



October 2, 2025

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

Re: Franklin Country Club
MassDEP File No. 159-1319
Notice of Intent Peer Review #2

Dear Mr. Paslaski:

BETA Group, Inc. (BETA) has reviewed revised documents and plans for the Notice of Intent (NOI) seeking approval for proposed work including expansion of the existing clubhouse, modification of the 5th 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 revised documents were received by BETA and will form the basis of the review:

- Letter entitled **Franklin Country Club – Notice of Intent – Response to Comments**; prepared Avalon Consulting Group LLC.; dated September 24, 2025. Inclusive of:
 - Project Narrative
 - WPA Form 3
- Plans (10 Sheets) entitled **Clubhouse Renovations Franklin Country Club**; prepared by Graves Engineering, Inc.; dated August 18, 2025 and revised through September 24, 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 and revised through September 24, 2025; stamped and signed by Timothy D. Gerrish Registered Landscape Architect No.4245.
- Stormwater Management Report entitled **Supplement #1 to Stormwater Report for Clubhouse Renovations**; prepared by Graves Engineering, Inc.; dated September 24, 2025; signed and stamped by Micheal Andrade MA P.E. No. 45689.
- Plans (1 Sheet) entitled **Exhibit A – Resource Area Impact Plan – BVW & Bank**; prepared by Graves Engineering, Inc.; dated September 24, 2025; stamped and signed by Micheal Andrade MA P.E. No. 45689.
- Plans (1 Sheet) entitled **Exhibit B – Resource Area Impact Plan – RA & BLSF**; prepared by Graves Engineering, Inc.; dated September 24, 2025; stamped and signed 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

PEER REVIEW UPDATE—OCTOBER 2, 2025

The Applicant has provided revised materials and written comment responses pursuant to BETA's September 17, 2025 peer review letter. BETA's original comments from the September 17, 2025 peer review letter are included in plain text. Comment responses attributed to Avalon Consulting Group LLC (ACG), are provided in *italics* and are prefaced with "ACG:" BETA's most recent responses are provided in **bold** and are prefaced with "**BETA2:**".

BETA's responses in this letter identify that the Applicant has demonstrated compliance with the Act and Bylaw.

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 5th tee.

Phase IB – Fall 2025:

- Vista pruning at 5th 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.

BETA2: Resource Area impacts have been updated to include the following:

- **1,876 square feet of impacts to BVW;**
- **160 linear feet of impacts to Bank;**
- **38,935 square feet of impacts to RA;**
- **4,906 square feet of impacts to BLSF;**
- **9,795 square feet of impacts to the 0-25-foot Buffer Zone;**
- **10,455 square feet of impacts to the 25-50-foot Buffer Zone; and**
- **20,473 square feet of impacts to the 50-100-foot Buffer Zone.**

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	✓ (BETA2)	
Abutting Property Assessors' Reference	✓ (BETA2)	
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.

ACG: MassDEP issued file number CE 159-1319 on September 19, 2025.

BETA2: The Applicant provided the following responses to comments provided by MassDEP:

MassDEP: The proposed areas of alteration located within Bordering Land Subject to Flooding must be quantified in Section B of the NOI even if considered temporary in nature. The applicant should demonstrate how the project complies with 310 CMR 10.57(4).

Response: See revised WPA Form 3 in Appendix F.

2. ... The applicant should demonstrate how the project complies with 310 CMR 10.55(4), as appropriate.

Response: See Section 4.1 of revised Project Narrative.

3. The Applicant should quantify degraded RA and redemonstrate how the project meets the provisions of 310 CMR 10.58(5)(a)-(e), with particular detail to (a) and (e) as proposed work appears to expand beyond existing degraded areas and is proposed closer to the river. Per 310 CMR 10.58(5)(e), work shall not exceed the amount of degraded area, provided that the proposed work may alter up to 10% if the degraded area is less than 10% of the riverfront area, except in accordance with 310 CMR 10.58(5)(f) or (g)". How much alteration to the site has occurred since 1996 and does it exceed 10%? Mitigation/restoration, currently proposed to satisfy the 1999 OOC, would not appear appropriate to meet either (f) or (g) for any new alterations.

Response: See Section 3.4 of revised Project Narrative.

4. The site plan notes that test pits will be conducted prior to construction and shows a requirement for the 2 ft separation to SHGW. The Applicant should provide test pit information at the location and confirm the depth is at least 2 ft to SHGW and/or bedrock. If less than 4 ft to SHGW, a mounding analysis is required. See V2, Ch2, p88 of the MA Stormwater Handbook.

Response: See response in Part I, Section 6.0, SW4.

5. The Applicant states that under the local stormwater bylaw that runoff is considered clean and is not required to meet TTS and TP removal requirements. Does the Applicant intend to apply for LID credits to meet TSS removal Standard 4 under the MA Stormwater Standards? Low impact development ("LID") credits allow applicants to reduce or eliminate structural stormwater BMPs required to meet Standards 3 and 4. Should a project not qualify for LID credit, then an Applicant would be required to demonstrate compliance with St. 3 and 4.

Response: See response in Part I, Section 6.0, SW5.

6. The site contains soil class A/rapid infiltrating soils and is within a Zone II, which requires 44% TSS pre-treatment to meet Standard 4 (see Vol.1, Ch 1, pg. 8) which is not noted on the Stormwater Checklist.

Response: See response in Part I, Section 6.0, SW6.

7. In a Zone II, a proposed building's roof composition should be specified on the site plan. If metal roofs are proposed, appropriate pre-treatment BMPs for metals must be designed and installed prior to any infiltration of roof runoff. See V1, Ch1 of the MA Stormwater Handbook.

Response: The roof composition is Standing Seam Kynar finished Galvalume Steel material and is not considered a traditional galvanized steel or copper "metal roof" as defined in the Mass Stormwater Handbook and does not require additional treatment prior to infiltration. However, it is noted that the proposed stormwater treatment system (Isolator Row Plus) provides up to 81% metal (zinc) removal. See Sheet C101, Plan Notes: Paving, Layout, Grading and Drainage #7.

8. To ensure the long-term functionality of the subsurface infiltration system, the Commission may want to consider that the O&M Plan includes provisions for the inspection and removal of accumulated sediment based on manufacturer recommendations.

Response: The Long Term Drainage System Operation & Maintenance Plan includes a requirement for inspection and maintenance per the manufacturers recommendations, which are attached to the O&M plan (Appendix D).

If the Commission finds the project approvable, MassDEP recommends:

1) conditions and a deed restriction that memorializes the limit of alteration to Riverfront Area;

Response: The limits of the alteration are memorialized in Orders of Conditions issued under DEP File numbers 159-664 and 351-604 (1999 Clubhouse), 351-999 (2013 Pool Redevelopment) and 159-1041 (2013 Function Deck), thus a deed restriction is not necessary.

2) a condition for the submission of a signed Illicit Discharge Statement prior to the start of work;

Response: A signed Illicit Discharge Statement is included in the Long Term Drainage System Operation & Maintenance Plan (Appendix D).

3) perpetual conditions for O&M Plan activities; and

Response: Agreed.

4) conditions for monitoring the planting areas, which are proposed to satisfy requirements under the expired OOC, and conditions should they fail, that may include the Commission requiring additional measures [to] that ensure the function and value of the restoration areas prior to the issuance of a Certificate of Compliance.

Response: Monitoring and reporting of the conditions of the planting areas are included in the revised Project Narrative.

A2. The following Plan elements are required:

a. A Registered MA PLS Stamp on the existing conditions plan.

ACG: The detail/topographic survey was conducted by a Registered MA Professional Engineer (PE) as allowed by MA State Law. No work abutting, within close proximity to, or certifying property lines is proposed; thus a PLS survey is not required.

BETA2: The town line between Wrentham and Franklin is shown and property lines are shown on the index plan on Sheet C101, BETA defers to the Commission on the requirement of a PLS stamp.

b. The Assessor's Reference for the parcel where work is proposed.

ACG: The parcel Assessor's reference is noted on Sheet C101 under "General Notes".

BETA2: Comment addressed.

- c. The Assessor's Reference for the abutting properties.

ACG: Assessor's references for the immediately abutting properties are shown on the Index Plan, Sheet C101.

BETA2: Comment addressed.

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.

BETA2: The Applicant has provided supplemental information detailing how the Project complies with the Bylaw and the Act. Specifically, the Applicant has provided plan changes for Bylaw compliance, narrative information on how the Project complies with Performance Standards, an alternatives analysis for work within RA, and information regarding impacts to BLSF. The Applicant also provided information as to why work is proposed within the 0-25-foot Buffer Zone to Resource Areas. BETA has recommended multiple Special Conditions for the Commission's consideration.

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.

ACG: No response required.

BETA2: No further comment required.

CONSTRUCTION COMMENTS

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

ACG: Material stockpiles (soil, sod, etc.) will be stored on site at the maintenance facility outside areas subject to jurisdiction of the Conservation Commission as notes on Sheet C101, Plan Notes: Coordination, Site Demo, Sediment and Erosion Control and Restoration #10.

The laydown area for construction is within the temporary construction fence shown in red on sheet C107, Phase II, designated as "LAYDOWN AREA."

BETA2: Comment addressed. The Commission could consider including a Special Condition within the Order of Conditions stating no stockpiling of material including soil, sod, pavement, or other material that could cause runoff shall be stockpiled within jurisdictional areas.

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

ACG: Resource Area impacts are summarized in a table and called out graphically on exhibits A and B, (Appendix E).

BETA2: Comment addressed.

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

ACG: See Sheet C101, Plan Notes: Coordination, Site Demo, Sediment and Erosion Control and Restoration #11, which has been revised to add "until full site stabilization is achieved."

BETA2: Comment addressed.

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.

ACG: The Landscape Plan and the Project Narrative specify that areas proposed to be vegetated with native plantings and seeding shall be monitored for at least two (2) growing season by a qualified wetland scientist to demonstrate successful establishment. Reports, including photographs will be issued annually.

BETA2: BETA recommends the Commission include a Special Condition within the Order of Conditions requiring the Applicant to submit annual monitoring reports for two (2) growing seasons detailing conditions of the plantings with associated photos. Presence and removal efforts related to invasive species can also be detailed in these reports. See BETA2 response to Comment W6.

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.

*ACG: The Landscape Plan and the Project Narrative specify for a period of at least two (2) growing season, purple loosestrife (*Lythrum salicaria*) and any other invasive plants observed in the planting areas will be remove by hand. The presence of invasive species within the planting areas will be noted in the reports reference above.*

BETA2: BETA recommends the Commission include a Special Condition within the Order of Conditions requiring the Applicant to hand remove invasive species from the planting areas when encountered for two (2) growing seasons. Information regarding presence and removal efforts related to invasive species could also be included in monitoring reports. See BETA2 response to Comment W5.

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.

ACG: The work proposed in Bank and BVW is limited to planting of native plants, which we consider to be an improvement over existing condition. Statements regarding compliance with Performance Standards for work in Bank and BVW are included in Section 4 of the revised Project Narrative.

BETA2: Comment addressed.

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.

ACG: The work proposed in BLSF includes planting of native vegetation, and removal and replacement (at the same location and elevation) of existing bituminous pavement. The drain outfall is not within BLSF based on the July 8, 2025 FEMA revisions. Statements regarding compliance with Performance Standards for work in BLSF are included in Section 4 of the revised Project Narrative.

BETA2: Comment addressed.

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.

ACG: No response required.

BETA2: BETA recommends the Commission include a Special Condition 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.

ACG: Specific constraints that preclude work for being sited outside of RFA are provided in section 3.4 of the revised Project Narrative.

BETA2: Comment addressed. The Applicant has provided an alternatives analysis. BETA defers to the Commission on the approval of the submitted alternatives analysis.

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.

ACG: Based on existing drainage, the proposed subsurface infiltration system has been designed as shallow as possible. Therefore, the elevation of the overflow structure cannot be raised. Given the existing slope of the bank, the overflow structure cannot be moved outside the 0-25' Buffer Zone.

BETA2: The Applicant provided a narrative detailing why work is proposed within the 0-25-foot Buffer Zone. BETA defers to the Commission on the acceptance of the Variance request.

W12. Impacts to the 0-25', 25'-50', and 50'-100' Buffer Zones should be quantified individually.

ACG: Impacts to the 0-25', 25-50', and 50-100' Buffer Zone Resource areas are described in section 3.3, of the revised Project Narrative, and tabulated and graphically displaying on Exhibit A (Appendix E).

BETA2: Comment addressed.

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.

ACG: The existing system and discharge discussed in the Stormwater Report is located in Wrentham and is proposed to be expanded with two additional rows of chambers.

BETA2: Explanation provided. Issue resolved.

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.

ACG: As identified in the Stormwater Report Narrative, the peak 100-year storm discharge velocity at the outfall is 10.9 feet per second, and the erosive velocity protection provided by the proposed erosion control matting is 15 feet per second, thus, the selected matting will protect against erosion for all design storms.

BETA2: The proposed product is listed as a turf reinforcement mat that is anticipated to provide erosion protection to the area it covers but does not appear to provide mitigation of erosive velocities. Given the proximity of the outfall to Uncas Brook, BETA recommends the installation of traditional energy dissipation (e.g. rip rap). The Commission may wish to consider this as a condition of approval.

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.

ACG: Agreed.

BETA2: BETA defers to the Commission regarding the proposed condition. No further comment.

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

ACG: The subsurface infiltration system is proposed within the footprint of the existing 5th tee and soil testing has not been completed so as not to disturb the golf course operations. As identified in the system detail on Sheet C502, and as discussed with the Commission on September 18, 2025, confirmatory soil testing for estimated seasonal high groundwater table (ESHGWT) and soil texture will be witnessed by the Design Engineer prior to system installation. Should there not be a minimum 2’ separation from the ESHGWT, or if less than 4 ft to the ESHGWT, additional analysis and modified plans will be submitted.

BETA2: Information provided. With the understanding of the potential for test pitting to impact site operations BETA defers to the Commission to require the test pits to be performed as a condition of approval.

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.

ACG: Water Quality Calculations (Stormwater Management Standard 4) are provided in the revised Stormwater Narrative. The new impervious surfaces created by the project include roof area and cart paths. Many jurisdictions consider cart paths used by pedestrian and electric-only carts and that are seasonal in use (not in winter), to produce “clean” runoff that does not require treatment of total suspended solids (TSS) or total Phosphorus (TP) (TP removal as required by the Town of Franklin Bylaws Chapter 153-Stormwater Management). As there is not yet published documentation to support this, the proposed stormwater system has been redesigned to treat TSS and includes the addition of a proprietary stormwater treatment unit (“Isolator Row Plus”) and subsurface infiltration system with an anticipated TSS removal rate in excess of 80%.

BETA2: A TSS Calculation worksheet has been provided and, with the addition of the isolator row, a TSS removal rate of 91% has been estimated for areas within the system’s catchment area. Although some impervious areas of the Site will remain untreated, the project is will meet this standard to the maximum extent practicable, as required, as a redevelopment. Issue resolved.

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

ACG: The “Isolator Row Plus” treatment device is proposed due to the presence of a critical area and soils with rapid infiltration rates. This system will remove 80% of TSS prior to discharge to the subsurface infiltration system, in excess of the 44% required.

BETA2: The proposed isolator row will provide the required pretreatment. Issue resolved.

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.

ACG: A Construction-Period Operation and Maintenance Plan has been provided on Sheet C101, Plan Notes: Coordination, Site Demo, Sediment and Erosion Control and Restoration #12.

BETA2: Requirements provided. Issue resolved.

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

ACG: A stabilized construction entrance is provided on Sheet C107 with a detail on Sheet C501.

BETA2: Plan revised. Issue resolved.

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

ACG: The addition of silt fence to the filter sock is proposed to separate golfers and construction activities. At the public hearing on September 18, 2025, the Commission agreed that silt fence is acceptable in this instance, with the understanding that the Franklin Country Club proposes to remove the silt fence as soon as the individual work area is stabilized.

BETA2: Information provided. No further comment.

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.

ACG: As identified in the Long-Term Drainage System Operation & Maintenance Plan, revised 9/24/25, "in the event of a change in property ownership, the new owner shall be provided with a copy of this Plan and be responsible for performing the required duties herein."

Franklin Country Club is financially stable and is unlikely to be sold. In the unlikely event that this did occur, it would likely be sold for continued use as a golf course. Franklin Country Club, through their professional staff, maintains records regarding the clubhouse, pool, maintenance facility, irrigation wells, turf, and the existing stormwater management system located in Wrentham, and completes the required maintenance to maintain the overall asset. The Operation and Maintenance of, and notification of the presence of, the stormwater management system beneath the 5th tee would be conveyed as part of an entire package of information to a new owner.

BETA2: Information provided. Issue resolved.

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

ACG: A map has been added as an appendix to the Long Term Operation and Maintenance Plan (Appendix D).

BETA2: Map provided. Issue resolved.

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

ACG: The owner's signature has been added to the Long Term Operations and Maintenance Plan (Appendix D).

BETA2: Signature provided. Issue resolved.

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.

ACG: Cut sheet from the subsurface infiltration system manufacturer detailing inspection and maintenance requirements, where provided, have been added to the Long Term Operation and Maintenance Plan in Appendix D.

BETA2: Information provided. Issue resolved.

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.

ACG: A signed illicit discharge compliance statement has been added to the Long Term Operation and Maintenance Plan (Appendix D).

BETA2: Signature provided. Issue resolved.

REVIEW SUMMARY

Based on our review of the NOI submittal and Project plans, the Applicant has provided 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, the Bylaw, and the Massachusetts Stormwater Management Standards. Recommendations for Special Conditions have been provided for the Commission's consideration where appropriate.

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

Very truly yours,
BETA Group, Inc.



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