



October 16, 2025

Mr. Gregory Rondeau, Chairman  
355 East Central Street  
Franklin, MA 02038

Re: 380 King Street  
Site Plan Review

Dear Mr. Rondeau:

BETA Group, Inc. has reviewed the documents submitted for the proposed 380 King Street Condominiums project, located at 370, 380, and 390 King Street in Franklin, Massachusetts, and has provided peer review services. An initial review of the development documentation, summarized in a June 26, 2025, report, was followed by a second submittal on September 22, 2025, addressing the initial peer review comments. A second review of the resubmitted documentation, summarized in a September 30, 2025, report, was followed by a third submission on October 6, 2025, addressing the second round of peer review comments. This letter presents BETA's findings, comments, and recommendations regarding the most recent submission from October 6, 2025.

## BASIS OF REVIEW

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

- A Response to Peer Review Comments Letter, dated October 6, 2025, by Narragansett Engineering, Inc. (NEI).
- A Response to Peer Review Comments Letter, dated October 3, 2025, by VHB (VHB).
- Revised Plans (6 sheets) entitled: "380 King Street- Condominiums" dated October 10, 2024, revised through October 2, 2025, prepared by Narragansett Engineering, Inc. Portsmouth, RI.
- Stormwater Management Report Documents including:
  - Revised mounding analysis calculations
  - Illicit Discharge Statement
- Sewer Flow memo dated September 29, 2025 and revised through October 6, 2025

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

- *Zoning Chapter 185 From the Code of the Town of Franklin*, current through July 2021
- *Zoning Map of the Town of Franklin, Massachusetts*, attested to October 7, 2020
- *Stormwater Management Chapter 153 From the Code of the Town of Franklin*, Adopted May 2, 2007
- *Subdivision Regulations Chapter 300 From the Code of the Town of Franklin*, current through March 8, 2021
- *Wetlands Protection Chapter 181 From the Code of the Town of Franklin*, dated August 20, 1997
- *Town of Franklin Best Development Practices Guidebook*, dated September 2016

## COMPILED REVIEW LETTER KEY

BETA reviewed this project previously and provided review comments in a letter to the Planning Board dated June 26, 2025, and September 30, 2025 (*comments in italics*). Narragansett Engineering, Inc. (NEI)

and VHB provided responses on June 26 and September 30, 2025 (responses in standard text). BETA's most recent comments on the status of each item are provided *in bold italics*.

## 1.0 SITE AND PROJECT DESCRIPTION

The project site includes three parcels, Lots 303-41, 42, & 43 all owned by the applicant, Marguerite Family Trust. The primary site is located at 380 King Street which is a 1.113-acre parcel identified as lot 303-42. Although most of the development activity centers on the 380 King Street site, paved connections with the 2 adjacent lots at 370 & 390 King Street are proposed to connect all three lots for vehicular access between lots. The Site is located within the Commercial II Zone. The sites are located on the south side of King Street, the parcel east of the site at 370 King Street is the Sierra's Brick Oven Pizza site and the parcel west of the site at 390 King Street is the King Street Café site. The 370 King Street parcel extends to the east behind the parcels at 380 & 390 King Street. The easterly and rear lot line for the parcel at 370 King Street is the boundary between the Commercial II Zone and the Residential VI Zone. A recently endorsed ANR Form A plan has subdivided this strip into three separate parcels. Two will be added to the parcels at 380 & 390 King Street and the 3<sup>rd</sup> is identified as Parcel E (11,101 s.f.) which is to be conveyed to Spruce Pond Condominium. This parcel essentially encompasses all the remaining natural vegetation at the rear of the 3 commercial parcels.

Spruce Pond is located east of 370 King Street. South of the parcels within the Residential VI district is the Spruce Pond Village Condominium complex. Lots to the north of the Site across King Street are within the General Residential V zoning district and are all occupied by single family residential dwellings. The Site is currently being used as a gravel parking area for the adjacent 2 restaurant uses. The former building on site has been removed and except for a thin strip at the rear of the parcel there is very little vegetation remaining on site. There is a paved driveway along the front of the parcel that connects the parking areas for the parcels at 370 and 390 King Street. There are 3 existing driveway openings on King Street which serve these 3 parcels. The middle opening is located at the northeast corner of the parcel at 380 King Street and will continue to serve as the primary access driveway into the site from King Street.

Topography at the Site slopes uniformly across the site from west to east towards Spruce Pond. The Site is not located within an NHESP-mapped estimated habitat of rare or endangered species. As previously noted, there is a flagged wetlands area at the southwest corner of the parcel which flows south towards West Central Street. NRCS soil maps indicate the presence of Woodbridge Fine Sandy Loam soils, with a Hydrologic Soil Group (HSG) rating of C (minimal infiltration potential). Test pits conducted on site show fill depths ranging from 26"-49"

The project proposes constructing a 30 unit, 3-story multi-family residential building with a footprint of 11,602 s.f. Paved access that will serve all 3 lots will be maintained at the front of the lot. Interconnection between the 3 lots will also be provided at the rear of the parcel. Overall, 60 parking spaces will be provided on site to serve the units, including 3 HP accessible spaces. These spaces will be located at the front of the lot consistent with the existing spaces on site and expanded along the easterly property line out to the rear of the parcel. All spaces will be 9' wide and 19' long with 24' min. wide access aisles. Although not labeled on the plans, based on the details, it appears that vertical curbing will be used across the site. Sidewalks will be provided along the north, south and east end of the building, which will provide pedestrian access to the entrances at the north and south ends of the building. There is an existing sidewalk along King Street in front of all 3 parcels, however, there is no connection proposed between the building and the sidewalk along King Street. An enclosed dumpster pad is shown at the left rear corner of the parcel adjacent to the existing dumpster pad at 370 King Street. Some site lighting, both existing and

proposed, is indicated on the plans which refer to a Lighting Plan, which could not be found in the application.

The Landscaping will consist of 16 trees across the front and along the easterly property line. Existing trees along the westerly property line will be maintained. The existing vegetative buffer at the rear of the parcel, which is located within Parcel E, will be maintained and as noted on the plans will be conveyed to the abutting Spruce Pond Condominium. Landscaped islands are indicated on the plans, but the landscaping plan is missing from the set. Proposed utilities include domestic water, electric, and sanitary sewer. The sanitary sewer will be relocated around the building but will maintain the connection from the King Street Café to the sewer main adjacent to Spruce Pond. The existing 6" DI water service will continue to be used to service the building.

Stormwater management is proposed via three subsurface infiltration basins. Catch basins and manholes will be used to collect the runoff from the roadway surface. Roof runoff will also be collected and directed to the system at the rear of the parcel. The existing stormwater collection system at 390 King Street currently is directed primarily across the subject parcel towards 2 separate outfalls adjacent to Spruce Pond. Most of this watershed area will remain unchanged by the development except for minor adjustments in the watershed delineation at the rear of the parcel. The existing outfalls towards Spruce Pond will all be maintained.

## 2.0 WAIVERS

In accordance with the decision by the Zoning Board of Appeals, endorsed on September 28, 2023, the Board voted to Grant a Variance for 380 King Street to allow a multi-family use for up to 40 residential units, one of each ten shall be affordable. No other variances were granted by the decision and according to the decision, the applicant is required to obtain site plan approval, any special permits deemed necessary, and all other approvals required by the Town of Franklin Planning Board.

## 3.0 TOWN OF FRANKLIN ZONING REQUIREMENTS

The project is subject to the Town of Franklin zoning regulations outlined under Chapter 185. Review comments related to the zoning bylaw are provided in the following sections.

As noted above, the project proposes a 30-unit multifamily 3-story building. The Use variance has been granted by the ZBA, however, all other zoning requirements within the Commercial II Zone remain in effect.

### SCHEDULE OF LOT, AREA, FRONTAGE, YARD AND HEIGHT REQUIREMENTS (§185 ATTACHMENT 9)

The project will comply with dimensional requirements for lot area, frontage, lot width, lot depth front yard, building height, building coverage, and maximum impervious coverage. A Zoning summary is presented on sheet C—100 which shows that the lot and the proposed development meet the zoning requirements for the underlying zone.

- Z1. *BETA recommends that the Zoning summary be expanded to show that the setback dimensions for the proposed building comply with the zoning requirements. NEI: Zoning setback requirements and provided distances to said setbacks have been added to the Zoning summary table on sheet C-100A of the revised plan set. **BETA2: Zoning summary revised; item resolved.**  
**BETA3: Item is closed.***

### PARKING, LOADING AND DRIVEWAY REQUIREMENTS (§185-21)

See Traffic Assessment and Impact below.

### SIDEWALKS (§185-28) AND CURBING (§185-29)

The project is located within the Commercial II zoning district and is thus subject to §185-28. An existing sidewalk is present along King Street, and the project proposes using the existing driveway entrance into the site. Thus, no changes will be required inside King Street Right of Way.

Proposed curbing is identified as vertical curbing around the entirety of the proposed parking lot and landscaped islands. However, material for the curbing is not identified. Sidewalks are proposed on 3 sides of the building which will provide pedestrian access to the 3 entrances into the building.

- Z2. *Depict existing and proposed sidewalk width on the plans. The sidewalk along the frontage must be at least 6 feet in width. BETA defers to the Town if the existing width can be maintained. (§185-28). NEI:* The proposed sidewalk width is noted on plan sheet C-100A. The proposed work on the section of sidewalk along the frontage of King Street shall match existing sidewalk width. Per discussions with the Town Planning Board the existing sidewalk does not need to be altered. *BETA2: Plans revised; item resolved. BETA3: Item is closed.*
- Z3. *Based upon the plans, it appears that the proposed interior sidewalk will be 4' wide. At the front of the building at the west corner, the sidewalk width measures only 3'. BETA recommends that this sidewalk be a minimum of 5' wide. NEI:* The proposed width of interior sidewalk has been revised to provide a continuous width of 4 feet. The width of interior sidewalks is in conformance with the 2010 ADA Standards for Accessible Design dated September 15, 2010. *BETA2: Plans revised, and explanation provided; item resolved. BETA3: Item is closed.*
- Z4. *BETA recommends that a sidewalk connection from the proposed site to King Street be designed and shown. NEI:* A connection to the existing sidewalk on King Street has been provided in the revised plan set. *BETA2: The proposed sidewalk connection to King Street is not accessible as shown. Sidewalks that exceed 5.0% running slope are considered ramps and should be equipped with hand railings and a landing at each end. Revise the sidewalk segment to be accessible. NEI:* The proposed sidewalk connection to King Street has been revised and is less than 5 percent (%). *BETA3: Plan revised; item resolved.*

### 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 in compliance with this section except as noted below:

- Z5. *Snow storage areas should be identified in the plans. (§185-31.C.(3).(i)). NEI:* Snow storage areas can be located on plan sheet C-100A of the provided plan set. *BETA2: Snow storage areas provided; item resolved. BETA3: Item is closed.*
- Z6. *Provide note that all plantings shall come from the Best Development Practices Guidebook (§185-31.C.(3).(k)). NEI:* Note 16 on Sheet C-201 states that all plantings shall conform from the Town of Franklin's Best Development Practices Guidebook. See landscape plan for additional detail. *BETA2: Note provided; item resolved. BETA3: Item is closed.*
- Z7. *Indicate if site lighting is proposed and provide photometric plan if applicable (§185-31.C.(3).(l)). NEI:* Site lighting is proposed as part of this project and the proposed light locations can be found

on Sheet C-101. A lighting plan and photometric plan has been provided in the revised plan set. *BETA2: Photometric plan provided; item resolved. BETA3: Item is closed.*

- Z8. *Provide description of traffic circulation and safety especially since the abutting commercial uses will be granted access easements at both the front and rear of the parcel. (§185-31.C.(3).(s)). NEI: Access has been revised in the provided plan set. Access is no longer granted for the eastern Lot, housing Sierra's Brick Oven Pizza, on the southern portion of the site. The entrance onto the subject parcel from King Street has been closed. A traffic circulation plan and traffic impact report has been provided by VHB as part of the revised plan set. BETA2: Site access revised, and traffic impact report provided; item resolved. BETA3: Item is closed.*

#### LANDSCAPING AND SCREENING (§185-35)

Refer to Landscape and Grading section below.

### 4.0 TRAFFIC ASSESSMENT AND IMPACT

The Applicant provided a traffic impact memorandum as part of the most recent submission for review. Additional comments are provided below.

#### GENERAL TRAFFIC COMMENTS

- T1. *The Planning Board should discuss whether a Traffic Impact Analysis is warranted for this project. NEI: A traffic impact report prepared by VHB is included in the revised package. BETA2: Traffic Impact Report provided. Additional comments regarding the Traffic Impact Report are provided in this section. NEI: See Response to Comments provided by VHB. BETA3: Responses provided; item resolved.*
- T2. *Apparatus circulation shown on sheet C-200 is dependent upon entrance into the site from the adjacent lot. BETA defers this final assessment to the fire department but recommends that this be modified to show access from the main driveway entrance. NEI: The fire apparatus circulation has been modified to include entry and egress from the entrance on 370 as well as 390 King Street. The entrance on 380 King Street to the public right-of-way is proposed to be closed in lieu of the cross access provided by both adjacent lots. This modification has been reviewed and approved by the local fire chief. The email from the fire chief is included in the revised package. BETA2: Letter from Fire Chief provided and circulation revised; item resolved. BETA3: Item is closed.*

#### SITE ACCESS AND CIRCULATION

Access to the Site is proposed via the existing curb cut in King Street at the westerly corner of the frontage. As shown on Sheet SV-300, access easements will be granted for all 3 lots to use all the access travel lanes and entrances from either one. The access lanes are all identified as 24' wide. A sidewalk is proposed around the proposed building but does not extend to any sidewalk areas either on the 2 abutting lots or onto King Street.

- T3. *Confirm that the proposed configuration has been reviewed by the Town Fire Department. NEI: Refer to the response to comment T2. BETA2: Item resolved. BETA3: Item is closed.*
- T4. *The proposed grade across the parking spaces at the rear of the parcel are shown at a 4.3%± grade. Recommended maximum grades for parking spaces is 3.0%. BETA recommends that the design review modifying the design to adhere to this maximum grade. NEI: Site grading has been revised as part of the attached plan set. Due to the existing slopes of the adjoining sites as well as the existing site, the provided grades for parking and drive aisles have been reduced to the*

maximum extent practicable. *BETA2: The parking lot on the south side of the building is currently graded at approximately 8.0%, which exceeds standard practice for parking areas. MassDOT guidance recommends that grades do not exceed 7.0% where buses will use a facility. Although buses are not anticipated to use this parking area, emergency vehicles such as fire trucks and ambulances will. BETA recommends that the engineer evaluate alternatives to reduce the slope. Options such as incorporating a retaining wall or increasing the slope along the southern property line may help achieve a more compliant grade. This item remains outstanding. NEI: The site grading has been revised throughout the plans to ensure the grades in the parking area are at or less than 7%. BETA3: Plans revised; item resolved.*

- T5. *Proposed curb material should be designated on the plans. NEI: The curb type and material shall be precast concrete curbing as called out on plan sheet C- 100A. BETA2: Callout provided; item resolved. BETA3: Item is closed.*

PARKING AND LOADING

Required parking is defined by §185-21.B of the Town Zoning Bylaw. The proposed development includes residential and nonresidential uses in the Commercial II zoning district. Required parking is calculated as follows:

Use Designation	Criteria	# of Units / Building Area	Required Parking
Residential	2.0 spaces per residential unit	30 units	60 Spaces

The project proposes 60 parking spaces. Three (3) of the parking spaces are designed to be HP accessible with one designated as van accessible in accordance with 521 CMR 23.2.1 & 2

Parking spaces are 9 feet wide; and 19 feet long and access lanes are all designated as 24' wide.

- T6. *There are no designated guest parking spaces on the site. BETA recommends an adequate number of spaces be provided for guest spaces or an easement be granted for the potential use of the parking spaces on one of the abutting commercial sites. NEI: This project meets the required parking requirements. A waiver for 59 spaces (one less than the required 60 spaces) is being requested. This was discussed and recommended by planning board members to provide additional green space. BETA2: BETA defers to the Town regarding the waiver for reduced parking requirements. BETA has no further comment. BETA3: Item is closed.*

ADDITIONAL COMMENTS – TRAFFIC IMPACT MEMORANDUM

- T7. *Provide traffic volume collected as part of the previously conducted Transportation Impact Assessment that was utilized for the analysis. NEI: The requested traffic volume networks from the nearby childcare daycare study referenced in VHB's September 16, 2025, transportation evaluation are provided attached for reference. The underlying raw traffic count data sheets also have been provided for reference. BETA3: Information provided; item resolved.*
- T8. *Clarify why the 2022 traffic volumes, collected as part of a previously conducted Transportation Impact Assessment, were not projected to 2025 volumes to represent existing conditions. NEI: The analysis presented in VHB's transportation was intended to document the Project's potential impacts and not to provide a fully comprehensive evaluation of traffic conditions in the surrounding area. As documented in the study, the Project is estimated to generate 24, 22, and 15 vehicle-trips during the respective weekday morning, weekday evening, and Saturday midday*

peak hours. This normal traffic generation will have negligible impact on the operation of King Street’s signalized intersection with Union Street regardless of the underlying volumes used. While adjusting the volumes to a new 2025 No-Build condition (without the Project) would result in higher intersection volumes, the net increase from the Project would remain unchanged. Accordingly, with only one vehicle being generated every three minutes under peak conditions, and not all of that traffic passing through this intersection, the analysis confirms that there will be minimal impacts. *BETA3: Item resolved.*

T9. *Clarify whether the speed used for the sight distance analysis was based on measured travel speeds or the posted speed limit. NEI:* The study’s sight distance analysis was based on the current posted speed limits within the study area. As noted in the study, the proponent will be pruning and cutting back brush near the Project Site driveways to help further enhance sight lines beyond those noted. *BETA3: Item resolved.*

## 5.0 SIGNAGE AND LIGHTING

The project proposes 3 accessible parking signs at the proposed spaces. All signs are anticipated to be appropriate for their use.

Based upon the site plans, it appears that Site lighting will be provided by 4-20’ poles situated along the north and east edge of the lot. 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. *Identify the size, type and number of fixtures to be mounted at each pole location. NEI:* There are 5 proposed 150W pole mounted light fixtures as shown on the provided photometric plan and details. *BETA2: Lighting cut sheets and Photometric Plan provided; item resolved. BETA3: Item is closed.*

SL2. *Provide a Photometric plan with sufficient illuminance values to document that there are no adverse impacts on the abutting parcels. NEI:* Refer to response to comment Z7. All proposed light fixtures will be dark sky compliant. *BETA2: Item resolved. BETA3: Item is closed.*

## 6.0 UTILITIES

Proposed utilities depicted on the plans include domestic water, fire service, sanitary sewer, electric service, and gas service. Except for the underground electrical, all other utilities will connect with the existing utilities onsite.

Domestic water is proposed via new 2” CLDI and fire service is provided via new 6” CLDI. These services will connect to the existing 6” DI water service. There is an existing hydrant on King Street at the east corner of the parcel, and no new hydrants are proposed on site.

The existing sanitary sewer which services the existing site and westerly abutter will be relocated around the building. Two (2) new manholes will be placed at each angle point at the rear of the building. Sanitary sewer service is proposed via new 8” PVC service that will connect with the second manhole.

Natural gas will be connected to the existing service on site at the east corner of the frontage.

Electric service is proposed via new underground service which will come from a utility pole at the front of the site to a proposed transformer at the northwest corner of the building.

U1. *BETA recommends that a construction detail for the proposed electrical conduit bank and trench be provided. NEI: A construction detail for the proposed electrical service connection has been provided on the revised plan set sheet C-204. BETA2: Details provided; item resolved. BETA3: Item is closed.*

## 7.0 LANDSCAPE TREATMENT & GRADING

A landscaping plan is noted in the drawing list on the cover sheet; however, it was not included in the set. Based on the grading plans, it appears that 10 trees will be added on the site. Seven to the east and 3 along the frontage. Existing trees will be maintained along the frontage and easterly property line. Other areas are designated as proposed landscaped areas, but no details have been provided.

The project is required to provide screening under §185-35 at the rear of the parcel, however, the existing natural vegetative screen will be conveyed to the abutting Spruce Pond condominium complex.

LA1. *Provide a landscaping plan which documents compliance with the bylaws. NEI: A landscape plan has been provided as part of the revised plan set. BETA2: Landscape Plan provided; item resolved. BETA3: Item is closed.*

LA2. *Indicate method to be utilized to protect the existing trees which as shown will be maintained. NEI: Details pertaining to the protection of existing trees during construction has been included in the landscape plans as part of this revised plan set. BETA2: Tree protection detail provided; item resolved. BETA3: Item is closed.*

LA3. *BETA will defer to the Board whether the naturally vegetated buffer to the rear of the parcel will satisfy the requirements of §185-35 for screening. NEI: Noted. BETA2: No further comment. BETA3: Item is closed.*

G1. *The sidewalk along the southern side of the proposed building is indicated at 6.5% running slope which qualifies as an ADA ramp. Running slopes greater than 5.0% slope require handrails and landings at each end of the ramp. Revise grading or provide the required handrails and landings. NEI: The sidewalk along the building on the south side has been revised to ensure no section is steeper than 5%. BETA3: Plans revised; item resolved.*

G2. *The sidewalk along the northern side of the proposed building is indicated as 8.0% and 5.4% running slopes, which qualifies them as ADA ramps. Running slopes greater than 5.0% slope require handrails and landings at each end of the ramp. Revise grading or provide the required handrails and landings. NEI: The grading has been revised to ensure pedestrians have an accessible route (5% or less) from King Street to all proposed building entrances. The entire site has been regraded to ensure no slopes are more than 7%. There is no requirement that the entire site has to be ADA compliant and due to the existing grades of the property, this is not feasible. The site provides an accessible route from all handicap spaces to the proposed building. BETA3: Explanation provided; item resolved.*

G3. *The sidewalk connecting the property to King Street proposes a 7.5% running slope which qualifies it as an ADA ramp. Running slopes greater than 5.0% slope require handrails and landings at each end of the ramp. Revise grading or provide the required handrails and landings. NEI: The sidewalk*

from the north parking area connecting to King Street has been regraded to meet ADA compliance with less than 5% slopes. *BETA3: Plans revised; item resolved.*

- G4. *Grading at the southeast corner of the building does not work. The 139 contour meets the curbing at the same location as a 340 spot grade, creating a grading discrepancy of 0.50'. Revise grading plan. NEI: The grading at the southeast corner of the building has been revised. BETA3: Plan revised; item resolved.*
- G5. *A significant portion of the western parking lot is graded at 0.50% slope. In BETA's experience, 0.50% slope is not a sufficient slope to allow water to sheet flow and provides little to no wiggle room for the contractor to install the pavement correctly, leading to standing water. BETA strongly recommends revising the grades in this area to provide a minimum of 1.0% slope. NEI: NEI agrees, the grading throughout the property has been revised to ensure no paved areas are less than 1%. BETA3: Plan revised; item resolved.*
- G6. *The "Typical Gravity Retaining Wall Section" detail on sheet C204 indicates filter fabric extending out the back of the wall face. The wall along the eastern property line is shown approximately one foot off the property line with a parking lot flush against the property line. BETA is concerned with how this retaining wall will be constructed given the proximity of the parking lot. BETA is also concerned with the load of cars being parked so close to the proposed retaining wall. BETA recommends moving the retaining wall off of the property line to provide more of a buffer between the parking and the retaining wall. NEI: The retaining wall has been shifted to two feet off the property line. The retaining wall will be designed for the surcharge load of vehicles parked on the upgradient side of the retaining wall. The wall is close to the property line per discussion with the Board to maximize courtyard area greenspace as much as feasible. A stamped retaining wall detail and design shall be supplied by a Massachusetts licensed engineer upon approval of the project (prior to construction). BETA3: Plans revised, and explanation provided; item resolved.*

## 8.0 STORMWATER MANAGEMENT

The proposed stormwater management design consists of three subsurface infiltration systems located at the rear and along the west side of the building. Runoff from the westerly abutter at 390 King Street will all flow towards the parcel with no treatment. Stormwater runoff will be conveyed to the systems via a closed drainage system consisting of catch basins, manholes, and roof leaders. Outlets from all 3 systems will direct runoff east towards the collection system on the 370 King Street parcel. Eventually, all of the runoff from these sites will discharge into Spruce Pond.

### GENERAL

- SW1. *Review the existing outlet erosion protection at each of the outfalls on Spruce Pond to determine if any maintenance is required. NEI: Note No. 5 on Sheet C-001 has been added to the plans to inspect and rehabilitate the existing outfalls on Spruce Pond as required for the benefit of this project prior to the connection of the proposed stormwater facilities. BETA2: Note provided; item resolved. BETA3: Item is closed.*

### 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 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.

- SW2. *Provide timing schedules and sequences of development including clearing, stripping, rough grading, construction, final grading, and vegetative stabilization. NEI: A stormwater pollution and prevention plan can be found in the appendix of the stormwater report and includes timing and sequencing of construction. BETA2: Construction schedule and sequence provided. Indicate the approximate timing schedules for the project; item is outstanding. BETA3: Item is closed.*
- SW3. *The applicant is reminded that a stormwater permit from the Town of Franklin DPW is required for the proposed activity. NEI: Correspondence is underway between NEI and the Town of Franklin DPW regarding the stormwater permit required for the proposed activity. Stormwater report and calculations can be found in the package. BETA2: Item resolved. BETA3: Item is closed.*
- SW4. *Provide an O & M Plan in accordance with the requirements of §153-18 signed by the Owner. NEI: An O&M plan in accordance with the requirements of §153-18 within the Town of Franklin Code of Ordinances can be found in the appendix of the stormwater report. BETA2: O&M Plan provided; item resolved. BETA3: Item is closed.*

#### SUBDIVISION REGULATIONS - STORMWATER MANAGEMENT REGULATIONS (§300-11)

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

- SW5. *Drainage piping is proposed to be HDPE with less than 42" of cover depth. BETA recommends that the stormwater piping be revised to RCP consistent with the requirements of the section. Either request the waiver or bring the piping into compliance with the regulations. (§300-11.B(2.a)). NEI: Technical Note 2.01 Minimum and Maximum Burial Depth for Corrugated HDPE Pipe (per AASHTO) sets the minimum cover of 12" diameter HDPE piping at 12" below grade to provide H20 loading. The design set forth in the revised plans is in conformance with this requirement. Standing water shall not exist within proposed pipes as designed for this project. A waiver for the depth and material requirement of the Town shall be filed and included with this project submission. BETA2: Waiver requested – BETA defers to the Town on waiver request. BETA3: Item is closed.*

#### BEST DEVELOPMENT PRACTICES GUIDEBOOK

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

- SW6. *Indicate if proposed seed mix and plantings will reflect native vegetation, particularly near woodland areas (BDPG Page 7). NEI: The landscape features including seed mix and plantings are in conformance with the Best Development Practices Guidebook and the details can be found on the landscape plan. BETA2: Item resolved. BETA3: Item is closed.*
- SW7. *Confirm that landscaping plan has been designed in accordance with the planting bed and seeding guidelines outlined on Page 15. NEI: Refer to the response to comment SW6. BETA2: Item resolved. BETA3: Item is closed.*

### 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

No LID measures are proposed.

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 - complies with standard.

SW8. *A small portion of the runoff from the proposed driveway connection with 370 King Street will flow untreated towards the collection system on the adjacent site. BETA recommends that this area be addressed to demonstrate compliance with the standards. NEI:* The driveway connection to 370 King Street on the southern portion of the site has been revised to treat all proposed impervious cover in this area with proposed stormwater treatment facilities.

Due to site constraints, the small impervious area on the north driveway access to 370 King Street cannot be collected. The proposed site collects a portion of impervious area from the site west of the subject parcel (390 King Street) through the northern and southern driveway entrances. The impervious areas are collected and treated in the proposed systems. Overall, the project is collecting and treating more impervious area than the site contributes. These calculations can be found in the water quality calculations within the stormwater report. *BETA2: Stormwater calculations provided; BETA defers to Franklin DPW as to whether this is acceptable. BETA3: Item is closed.*

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 subsurface infiltration systems. Calculations indicate a decrease in peak discharge rate and peak runoff volume to all points of analysis.

SW9. *Provide individual watershed areas for the catch basins to document that the impervious surface area tributary to these structures is less than 1/4 of an acre. NEI:* A watershed map (CB Sheds) has been included in the stormwater report appendix to show all catchment areas are less than the required ¼ acre. *BETA2: Sub-catchment watershed plan provided; item resolved. BETA3: Item is closed.*

SW10. *The exfiltration rate utilized in the design of the subsurface systems is 1.02 inches per hour. BETA agrees that the Rawls rate for the material as described in the soil evaluation was used, however: the soil evaluations identify the layers as a dense layer. Based upon our experience with these soil types, BETA recommends that an exfiltration rate of 0.17 inches per hour be used for the design of these 3 systems or perform an in-situ saturated conductivity test to determine a rate. NEI:* A percolation test was conducted on November 26th, 2024, during the soil evaluations, concluding perc rates of greater than 1.02 inches per hour. The perc tests were completed in the C layer ranging from 32 inches to 35 inches from the surface. To remain conservative, the Rawls rate for sandy loam as found in the soil evaluations were utilized for this design. This percolation test can be found in the revised site plan package. We appreciated BETA's experience, however our observations yielded sandy soils, and we do feel comfortable with the rates used, especially when

blackboarded against the in-situ rates. The perc testing data is now included in the appendix. *BETA2: Explanation provided; item resolved. BETA notes that typically subgrade soils will be observed during construction as part of a condition of approval. If soils do not look as designed in the field observation, the design will need to be redone at that time. NEI: NEI will complete site inspections throughout the construction process. NEI will inspect the bottom of the excavation to ensure the subgrade soils are what were designed for and will modify if necessary. BETA3: Item is closed.*

SW11. *Review subcatchment boundary for EDA-1. It appears that the catchment area behind the building flows onto the site rather than the King Street system area. This issue will also apply to the proposed conditions analysis where all of EDA-1 is assumed to bypass the proposed system on the site. NEI: EDA-1 and EDA-3 have been revised to capture the runoff from 390 King Street. The proposed watershed maps have been revised to include these additional areas. BETA2: Watershed maps revised; item resolved. BETA3: Item is closed.*

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 indicate that soils are Woodbridge fine sandy loam with a hydrologic group rating (HSGR) of C/D (poor infiltration potential). The Applicant has conducted three soil tests at the Site indicating the subsurface soils are predominantly fill at varying depths overlying a dense sandy loam layer. Groundwater was not detected on any of the test pits, however, redoximorphic features were identified in 2 of the 3 pits.

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

SW12. *Only three test pits were conducted on site, however, based upon the consistency of the results BETA does not believe that any additional test pits are required for the design. NEI: Noted. BETA2: Item resolved. BETA3: Item is closed.*

SW13. *BETA recommends that a construction detail be added to the plans which show the remove and replace required beneath the proposed subsurface infiltration systems. NEI: The depth of the proposed infiltration basins should be below all fill amounts. In the event there is remaining fill a note has been added to sheet C-300 to remove and replace all fill with clean C-33 Sand. BETA2: Note provided; item resolved. BETA3: Item is closed.*

SW14. *The Estimated seasonal high groundwater level on site has been determined based on a "Frimpter" adjustment above the bottom of the test pits of 29". BETA does not agree with this adjustment, based upon the redoximorphic features encountered and the density of the underlying mineral soils, the top of the C horizon soils should be used as ESGHW. NEI: The proposed stormwater facilities have been redesigned as part of the revised plan set. The stormwater features now provide adequate separation from the elevations in which redox features were found during the site's soil evaluations. BETA2: Stormwater facilities revised; item resolved. BETA3: Item is closed.*

SW15. *Since the proposed infiltration systems are being used for both Standards 2 & 4, in accordance with the standards, a mounding analysis is required. NEI: The mounding analysis for each infiltration system can be found in the appendix of the Stormwater Report. BETA2: Mounding analyses provided is not consistent with the infiltration rate used for drawdown. It looks like 0.17 inches per hour was utilized for the mounding analysis but 1.02 inches per hour was used for the*

*Hydro CAD design. Reconcile the Hydro CAD model, drawdown calculations, and mounding analysis; item is outstanding. NEI: The mounding analyses have been revised to be consistent with the stormwater analysis and still meet the design requirements. BETA3: Revised calculations provided; item is resolved.*

SW16. *Please review the Diversion manhole detail on sheet C-300 it appears that the diversion manhole outlets are mislabeled. NEI: The labels for the Diversion manholes on sheet C-300 have been revised. BETA2: Labels revised; item resolved. BETA3: Item is closed.*

SW17. *A setback of at least 10 feet from property lines and buildings for all SCMs is typically required per (MA Handbook V1C1 Pg 8). Infiltration system No. 2 should be moved as needed to meet this setback. NEI: All Stormwater Control Measures (SCM's) have been relocated on the revised plan set to conform with the 10' minimum separation setback from property lines and buildings. BETA2: Location of SCMs revised to comply with required setbacks; item resolved. BETA3: Item is closed.*

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 includes the following treatment trains:

Treatment Train	SCM 1	SCM 2	Infiltration BMP	TSS Removal %
A	Deep Sump Catch Basin	"Isolator Row"	Subsurface Infiltration System	85%
B	Deep Sump Catch Basin	"Isolator Row"	Subsurface Infiltration System	85%

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

Per Standard 6, the project is required to provide at least 25% TSS removal as pretreatment. Pretreatment for the infiltration systems is provided via an isolator row.

SW18. *Provide impervious surface area tributary to each catch basin to document compliance with the requirements of Volume 2, Chapter 2 page 4 for maximum tributary area (See SW3). NEI: Refer to response to comment SW9. BETA2: Sub-watershed Plan provided; item resolved. BETA3: Item is closed.*

SW19. *The plans should identify what treatment will be provided by the swale located along the easterly side of the building. TSS Removal calculations should be provided for this train also. NEI: Per the previous design, the conveyance swale located due east of the proposed building was for conveyance purposes only. As part of the revised design provided here within, this swale has been removed. BETA2: Comment is no longer applicable; item resolved. BETA3: Item is closed.*

SW20. *Remove pretreatment devices from TSS worksheet for total TSS; the 80% TSS provided by the subsurface system is inclusive of required pretreatment. NEI: The pretreatment devices have been removed and the calculation only show the isolator pretreatment row. The revised TSS worksheet provided as attached. BETA2: TSS calculations revised; item resolved. BETA3: Item is closed.*

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. standard not applicable.

CRITICAL AREAS (STANDARD NUMBER 6): Stormwater discharges to critical areas must utilize certain stormwater management BMPs approved for critical areas. 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 less than one acre of land, it will 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 inlet protection, linear sedimentation control (compost filter sock), and designated stockpile locations with perimeter controls. A basic construction sequence is outlined on the plans.

SW21. *BETA recommends that silt sacks be added to the catch basins at 370 King Street site. In addition, features needed to protect the existing collection system once the catch basins are removed should also be spelled out.* NEI: Inlet protection has been called out on the revised plan set at 370 King Street and within the downstream catch basin along King Street. (See sheet C-001)

Note No. 15 on Sheet C-101 has been added to the revised plan set stating the utilization of inlet protection at all new catch basins until site stabilization has occurred. *BETA2: Inlet protection provided; item resolved. BETA3: Item is closed.*

SW22. *Provide construction sequence to identify timing associated with the removal of the existing pavement at the front of the lot.* NEI: Refer to response to comment SW2. The existing pavement at the front of the lot shall be removed during the sequence to remove other existing site features and utilities. *BETA2: See BETA response to SW2. BETA3: Item is closed.*

SW23. *Clearly indicate inlet protection will be provided at all new catch basins until the Site is fully stabilized. In coordination with the DPW, provide inlet protection at existing catch basins adjacent to the site on King Street.* NEI: Refer to response to comment SW21. *BETA2: Item resolved; see SW21. BETA3: Item is closed.*

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. Although it was indicated in the table of contents, a Stormwater Operation and Maintenance Manual was not provided with the Stormwater Management Report.

SW24. *Provide the O & M report and a Long-Term Pollution prevention plan.* NEI: Refer to response to comment SW2 & SW4. *BETA2: O&M Plan provided; item resolved. BETA3: Item is closed.*

ILLICIT DISCHARGES (STANDARD NUMBER 10): All illicit discharges to the stormwater management system are prohibited. A signed Illicit Discharge Compliance Statement was not provided with the submission.

SW25. *Provide a signed Illicit Discharge Compliance Statement.* NEI: An Illicit Discharge Compliance Statement has been included in the revised stormwater report as attached. *BETA2: BETA notes that there is a section in the stormwater report discussing illicit*

*discharges. Typically, a single-sheet form is provided stating that the owner is responsible for identifying and eliminating any illicit discharges. The owner typically signs this form. This item is outstanding. NEI: An Illicit Discharge Statement stating the owner is responsible for identifying and eliminating any illicit discharges has been included in this resubmission. BETA3: Statement provided; item resolved.*

## 9.0 ADDITIONAL COMMENTS

The following are additional comments provided by BETA in an email sent on September 18, 2025:

- AC1. The existing left turn lane providing access to 380 King Street will need to be removed or relocated. NEI: The existing left turn lane has been conceptually shown on the revised plan set to be removed and replaced with stripping. NEI and VHB shall coordinate with the Town and DPW for final stripping removal and replacement. BETA2: Response provided; item resolved. BETA3: Item is closed.*
- AC2. Related to this, the applicant should provide a plan with the proposed changes to the King Street lane configuration as a result of the driveway closure. NEI: See response to comment 1. BETA2: Item resolved; see AC1 (comment 1). BETA3: Item is closed.*
- AC3. The applicant should clarify why the driveway proposed to be closed was selected and not one of the adjacent driveways at either 370 or 390 King Street. NEI: The Board recommended the closure of this accessway at 380 King Street. This entrance was chosen to be closed following discussion with the Board members. This option provided additional green space and increases the driveway spacing of the remaining entrances. BETA2: Explanation provided; item resolved. BETA3: Item is closed.*
- AC4. The applicant should provide a discussion of how they expect the traffic generated by the proposed residential development to be distributed to and from the other access driveways on King Street. NEI: A traffic memorandum by VHB has been attached as part of this submission. BETA2: Traffic memorandum by VHB provided; item resolved. BETA3: Item is closed.*
- AC5. An analysis of the existing and expected operations at the King Street and Union Street signalized intersection should be provided. Specifically, the expected queue length along the southbound King Street approach to Union Street should be provided for the future build, or post-development conditions. This is critical to understand whether additional off-site mitigation measures are warranted. NEI: See response to comment 4. BETA2: Item resolved; see AC4 (comment 4). BETA3: Item is closed.*
- AC6. The speed hump shown at the proposed connection between 380 and 390 King Street is not needed. Vehicles will be slowing down to make the right turning maneuvers to and from the proposed connection. NEI: The speed hump locations have been discussed with the Board members. If requested, this speed hump at this location can be removed.*

*BETA2: BETA defers to the Planning Board on this matter; item resolved. BETA3: Item is closed.*

*AC7. The stop sign and stop line at the proposed connection are also not needed. NEI: The stop sign and stop lines have also been previously discussed and recommended by the Board members. If requested, the stop sign and stop bar can be removed. BETA2: Explanation provided; item resolved. BETA3: Item is closed.*

*AC8. A detail for the proposed speed table should be provided. NEI: A detail for the proposed speed table has been provided in the updated plan set on sheet C-203. BETA2: Detail provided; item resolved. BETA3: Item is closed.*

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

Very truly yours,  
BETA Group, Inc.



Steven Lee, P.E., S.E.  
Senior Project Engineer