



September 17, 2025

Tyler Paslaski, Permitting Specialist  
Town of Franklin Conservation Commission  
355 East Central Street  
Franklin, MA 02038

**Re: Franklin Country Club  
MassDEP File No. Not Yet Issued  
Notice of Intent Peer Review**

Dear Mr. Paslaski:

BETA Group, Inc. (BETA) has reviewed documents and plans for the Notice of Intent (NOI) seeking approval for proposed work including expansion of the existing clubhouse, modification of the 5<sup>th</sup> tee complex, vista pruning, and installation of plantings (the Project) at **Franklin Country Club** located at 672 East Central Street in Franklin, Massachusetts (the Site). Portions of the proposed work is located within the Town of Wrentham. This letter is provided to present BETA's findings, comments and recommendations, and only addresses compliance regarding work that is proposed within the Town of Franklin.

## **BASIS OF REVIEW**

The following documents were received by BETA and will form the basis of the review:

- Notice of Intent entitled **Town of Franklin Notice of Intent**; prepared Avalon Consulting Group LLC.; dated August 2025. Inclusive of:
  - Project Narrative
  - Local Forms
  - WPA Form 3
  - Wetland Resource Evaluation
  - Figures (USGS Locus Map, Soil Map, FEMA Map, and NHESP map)
- Plans (10 Sheets) entitled **Clubhouse Renovations Franklin Country Club**; prepared by Graves Engineering, Inc.; dated August 18, 2025; revised through September 10, 2025; stamped and signed by Micheal Andrade MA P.E. No. 45689.
- Plans (2 Sheets) entitled **Franklin Country Club**; prepared by Gardner and Gerrish Landscape Architects LLC.; dated August 2, 2025; unstamped and unsigned.
- Stormwater Management Report entitled **Stormwater Report for Clubhouse Renovations**; prepared by Graves Engineering, Inc.; dated August 18, 2025; signed and stamped by Micheal Andrade MA P.E. No. 45689.

Review by BETA included the above items along with the following, as applicable:

- Site Visit on September 16, 2025
- **Massachusetts Wetlands Protection Act 310 CMR 10.00** effective October 24, 2014
- **Massachusetts Stormwater Handbook** effective January 2, 2008 by MassDEP

- **Stormwater Management Chapter 153 From the Code of the Town of Franklin**, Adopted May 2, 2007
- **Wetlands Protection Chapter 181 From the Code of the Town of Franklin**, dated August 20, 1997
- **Chapter 300: Subdivision of Land From the Code of the Town of Franklin**, adopted September 29, 1986
- **Town of Franklin Best Development Practices Guidebook**, dated September 2016

## SITE AND PROJECT DESCRIPTION

The 115.31-acre Site is located at 572 East Central Street and consists of one (1) parcel identified as Map 300 Lot 002-000 in Franklin, Massachusetts. The Site is bounded to the north by East Central Street, to the west and south by residential homes, and to the east by undeveloped forest and residential homes. The Site has historically been the operating location of the Franklin Country Club and includes forested areas, wetland complexes, golf greens, and structures associated with the golf course.

Resource Areas Subject to Protection under the Massachusetts Wetlands Protection Act (M.G.L. ch.131 s.40) and its implementing regulations at 310 CMR 10.00 (collectively “the Act”), as well as the Town of Franklin Wetlands Protection Bylaw (Chapter 181) and its associated regulations (collectively “the Bylaw”) are present at the Site and include:

- Bank/Mean Annual High Water (MAHW);
- Bordering Vegetated Wetlands (BVW);
- Land Under Water (LUW);
- Bordering Land Subject to Flooding (BLSF);
- Riverfront Area (RA); and
- Buffer Zone.

The Site is not located within any Surface Water Protection Areas (Zone A, B, or C), or Zone I, or Interim Wellhead Protection Areas. The Site is located within a Zone II Wellhead Protection Area. There are no Outstanding Resource Waters (ORWs) or Areas of Critical Environmental Concern (ACEC) present, and the most recent Natural Heritage and Endangered Species Program (NHESP) mapping does not depict any Priority Habitat of Rare Species or Estimated Habitat of Rare Wildlife at the Site. There are no NHESP-mapped Certified or Potential Vernal Pools located within 100 feet of the Site.

Natural Resource Conservation Service (NRCS) soil maps indicate the presence of the following soil type at the Site, Freetown muck, 0 to 1 percent slopes with a Hydrologic Soil Group (HSG) rating of B/D, Hickley loamy sand, 3 to 8 percent slopes, with a HSG rating of A, Hinckley loamy sand, 8 to 15 percent slopes with a HSG rating of A, Merrimac fine sandy loam, 3 to 8 percent slopes with a HSG rating of A, Canton fine sandy loam, 0 to 8 percent slopes, extremely stony, with a HSG rating of B, and Udorthents, sandy, with a HSG rating of A.

Proposed work is associated with the expansion of the existing clubhouse, modification of the 5th tee complex, vista pruning, installation of plantings, alteration of existing cart paths, and installation of related stormwater improvements (collectively referred to as “the Project”). Proposed activities will occur in phases; the Applicant has proposed the following phased construction and timing to complete work:

Phase IA – Fall 2025:

- Installation of erosion and sedimentation controls;
- Installation of tree protection;

- Removal of proposed storage and fencing outside of jurisdictional areas;
- Removal of the existing stairs;
- Removal and disposal of sod; and
- Grading and installation of sod to construct the 5<sup>th</sup> tee.

Phase IB – Fall 2025:

- Vista pruning at 5<sup>th</sup> hole pond.

Phase II – Fall 2025:

- Installation of erosion and sedimentation controls;
- Excavation and stockpiling of existing perennials to be transplanted;
- Removal and disposal of sod;
- Removal of existing stairs;
- Grading of the tee area and installation of crushed stone to create a storage pad;
- Installation of temporary construction fencing;
- Demolition of existing clubhouse decking; and
- Construction of exterior of clubhouse, and replacement and addition of HVAC.

Phase III – Spring 2026:

- Removal of construction fencing;
- Relocation of erosion and sedimentation controls to cart path locations;
- Removal of existing stairs;
- Excavation of gravel, fine grading of the tee, and installation of drainage;
- Removal of existing cart paths and recycling of asphalt off site;
- Removal and disposal of sod;
- Construction and paving of cart paths;
- Construction of stairs;
- Stabilization of exposed soil with sod, seed, and hydro mulch; and
- Removal of erosion controls.

Phase III – Fall 2026:

- Installation of proposed shrubs, herbaceous seeds, and native grass.

As reported by the Applicant, Project will result in direct impacts to the following Resource Areas:

- 1,876 square feet of impacts to BVW;
- 160 linear feet of impacts to Bank;
- 38,935 square feet of impacts to RA; and
- 40,723 square feet of impacts to the 100-foot Buffer Zone.

The Project proposes the installation of native vegetation throughout portions of the site.

## ADMINISTRATIVE AND PLAN COMMENTS

The plan set (as identified above) is missing information and requires additional information for clarity.

**Table 1. NOI Plan**

NOI Plan Requirements	Yes	No
Scale of 40'=1" or larger	✓	
North Arrow (with reference)	✓	
Topographic contours (2' intervals)	✓	
Existing Conditions Topography (with source and date of survey)	✓	
Proposed Topography	✓	
Existing and Proposed Vegetation	✓	
Existing Structures and Improvements	✓	
Resource Areas and Buffer Zones labeled	✓	
Location of Erosion Controls	✓	
Details of Proposed Structures	✓	
Construction Sequence and Schedule	✓	
Registered PLS Stamp (Existing Condition Plans Only)		✓ (See Comment A2.a)
Assessors' Reference		✓ (See Comment A2.b)
Abutting Property Assessors' Reference		✓ (See Comment A2.c)
Survey Benchmark	✓	
Accurate Plan Scale	✓	

## PLAN AND GENERAL COMMENTS

- A1. The Massachusetts Department of Environmental Protection (MassDEP) has not issued a DEP file number as of this writing.
- A2. The following Plan elements are required:
  - a. A Registered MA PLS Stamp on the existing conditions plan.
  - b. The Assessor's Reference for the parcel where work is proposed.
  - c. The Assessor's Reference for the abutting properties.

## WETLAND RESOURCE AREAS AND REGULATORY REVIEW

BETA conducted an onsite review of existing conditions and proposed work areas on September 16, 2025. The Project proposes impacts to onsite areas Subject to Jurisdiction and Protection under the Act and Bylaw including Bank, BVW, RA, and the associated 0-25', 25-50' and 50-100' Buffer Zones. Work proposed within Bank and BVW is associated with the installation of native vegetation. A Variance request has been submitted for work within the 0-25' Buffer Zone as required by the Bylaw. The Project is subject to the MassDEP Stormwater Standards.

The NOI application includes narrative information describing the Project and proposed mitigation. Mitigation measures include use of erosion controls, planting of native species, and stormwater management. Additional information is required to demonstrate compliance with the Bylaw and Act.

Specifically, work proposed within BLSF should be quantified; narrative information on how the Project complies with the Performance Standards for both Bank and BVW should be provided; plans should be updated to include required information per the Bylaw; and a more detailed alternatives analysis should be provided for work within RA and to support the Variance request per Bylaw requirements. Mitigation in the form of planting native vegetation is proposed within the onsite BVW and along the Bank of Uncas Brook. This work was previously approved under the NOI filed in 1999 (File No. 159-0664); however, this work never occurred.

Based on our review of the NOI submittal and Project plans, the Applicant is required to provide the Conservation Commission with additional information to describe the Site, the work, and the effect of the work on the interests identified in the Act and the Bylaw.

### **RESOURCE AREA BOUNDARY COMMENTS**

W1. BETA completed a review of the onsite Bank/MAHW and BVW delineation. Bank/MAHW is apparent based on topographic relief and has been accurately delineated. In addition, BETA concurs with the BVW delineation depicted on the plans. BVW at the Site exists within disturbed/maintained areas and was therefore assessed based on soils. Generally, the boundary of BVW at the Site follows the transition from a sandy loam with high organic content and apparent depletions/redoximorphic concentrations to a fine sandy loam with a brighter matrix color.

### **CONSTRUCTION COMMENTS**

W2. Material stockpiles and laydown areas should be depicted on the Project plans.

W3. Resource Area impacts (both permanent and temporary) should be clearly labeled on the Project plans.

W4. Proposed catch basins should be fitted with inlet protection until full Site stabilization is achieved.

### **MITIGATION COMMENTS**

W5. Areas proposed to be vegetated with native plantings and seeding should be monitored for at least two (2) growing seasons to demonstrate successful establishment. This could be included as a Special Condition in the Order of Conditions.

W6. While invasive species pressure along Uncas Brook appears to be relatively limited, BETA observed some occurrences of purple loosestrife (*Lythrum salicaria*). It is recommended that the Applicant include hand-removal of these species as a part of the monitoring period referenced above, and that this monitoring period also include a review of any additional invasive species that are established along proposed planting areas and require management.

### **WPA PERFORMANCE STANDARDS COMMENTS**

The Project proposes 160 linear feet of impacts to Bank, 1,876 square feet of impacts to BVW, and 38,935 square feet of impacts to RA. Work proposed within BVW is associated with the installation of native vegetation. All work proposed along Bank is only associated with the installation of native vegetation.

W7. The Applicant should provide information on how the Project complies with the Performance Standards set forth in the Act for Bank (310 CMR 10.54) and BVW (310 CMR 10.55). The Applicant has stated the planting of native vegetation is exempt under 310 CMR 10.02(2)(b)(2)d; however, this provision is only applicable for work within the Buffer Zone, not within BVW.

*BORDERING LAND SUBJECT TO FLOODING (310 CMR 10.57)*

- W8. Impacts to BLSF for the planting of native vegetation, installation of the drain outfall apron, and removal of existing bituminous pavement should be quantified and details regarding how the Project complies with the Performance Standards set forth in the Act should be provided.
- W9. The 100-year floodplain at the Site is identified as a FEMA Zone A and therefore does not have a published base flood elevation (BFE). While development projects proposing significant grading may warrant a hydraulic study to determine the BFE, no fill is proposed as a part of this Project. Although the work proposed as part of the Project does not warrant further floodplain analysis, it is recommended that the Commission include a finding in the Order of Conditions stating that the BLSF boundary at the Site is approved for this filing only.

*RIVERFRONT AREA (310 CMR 10.58)*

- W10. The Applicant has provided an alternatives analysis in accordance with 310 CMR 10.58(4). The Applicant states that there is no alternative with less adverse impact; however, specific alternatives are not provided. At a minimum, the Applicant should identify specific constraints at the Site that preclude work from being sited outside of RA. For example, the increase in impervious area may be warranted as part of overall Project goals.

**BYLAW REGULATORY COMMENTS**

- W11. The Applicant has provided a Variance request for work within the 0-25' Buffer Zone in accordance with Bylaw Regulation Section 5. The alternatives analysis should be revised to provide more detail; for example, the constraints that may exist at the Site which require the installation of the stormwater discharge at its proposed location near Uncas Brook rather than a further upgradient location.
- W12. Impacts to the 0-25', 25'-50', and 50'-100' Buffer Zones should be quantified individually.

**STORMWATER MANAGEMENT REVIEW**

The proposed stormwater management design consists of a new subsurface infiltration system located beneath the rebuilt #5 tee. Stormwater runoff will be conveyed to this system via a new closed drainage system consisting of area drains and trench drains. Overflow from this system will be discharged over a new outfall apron and then conveyed overland to Uncas Brook. The project also proposes to retain and expand an existing subsurface system located east of the country club building. Stormwater runoff from the existing and expanded roof will be conveyed to this system via reconfigured roof drains. Two new trench drains and one area drain will be connected to the existing closed drainage system that discharges to this existing subsurface system.

- SW1. Clarify the proposed treatment of the existing subsurface infiltration system. The stormwater report indicates this system will be expanded, but this work is not represented on the plans.

**MASSDEP STORMWATER STANDARDS**

The project is subject to the Wetlands Protection Act 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 minimizing disturbance to existing trees and shrubs,

**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 proposes a new discharge via the new drain outfall apron for conveyance of excess stormwater runoff from the new subsurface infiltration system. The apron will be installed with erosion control pattern to mitigate erosion of the apron surface.

SW2. Provide calculations/supporting documentation to demonstrate that the naturalized apron can effectively mitigate erosive velocities for protective of Uncas Brook and the bordering vegetated wetlands.

**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 new subsurface infiltration system. Calculations indicate a decrease in peak discharge rate and peak runoff volume to all points of analysis except for Design Point #2 during the 100-year storm event. Design Point #2 represents the outfall from the existing Cultec system. As the increase in runoff volume is small, and the system does not outfall near to a flood zone, the impact of this increase is expected to be minor.

BETA has reviewed the provided watershed plans and HydroCAD models. The model and catchment areas for all analyzed watersheds are consistent with the site plans.

**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 Hinckley loamy sand with Hydrologic Soil Group Rating (HSGR) A (high infiltration). No test pits have been conducted at the Site to verify soil conditions. An exfiltration rate of 2.41 in/hr. has been utilized in the design of the subsurface system, consistent with the "Rawl's Rate" for HSGR A soils.

Groundwater recharge is proposed via one new subsurface infiltration systems and the existing, expanded Cultec system. The project is expected to provide a recharge volume in excess of what is required for new impervious areas.

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

SW3. Recommend a condition that an agent of the town observe native soils after excavation for basins to confirm design assumptions.

SW4. Provide a soil test within the footprint of the subsurface infiltration system to confirm seasonal high groundwater elevation and soil texture.

**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).*

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

The project includes the following treatment trains:

Treatment Train	SCM 1	SCM 2	Infiltration SCM	TSS Removal %
A	None	none	Subsurface Infiltration System	80%

The project has been designed to provide at least 80% TSS removal for treated impervious areas. The proposed infiltration SCM has been sized to treat the required 1-inch water quality volume for its catchment area.

Per Standard 6, the project is required to provide at least 44% TSS removal as pretreatment. No pretreatment is provided.

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

SW5. Provide TSS removal calculations for all watersheds.

SW6. Provide required 44% pretreatment, such as an isolator row (with maintenance access) in the proposed subsurface infiltration system.

**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 SCMs.*

The project includes a country club with a golf course which is not typically considered a LUHPPL.

**CRITICAL AREAS (STANDARD NUMBER 6):** *Stormwater discharges to critical areas must utilize certain stormwater management SCMs approved for critical areas.*

The project is located within MassDEP mapped wellhead protection area – Zone II which is a critical area. Refer to Standard 4 for review of the additional treatment requirements for a critical area. Subsurface infiltration systems are considered recommended SCMs for use in Zone II Wellhead protection areas.

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

The project is considered a mix of new development and redevelopment. Provided these review comments are addressed, the project will fully comply with all standards except for Standard 4. The impervious area treated by the proposed stormwater management system exceeds the net new impervious area added by the project. The project is anticipated to improve upon existing conditions with regards to stormwater management.

**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 less than one acre of land, it will not be required to file a Notice of Intent with EPA nor develop a Stormwater Pollution Prevention Plan (SWPPP). An erosion control plan has been provided showing filter sock with silt fence.

SW7. Provide inspection and maintenance requirements for construction-period erosion controls.

SW8. Provide anti-tracking measures at construction site entrance(s).

SW9. BETA defers to the Commission to permit the use of silt fence barrier.

**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.

SW10. Indicate how future property owners will be notified of the presence of the stormwater management system and the requirement for proper operation and maintenance.

SW11. Provide map, drawn to scale, that shows the location of all stormwater SCMs in each treatment train.

SW12. Provide signature of owner on the O&M Plan.

SW13. Recommend including cut sheet from subsurface infiltration system manufacturer detailing inspection and maintenance requirements, where provided, as an attachment to the O&M Plan.

**ILLICIT DISCHARGES (STANDARD NUMBER 10):** *All illicit discharges to the stormwater management system are prohibited.* The stormwater report states that there are no existing illicit discharges and none are proposed.

SW14. Provide signed illicit discharge compliance statement.

## REVIEW SUMMARY

Based on our review of the NOI submittal and Project plans, the Project as proposed will require additional information or modification to demonstrate compliance with the Act, the Bylaw, and the Massachusetts Stormwater Management Standards. It is recommended that the comments herein be addressed prior to the issuance of an Order of Conditions.

If we can be of any further assistance regarding this matter, please contact us at our office.

Very truly yours,  
BETA Group, Inc.



Anna Haznar  
Staff Scientist



Jonathan Niro, PWS  
Project Manager



Stephen Borgatti, PE, MENG  
Senior Project Engineer

cc: File