



# Guerriere & Halnon, Inc.

ENGINEERING & LAND SURVEYING

[www.gandhengineering.com](http://www.gandhengineering.com)

Est. 1972

**Milford Office**  
333 West Street, P. O. Box 235  
Milford, MA 01757-0235  
(508) 473-6630/Fax (508) 473-8243

**Franklin Office**  
55 West Central Street  
Franklin, MA 02038-2101  
(508) 528-3221/Fax (508) 528-7921

**Whitinsville Office**  
1029 Providence Road  
Whitinsville, MA 01588-2121  
(508) 234-6834/Fax (508) 234-6723

F4694

June 6, 2025

Franklin Conservation Commission  
355 East Central Street  
Franklin, MA 02038  
Attn: Breeka Li Goodlander, Agent

RE: ***Comments from Beta Group 260 Daniels Steet, Notice of Intent***

Dear Members of the Commission:

On behalf of our client, Dianne Raymondi, Guerriere & Halnon, Inc. has prepared the following information to address comments contained in the letter to the Planning Board from BETA Group.

**BETA's** findings, comments and recommendations are shown in *italics* followed by our response in **bold**.

*PLAN AND GENERAL COMMENTS*

A1. *MassDEP has not issued a file number for this Project a of this writing.*

**G.H. Response: The DEP # associated with this site is number #159-1315**

A2. *The Plan should be revised to include the following:*

a. *The source and date of survey of existing conditions topography;*

**G.H. Response: Plan have been updated to include the survey information**

b. *Existing vegetation including the existing tree line; and*

**G.H. Response: The existing tree line has been added to the plan**

c. *A Construction Sequence and Schedule with all proposed activities in jurisdictional areas in accordance with Section 7.18.1.14 of the Bylaw Regulations.*

**G.H. Response: See Planting Schedule on Sheet 2.**

**See Construction Sequence and Schedule on Sheet 3**

*RESOURCE AREA AND BOUNDARY  
COMMENTS*

BETA conducted a Site visit on May 20, 2025 to assess existing conditions and to review Resource Area delineations, focusing on the definitions and methodologies referenced under the Act and the Bylaw. Review of Resource Area delineations included all flagged areas on the Site.

W1. BETA concurs with the delineation of Bank associated with the stream as depicted on the plan and concurs with its status as intermittent. Based on field observations, it appears that that no wetlands (isolated or bordering) are present within 100 feet of the Site. However, BETA recommends that flags 1, 2, 3, 5, 6, 7, 8, and 9 not be formally approved under the OOC as part of this filing due to the flags being located offsite.

**G.H. Response: Acknowledged**

*CONSTRUCTION COMMENTS*

W2. The Applicant should provide an Erosion & Sedimentation Control Plan which includes contact information of the person(s) responsible for inspection and maintaining erosion control, and all other requirements listed in Section 7.12.1 of the Bylaw Regulations.

**G.H. Response: The Erosion and Sediment Control narrative has been added to sheet 3 of the plan set.**

W3. The location where each of the seed mixes are proposed to be applied should be included on the plans.

**G.H. Response: The seed mix location has been added to the plan.**

W4. The western slope is proposed to remain as a 2V:1H slope; however, it is recommended that this be regraded to 3V:1H to support long-term stability.

**G.H. Response: The entire proposed slope has been regraded to a 3:1 slope.**

*MITIGATION COMMENTS*

W1. Filling and grading work that was observed at the Site was not permitted under the Act or Bylaw. Based on a review of historic aerial imagery, the filling and grading occurred between 2021 and 2025. No MassDEP filing for this property was found on the Energy & Environment Affairs Data Portal. Further information should be provided on the work already performed (e.g., number and size of trees cut) to inform mitigation design. BETA defers the Commission regarding actions to mitigate for the unpermitted work.

**G.H. Response: Acknowledged**

W2. The Applicant has provided a planting plan; however, specific locations of species has not been provided. The planting plan should be updated to show the location where specific species will be installed.

**G.H. Response: A planting legend has been added with species type and number to**

be planted.

W3. *Migration of sediment from the already performed work was observed within the Buffer Zone, although no sediment has been discharged to the intermittent stream. It is recommended that the sediment be removed during Site stabilization efforts to prevent further migration towards the stream.*

**G.H. Response: The contractor will work with the commission to best remove sediment within the buffer zone. Erosion control shall be placed prior to any additional work being proposed.**

W4. *Japanese knotweed (Fallopia japonica) was observed to be sprouting within the Buffer Zone within the area disturbed by the unpermitted work. It is strongly recommended that these species be removed and that the Site be monitored for continued growth, as the imported soil may have caused this issue. BETA defers to the Commission on the requirement for a long-term invasive species control plan.*

**G.H. Response: Any and all invasive species within the existing and proposed fill work area shall be removed prior to additional grading of the site.**

*BYLAW REGULATORY COMMENTS*

W5. *BETA defers to the Commission on the approval of the Project Narrative due to several Bylaw requirements being absent from the current Project Narrative (Bylaw Regulation Section 7.9.1.) including who is performing the work and when the proposed activity will be done. This information could be submitted prior to construction as part of a Special Condition.*

**G.H. Response: The contractor responsible for the work is James Thornhill. The proposed work will be accomplished as soon as allowed by the Conservation Commission.**

We believe these responses have addressed the concerns expressed by BETA Group from their review letter. Should you have any further questions or concerns, please contact our office.

Sincerely,  
**Guerriere & Halnon, Inc.**



Brian Hassett  
Project Manager