

SW10. BETA notes that the required 20 feet setback to the property line has not been met for Basin #1. However, this is an existing nonconformity. (§300-11.A(7.a)).

G&H: Acknowledged.

BETA2: BETA DEFERS TO THE TOWN.

**G.H. Response: Acknowledged**

BEST DEVELOPMENT PRACTICES GUIDEBOOK

The project is required to comply with the requirements of the Town of Franklin 2021 Best Development Practices Guidebook (BDPG).

SW13. Indicate if proposed seed mix and plantings will reflect native vegetation, particularly near woodland areas (BDPG Page 7).

G&H: Within the Buffers any disturbed areas will be planted with the New England Conservation Seed Mix.

BETA2: BETA RECOMMENDS THAT THE SEED MIX BE IDENTIFIED ON THE PLANS TO ENSURE CONFORMITY DURING CONSTRUCTION.

**G.H. Response: See notes 8/9 and hatched area added to the landscaping plan identifying the seed mixes to be used during construction.**

**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 to mitigate increases to runoff rates with the use of a subsurface detention system and two existing infiltration basins. Calculations indicate a decrease in peak discharge rate and runoff volume to the point of analysis at the southern wetlands.

SW18. Existing basin #2 has been designated as a wetland resource area. Provide an interim point of analysis at the wetland boundary and demonstrate that a net decrease in peak discharge rate and runoff volume is proposed.

G&H: As discussed at the 1/28/25 working session, 80% TSS removal is achieved for the equivalent water quality volume associated with the net increase in impervious area for the project, prior to discharge to Basin #2. Similarly, the water quality volume for the remaining balance of existing impervious areas is treated to a minimum of 62.5% TSS removal, an improvement over the existing treatment level of 44%. Achieving the above performance standard eliminates the 50' setback to wetlands for the infiltration components of basin #2, and allows for the inclusion of infiltration within the upland portion of basin #2 to be included in the stormwater model. An interior berm dividing the wetland and infiltrating areas is not required.

BETA2: THE "INTERIM POINT OF ANALYSIS" REFERENCED IN SW18 WOULD BE AN ANALYSIS DATA POINT BASED ON THE HYDROCAD MODEL, NOT A PHYSICAL BERM CONSTRUCTED AT THE SITE. A TABLE SHOULD BE PROVIDED IN THE STORMWATER REPORT, SIMILAR TO THE ONE WITHIN THE STANDARD 2 NARRATIVE, COMPARING PRE- AND POST-DEVELOPMENT PEAK DISCHARGE RATE AND RUNOFF VOLUME AT THIS POINT. AS THERE IS NO SEPARATION BETWEEN THE INFILTRATION BASIN AND THE WETLAND RESOURCE AREA, THE POINT OF ANALYSIS SHOULD BE POSITIONED AT THE INFLOW TO THE BASIN. A COMPARISON OF THE RESULTS OF THE HYDRO-CAD ANALYSIS FOR BOTH PEAK FLOW RATE INTO THE BASIN AND MAXIMUM WATER SURFACE ELEVATION ARE AS FOLLOWS.

Storm event	Existing (Peak flow rate/ Max W.S. El/Dewatering Time)	Proposed (Peak flow rate/ Max W.S. El/Dewatering Time)
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2 Year	11.48 cfs / El. 254.23 / <b>52 hours</b>	31.01 cfs / El. 254.47 / <b>52 hours</b>
10 Year	27.27 cfs / El. 255.54 / <b>64 hours</b>	49.66 cfs / El. 255.90 / <b>65 hours</b>
25 Year	34.69 cfs / El. 255.95 / <b>66 hours</b>	61.41 cfs / El. 256.43 / <b>66 hours</b>
100 Year	43.98 cfs / El. 256.91 / <b>66 hours</b>	79.37 cfs / El. 257.99 / <b>70 hours</b>

As can be seen there is an increase in stormwater depths over Basin 2 for all events. For the 10 year event, this increase is approximately 5". Peak flow rates are increased but overall volumes have been dramatically reduced, which is why the increase in the water surface elevation does not reflect comparatively with the peak flow rate increase. BETA recommends that the Board wait for a Conservation Commission decision regarding the isolated wetlands to determine if these increases are acceptable.

**G.H. Response:** Because the wetlands are located within an active existing stormwater basin, the primary impact of storm events experienced by the in-basin wetlands is inundation. This is best approximated by comparing dewatering times, which have been added to the table above in bold. As can be seen, the total time spent inundated is not anticipated to significantly change during all storm events. In particular, smaller storm events are anticipated to experience no change. G&H will discuss this comment with the conservation commission at the hearing on 4/17/25.

SW20. Revise hydroCAD model to account for the existing low area south of the southwestern building corner. Based on grading, this area is expected to function as a detention basin under pre-development conditions and should be modeled as such.

G&H: The HydroCAD model has been revised as requested.

BETA2: MODEL REVISED. REVISE MODEL FOR SUBCATCHMENT PR-1 TO USE A MINIMUM TC OF 6 MINUTES.

**G.H. Response:** Tc for subcatchment PR-1 has been revised as requested.

SW29. BETA notes that a 50' setback is required between infiltration basins and surface waters, which includes wetlands. As wetlands are present in Basin #2, this setback is not provided. However, this is an existing nonconformity. BETA defers to the Town.

G&H: During the working session on 1/28/25, it was determined that meeting specific TSS removal targets prior to discharge to Basin #2 would eliminate this requirement. These targets have been met (See SW18 response) G&H defers to the board.

BETA2: BETA AGREES THAT DURING THE WORKING SESSIONS, THE USE OF INFILTRATION BASIN #2 COULD BE MAINTAINED IF THE DISCHARGE INTO THE BASIN HAD BEEN TREATED. HOWEVER, THE PROPOSED SUBSURFACE INFILTRATION STRUCTURE MUST STILL MEET THE MINIMUM DESIGN REQUIREMENTS FOR SETBACK FROM A RESOURCE. THE PLANS SHOULD IDENTIFY THAT THE SYSTEM WILL MEET THE 50' SETBACK FROM THE PROPOSED WETLAND LIMITS AS ALTERED.

**G.H. Response:** the subsurface infiltration structure has been reconfigured to meet the required 50' setback to the new limits of IVW in Basin #2, and dimensions indicating compliance added. See revised sheet 11.

SW32. Due to the presence of wetlands within Basin #2, the 80% TSS removal requirement should be achieved prior to discharge to the wetlands. BETA recommends that the design review the potential to provide the 80% TSS Removal in that portion of the basin outside the limits of the wetlands prior to using this wetland area for excess storage.

G&H: TSS removal targets have been achieved as discussed during the 1/28/25 working session. See SW18 response.