

# United Consultants, Inc.

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June 20, 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**

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, Franklin Fire, Massachusetts Department of Environmental Protection 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 title "Site Plan Panther Way" Dated December 13, 2024, was submitted with 1 Special Permit and Site Plan.  
*No response.*
2. The site is located on Panther Way in the Commercial I Zoning District. (Assessors Map 270 Lot 028, 038 & 039). The site.  
*The site is located in the Commercial II Zoning District.*
3. The applicant is not 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 housing unit count has been reduced to 44 units.*
4. Applicant has filed with the Conservation Commission.  
*The Conservation Commission review is ongoing...*

### **Comments:**

There from April 28 meeting:

- Reduce the number of units - unit count has been reduced from 48 to 43.  
*The proposed unit count is 44 total units.*
- Consider moving or removing unit 1 - Unit 1 has been removed.  
*Agreed.*
  
- Discussion was had to add a sidewalk from the entrance to CVS.

*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.*

### **Town Engineer**

No comments received.

### **BETA Group, Inc. - Planning Board**

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

SV2.

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. The applicant has requested a waiver from the requirement to provide granite or reinforced concrete curbing.

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. *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.*

SV3. Provide clear callouts for the linework assumed to reflect sidewalks and grassed strips. Clarify if a sidewalk is proposed in front of Units 1 thru 12. *Sidewalk on south side of the driveway only. Labels for the sidewalk, grass strip and vertical concrete curb have been added to the site plans.*

SV4. Provide construction detail for sidewalks. *Details provided on sheet 15 of 17.*

Site Plan and Design Review (§185-31)

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).(1)). *A photometric plan has been included in the plan set.*

SV6. Provide required parking schedule (§185-31.C.(3).(o)). *A parking schedule has been added to sheet 5.*

SV7. Provide required sight line information (§185-31.C.(3).(t)). *Sight line information has been added to sheet 7.*

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.  
*Unit count revised to 44 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%.  
*The open space has been revised.*
- 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. *The requested information has been added to sheets 2 and 3.*
- 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. *The applicant will provide an updated virtual view of the site.*
- SV3. In accordance with par (ii) j. *Locations of all historically significant sites or structures on the property, including but not limited to cellar holes, stone walls, earthworks, and graves;* Confirm that these structures have all been identified. *The requested information has been added to sheets 2 and 3.*
- SV4. In accordance with par (iii) Primary and secondary open space lands and potentially developable lands shall be identified and delineated. This information has not been provided. *The open space area has been revised and is now included on the site plans. The open space contains a walking trail for open space access. The developable portion of the site is within the limit of work area.*

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

**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. *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 boogie court has been provided however they are not located within the open space area.*
- 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 does not agree with the figures identified on sheet 1. *The open space area has been revised and the areas have been revised on sheets 1 and 4.*
- SV8. In accordance with 1f. the plan should take into account any Town of Franklin or other public lands for preservation or improvements. A walkway which connects with West Central Street has been shown. *There are not any Town of Franklin or public land within the development area. Improvements have been added to the project including a sidewalk and cross walk on Panther Way.*
- SV9. In accordance with par 2 at the owner's option, all areas to be protected shall be conveyed to a separate entity subject to the approval of the Board. The plans should show associated monumentation. In addition, the owners are required at the time of application to provide a management plan for the open space which has not been provided. *Monumentation has been added to sheets 4 and 5. A waiver request has been added to sheet 1. (Waiver request number 9) 8*
- SV10. In accordance with 3. (b), (iv) Low Impact development practices shall be utilized to the greatest extent possible. Based on the existing steep grades on the parcel, these practices would be limited to the area of the 2 existing dwellings. There are no LID measures proposed for the control of stormwater runoff on site. *Based on the site grading and the development proposal LID measures were not found to be an option.*
- 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) *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.*
- 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. *The single family units and the duplex units will each have two garage spaces.*
- SV13. In accordance with sub paragraph (vii) Solid waste storage, air conditioners, loading areas and the like shall be shielded from view by walls, dense vegetation, or fences. Each of these items should be identified on the plans including the method to be utilized to shield them from view. *Waste storage for the single family units and duplex units will be located within the garage. The mixed use building will have solid waste storage within the fenced in waste receptacle area. Air conditions and screening options have been added to the plans. The commercial space will have the loading area located within the garage.*

- 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)). *Commercial space parking calculations have been added to sheet 5.*
- SV15. Recommend providing pedestrian connections to the proposed trail; the proposed open Space is required to be suitable for use for passive and/or active recreational purposes and thus access to the trail from the senior village should be encouraged. *Access to trails has been added.*
- 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. *The open space area will contain preserved vegetation.*
- 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 re-grading and the proposed driveway, parking areas, and building sites will not follow natural topography. *The project has been reduced in units as suggested by the Planning Board.*

The Applicant provided a basic traffic impact assessment including an analysis of vehicle trip generation and the potential impact on surrounding roadways. Comments regarding the traffic impact will be forthcoming from BETA in a separate memo.

#### 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. Three shorter driveway segments are proposed to branch off of the main driveway; one will connect to a new parking lot located in front of the new multi-use building, one will connect to an existing driveway on the lot to the south, and one will terminate in a dead end. Proposed housing units are located adjacent to the main driveway or the secondary driveways. All proposed driveways are 24-ft in width with a maximum grade of 8%. Stop line and stop signs are proposed at driveway intersections for traffic control.

- T1. Confirm that the proposed configuration has been reviewed by the Town Fire Department. *See Fire Department Letter dated May 29, 2025.*
- T2. Review roadway cross section detail for consistency with plans. A 26-ft roadway width is shown on the cross section, while a 24-ft roadway width is proposed on the plans. Refer to comment T5. *The width was revised on the cross section.*
- 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)). *Sight distances have been added to sheet 7.*
- T4. Revise driveways serving more than one dwelling to be a maximum paved width of 22 feet (§185-48.F.3(d.i)). *The proposed driveways for unit 1 through 26 are twenty feet wide. The main access roadways and travel aisles within the mixed use parking area are proposed to be twenty four feet in width. The applicant defers to the Planning Board regarding the minimum width of these access roadways and parking aisles.*
- T5. Recommend providing pedestrian walkways between the mixed-use building entrance and the parking lot. *Proposed walkways have been added.*
- T6. Recommend providing pedestrian walkways connecting the mixed-use building to the proposed sidewalk with consideration of other features. (§185-48.F.3(c.ii)). *A pedestrian walkway has been added which connects the mixed use building to the access road sidewalk.*

**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 5,000 Sq. Ft. of floor area for a fine dining restaurant.

Required parking is calculated as follows:

Use Designation	Criteria	# of Units / Building Area	Required Parking
Dwelling Units (Standalone)	2 Spaces per dwelling unit	29 Units	58 Spaces
Dwelling Units (Mixed Use Building)	2 Spaces per dwelling unit	20 Units	40 Spaces
Restaurant (Mixed Use Building)	1 Space per 400 Sq. Ft. of gross building area*	5,000 Sq. Ft.	13 spaces

*\*Per senior village standards, §185-48.F.3(c.iii). The unit count has been revised. Forty four residential units are proposed.. A parking schedule has been added to sheet 5.*

The standalone dwelling units are assumed to each have an attached garage. In front of the mixed-use building, a parking lot with 56 parking spaces is proposed. Two (2) of these parking spaces are designed to be van accessible.

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

- T7. Confirm the proposed uses and associated square footage in the mixed-use building. *The commercial space is proposed to be 3,196 sq. ft. The proposed commercial space use has not been determined. The applicant has suggested a restaurant use which would be a more intensive use relative to parking and traffic.*
- 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. *Units 1 through 26 will have two garage spaces per unit. The mixed use building will have 22 spaces within the building gage and 24 space located in the exterior parking area.*
- T9. In accordance with 521 CMR 23.2.1, provide a total of three accessible parking spaces. *With the reduction in the mixed use building total parking space to 46, two handicap spaces are required.*
- T10. In accordance with 521 CMR 20, provide an accessible route from the accessible parking spaces to the building entrance. *An accessible route has been provided.*
- T11. Indicate the location of the mixed-use building entrance including pedestrian access from the parking lot. Accessible parking spaces should be located as near as possible to the building entrance they are meant to serve. *The entrances have been added and the handicap parking spaces are located in close proximity to the commercial space entrance.*
- T12. BETA defers to the Town whether the two eastern parking lots are considered separate parking facilities. Per §185-48.F.3(c.i), no parking facility may contain more than 50 parking spaces. *The parking areas have been revised and the mixed use building parking area now contains 24 exterior parking spaces.*
- 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. *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 defer to the Panning Board as to the adequacy of the parking location.*
- T14. Identify snow storage areas for the parking area and driveway. *Snow storage areas for the parking area and driveway have been added to sheet 11.*

## 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 project plans do not indicate any proposed lighting.

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.

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

## 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. *A detail has been added to sheet 16.*
- U2. Confirm that there is sufficient sewer capacity in the existing sewer connection to Panther Way for both the existing and proposed developments. *See attached email from Town Engineer Michael Magglio regarding sewer capacity.*
- 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. *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.*
- U4. Clarify if electric, telecom, and/or gas services are proposed. Note that, per §185-48.F.3(d.v), all utilities must be underground. *The proposed electric, telephone, cable television and gas services are shown on the roadway section on sheet 15. A note has been added to the roadway section indicating that the utilities shall be installed underground.*

## Landscape Treatment & Grading

The project proposes numerous tree and shrub plantings throughout the project area, including 201 Norway Spruce plantings, 31 American elm plantings, 31 sugar maple plantings, 31 white angel crab plantings, and 31 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 56 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 56 spaces, 38 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 Norway Spruce 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 16 feet below pre-development grades in some areas.

- LA1. Depict existing treeline and proposed limit of tree clearing on the planting plan. *The existing treeline and proposed treeline have been added to the site plans.*
- 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. *A waiver request has been added to sheet 1.*
- LA3. Indicate proposed seed mix and loam depth for disturbed areas. Use of native seeding is encouraged especially in areas which are not required to be a fine lawn. *The loam depth and seed types have been added to sheet 11.*
- 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. *The parking area and tree plantings have been revised.*
- 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)). *A waiver request has been added to sheet 1.*
- LA6. Indicate the proposed maximum cross slope and longitudinal slopes for the trail and the approximate limit of grading required for installation. *The limit of work proposed tree line has been added. Notes regarding the trail slopes have been added to the pedestrian trail detail on sheet 15.*
- LA7. Review grading behind Unit 1. The corner of the building is located at the bottom of a proposed swale which could cause stormwater runoff to pool at the building wall. Recommend extending swale around the building and providing spot grades to clarify design intent. *Unit 1 has been removed and the grading has been revised.*
- LA8. Review grading behind the mixed-use building. The back wall appears to be a low point which could cause stormwater runoff to pool at the building wall. Recommend providing spot grades to clarify design intent. *The grading behind the mixed use building has been revised.*

## Stormwater Management

The proposed stormwater management design consists of three new subsurface infiltration systems including shared use of the existing surface infiltration basin with the existing commercial use to the south. 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.

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

## General

- SW1. Revise watershed plans for clarity. The lines delineating subcatchments are indistinguishable from lines delineating edge of pavement, property lines, soil group boundaries, and other features. *The watershed line work has been clarified.*
- SW2. Indicate the size of the outlet pipe from the infiltration basin. *The inlet and outlet pipes have been added to the detail on sheet 17. The OCS pipe labels have also been added on sheet 7.*
- SW3. Evaluate the need to provide fencing or similar barrier around the infiltration basin, as it is near to areas where pedestrians may frequent. *Rock's from the site has been added to the detention basin as a barrier.*
- SW4. Clarify the location of proposed water quality units, identified in the Stormwater Report narrative but not depicted on the plans. A detail for Contech CDS 1515-3-C has been provided, but no proposed locations are identified. *The water quality units have been labeled in the drainage structure schedule on sheet 6. The four existing water quality units have been labeled on sheet 7.*

## Stormwater management regulations (chapter 153)

The project proposes to disturb land in excess of one acre within the Town of Franklin. It is therefore subject to the Stormwater Management Regulations. The project is also required to comply with the Town of Franklin Best Development Practices Guidebook (BDPG). Compliance with these regulations is outlined below and throughout the following sections.

Refer to Standard 4 section below for discussion of Town pollutant removal requirements. Refer to Standard 8 section below for discussion of Operation & Maintenance Plan.

- SW5. Provide clear and definite delineation of any area of vegetation or tree disturbance (§153-12.J). *The existing tree line and proposed tree line have been added to the site plans.*
- 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)). *Drainage easement for the two proposed lots will need to be created. Refer to the proposed plan Comment and Response U3.*

## 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). *Proposed seed mixes, area of seeding and revised tree plantings have been added to sheet 11. The planting are listed in the Town of Franklin (BDPG).*
- SW8. Confirm that landscaping plan has been designed in accordance with the planting bed and seeding guidelines outlined on Page 13. *The (BDPG) planting bed and seeding requirements have been added to sheet 11.*

## 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).

SW9. Provide scour protection at proposed headwall Nos. 30 & 32. *Riprap locations have been added to sheet 7.*

SW10. Provide calculations for sizing of scour protection, including existing riprap apron to remain. *Sizing information and details have been added to sheet 17. Calculations have been added to the drainage report Appendix H.*

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

SW12. Depict the closed drainage system for the southeastern lot on the watershed plans or utility plans to confirm that the accuracy of subcatchment routing in this area. *Rick to add. The requested information has been added on sheet 7.*

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

SW14. The Hydrocad models utilize a rating of HSG B for the western portions of the site. BETA requests that the applicant clarify why the NRCS HSG A rating for this soil type was not used in this model. *The western portion of the site is listed as Charlton Hollis Rock. Soil test pits were excavated as part of the first permitting process for the bus building and were determined to be a HSG B.*

SW15. Revise HydroCAD model to exclude the duplicate Pond 2 (6P) for clarity. *The model has been revised.*

SW16. Confirm outlet devices for Pond 4. The hydroCAD model indicates 4 orifices are proposed, but only 3 are depicted in plan view. *Pond 4 has been eliminated.*

SW17. Indicate outlet device inverts from each subsurface infiltration system on the plans to confirm consistency with the HydroCAD model. *The outlet device inverts have been added to the site plans sheet 17.*

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

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 subsurface infiltration systems and the infiltration basin.

Groundwater recharge is proposed via three new subsurface infiltration systems and an 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.

SW19. Provide a soil test within the footprint of each subsurface infiltration system to confirm seasonal high groundwater elevation, soil texture and depth to bedrock. *Additional soils information has been added to sheet 6 and the drainage report.*

SW20. Indicate the soil conditions detected at each soil horizon in each test pit to confirm suitability of soil for infiltration. *Additional soils information has been added to sheet 6 and the drainage report.*

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

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

SW23. Confirm that the model for the existing infiltration basin is accurate. The existing conditions plan show a bottom elevation of 250', but an elevation of 249' has been utilized in the model. *The 249 Contour has been added.*

SW24. Although it does not impact the results, correct the storage volume for the subsurface infiltration systems in the HydroCAD model. The model shows system heights of 50 feet rather than 5 feet. *The heights of the underground ponds have been revised.*

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

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. *Information provided in Appendix E.*

SW27. It appears that the applicant is proposing to use the Proprietary Separators for pretreatment for the subsurface infiltration structures. BETA recommends that the drainage schedule indicate where these units will be utilized. *The proposed water quality unit labels have been added on sheet 6. The existing water quality units have been labeled on sheet 7.*

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. *Information has been provided in appendix E.*

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. *Deminimus calculation added to Appendix E.*

SW30. Provide calculations for required/provided water quality volume. *WQV Calculations have been added to Appendix A.*

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.

SW31. Provide callout identifying entry sedimentation control mat on the Erosion Control Plan. *Label has been added on sheet 13.*

SW32. Provide detail for proposed silt sacks and identify locations on the plans. *Locations and details are provided on the plans. A Silt Sak detail is on sheet 17. Notes regarding silt sak installation are listed in the O&M Construction Phase note 7 on sheet 13.*

SW33. Provide criteria for permanent or temporary restoration of disturbed areas including how soon after disturbance measures will be implemented. *See note 6 added to the O&M section - construction phase*

*for permanent slope stabilization. See note 7 O&M section - construction phase for temporary erosion control.*

- SW34. Provide seed mix for temporary/permanent stabilization. Rick to provide. *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.*
- SW35. Provide typical location(s) of soil/material stockpile area on plans with erosion and sedimentation control measures to limit transport of materials. Areas should be located outside of buffer zones to the extent practicable. *Temporary stock pile areas have been added and compost sock have been added around the temporary stockpile areas. See sheets 12 and 13. The stockpile temporary stabilization methods can be found in the O&M section - construction phase note 8.*
- SW36. Provide means of stabilizing existing and proposed steep slopes, including construction period steep-slopes created by excavation activities. *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.*
- SW37. Identify provisions for protecting infiltration capacity of stormwater ponds during construction. *Erosion control measures have been provided including compost socks, silt saks, site stabilization methods and inspections and maintenance. See note added to Infiltration Ponds 3 and 5 on sheet 17.*
- 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. *Refer to revised erosion control measures have including compost socks, silt saks, site stabilization methods and inspections and maintenance.*
- SW39. Provide additional information on project phasing, including at one point each temporary sediment basin will be removed to complete work within their footprint. If removed too early in the construction sequence, existing SCMs could be impacted. *Project phasing notes have been added to sheet 12.*
- 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.*
- SW40. Revise O&M Plan to indicate the names, addresses, and phone numbers of the person(s) responsible for operation and maintenance (§153-18.B(1)) and identify the person(s) responsible for financing maintenance and emergency repairs (§153-18.B(2)). *Information provided.*
- SW41. Provide list of easements with the purpose and location of each (§153-18.B(4)). *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.*
- SW42. Provide signature(s) of the owner(s) (§153-18.B(5)). *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.*
- SW43. Confirm which party(ies) are responsible for maintenance of the infiltration basin. *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.*
- SW44. Revise O&M Map to include snow storage areas. *Snow storage information and locations have been added to sheets 12 and 13.*
- SW45. Indicate specific tasks for inspecting and maintaining the infiltration basin and subsurface infiltration systems. Tasks should be considered with Volume 2 of the MA Stormwater Handbook and manufacturer requirements. *The information has been added to the O&M section of the drainage analysis.*

SW46. Depict approximate location of proposed inspection ports for subsurface systems in plan view. *The approximate locations of the inspection ports have been added to sheet 7.*

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

## Summary

Based on our review of the Project documents and plans, the Applicant is required to provide additional information to the Town to demonstrate compliance with Town Regulations, MassDEP Stormwater Management Standards, and generally accepted engineering practices.

BETA has specifically noted the following key review comments:

- The project includes substantial earth disturbance and may require further permitting under §185-23.
- The project is required to provide additional information to comply with the Senior Village Standards.
- Sight distance to the north of the proposed driveway is limited and must be reviewed by the Applicant.
- An insufficient number of accessible parking spaces has been provided and the parking lot has not been designed with the required accessible route.
- No information on proposed lighting has been provided.
- No information has been provided for electric, telecommunications, or gas services.
- The proposed landscaping plan does not meet the requirements of the Senior Village District standards and limited information has been provided for proposed seed mix for disturbed areas.
- The proposed means of treating stormwater runoff is inconsistent between the stormwater report and the plans; the locations of proposed water quality units must be clearly identified on the plans.
- Completed test pits are not within the footprint of proposed infiltration systems and the water table elevation is inconsistent between completed test pits throughout the Site. Additionally, the locations of infiltration testing have not been provided on the plans.
- Additional information is required for the Erosion Control Plan and the Operation & Maintenance Plan.

*The above requested information has been added or provided and the specific items are included in the applicant's responses to comments.*

## **Planning Board Comments**

- Add sidewalks to mixed use buildings. *Sidewalk locations have been added.*
- Delete Pickle ball court *Pickle ball court has been removed and a bocce court has been added.*
- Connect the sidewalk to walking trail. *The requested walkway connections have been added.*
- Hatch green/landscape areas for Board presentation. *The areas have been identified on the site plans.*
- Street Lighting. *A photometric plan has been provided.*
- Provide architectural's plans for the project buildings. *The applicant will provide the required architectural plans.*

- Provide 3D Rendering of clubhouse to green space. *The applicant will provide the required renderings and 3D model.*
- Accessible sidewalk to mixed use building. *The accessible route has been provided.*
- Revise Density. *The proposed unit count has been revised.*
- *Need structural drawings for retaining walls. The applicant will provide the requested structural drawings.*
- Add gate to exist road. *A gate has been added.*
- Site lighting and stonewalls at entrance. *Site lighting has been provided. Refer to the photometrics plan.*
- Work with Fire Department on Access Road. Refer to the Deputy Fire chief's letter.
- Setback waivers. Unit one was eliminated and unit reconfiguration has reduced the requested setback waivers.
- Traffic Assessment. *The applicant has provided a traffic memo from Tetra Tech.*
- Entry / Exit driveway to Route 140. *Refer to Tetra Tech traffic memo.*

### **Conservation Commission and MassDEP Comments**

1. Test pits should be performed at the location of infiltration structures, including subsurface systems, to confirm depth to seasonal high groundwater. At least 2 feet of separation between the base of the basin and seasonal high groundwater and bedrock is required. If less than 4 feet, a mounding analysis is required.

Soil logs should be provided to the Commission and MassDEP.

*Soil logs have been added to sheet 6 and to Appendix F of the drainage report.*

2. The applicant should provide the required calculations for Standard 3 (required recharge volume and provide recharge volume) and 4 (required water quality volume and provided water quality volume) to demonstrate compliance. Each treatment train should have its own legible TSS worksheet. Revised information should be provided to MassDEP and the Commission.

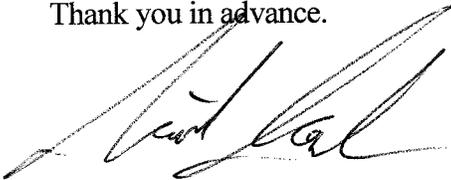
*The requested information has been provided or added to the drainage report.*

3. The applicant should provide more information about the proposed trail. It's unclear how it will be constructed and what materials will be used. Additional information should be provided to MassDEP and the Commission.

The pedestrian trail detail can be found on sheet 15. Notes have been added to the site plans re-grading slopes and grading has been revised.

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

**Rick**

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**From:** Michael Maglio <[mmaglio@franklinma.gov](mailto:mmaglio@franklinma.gov)>  
**Sent:** Monday, March 17, 2025 11:45 AM  
**To:** Rick  
**Subject:** Fwd: Panther Way

Hi Rick, no issues with sewer capacity at that location.

-----  
Michael Maglio, PE - Town Engineer  
Franklin DPW - Engineering Division  
257 Fisher Street, Franklin, MA 02038  
508-553-5500

----- Forwarded message -----  
**From:** **Doug Martin** <[domartin@franklinma.gov](mailto:domartin@franklinma.gov)>  
**Date:** Mon, Mar 17, 2025 at 11:31 AM  
**Subject:** Re: Panther Way  
**To:** Michael Maglio <[mmaglio@franklinma.gov](mailto:mmaglio@franklinma.gov)>

No problems as that will flow into the 15" main in Panther Way and then into the BSI and be pumped up Rt 140 by the new pump station.

On Mon, Mar 17, 2025 at 11:11 AM Michael Maglio <[mmaglio@franklinma.gov](mailto:mmaglio@franklinma.gov)> wrote:  
Doug, are there any issues regarding sewer capacity for Brad's proposed senior housing project on Panther Way? I think BETA may have raised the comment to Rick, but I wasn't aware of any issues.

They're currently looking at 49 units.

Thanks

-----  
Michael Maglio, PE - Town Engineer  
Franklin DPW - Engineering Division  
257 Fisher Street, Franklin, MA 02038  
508-553-5500

----- Forwarded message -----  
**From:** **Rick** <[Rick@uci850.com](mailto:Rick@uci850.com)>  
**Date:** Fri, Mar 14, 2025 at 11:34 AM  
**Subject:** Panther Way  
**To:** Michael Maglio <[mmaglio@franklinma.gov](mailto:mmaglio@franklinma.gov)>

Mike,

Good morning.

Just wanted to circle back and see if you had a chance to check with the sewer department regarding the sewer capacity for the Panther Way Senior Village project.

Thanks Rick

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