

November 20, 2025

Breeka Li Goodlander, PWS, CERPIT  
Conservation Director  
Town of Franklin Conservation Commission  
355 East Central Street  
Franklin, MA 02038

**Re: 1199 West Central Street – Garelick Farms  
MassDEP File No. Not Yet Issued  
Notice of Intent Peer Review**

Dear Ms. Goodlander:

BETA Group, Inc. (BETA) has reviewed documents and plans for the project entitled ***Garelick Farms Flood Resiliency Improvements*** (the Project), located at ***1199 West Central Street*** (the Site) in Franklin, Massachusetts. This letter is provided to present BETA's findings, comments and recommendations.

## **BASIS OF REVIEW**

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

- Notice of Intent entitled ***Garelick Farms Flooding Resiliency Improvements***; prepared by Tighe & Bond; dated September 2025. Inclusive of:
  - WPA Form 3
  - Filing Fees
  - Local Forms
  - Project Narrative
  - Abutters Information
- Plans (9 Sheets) entitled ***Garelick Farms Flooding Resiliency Improvements – Permit Drawings***; dated September 2025; prepared by Tighe & Bond; stamped and signed by Jean Christy, MA PE No. 47080 and Wayne Edward Bates, MA PE No. 36402.
- Stormwater Report entitled ***Stormwater Management Report***; dated September 2025; prepared by Tighe & Bond; stamped and signed by Jean Christy, MA PE No. 47080.
- Supplemental Information Package entitled ***Notice of Intent – Supplemental Information***; dated October 22, 2025; prepared by Tighe & Bond. Inclusive of:
  - Revised Plans (9 Sheets) entitled ***Garelick Farms Flooding Resiliency Improvements – Permit Drawings***; dated September 2025 and revised October 2025; prepared by Tighe & Bond; stamped and signed by Jean Christy, MA PE No. 47080 and Wayne Edward Bates, MA PE No. 36402.
  - Drainage Flow Memorandum

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

- Site Visit on November 3, 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
- ***Town of Franklin Best Development Practices Guidebook***, dated September 2016

## **SITE AND PROJECT DESCRIPTION**

The Site is 51.71-acre parcel identified by the Town of Franklin Assessor's Office as Assessor's Map 275 Lot 23 located at 1199 West Central Street in Franklin, Massachusetts. The Site is bounded to the north by a railroad right-of-way, to the west by an undeveloped lot and Maple Street, and to the south and east by West Central Street. Existing conditions at the Site include the Garelick Farms facility and associated site features, undeveloped wooded areas, and wetland complexes. Topographic relief at the Site generally follows an east-to-west orientation.

Resource Areas Subject to Protection or Jurisdiction 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") and the Town of Franklin Wetlands Protection Bylaw (Chapter 181) and its associated regulations (collectively "the Bylaw") are present at the Site and include:

- Bank;
- Bordering Vegetated Wetland (BVW);
- Land Under Water (LUW);
- Bordering Land Subject to Flooding (BLSF);
- Riverfront Area; and
- Buffer Zones (25-foot No Disturbance Zone, 50-foot No Build Zone and the 100-foot Buffer Zone).

The Site is not located within any Surface Water Protection Areas (Zone A, B, or C), or Zone I, Zone II, or Interim Wellhead Protection Areas. 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: Scarboro and Birdsall soils, 0 to 3 percent slopes with a Hydrologic Soil Group (HSG) rating of A/D, Swansea muck, 0 to 1 percent slopes with a HSG rating of B/D, Whitman fine sandy loam, 0 to 3 percent slopes, extremely stony with a HSG rating of D, Charlton-Hollis-Rock outcrop complex, 3 to 8 percent slope with a HSG rating of A, Merrimac fine sandy loam, 0 to 3 percent slopes with a HSG rating of A, Merrimac fine sandy loam, 3 to 8 percent slopes with a HSG rating of A, Windsor loamy sand with an HSG rating of A, Woodbridge fine sandy loam, 3 to 8 percent slopes with a HSG rating of A, Canton fine sandy loam with a HSG rating of B, and Udorthents, sandy with a HSG rating of A.

Work proposed as a part of the Project includes the following activities:

- Installation of erosion and sedimentation controls;
- Mobilization at the Site and staging of material;
- Installation of the 36" drainage pipe, deep sump catch basins, and manholes;
- Construction of the outfall;
- Backfilling of excavated trenches;

- Repaving and stabilization of trenches excavation limits;
- Construction of a headwall and outfall;
- Cleaning and testing of the drainage pipe;
- Stabilization/restoration of temporarily impacted areas;
- Installation of restoration plantings; and
- Demobilization and site cleanup.

The Project will result in the following impacts to Resource Areas:

- 6,605 square feet (sf) of temporary and 50 sf of permanent impacts to RA;
- 1,556 sf of temporary and 50 sf of permanent impacts to the 0-25-foot No Disturbance Zone;
- 2,903 sf of temporary impacts to the 25-50-foot No Build Zone; and
- 2,983 sf of temporary 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)		✓ (See Comment A2.a.)
Topographic contours (2' intervals)	✓	
Existing Conditions Topography (with source and date of survey)	✓	
Proposed Topography	✓	
Existing and Proposed Vegetation		✓ (See Comment A2.b.)
Existing Structures and Improvements	✓	
Resource Areas and Buffer Zones labeled	✓	
Location of Erosion Controls	✓	
Details of Proposed Structures	✓	
Construction Sequence and Schedule		✓ (See Comment A2.c.)
Registered PLS Stamp (Existing Condition Plans Only)		✓ (See Comment A2.d.)
Assessors' Reference	✓	
Abutting Property Assessors' Reference	✓	
Survey Benchmark		✓ (See Comment A2.e.)
Accurate Plan Scale	✓	

## PLAN AND GENERAL COMMENTS

- A1. The Massachusetts Department of Environmental Protection (MassDEP) has not issued a file number as of this writing.
- A2. The following elements are missing from the provided Plan Set:
  - a. A north arrow reference should be provided on the plans per Bylaw Regulations Section 7.18.1.3.
  - b. Existing and proposed vegetation referenced in Bylaw Regulation Section 7.18.1.5 and 7.18.1.6 should be included on the plans, including individual trees/shrubs with a

diameter greater than 1" proposed for removal. It is BETA's understanding that the Commission generally increases the size threshold for tree location based on the Project and therefore defers to the Commission on this matter. The existing and proposed tree line should be shown, and the proposed trees located along the limits of trenching should be qualified as being either removed or retained.

- c. A Construction Sequence with all proposed activities within Jurisdictional Areas should be provided on the plans per Bylaw Regulations Section 7.18.1.14.
- d. A PLS stamp should be provided on the existing conditions plan.
- e. A survey benchmark should be provided on the plans.

## **WETLAND RESOURCE AREAS AND REGULATORY REVIEW**

BETA has completed a regulatory review of the Site and the submitted documents and plans, focusing on compliance with jurisdictional regulations set forth in the Act and Bylaw. The Project proposes impacts to onsite areas Subject to Jurisdiction and Protection under the Act and Bylaw including Riverfront Areas, and the 0-25-foot, 25-50-foot, and the 50-100-foot Buffer Zone to Bank and BVW.

The NOI application includes narrative information describing the Project. A variance request has been submitted for work within the 0-25-foot and 25-50-foot Buffer Zones. For work with RA the Performance Standards at 310 CMR 10.58(5) - Redevelopment Within Previously Developed Riverfront Area - are being used. Proposed mitigation for impacts includes the installation of plantings within the 0-25-foot Buffer Zone in the southern and northern section of the Site, use of erosion controls, stabilization using native seed mix, restoration of 50 sf of RA, and stormwater management improvements.

For full compliance with the Bylaw and Act, revisions to the plans are required and information as detailed in this peer review should be submitted. The Applicant should also submit further information regarding the should provide plan revisions and further information as described in this letter to comply with the Act and Bylaw.

## **RESOURCE AREA BOUNDARY COMMENTS**

- W1. BETA completed a review of the onsite Bank/MAHW and BVW delineation. Bank/MAHW is apparent based on topographic relief and has been accurately delineated. In addition, BETA concurs with the BVW delineation depicted on the plans and located along the 1B/1C Series stream. Generally, the BVW was observed at the toe of slope, where vegetation communities changed from FACU/FAC species to FAC/FACW/Obligate species. Soils within the wetland were observed to have apparent depletions/redoximorphic concentrations and qualifies as a Depleted Under Dark Surface indicator. No other additional areas of BVW were observed at the Site within 100 feet of the proposed work.

## **CONSTRUCTION COMMENTS**

- W2. Erosion and sedimentation controls should be depicted on either side of the limits of work throughout the Buffer Zone / RA and downgradient of the proposed plantings within Buffer Zone / RA.
- W3. Proposed erosion and sedimentation controls include use of silt fence and straw wattles. Silt fence and straw are not permitted erosion control measures in the Town of Franklin (Pg. 13 of Town of Franklin Best Development Practices Guidebook). The Applicant should coordinate with the

Conservation Commission to determine the appropriate erosion control measures for the Site. Twelve (12)-inch diameter compost filter tubes may be an appropriate option commensurate with the scope of the Project.

- W4. Resource Area impacts (both permanent and temporary) should be clearly depicted on the plans. The Applicant should confirm if Bank impacts are required as work (including limits of work/erosion and sedimentation control installation) appears to overlap with Bank along flag 1F-3.
- W5. The limit of existing pavement and vegetated shoulder should be labeled on the plans adjacent to the location where work is proposed.

### **MITIGATION COMMENTS**

- W6. The Applicant should state if vegetation will be removed within Resource Areas or Buffer Zone to complete the Project. Vegetation was observed in the locations where the headwall, outfall, and portions of the pipe are proposed.
- W7. Provide specifications of the proposed seed mixture(s) for stabilization of disturbed areas within Buffer Zone and RA on the plans.
- W8. A Planting List with information including species of plantings and number of plantings proposed at the Site should be included on the plans.
- W9. A monitoring protocol should be submitted by the Applicant for the proposed mitigation plantings that includes monitoring frequency, corrective actions, metrics for success, and reporting schedule. These plantings (including areas of seeding) should be monitored for two (2) growing seasons to confirm successful establishment.
- W10. Invasive species including Norway maple (*Acer platanoides*), bittersweet (*Celastrus orbiculatus*), Japanese stiltgrass (*Microstegium vimineum*), and callery pear (*Pyrus calleryana*) were observed within the area where the pipe and outfall are proposed within the 100-foot Buffer Zone. The Applicant should provide information on how invasive species will be managed to ensure no further spread occurs during and after construction, and that any post-construction restoration is successful.

### **WPA PERFORMANCE STANDARDS COMMENTS**

The Project proposes permanent impacts to the onsite Riverfront Area and 100-foot Buffer Zone. The Performance Standards at 310 CMR 10.58(5) are being referenced for compliance with RA Performance Standards due to the Site's degraded/previously developed status.

- W11. Erosion controls, grading, and the limit-of-work are depicted within 1 foot of the Banks delineated as 1F-1 through 1F-3 and 1E-4. The Applicant should state if Bank impacts are proposed as a result of construction of the headwall. If impacts are not proposed the Applicant should provide information on how Bank and LUW will be protected during construction.

#### *RIVERFRONT AREA (310 CMR 10.58)*

- W12. Work within RA includes the installation of the headwall and installation of plantings along the southern side of the stream and within the Buffer Zone Mitigation Area. The Applicant should confirm if impacts associated with installation of plantings have been quantified as a part of the RA and Buffer Zone impacts.

- W13. The Applicant should provide further information regarding the location where restoration of RA is proposed, including existing conditions (e.g., vegetative community) to ensure that restoration is in-kind with existing conditions.
- W14. If the Commission determines the Project is permissible under 310 CMR 10.58(5) then a Special Condition within the Order of Conditions should be included as required under 310 CMR 10.58(5)h that prohibits further alteration within the restoration or mitigation areas, except as may be required to maintain the area in its restored or mitigate condition, and prior to requesting the issuance of the Certificate of Compliance, the Applicant shall demonstrate the restoration or mitigation area has been successfully completed for at least two growing seasons.

### **BYLAW REGULATORY COMMENTS**

- W15. A USGS Topographic Map, a Natural Heritage and Priority Habitats and Estimated Habitats Maps, and a FEMA Flood Plain map are required for NOI submissions to the Franklin Conservation Commission per Bylaw Section 7.17.1.
- W16. The Applicant should provide the Construction Sequence on the plans per Bylaw Section 7.15.
- W17. The Erosion and Sediment Control Plan should include a description of the measures that will be taken to properly install and maintain the erosion control devices used during the Project and include the requirement that the erosion control will be inspected weekly and all other criteria set forth in Bylaw Regulation Section 7.12.
- W18. The Applicant submitted a Variance request for the work proposed within the 0-25-foot Buffer Zone and the 25-50-foot Buffer Zone. BETA defers to the Commission on the issuance of this waiver.

### **STORMWATER MANAGEMENT REVIEW**

The proposed stormwater management design consists of providing a redundant 36-inch drainpipe to supplement the existing 48-inch drainpipe that currently conveys stormwater to wetlands on the northeast side of the existing building. The additional pipe is designed to alleviate localized flooding that occurs during high-intensity rain events. The design also includes three (3) deep-sump, hooded catch basins that will tie into the proposed 36-inch RCP run. Runoff discharges to a new outfall and accompanying riprap on the northeast side of the existing building.

### **GENERAL**

- SW1. Provide a plan to accompany the hydraulic calculations (pipe sizing) showing the areas flowing to each catch basin/pipe.
- SW2. The hydraulic analysis indicates that all proposed pipes are HDPE. Revise to indicate RCP.
- SW3. The flared end section at the end of the proposed 36-inch pipe run discharges to a 3:1 ( $\pm$ ) slope. Additionally, the flared end section is oriented at an angle that is not perpendicular to the slope, which will render the riprap less effective. BETA recommends that the angle of the outlet pipe be reevaluated, and a concrete headwall be utilized to provide an effective flat area where the riprap can dissipate flows and prevent scouring.
- SW4. Recommend providing a detail for the replacement of curb on site.

SW5. Provide an existing and proposed drainage area map showing drainage areas and stormwater flow paths (§153-15.A.(2)). Soil boundaries should also be displayed on the map.

## **MASSDEP STORMWATER STANDARDS**

The Project as proposed 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 proposes a new outlet to wetlands that is equipped with a riprap outfall to prevent scouring. Additional calculations are required; Standard 1 is outstanding.

SW6. Provide riprap/outfall sizing calculations.

**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 alleviate localized flooding during high intensity storm events by providing a redundant 36-inch drainpipe to supplement the existing system and provide backup conveyance to the wetlands north of the existing building. Calculations indicate a decrease in peak discharge rate to all points of analysis. Standard 2 is met.

**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 in the location of the proposed work are Udorthents, sandy with a hydrologic group rating (HSGR) of A (high infiltration potential), Scarboro and Birdsall soils with a HSG of A/D, and Swansea muck with a HSG of B/D. The Applicant has conducted five (5) test borings at the Site indicating the subsurface soils are predominantly fill at varying depths overlying glacial till. Groundwater was not noted during the test borings.

Groundwater recharge is not proposed as part of the Project as the intent of the design is to alleviate localized flooding on the site. Standard 3 is met to the greatest extent practicable.

SW7. While the proposed 36-inch pipe is intended to convey floodwaters during high-intensity storm events, it will predominantly carry low flows from the parking areas under typical conditions. As the project includes a new outfall to a wetland resource area, BETA recommends that the Applicant evaluate the proposed system's ability to achieve the Total Suspended Solids (TSS) and Total Phosphorus (TP) utilizing infiltration measures. Treatment area would be considered areas that flow to the basins and not the entirety of the project site.

**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 train:

Treatment Train	SCM 1	SCM 2	SCM 3	TSS Removal %
A	Deep Sump Catch Basin			25%

The project discharges stormwater runoff to wetlands northeast of the existing building, which discharges to Mine Brook. Mine Brook (segment MA72-14) is listed as a Category 5 water, which requires a Total Maximum Daily Load (TMDL) as listed in the Massachusetts Year 2022 Integrated List of Waters. The impairments for this segment of Mine Brook include E.coli and temperature – both impairments that do not require a TMDL reduction associated with them.

The Project has been designed to provide 25% TSS removal by replacing three (3) existing catch basins with new deep-sump hooded catch basins. Given that the project qualifies as a redevelopment as there is no increase in impervious area, Standard 4 is met to the greatest extent practicable.

**HIGHER POTENTIAL POLLUTANT LOADS (STANDARD NUMBER 5):** *Stormwater discharges from Land Uses with Higher Potential Pollutant Loads (LUHPPLs) require the use of specific stormwater management BMPs.*

The proposed use is considered a LUHPPL. Given the project qualifies as a redevelopment, Standard 5 is met to the greatest extent practicable.

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

The project is located outside of any MassDEP wellhead protection areas, including Zone I, II, and any interim Wellhead Protection Areas. Standard 6 is 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 qualify as a redevelopment as the pre- and post-development impervious areas will be the same. Standard 7 is met by improving existing conditions.

**EROSION AND SEDIMENT CONTROLS (STANDARD NUMBER 8):** *Erosion and sediment controls must be implemented to prevent impacts during construction or land disturbance activities.*

As the project proposes to disturb greater than one acre of land, a Notice of Intent with EPA and local Conservation Commission was submitted, and a Stormwater Pollution Prevention Plan (SWPPP) will be developed prior to construction beginning. Erosion controls are indicated on the plans including stockpile areas and construction tracking pad. A basic construction sequence and estimated dates are included in Section 2 of the Stormwater management report. Standard 8 requires minor revisions to be met.

SW8. Provide catch basin inlet protection and perimeter controls on the Existing Conditions & Site Preparation Plan.

SW9. Indicate that proposed catch basins will be equipped with inlet protection once installed until the end of construction.

**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 Long-Term Stormwater Operation & Maintenance Plan was included in Appendix F of the Stormwater Management Report. The O&M Plan indicates responsible parties for the project, routine and non-routine maintenance tasks, and inspection criteria. The O&M Plan also provides guidance on long-term pollution prevention practices for the project. Standard 9 is met.

**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. The Stormwater checklist indicates that one will be provided prior to the commencement of construction. Standard 10 is met, pending receipt of the signed illicit discharge statement,

SW10. Provide a signed illicit discharge statement.

## REVIEW SUMMARY

Based on our review of the NOI submittal and Project plans, the Applicant is required to provide additional information to comply with the Act and the Bylaw.

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

Very truly yours,  
BETA Group, Inc.



Anna Haznar  
Staff Scientist



Jonathan Niro, PWS  
Project Manager



Steven Lee, PE, SE  
Senior Project Engineer

cc: Amy Love, Town Planner