

Dear Members of the Zoning Board of Appeals and Conservation Commission,

We respectfully submit the following supplemental comments regarding the **Drainage Report (Allen & Major, 6/12/25)** and the **Peer Review (BETA Group, 7/10/25)** for the proposed 444 East Central Street development. While the peer review identified several important deficiencies, there remain **critical issues that were not addressed** and warrant your attention:

1. Misstatement of Water Quality Standard (Standard 4 – TSS Removal)

- The Drainage Report repeatedly references a **44% Total Suspended Solids (TSS) removal** rate.
- MassDEP Stormwater Standard 4 requires **80% TSS removal**.
- This discrepancy was not noted by the peer review and calls into question the project's compliance with Standard 4.

2. Zone II / Well #9 Public Water Supply Risk

- The site lies within the **Zone II recharge area of Franklin's Public Water Supply Well #9**.
- MassDEP requires the "**highest and best practicable method of treatment**" for discharges within Zone II.
- Neither the Drainage Report nor the Peer Review sufficiently addressed this critical public health concern or evaluated the adequacy of proposed protections.

3. Weak Enforcement of Operation & Maintenance (O&M)

- The long-term O&M plan relies solely on the property owner's diligence, with annual reports submitted to the Conservation Commission.
- There is **no deed restriction, easement, or covenant** to ensure perpetual compliance after transfer of ownership.
- Without binding legal enforcement, the risk of system neglect and failure is high.

4. Over-Reliance on Subsurface Proprietary Systems

- The drainage plan depends almost entirely on underground infiltration and treatment systems.
- These systems are prone to **clogging and loss of function over time**, especially in high groundwater and poor soil conditions present at this site.

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- The peer review requested clarifications but did not recommend redundancy, fail-safe measures, or surface-based alternatives.

5. **Snow Storage & Salt Impacts on Zone II**

- While snow storage was flagged, neither report adequately evaluated the **long-term chloride loading** from deicing chemicals and its potential impact on **Zone II groundwater and Well #9**.

Conclusion

We urge the Board and Commission to require the applicant to address these unresolved issues. Given the site's location within a critical public water supply protection area, reliance on optimistic assumptions and untested infiltration measures is unacceptable. The health and safety of Franklin residents depend on robust, enforceable, and conservative protections for our drinking water.

Respectfully submitted,
Gene Grella