

# United Consultants, Inc.

850 Franklin Street Suite 11D  
Wrentham, MA 02093  
508-384-6560 FAX 508-384-6566

August 8, 2025

Mr. Gregory Rondeau, Chair  
And Members of the Franklin Planning Board  
355 East Central Street  
Franklin, MA 02038

## **Re: Panther Way Senior Village - Site Plan Peer Review - 2**

Mr. Chairman and Board Members,

On behalf of the applicant, Camford Property Group, Inc., we have provided a summary of the following comments from The Town Planner, Town Engineer, Franklin Conservation Commission and BETA Group, Inc. We have also provided comments received from the Town of Franklin Planning Board at the Public Hearing. Our responses are immediately following each comment and they have been italicized.

### **Town Planner**

#### **General**

1. The Special Permit under Senior Village titled "Site Plan Panther Way" dated December 13, 2024 was submitted with one Special Permit and Site Plan.

*Agreed. No response.*

2. The site is located on Panther Way in the Commercial I Zoning District (Assessors Map 270 Lots 028, 038 & 039). *The site is located in the Commercial II Zoning District.*

3. The applicant is proposing to construct 48 Multi Unit residential buildings for over fifty-five (55) in age, under the Town of Franklin Zoning By-law Ch. 158-48, "Senior Village Overlay District"

*The unit count has been reduced to 44 residential units.*

4. Applicant has filed with the Conservation Commission.

*Agreed.*

Comments from June 2 meeting:

- Provide the pedestrian trail throughout the property. *The pedestrian trail has been extended and now has connection points the driveway sidewalks system.*

- Work with DPW on an extension of the sidewalk along Panther Way. The applicant and I met with the DPW Director and the Town Engineer. *The suggested sidewalk has been added to the site plans.*

Below are 11 waivers requested by the applicant: *Requested waivers are listed on sheet 1 of the site plans.*

## **Town Engineer**

1. The DPW Director and I met with the Applicant to review the proposed sidewalk construction along Panther Way. Our recommendation is for the Applicant to construct a 5 foot wide asphalt sidewalk with granite curbing, matching the existing sidewalk on the east side of Panther Way, from the proposed site entrance to the entrance at Highwood Condominium Development. A crosswalk with a Rectangular Rapid Flashing Beacon (RRFB) should also be provided from the Applicant's proposed site entrance across Panther Way to a new accessible pedestrian ramp on opposite side of the road. The above requests have been added to sheet 7.

2. If the proposed commercial space is to be used as a restaurant, an exterior grease trap will be required, however, one does not need to be installed until such time. *If the commercial space is proposed to be a restaurant, the applicant will provide a design for the grease trap and will install the exterior grease trap. The applicant requests that this be done when and if the space is used for a restaurant.*

3. Due to the 8% slope of the proposed main driveway which runs straight to Panther Way, we recommend the use of MassDOT Cascade style grates for the catch basins along this section. Cascade style grates are more efficient at capturing runoff, especially on steeper slopes. This will minimize any bypass runoff that will end up on Panther Way during heavy rain events. *The catch basin details have been revised to include the cascade grates. See details on sheet 14.*

4. While we understand the previously developed adjacent site was designed using the lower rainfall values from TP-40 and both sites area to utilize the same existing infiltration basin, given the increase in intense storm events over the recent past, we feel that it is imperative that the drainage design be based on the more conservative values provided under NOAA Atlas-14, especially where overflows from the infiltration basin are directed to the Town's drainage system. *The drainage calculations have been revised using the NOAA Atlas-14 rainfall values.*

## **Franklin Conservation Commission**

- Significant grading is proposed within the Buffer Zone that appears to be in an area that is currently vegetated and has existing ledge. The applicant should confirm that blasting / hammering is required for removal of ledge and provide information on how Resource Areas will be protected during removal. *Ledge removal notes have been added to sheet 12.*

- The pedestrian path will be constructed of a compact sub-base, then a 5" layer of gravel, topped with 2" of loam and seed - how frequently will maintenance occur on the path? The Applicant should consider a barrier or signage to prevent maintenance from occurring outside of the path. *Notes indicating moving and vegetation trimming have been added to the plan. Proposed signs have been added to the plans.*

- Provide the species mix for the proposed seed mix on the plans. *Seed mix species have been added on sheet 11.*

- Revise the construction sequence to include the construction of the pedestrian path. *The construction sequence has been revised to include the pedestrian path. See sheet 13.*

**BETA Group, Inc.**

**Schedule of Lot, Area, Frontage, Yard and Height Requirements (§185 Attachment 9)**

The project will comply with dimensional requirements for frontage, lot width, lot depth, front yard, side yard, rear yard, building height, building coverage, and maximum impervious coverage.

**SV1. BETA recommends that the building setbacks be identified on the Layout Plans (Sheets 4&5) and provide setback dimensions for the proposed structures, especially where waivers have been requested.**

*The building setback dimensions and the setback dimensions have been added to sheets 4 and 5.*

Parking, Loading and Driveway Requirements (§185-21)

Refer to Traffic Assessment section below.

Earth Removal (§185-23)

The project is anticipated to require significant earth disturbance and may require further permitting under this section.

**SV1. Quantify approximate required earth removal volume. Earth removal in excess of 1,000 cubic yards requires a Special Permit from the Board of Appeals.**

*UCI; An Earth Removal permit has been filed for with the Zoning Board of Appeals.*

**BETA: Although the permit application has been filed, BETA recommends that overall cut & fill quantities be identified on the plans.**

*The earth quantities have been added to sheet 6.*

Sidewalks (§185-28) and Curbing (§185-29)

The project is located within a Commercial II zoning district. An existing sidewalk is not present along the street frontage and no sidewalk is proposed. A sidewalk is present on the opposite side of Panther Way but no means of connecting to this sidewalk is proposed. A waiver has been requested from the requirement to provide a sidewalk along the street frontage.

A new sidewalk is proposed along the southern side of the proposed driveway and around the cul de sac. A trail is also proposed within the open space area which will connect to West Central Street.

Proposed curbing includes vertical concrete curb.

**SV2. As noted, the applicant has requested a waiver from the requirement to provide a sidewalk along Panther Way. There is a sidewalk on the opposite side of Panther Way. There is also a sidewalk on the same side of Panther Way from West Central Street up to the CVS parking lot entrance approximately 200'. BETA would like to note to the Board, that a sidewalk along Panther Way will provide public access to West Central Street and the adjacent commercial and retail outlets. Admittedly there will remain a gap between this site and the adjacent commercial site to the south. However, this site is currently owned by the applicant and shares access and stormwater features with the proposed Senior Village.**

*UCI: The applicant and UCI have met with the DPW Director and Town Engineer to discuss the sidewalk on Panther Way. An alternative location and crosswalk was suggested and has been included in the revised site plan.*

**BETA: Based upon the discussion with the DPW, BETA will defer this issue to the Board. The sidewalk location has been added as requested by the DPW. The applicant defers to the Planning Board on the suggested location.**

The project has been submitted for Site Plan Review and is required to conform to the requirements of this section. The submission is generally in compliance with this section except as noted below:

SV5. Indicate if lighting is proposed and provide required photometric plan (§185-31.C.(3).(l)).

*UCI: A photometric plan has been included in the plan set.*

**BETA: See Section 7.0 below.**

*See response to Comment in Section 7.0 below.*

Landscaping and Screening (§185-35)

Refer to Landscape and Grading section below.

Senior Village Overlay District (§185-48)

The project proposes a Senior Village and an application of a Special Permit has been requested pursuant to this section of the bylaw. The project is located within the Commercial II Zoning District and thus the Senior Village Overlay District applies. The project is required to comply with the standards outlined in this section. Review comments associated with this bylaw are outlined below and throughout the following sections of this report.

As stated in the Bylaw, the purpose of the district is to “*encourage development of residential communities for persons 55 years of age and older, by allowing for a greater variety of uses and building types at a higher density than would normally be allowed..... It is intended that a senior village development provide a range of housing types and facilities that are responsive to the socio-cultural, health care, and recreational needs of senior residents.*” In addition, it also notes that: “*Development should be concentrated in the most suitable and least environmentally sensitive areas of the landscape. Preservation of natural open space is strongly promoted, as is provision and enhancement of additional open space for recreational use and enjoyment of residents.*”

In accordance with the bylaw, the site meets the General Standards 48.D.(1) General Standards.

- a) The proposed development is 49 units which is greater than required 10 units.
- b) The total land area of the development is 15.02 acres which is greater than the minimum 5 acres required.
- c) an accessory use, restaurant, is proposed in the front building.

(2) Density Determination

- a) The Base density of the parcel is 1.5 units per gross acre which correlates to 22 units. The maximum allowable density is 5x the Base Density = 110 units.
- b) In accordance with this section of the bylaw, “*The allowable increased density, up to the calculated maximum number of housing units for the given senior village site, is at the discretion of the Board...*”
- c) In accordance with this section of the bylaw, a minimum of 15% of the Total Number of units shall be set aside as affordable housing if open space is  $\geq 30\%$ . Actual Open space is 32.2%.
- d) In accordance with 48.D.(2)(c)(ii)b. an additional 2.5 units can be added for each affordable unit added. The applicant is not proposing any additional affordable units.

**Senior Village Application Requirements. (§185-48.E).**

SV1. In accordance with par (ii)d. *Vegetative cover conditions on the property according to general cover type including cultivated land, meadow, pasture, woodland, and wetland; trees with a*

diameter at breast height (DBH) in excess of 15 inches, the actual canopy line of existing trees and woodlands. This information is required and has not been provided.

*UCI: The requested information has been added to sheets 2 and 3.*

**BETA: The requested information has been shown. BETA will defer to the Board whether individual trees within the wooded areas in excess of 15" DBH should be identified. An existing tree inventory of trees in excess of 15" DBH has been added to sheet 11.**

- SV2. In accordance with par (ii)g. *A viewshed analysis showing the location and extent of views into the property from public roads and from public lands;* This information is required and has not been provided.

*UCI: The applicant will provide an updated virtual view of the site.*

**BETA: Comment remains.**

*UCI: The applicant will provide an updated virtual view of the site at the hearing.*

- SV5. In accordance with par (2) Application, a brief written description of the proposed project detailing the items listed in the bylaws is required and has not been submitted.

*UCI: A narrative description has been added to sheet 4.*

**BETA: As noted, a project narrative has been added to sheet 4. BETA will defer to the Board whether this is sufficient. The applicant defers to the Planning Board.**

#### **Senior Village Standards. (§185-48.F).**

- SV6. In accordance with par. 1b. a minimum of 40% of the required open space shall be suitable for use for passive and/or recreational purposes. This area should be delineated on the plans.

*UCI: The open space includes a walking path to provide access to the open space area as well as connectivity to the site driveways and mixed-use building. The open space also includes a wetland and lawn area. The open space provides for a mixture of passive and recreational uses. A clubhouse and bocce court have been provided however they are not located within the open space area.*

**BETA: The proposed open space will primarily provide passive recreational use. The proposed walking path will allow active use of the area and will provide access to nearly all the proposed open space. Grades in the open space range from 5-15% and the walking path should be constructable with minimal impact on the abutting natural vegetation. BETA will defer to the Board regarding the adequacy of the use of the open space. The applicant defers to the Planning Board.**

- SV7. In accordance with par 1c. *The percentage of open space that is wetland resource areas as defined and regulated pursuant to the Massachusetts Wetlands Protection Act (MGL c. shall not normally exceed the percentage of the tract that is wetlands;* The values for total lot area and open space area shown on sheet 4 do not agree with the figures identified on sheet 1.

*UCI: The open space area has been revised and the areas have been revised on sheets 1 and 4.*

**BETA: Open space area is noted as 220,468 s.f. in the description, and 220,494 s.f. on the plan view on Sheet 4. Although close there remains a discrepancy that should be corrected. The area has been revised on sheet 4 in the plan view.**

SV11. In accordance with par (c) Parking standards. § (i) a maximum of 2 spaces per unit shall be permitted. The application should document if the garage spaces as proposed for the single family and duplex units will meet this requirement. The driveways for these units are all long enough to provide 2 guest spaces per unit. BETA will defer the requirement for guest spaces to the Board as noted in this section of the bylaw. (See comment below)

*UCI: Each single-family unit and duplex unit will have two garage spaces. Additionally, two guest spaces are provided for each single-family unit and duplex unit. A note reflecting this has been added to sheets 4 and 5.*

**BETA: The garage spaces are now identified; however, BETA recommends that unit nos. 13-16 be moved further away from the edge of roadway to ensure that cars parked in the driveway do not interfere with the use of the sidewalk. The locations of units 13 - 15 were revised. Unit 16 was not revised due to the rear setback distance to the property boundary.**

SV12. Par. (c) § (i) also notes “All off-street parking shall be sited to the side or rear of buildings and shall minimize visibility from public and private streets.” As noted above, the applicant should confirm that the garage will provide the 2 spaces required per unit. BETA will defer the issue of use of the space between the roadway and the garage as guest spaces.

*UCI: The single-family units and the duplex units will each have two garage spaces.*

**BETA: As previously noted, BETA will defer the use of the space between the roadway and garage as guest spaces to the Board. The applicant defers to the Planning Board.**

SV14. Verify that the proposed accessory restaurant use does not exceed 5% of the total gross building area for the entire senior village (§185-48.D.1(e)).

*UCI: Commercial space parking calculations have been added to sheet 5.*

**BETA: Comment addressed; however, the proposed use of the commercial space is not identified as restaurant use. The applicant is considering a restaurant however a tenant has not been determined at this time. If necessary the applicant would be amenable to a condition of a permit that allows review of the tenant once determined.**

SV16. BETA defers to the Town regarding the requirement that landscape shall be preserved in its natural state insofar as practicable (§185-48.F.3(b.i)). The project proposes substantial grading and the post-development landscape will differ significantly from the natural state.

*UCI: The open space area will contain preserved vegetation.*

**BETA: BETA defers this issue to the Board. The applicant defers to the Planning Board.**

SV17. BETA defers to the Town regarding the requirement that streets, parking area, and building sites be designed and located in such a manner to preserve natural topography, significant landmarks and natural systems, and trees and to minimize cut and fill (§185-48.F.3(b.ii)). The project proposes substantial regrading and the proposed driveway, parking areas, and building sites will not follow natural topography.

*UCI: The project has been reduced in units as suggested by the Planning Board.*

**BETA: As previously noted, BETA defers this issue to the Board. The applicant defers to the Planning Board.**

## Traffic Impact and Assessment

No additional traffic data or assessment has been submitted by the applicant.

### Site Access and Circulation

Access to the Site is proposed via a new curb cut and driveway entrance connecting to Panther Way. The proposed driveway is over 1,000 feet in length and will cross the site from east to west, terminating in cul de sac. One roadway is proposed to branch off of the main driveway; and connect to the existing driveway on the lot to the south to act as an emergency entrance. Proposed housing units are all directly accessed from a roadway. All proposed roadways are 24-ft in width with a maximum grade of 8%. Stop line and stop signs are proposed at driveway intersections for traffic control.

T3. Provide calculation for sight distance at driveway entrances. BETA observed limited visibility to the north of the proposed driveway entrance and this direction should be reviewed for adequacy of stopping sight distance. Sight distance must comply with the MassDOT Project Development and Design Guide (§185-21.C.7(c)).

*UCI: Sight distances have been added to sheet 7.*

**BETA: Based upon the notes associated with the proposed sidewalk north of the entrance, BETA recommends that a line-of-sight profile without the sidewalk improvements be developed and shown on the site plans to document the clearing required to provide the required 250' sight distance. The line-of-sight plan and profile have been added to sheet 9.**

### Parking And Loading

Required parking is defined by §185-21 of the Town Zoning Bylaw. The proposed development includes residential and nonresidential uses. According to the traffic impact assessment letter, the mixed-use building will include 3,196 Sq. Ft. of commercial space.

Required parking is calculated as follows:

Use Designation	Criteria	# of Units / Building Area	Required Parking
Dwelling Units (Standalone)	2 Spaces per dwelling unit	26 Units	52 Spaces
Dwelling Units (Mixed Use Building)	2 Spaces per dwelling unit	18 Units	36 Spaces
Commercial (Mixed Use Building)	1 Space per 400 Sq. Ft. of gross building area*	3,196 Sq. Ft.	8 spaces

*\*Per senior village standards, §185-48.F.3(c.iii).*

The single and duplex units will each have an attached 2 car garage. In front of the mixed-use building, a parking lot with 24 spaces is proposed with 22 spaces proposed in a garage on the first floor of the proposed building. Thus, the total provided for the structure is 46 parking spaces, with two (2) of these parking spaces designed to be van accessible.

All maneuvering aisles are at least 24 feet wide; parking spaces are 9 feet wide and 19 feet long.

T8. Verify if garages are proposed and indicate the capacity of each. To satisfy required parking criteria, each dwelling unit must have two associated parking spaces.

*UCI: Units 1 through 26 will have two garage spaces per unit. The mixed-use building will have 22 spaces within the building garage and 24 spaces located in the exterior parking area.*

**BETA: Comment addressed; however, BETA recommends that a parking layout inside the mixed-use building, including a floor drain layout, be added to the drawing set. The building**

*parking spaces have been added and were taken from the Architectural Plans prepared by Colwell Group. The floor drains were not added, however a note was added to the plan requiring that the floor drain design be completed by the mechanical / plumbing engineer and that the floor drain shall be connected to the MDC style trap.*

T10. In accordance with 521 CMR 20, provide an accessible route from the accessible parking spaces to the building entrance.

*UCI: An accessible route has been provided.*

**BETA: On sheet 5, relocate the “Van Accessible” signs to the proposed space location, and indicate the ramp location. On sheet 7 show spot grades at the front of the HP spaces which demonstrate compliance with 521CMR20. The sign locations have been revised on sheet 5. Spot grades were added to sheet 7.**

T13. Contrary to the bylaws, (§185-48.F.3(c.i)), the parking lot design at the mixed-use building is located at the front of the building and visible from the street. BETA will defer to the Board if this requirement is applicable to these parking spaces.

*UCI: The mixed-use building is on the corner of Panther Way and the proposed access roadway. The Zoning Bylaw frontage definition would suggest that the mixed-use building would have two front yards and two side yards. The applicant defers to the Planning Board as to the adequacy of the parking location.*

**BETA: As previously noted, BETA will defer to the Board if this requirement is applicable to these spaces. The applicant defers to the Planning Board.**

T14. Identify snow storage areas for the parking area and driveway.

*UCI: Snow storage areas for the parking area and driveway have been added to sheet 11.*

**BETA: Except for the area around the mixed-use building parking lot, there are no other designated snow storage areas identified on Sheet 11. BETA recommends that these areas be shown on sheets 4&5, and that snow storage areas along the access roadways be clearly designated. Additional snow storage areas have been added to sheets 6 and 7.**

### Signage and Lighting

The project proposes traffic control signs including stop signs and accessible parking signs. Stop signs are proposed at driveway intersections and at the new driveway entrance.

The Illuminating Engineers Society of North America (IESNA) recommends the following illuminance for parking lots:

Level	Horizontal Illuminance (Min)	Vertical Illuminance (Min.)	Uniformity Ratio (Max/Min)
Basic Maintained Illuminance	0.2	0.1	20/1
Enhanced Security Illuminance	0.5	0.25	15/1

- SL1. Recommend providing lighting in the parking lots and along sidewalks to enhance pedestrian safety.

*UCI: A site photometric plan has been included in the plan set.*

**BETA: Based upon the photometric plan provided, BETA has the following comments.**

- **There is a 400'± gap on the main access roadway without any streetlights. The roadway that runs south towards the emergency access also has no streetlights. BETA recommends that the applicant consider providing some smaller LED lighting at the driveway entrances along these areas to enhance pedestrian safety.**

*Unit driveway lamp posts have been added for units 1 - 26. A detail has been added to sheet 14. The unit driveway lights are not shown on the photometric plans.*

- **At the entrance, the proposed pole mounted light will illuminate Panther Way and the proposed crosswalk. The applicant has requested the waiver to allow this spillage. Based upon the crosswalk and the roadway curve north of the Highwood drive entrance, BETA has no issue with the spillage but will defer this issue to the Board.**
- **There is no proposed lighting along the walking path. BETA will defer to the Board whether lighting along this path should be considered. *The applicant prefers not to install walking path lighting but will defer to the Planning Board.***

#### Utilities

Proposed utilities depicted on the plans include domestic water, fire service, and sanitary sewer. Proposed water and sewer will be provided via new mains located beneath the proposed driveway. Proposed water will connect to the existing main at Panther Way; proposed sewer will connect to an existing sewer manhole located at the southeast corner of the Site which is connected to the existing main at Panther Way.

The proposed water main is 8" CLDI and services are identified as 2" diameter for domestic connections and 4" diameter for fire. Several fire hydrants are also proposed throughout the Site. The proposed sewer main is 8" SDR 35 PVC and several sewer manholes are proposed throughout the Site.

- U1. Provide detail for proposed water/sewer crossings.

*UCI: A detail has been added to sheet 16.*

**BETA: Detail should note distance of encasement required beyond water line. A note has been added to the detail.**

- U2. Confirm that there is sufficient sewer capacity in the existing sewer connection to Panther Way for both the existing and proposed developments.

*UCI: See attached email from Town Engineer Michael Maglio regarding sewer capacity.*

**BETA: Email not included in submission. *The email was attached to the rear of the response to comments pdf.***

- U3. Confirm whether a utility easement is required or in place for the sanitary sewer connection, which will be used by both the senior village and the development to the south.

*UCI: The owners and applicants will have an Approval Not Required plan of land dividing the property into 2 Lot. This plan will include a drainage easement, access easement and utility easements for the sewer and stormwater.*

**BETA: BETA will defer this issue to the Board but recommends that this be included as a condition.** *The applicant agrees with the recommendation and defers to the Planning Board.*

U5. **BETA: On the proposed roadway cross section, BETA has the following comments.**

- **Show anticipated limits of ledge removal.** *Approximate limits of ledge removal have been added to the roadway cross section.*
- **Show minimum cover depth for each utility.** *Depth of cover and dimension were added for the water, sewer and drain. Notes were added for the gas, telephone, electric and cable television.*
- **Integrate the design of the perimeter drain with the proposed ledge removal to ensure that groundwater does not impact the paved surface.** *The perimeter drain and ledge removal have been added to the roadway cross section.*
- **A filter fabric lined stone trench should be placed around the perforated piping to aid groundwater collection.** *Filter fabric, encapsulating the stone trench, has been added to the roadway cross section.*

U6. **BETA: BETA recommends that the layout of the proposed perimeter drain be shown on the utility plan including inverts and discharge connections with the stormwater collection system.** *The proposed perimeter drain with connection locations, and inverts have been added to sheet 10.*

#### Landscape Treatment & Grading

The project proposes numerous tree and shrub plantings throughout the project area, including 193 Eastern Red Cedar plantings, 25 American elm plantings, 25 sugar maple plantings, 25 white angel crab plantings, and 25 white birch plantings. New trees are generally proposed along driveways and parking areas.

Per §185-21.C.(5), the project is required to provide 1 tree per 10 parking spaces (applicable only to the parking lot). For 44 spaces, 6 trees are required. The planting plan includes significantly more trees than required to satisfy this requirement.

Per §185-48.F.3(c.ii), the project is required to provide 2 trees per 3 parking spaces. For 24 spaces, 16 trees are required. Approximately 34 trees are proposed in close proximity to the parking area.

The project includes outdoor parking for 10 or more cars and is required to provide screening in accordance with §185-35. Residential districts are located to the east and north of the building.

Screening is proposed along the northern property line consisting of 134 Eastern Red Cedar in two staggered rows. No screening is proposed along the eastern side of the parking area.

The project includes substantial regrading throughout the project area. Grading is predominantly cut and post-development grades are greater than 26 feet below pre-development grades in some areas.

LA1. Depict existing treeline and proposed limit of tree clearing on the planting plan.

*UCI: The existing treeline and proposed treeline have been added to the site plans.*

**BETA: Comment addressed; however, adjacent to the walkway at West Central Street an existing wooded area outside the limit of clearing is shown as loamed and seeded. BETA recommends that the designer revisit this area. The area to be loamed and seeded s has been revised on sheet 11.**

- LA2. Street trees are required along Panther Way ((§185-48.F.3(d.iv)).BETA will defer to the Board if additional tree plantings are required at the existing stormwater basin.

*UCI: A waiver request has been added to sheet 1.*

**BETA: As previously noted, BETA will defer this issue to the Board. The applicant defers to the Planning Board.**

- LA4. In accordance with the bylaws(§185-48.F.3(c.ii)), . 38 trees are required for the eastern parking lot. 36 are shown. BETA will defer to the Board relative to the placement as shown.

*UCI: The parking area and tree plantings have been revised.*

**BETA: BETA recommends that the designer review the Landscape Plan. The symbols for the proposed tree plantings are difficult to follow based on their size and appear to be incorrect (i.e. deciduous trees are marked by the symbols for evergreens and vice versa). The proposed tree symbol labels have been revised. The deciduous tree symbols have been increased in size.**

- LA5. Provide required street trees, spaced at intervals no greater than 20 feet along both sides of the street (§185-48.F.3(d.ii)).

*UCI: A waiver request has been added to sheet 1.*

**BETA: See comment above (LA2) See response to LA2.**

### Stormwater Management

The proposed stormwater management design consists of 2 new subsurface infiltration systems including shared use of the existing surface infiltration basin with the existing commercial use to the south. There is also an existing subsurface infiltration system on the existing commercial parcel that will be included in the development analysis. Stormwater runoff will be conveyed to these systems via a new closed drainage system consisting of catch basins, manholes, roof drains, and water quality units. Ultimately, all runoff from the developed portion of the site will be collected and directed into the existing infiltration basin at the front of the site. Overflow from the subsurface systems will be conveyed via piped flow to the infiltration basin; overflow from the infiltration basin will be conveyed via an outlet control structure into the Panther Way MS4. Nearly all the runoff from the development, including the existing commercial site will be directed towards the Panther Way MS4. Only the area to the far west o the site and the walkway area between West Central Street and the commercial site will continue to flow south towards west central street.

BETA observed that the existing infiltration system appears to be maintained in good condition.

### General

- SW3. Evaluate the need to provide fencing or similar barrier around the infiltration basin, as it is near to areas where pedestrians may frequent.

*UCI: Rock's from the site has been added to the detention basin as a barrier.*

**BETA: BETA has no issue with the use of the blasted rock as a barrier around the front of the basin but recommends that the stones be 3' minimum in size placed 8' on center. BETA will defer this issue to the Board. The note has been revised on sheet 7.**

SW6. Indicate if the existing drainage easement associated with the infiltration basin must be modified for the newly proposed drain connections (§153-15.A(11) & §300-11.A(6)).

*UCI: Drainage easement for the two proposed lots will need to be created. Refer to the proposed plan Comment and Response U3.*

**BETA: BETA recommends that the easement language be available for the Board to review to ensure that both parties are aware of their maintenance obligations for both the basins and the tributary systems. The applicant requests that the documents be prepared and submitted for review upon approval of the project and prior to endorsement.**

Subdivision regulations - stormwater management regulations (§300-11)

Additional requirements for stormwater management are outlined in §300-11 of the Town of Franklin Subdivision Regulations.

Best Development Practices Guidebook

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

SW7. Indicate if proposed seed mix and plantings will reflect native vegetation, particularly near woodland areas (BDPG Page 7).

*UCI: Proposed seed mixes, area of seeding and revised tree plantings have been added to sheet 11. The plantings are listed in the Town of Franklin (BDPG).*

**BETA: See Section 9.0 comments above. See response above.**

Massdep Stormwater Standards

The project is subject to Town regulation §153-16 and therefore must comply with the Massachusetts Stormwater Standards as outlined by MassDEP. Compliance with these standards is outlined below:

Low impact development (lid) techniques

Proposed LID measures include no disturbance to any wetland resource area.

BETA notes that, per §185-48.F.3(b.iv) of the Town of Franklin Zoning Regulations, the project is required to implement low-impact development practices to the greatest extent practicable.

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 does not propose any new discharges to wetlands. Overflow from the stormwater management system will be conveyed either via an outlet control structure or over a new riprap spillway then overland towards Panther Way. – **complies with standard.**

A riprap apron is present at the existing headwall prior to discharge to the infiltration basin. However, no new riprap aprons or other sedimentation controls are proposed at the two new headwalls (HW 30 and HW 32).

SW10. Provide calculations for sizing of scour protection, including existing riprap apron to remain.

*UCI: Sizing information and details have been added to sheet 17. Calculations have been added to the drainage report Appendix H.*

**BETA: Comment addressed; however, BETA recommends that a note be added to sheet 7 indicating that the rip rap apron at the existing headwall will be removed and replaced in accordance with the detail on sheet 17. The requested note has been added to sheet 7.**

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 via subsurface infiltration systems. Calculations indicate a decrease in peak discharge rate and peak runoff volume to all watersheds.

SW11. Review post-development peak discharge rate for watersheds 3S and 4S, representing the watershed for West Central Street and the western wetlands, respectively. Construction of the trail will require grading and tree clearing that will alter hydrology. The limit of disturbance should be depicted on the watershed plans and modeled in hydroCAD.

*UCI: The requested information has been added to the drainage analysis and is included in the report.*

**BETA:**

*UCI: No comment from BETA listed. No additional response.*

SW12. Depict the closed drainage system for the southeastern lot on the watershed plans or utility plans to confirm the accuracy of subcatchment routing in this area.

*UCI: The requested information has been added on sheet 7.*

**BETA: The requested information has been developed however, the HYDRO-CAD routing diagram for Post Development is not legible. BETA recommends that this diagram be enlarged so it is legible. A larger Post Development routing diagram has been provided.**

SW13. Depict the extent of the area modelled as “gravel roads” in the pre-development hydroCAD model.

*UCI: The area of gravel was from the predevelopment condition prior to the construction of the bus building. The original (2019) pre-development watershed plan has been added to the drainage report.*

**BETA: The Pre-development watershed map only depicts 3 watersheds while the model has 4. In addition, the area at the western edge of the parcel is not delineated either. BETA recommends that the designer revisit this watershed map and include all the areas of the proposed development to develop an accurate comparison. In addition:**

*We have included the original pre-development watershed plan from the 2019 submission. This plan did not have areas 3 and 4 but does depict the gravel parking area. We have also included the pre-development watershed plan from 2025-2025 which includes the additional land located to the west end of the site and contains the wetland as well as the watershed where the path connection is proposed to West Central Street.*

- **The discharge rate and volume toward West Central Street will definitively be reduced based upon the development of the commercial site which effectively diverted a significant portion of the watershed into the Panther Way MS4. However, BETA recommends that the discharge from the wetlands at the western part of the site and the walking path area below the commercial site be analyzed separately to**

**ensure that discharge towards the downgradient stormwater facilities is not increased by the proposed walkway development and grading.** *Pre-development area 3S represents the walkway below the commercial site and area 4S represents the wetland area. Post-development area 53S represents the walkway below the commercial site and area 54S represents the wetland area. Area 53S and 54S were then combined to represent the discharge to West Central Street. The combination is shown as Link 54L.*

- SW18. Review performance of existing basin based upon NOAA Atlas-14 rates for the 100-year frequency rainfall to determine impact of increased rainfall rate on Panther Way

UCI: The NOAA Atlas 14 - 100 year storm was modeled and the results are provided in the drainage report.

**BETA: Analysis was conducted, however, there is an increase in the 100-year peak discharge which should be addressed.** *The calculations have been revised. See revised drainage analysis.*

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 indicates the presence of Charlton-Hollis-Rock outcrop complex and Hinckley loamy sand with Hydrologic Soil Group Ratings (HSGR) of A (high infiltration) and B (moderate infiltration). Test pits conducted at the Site indicate a highly variable groundwater elevation from elevation 276' to 321.74'. Permeability testing was conducted at the Site in 2019 identifying subsurface soils as Sand and Gravel with a very high infiltration rate. A Rawls Rate of 8.27 in/hr, associated with Sand, has been utilized in design of the existing subsurface infiltration system and the infiltration basin. The proposed infiltration systems have been designed based upon testing in February 2025.

Groundwater recharge is proposed via 2 new subsurface infiltration systems and the existing subsurface infiltration system and infiltration basin. The project is expected to provide a recharge volume in excess of what is required.

Calculations have been provided indicating all BMPs will drawdown within 72 hours.

- SW20. Indicate the soil conditions detected at each soil horizon in each test pit to confirm suitability of soil for infiltration.

UCI: *Additional soils information has been added to sheet 6 and the drainage report.*

**BETA: Test pit logs for data shown on sheet 6 not provided. In addition, test pit locations are no longer shown. Comment remains.** *The test pits conducted in December 2023 were advanced to determine depth to refusal and or groundwater. Soil information gathered is listed on sheet 6. Permeability TP3-1 and 4-1 represent the soil conditions at Pond 3. Permeability TP5-1 and 5-1 represent the soil conditions at Pond 5. The test pit locations are now provided on the plan.*

- SW21. Indicate the location and depth of the permeability tests conducted at the Site and confirm that the results will remain valid following proposed grading.

UCI: *Additional soils information has been added to sheet 6 and the drainage report.*

**BETA: Although difficult to read, the data is shown on the logs associated with the permeability testing. However, there are additional permeability test results included in the report which have not been located. These test pit locations should be shown.** *The testing*

results listed were completed 2019 for the underground pond and the open pond which have already been constructed. The test pit locations and data have been added on sheets 6 and 7.

SW22. Review design of all subsurface infiltration systems to confirm that adequate separation to groundwater has been provided. The nearest test pits, TP3-0-N and TP4-0-N were completed only to elevations 263.92' and 277.61', respectively. Compared to the system bottom depths of 264.1 for Pond 4 and 265.7 for Pond 5, the test pit information is insufficient to demonstrate that the required separation to groundwater has been achieved.

*UCI: Additional soils information has been added to sheet 6 and the drainage report.*

**BETA: Infiltration system 4 has been eliminated, however, at Pond 5, the soil log for test pit 5-2 indicates that ESHGW is at Elevation 261.7 based upon the presence of weeping on 2-25-2025. BETA recommends that a Frimpter adjustment be made at this location since the bottom of the pond is at elevation 265.7 exactly 4' above the weeping level. The pond has been raised to provide 6 feet of separation to the weeping water observed on 2-25-2025.**

SW25. Provide required mounding analysis where infiltration BMPs have less than 4 feet of separation to estimated seasonal high groundwater.

*UCI: Additional soils information has been added to sheet 6 and the drainage report which depict a minimum of 4 feet to the bottom of the test pits.*

**BETA: See SW22 above. See the response to SW22 above.**

Total Suspended Solids (Standard Number 4): *For new development, stormwater management systems must be designed to remove 80% of the annual load of Total Suspended Solids (TSS).*

The project is also subject to the Town of Franklin pollutant removal requirements for new development sites. The project will meet these requirements by retaining the volume of runoff greater than 1.0 inch multiplied by the total post-construction impervious surface area on the Site.

The project includes the following treatment trains:

Treatment Train	SCM 1	SCM 2	Infiltration SCM	TSS Removal %
A	Deep Sump Catch Basin	None	Infiltration Basin	80%
B	Deep Sump Catch Basin	Subsurface Infiltration System	Infiltration Basin	>80%
C	Deep Sump Catch Basin	Subsurface Infiltration System (2 In Series)	Infiltration Basin	>80%
D	None (Roofs Only)	Subsurface Infiltration System	Infiltration Basin	>80%

The project has been designed to provide at least 80% TSS removal for treated impervious areas. Only a small portion of the driveway entrance will not receive treatment, but this area is expected to be considered

“De minimus”. The proposed infiltration SCMs have been sized to treat the required 1-inch water quality volume.

As the project is in an area with a rapid infiltration rate, the project is required to provide at least 44% TSS removal as pretreatment. Pretreatment is provided via deep-sump catch basins. The narrative identifies water quality units for providing additional pretreatment, but this does not appear to be reflected in the plans.

A Long Term Pollution Prevention Plan is included in the O&M Plan.

SW26. Provide TSS removal calculations for the flows into the existing basin.

UCI: Information provided in Appendix E.

**BETA: See SW28 below. See response to SW28 below.**

SW28. Provide typical TSS Removal sheet for both pretreatment and total treatment for the subsurface infiltration ponds. It should be noted that pretreatment cannot be used in the determination of Total TSS Removal.

UCI: Information has been provided in appendix E.

**BETA: Comment has not been addressed. BETA has the following relative to the data presented.**

- **The Water Quality Units will provide pretreatment for the infiltration systems only. Based upon EPA guidelines, TSS Removal rates for these units will be limited to 44%.**
- **As noted above, pretreatment cannot be used in the determination of Total TSS removal. The totals should be adjusted accordingly.**
- **Identify which treatment train the calculations apply to.**
- **Provide a sheet for both treatment and pretreatment for each train.**

*The TSS calculations have been revised and can be found in appendix E of the Drainage Analysis.*

- **The flows from the roof areas at the rear of units 1-13 is allowed to flow overland to CB 51. Because this flow is overland, pretreatment must now be provided. The catch basin alone does not meet the standard. BETA recommends that the roof leaders for these units be collected and piped directly into Pond 5. This would effectively eliminate the pretreatment requirement and ease our apprehension regarding the soil stability in the swale at the rear of the units.**

*The roofs have been connected to a pipe which has been connected to pond 5.*

SW29. TSS removal has not been provided for portions of the access driveway. Provide calculations to demonstrate that this area qualifies as “de minimus” or provide treatment.

UCI: Deminimus calculation added to Appendix E.

**BETA: Adjust calculations based upon SW28 above. Calculations have been revised.**

Higher Potential Pollutant Loads (Standard Number 5): *Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific stormwater management BMPs.*

The project includes a Senior Village which is not typically considered a LUHPPL. The traffic assessment indicates a peak trip generation of 638 trips per day which is below the 1,000 trips per day threshold to qualify as a LUHPPL – **standard not applicable.**

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

The project is not located in a critical area – **standard not applicable.**

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

The project does not qualify as a redevelopment – **standard not applicable.**

Erosion And Sediment Controls (Standard Number 8): *Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities.*

As the project proposes to disturb greater than one acre of land, a Notice of Intent will be required to be filed with EPA including development of a Stormwater Pollution Prevention Plan (SWPPP). A SWPPP was not provided with the submission; however, the narrative indicates that the project will be covered by a NPDES General Permit. Erosion control measures are depicted on the plans including compost socks, stabilized construction entrance, temporary sediment basins.

SW36. Provide means of stabilizing existing and proposed steep slopes, including construction period steep-slopes created by excavation activities.

*UCI: Permanent slope area seed mix has been added to sheet 11. Permanent seed mixes for all other areas have been added to sheet 11. See note 7 O&M section - construction phase for temporary seed mix.*

**BETA: BETA recommends that the note be expanded to note that these slopes should be mulched if exposed outside the growing season. The requested revised note has been added.**

SW38. Provide means of preventing construction-period sediment from entering the Town's MS4. The infiltration basin is an existing, active SCM and any sediment that reaches this system could be carried to the MS4 via the outlet control structure.

*UCI: Refer to revised erosion control measures including compost socks, silt sacks, site stabilization methods and inspections and maintenance.*

**BETA: BETA recommends that a silt fence be placed around the existing outlet control structure to protect the existing MS4 system in Panther Way. A silt fence has been added around the existing outlet control structure on sheet 13.**

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 Stormwater Operation and Maintenance Manual was provided with the Stormwater Management Report.

SW41. Provide list of easements with the purpose and location of each (§153-18.B(4)).

*UCI: The proposed easements will be added to the ANR plan to be submitted after approval. This will include a sewer easement, access easements, drainage and utility easements. The list of easement will be included in the application for a Storm-water Management Permit.*

**BETA: BETA recommends that this be included as a condition of approval. The applicant is amenable to the suggested condition of approval.**

SW42. Provide signature(s) of the owner(s) (§153-18.B(5)).

*UCI: The information required in Section 153-18A and 18B(1 through 6) will be included as part of the application for the Storm-water Management Permit.*

**BETA: BETA will defer this issue to the DPW. The applicant will defer to the DPW.**

SW43. Confirm which party(ies) are responsible for maintenance of the infiltration basin.

*UCI: The owner and applicant will provide the easement and easement responsible parties and maintenance responsibilities after project approval. The owner / applicant requested the Planning Board include this as a condition of approval.*

**BETA: BETA will defer this issue to the Board. The applicant defers to the Planning Board.**

SW44. Revise O&M Map to include snow storage areas.

*UCI: Snow storage information and locations have been added to sheets 12 and 13.*

**BETA: See T14 above. The snow storage areas have been added to sheets 12 and 13.**

Illicit Discharges (Standard Number 10): *All illicit discharges to the stormwater management system are prohibited. An unsigned Illicit Discharge Compliance Statement was provided with the submission.*

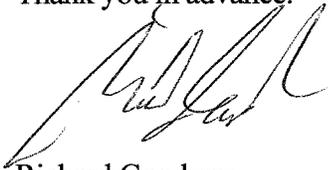
SW47. Provide owner's signature on Illicit Discharge Compliance Statement.

*UCI: The owner / applicant will provide a signed form to the Town DPW when the Storm-water Permit and SWPPP are filed.*

**BETA: BETA will defer this issue to the DPW. The applicant will defer to the DPW.**

We look forward to meeting with the Planning Board and the Conservation Commission to discuss this project further.

Thank you in advance.



Richard Goodreau  
Project Manager