stated in Note 23 on Sheet 24-02, the chambers will be half full as a result of the projected 10-Yr storm.*

SW4. Indicate whether the existing building roof will also drain to the subsurface system.

*Response: Based on the existing contours of Lot 17, all roof drainage either drains towards the street or to the back edge of Lot 17 along the shared property line with the Commuter Rail.*

SW5. Indicate personnel responsible for logging deep-hole tests

*Response: I performed the soil evaluation and perc tests (Soil Evaluator License # 647). This information has been added to the Deep Hole Logs on Sheet 24-01.*

SW6. Indicate methodology used for conducting percolation tests, if used for exfiltration rate, or clarify if exfiltration rate is based on soil textural analysis only.

*Response: I used the perc test specified for Title 5 with pre-soak and timings for 12", 9" and 6".*

SW7. Indicate provided storage volume in subsurface infiltration system.

*Response: Chamber total storage is 2,869 cubic feet (0.066 acre-feet).*

SW8. Evaluate proposed depth of subsurface infiltration system (approximately 8 feet below ground) in relation to elevation of groundwater. In the absence of an identified groundwater elevation, groundwater should be assumed to coincide with the lowest elevation reached during test pitting. Based on test pit logs, DH-2 was completed to an approximate elevation of 299.5', which is above the system bottom of 299.22'.

*Response: Evidence of high groundwater was not observed in nearby DH-1 which reached Elevation 298.6. There are no observed signs of seepage along the slope of the Commuter Rail property which has a toe elevation of 293. Observations will be made during construction to confirm that groundwater is deeper than bottom of chamber.*

SW9. Provide calculations showing that all infiltration BMPs will fully drain within 72 hours.

*Response: The chambers will fully drain in 24 hours. The revised HydroCAD report is provided as an Exhibit to the Operation and Maintenance Plan submitted with this response package.*

SW10. Provide Long-Term Pollution Prevention Plan.

*Response: The LTPPP is provided as Section 2.6 of the Operation and Maintenance Plan submitted with this response package.*

SW11. Provide anti-tracking measures at the driveway entrance.

*Response: A 30' x 30' anti-tracking pad has been added to the Sediment and Erosion Control plan Sheet 24-03 and Note 4 added to the Erosion & Sediment Control Notes. The minimum length of 50 feet cannot be achieved due to the estimated limit of excavation for the Stormtech system.*

SW12. In coordination with DPW, provide inlet protection for existing catch basin on Cottage Street.

*Response: A "See Note 3" label has been added to this catch basin. Note 3 states "The contractor shall install UltraTech 9217 Ultra-Drain Guard® or approved equal in all catch basin/drain grates within and adjacent to the limit of work. Drain guards shall be inspected and maintained according to manufacturer's specifications."*

SW13. Provide anticipated location(s) of soil/material stockpile area on plans with erosion and sedimentation control measures to limit transport of materials.

*Response: Proposed material storage area has been added to the SEDIMENT & EROSION CONTROL PLAN on Sheet 24-03. Sediment Barrier is shown/required along the entire downstream perimeter of this lot. Additional measures may be required as noted/required in the Erosion & Sediment Control Notes.*

SW14. Indicate how future property owners will be notified of the presence of the stormwater management system and the requirement for proper operation and maintenance.

*Response: The process is outlined in Section 2.2 of the Operation and Maintenance Plan included with this response package.*

SW15. Provide approximate annual maintenance budget to ensure the Owner is aware of the system's operating cost.

*Response: See response to Comment SW14.*

SW16. Provide Illicit Discharge Compliance Statement signed by the Owner.

*Response: The Illicit Discharge Compliance Statement signed by the Owner is provided as an Exhibit of the Operation and Maintenance Plan included with the response package.*

#### **SUMMARY**

- The proposed use is dependent on a Special Permit from the Town. The need for a Special Permit could be removed if the parcels were combined.

*Response: The request for a Special Permit remains since the application is for Lot 217 only. As requested by the Planning Board on April 22, 2024, the proposed parking has been revised to utilize the available space in both Lots 217 and 17. Assuming the waiver request for a 1-foot reduction in required parking space length is approved, all proposed travel lanes will be a minimum 22-foot wide to accommodate two-way travel, all current 15-16 foot long parking spaces on existing Lot 17 will be increased to 18 feet in length, and three (3) ADA-complaint parking spaces will be provided adjacent to the existing access ramp. The proposed re-painting and incidental work on Lot 17 is submitted with this response package to the Planning Board as an ANR plan.*

- The parking lot must be revised to comply with front yard requirements, ADA/MAAB requirements, and to ensure adequate turning movements.

*Response: The revised plan is compliant with all of these requirements. See responses to Comments Z1, Z3, T4, T10, T11, T12 and SL2.*

- Insufficient detail has been provided at the site entrance. The plans must show that the sidewalk along Cottage Street will function after construction.

*Response: See response to Comment T5.*

- The proposed lighting does not comply with the Zoning Bylaw and will create illumination on abutting properties.

*Response: See response to Comment SL6.*

- A model has not been provided for the subsurface infiltration system and therefore it is unknown if it will function as anticipated.

*Response: See response to Comment SW1.*

#### **Comments from Town Engineer, Michael Maglio, dated April 19, 2024 and received via email April 19, 2024:**

1. Applications that may need to be filed with the Franklin Department of Public Works include (but are not necessarily limited to) a Right-of-Way Excavation Permit, a Public Way Access Permit, and a Trench Permit.

*Response: This text has been added to Note 8 on the DEVELOPMENT PLAN (Sheet No. 24-01).*

2. This project is proposing an underground infiltration system to address runoff, but a storm water report with supporting calculations has not been submitted for review.

*Response: The requested HydroCAD report was provided via email on April 22, 2024 and approved by BETA just prior to the Planning Board Meeting that evening. Design revisions to meet the required 10-foot offset from the street ROW reduced the total runoff to the front catch basin to an area less*

*than 100 square feet, so that catch basin has been eliminated and the stormwater design has been modified to send all runoff to the catch basin at the back corner of the lot. The revised HydroCAD report is provided as an Exhibit to the Operation and Maintenance Plan submitted with this response package.*

3. Parking spaces P1 and P17 are laid out parallel to and at the back of the Cottage St sidewalk. It appears that the location of these spaces may be difficult to navigate and the aisle width between these two spaces is less than the required 24 feet.

*Response: As requested by the Planning Board on April 22, 2024, the proposed parking has been revised to utilize the available space in both Lots 217 and 17. Assuming the waiver request for a 1-foot reduction in required parking space length is approved, all proposed travel lanes will be a minimum 22-foot wide to accommodate two-way travel, all current 15-16 foot long parking spaces on existing Lot 17 will be increased to 18 feet in length, and three (3) ADA-complaint parking spaces will be provided adjacent to the existing access ramp. The proposed re-painting and incidental work on Lot 17 is submitted with this response package to the Planning Board as an ANR plan.*

4. The two dumpsters that are shown on the proposed plan should be screened with an enclosure.

*Response: A 8-foot high chain-link fence enclosure with privacy slatting has been added to the PROPOSED plan on Sheet 24-01.*

5. Snow storage locations should be shown on the plan.

*Response: Snow storage has been added to the proposed site plan (Sheet No. 24-01).*