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March 14, 2025

Planning Board
Town of Franklin
355 East Central Street
Franklin, MA 02038

Ref: Autumn Hill Senior Village
Peer Review Response

Dear Members of the Board:

I am writing to respond to comments from BETA dated February 14, 2025. Please find enclosed the following;

- Two full-size and five 11x17 copies of a revised site plan;
- One copy of a revised narrative; and
- One copy of a revised Stormwater Report.

We offer the following responses to BETA's comments for the Board's consideration:

SENIOR VILLAGE OVERLAY DISTRICT:

SV1. Comment: In accordance with par (ii)d. Vegetative cover conditions on the property according to general cover type including cultivated land, meadow, pasture, woodland, and wetland; trees with a diameter at breast height (DBH) in excess of 15 inches, the actual canopy line of existing trees and woodlands. The existing treeline is shown however individual trees in excess of 15" dbh have not been identified.

Response: A waiver is sought to not require locating 15"+ diameter trees on the site. The site has been redesigned several times, resulting in a small development footprint, which will minimize existing tree removal. Approximately 50% of the site will remain completely undisturbed.



SV2. *Comment: In accordance with par (ii)g. A viewshed analysis showing the location and extent of views into the property from public roads and from public lands; cross sections through the development area have been provided, which document the change in grades and relationship of the proposed development to the abutting parcels.*

Response: No comment required.

SV3. *Comment: In accordance with par. 1b. a minimum of 40% of the required open space shall be suitable for use for passive and/or recreational purposes. This area should be delineated on the plans.*

Response: The entire open space area is suitable for either passive or active recreational purposes as noted in the Senior Village Notes on sheet C-3.

SV4. *Comment: In accordance with 1f. the plan should take into account any Town of Franklin or other public lands for preservation or improvements. There are no paths walkways or other appropriate physical connections to the adjacent open space at the rear of the parcel identified on the site plans. BETA recommends that potential linkage and access to the adjacent public lands be developed and shown in compliance with the bylaw.*

Response: The proposed design leaves the rear portion of the site, which abuts the Town Forest, in a natural and undisturbed state. This is consistent with the Board's stated desire to minimize the visibility of the development from the Town Forest. There is an existing trail through the southeasterly corner of the site, which is shown on the plan, and which will be available for public use to integrate the open space with the adjacent Town Forest. Proposed walking paths have been added through areas of the site in immediate proximity to the proposed residential units. If the Board desires the Applicant to also provide a trail to the rear of the site along the natural topography, we request that be included as a condition of approval.

SV5. *Comment: In accordance with par 2 at the owner's option, all areas to be protected shall be conveyed to a separate entity subject to the approval of the Board. The plans delineate the boundaries of the proposed open space area including associated monumentation. The owners are required at the time of application to provide a management plan for the open space which has not been provided.*

Response: The Board indicated at the last meeting that there was no intent for the open space to be conveyed to the Town. Thus, the Applicant elects option a(iii) and would have the condominium association own and control the open space. We request a condition of approval that prior to the occupancy of any unit, condominium documents be provided to the Board for review demonstrating the management plan for the open space and the other provisions of section a(iii).





SV6. *Comment: In accordance with 3. (b), (iv) Low Impact development practices shall be utilized to the greatest extent possible. Based on the existing steep grades on the parcel, these practices would be limited to the area of the 2 existing dwellings. There are no LID measures proposed for the control of stormwater runoff on site.*

Response: Minimizing site disturbance, vegetation disturbance, and impervious coverage is an LID practice. Internal driveways are proposed at modest widths with one sidewalk to minimize impervious coverage, which is an LID practice. The small footprint of the development also allows for a substantial vegetated buffer between the developed portion of the site and the easterly wetlands, which is an LID design practice. Condensing the developed portion of the site as much as feasible, while minimizing land disturbance, does not leave adequate room for some of the referenced stormwater techniques, which occupy more space and require a more spread-out development footprint. We further note that the Town's regulations require a variety of structural stormwater management systems that are not consistent with this provision.

SV7. *Comment: In accordance with par (c) Parking standards. § (i) a maximum of 2 spaces per unit shall be permitted. The 2nd space on each unit is in the driveway in front of the garage. There are 5 guest spaces provided at the cul de sac.*

Response: We are unclear on the intent of this comment. The Planning Board specifically requested that we provide visitor parking spaces.

SV8. *Comment: Par. (c) § (i) also notes "All off-street parking shall be sited to the side or rear of buildings and shall minimize visibility from public and private streets." Except for the 2 existing single-family units to be maintained, the 26 new units will be a minimum of 325' from Summer Street and will be set below the crest of the ridge located between Summer Street and the development area anywhere from 6-12'. Thus, they will not be visible from Summer Street. However, as noted, the second space for these units will be at the front of the buildings and readily visible from the proposed way. BETA will defer to the Board on this matter.*

Response: As we noted in our prior correspondence to the Board, it is our view that the intent of the regulation is to minimize the view of parking areas from the adjacent public way. The proposed design achieves this objective as all new parking spaces are more than 360 feet from Summer Street and will not be visible from the public way. The interior circulating driveway is not a private street. It is merely an interior circulating driveway to provide vehicular access to the proposed garage and parking spaces in a manner that is typical and appropriate for townhouse multifamily developments. Attached to our prior letter dated September 23, 2024 are



photographs from other Senior Villages in Franklin that have similar driveway configurations and overall site design characteristics (Hidden Acres, Meadowbrook Heights, Palladini Village, and Villages at Oak Hill).

SV9. Comment: A Landscape Design should be submitted to document compliance with par (d) Landscaping, Shade trees and infrastructure.

Response: The applicant has, at great expense, engaged in a good-faith effort to substantially reduce the scope and size of the proposed development to address comments made by the Planning Board. It is premature to develop a site landscaping plan until the site layout is finalized. We therefore request additional time to provide such a plan, or that a condition of approval be included requiring the submission of a landscape plan to the Board.

SV10. Comment: In accordance with sub paragraph (vii) Solid waste storage, air conditioners, loading areas and the like shall be shielded from view by walls, dense vegetation, or fences. Each of these items should be identified on the plans including the method to be utilized to shield them from view.

Response: As noted in our July 24, 2024 letter, there are no loading areas on the site. Trash collection will be by individual unit owners as is typical in a single-family home setting, and disposal will be by private curbside collection organized by the condominium association. A detail for typical air conditioner condenser screening (vegetation) can be found on sheet C-15. The specific location of condenser units is not known at this time.

SUBDIVISION OF LAND (SC1 – SC8):

As noted in our July 24, 2024 response, according to 185-48.F.(3).(a).(v), “senior village residential subdivisions” (as defined in the Bylaw) must comply with the Franklin Subdivision Rules and Regulations. This development, while a “senior village planned unit development”, is not a “senior village residential subdivision,” and therefore is not required to meet the subdivision regulations. Senior Villages may be in the form of a “subdivision” (i.e. individual lots) or in the form of a townhouse development.

The term “subdivision” has a specific legal meaning and describes a development with individual lots and a separate roadway right of way (MGL Chapter 41, Section 81M). The proposed development is not a subdivision. It is a multifamily townhouse-style development on a single property that will be



owned and controlled by a condominium association. It is therefore our view that comments SC1-5 and SC7-8 are not applicable to this development.

Section 153-16.A of the Stormwater Management Regulations however does apply to this development, which requires adherence to the Stormwater management section of the Subdivision Regulations (Section 300-11). Below are our responses to the comments from this section of the regulations:

SC6. Comment: In accordance with §300-11. A. (7) Setbacks. a) the minimum setback distance for a stormwater pond to the property line is 20'. The small block wall that forms the down gradient slope of Infiltration Basin #1 measures only 10'+. Either request the waiver or bring the basin into conformance with the standard.

Response: §300-11.A.(7)(a) states "The minimum distance from the edge of the maximum pond water surface to property lines and structures shall be 20 feet." The edge of the maximum pond water surface for Infiltration Basin #1 lies more than 26' from the property line and therefore complies with this regulation.

SITE PLAN AND DESIGN REVIEW:

S1. Comment: A Landscaping Plan is required. (§185-31.C.3(k)). (See SC9 above).

Response: See response to SV9 above.

S2. Comment: Indicate means of waste disposal and proposed dumpster locations, if applicable (§185-31.C.3(i)).

Response: See response to SV10 above.

S3. Comment: In accordance with §185-31.C.3. (s) Description of traffic circulation, safety and capacity in sufficient enough detail for the Board to make a determination of whether a traffic impact analysis is necessary. If information is not sufficient, upon the request of the Planning Board, an applicant may be required to provide a comprehensive traffic study detailing the effects of the proposed development. A small description regarding traffic is identified in the narrative. The narrative describes conditions but does not discuss impacts. BETA will defer to the Board on the requirement for a traffic analysis.

Response: As we indicated in the narrative, senior villages do not generate substantial quantities of new traffic, particularly during peak hours on the adjacent roadways. Access to the site is ample for the proposed use.





STORMWATER MANAGEMENT:

SW1. Comment: The flow paths for existing conditions should be shown on the watershed plans. In addition, it appears that the sheet flow component of the existing conditions analysis is understated. BETA recommends that the designer review the grade at the start of the flow path.

Response: The flow paths are shown on the watershed plans. In the enclosed revised stormwater report, the flow paths have been labelled for clarity. We have also reviewed the sheet flow component for the existing conditions watershed and have increased the slope, therefore, decreasing the Tc. The changes did not affect the proposed design.

SW2. Comment: The impervious area tributary to catch basin 8+23 is greater than ¼ of an acre and exceeds the requirements as outlined on Volume 2 chapter 2, page 4 of the standards. The stormwater report should document that the TSS Removal rate reported is not dependent upon this SCM.

Response: The Town of Franklin TSS removal requirement is met by retaining 1" of impervious runoff, and the DEP TSS removal requirement of 80% is met by the infiltration field when including one pretreatment device (FD Unit C). The CB TSS removal is therefore not needed for this treatment train. The Stormwater report has been updated accordingly.

SW3. Comment: The discharge from proposed Infiltration Field 6 towards Uncas Brook will be directed to 2 proposed level spreaders at the northerly edge of the development. All the remaining infiltration systems which collect runoff flowing in this direction will infiltrate all the runoff from up to a 100-year rainfall event. BETA recommends that the designer review the outlet configuration for Infiltration Field 6 to see if the discharge from the 10-year event can be eliminated.

Response: We have revised the Infiltration Field 6 outlet, eliminated all discharge for all storms up to, and including the 10-year storm as requested.





SW4. *Comment: The runoff from the landscaped areas between the buildings along the down gradient side of the site will all flow uncontrolled toward the Town Forest and Uncas Brook. Based upon the steep grade in this area, BETA recommends that a 12" x 12" stone filled trench be established along the down gradient toe of the fill to minimize the potential for any erosion on this steep slope.*

Response: The proposed grades in this area are consistent with existing natural grades on many portions of the site, and there is no evidence of existing erosion issues. The areas in question will be thoroughly vegetated and will generate little runoff. It is our opinion that a stone trench is not needed. Nonetheless, if the Board is of the view that this is a substantive concern, we request a condition of approval that the 12"x12" stone trench be added in the areas noted by BETA.

SW5. *Comment: The proposed grading directs the runoff from watershed area P2g over the top of infiltration field 6. BETA recommends that the designer direct this runoff around the field and through the level spreader to control the potential for erosion resulting from this uncontrolled runoff.*

Response: The area over the infiltration field will be a broad, nearly level grassed area. It will decrease the potential for erosion as it will slow runoff velocities. We note further that the area in question is already proposed to slope into the level spreader. It is our opinion that there is no substantial erosion potential from this area. Aside from a small roof area at the top of the watershed, the entire watershed is vegetated. Nonetheless, if the Board is of the view that this is a substantive concern, we request a condition of approval that a swale be added at the easterly edge of the nearly-level grass area to pipe such runoff directly into the level spreader.

SW6. *Comment: The outlet from Basin 1 is designed as orifice flow. The flow should be analyzed as culvert flow. If orifice conditions are required to satisfy the design, then the outlet control structure should be in the basin adjacent to the storage.*

Response: It is our view that the HydroCAD accurately models the proposed outlet. The outlet for Basin #1 consists of a pipe and cap with holes in it. This is reflected in the HydroCAD model. The holes in the pipe cap are vertical orifices (devices 3 & 4 in the HydroCAD node) which are then routed through the pipe (i.e. culvert - device 1).

SW7. *Comment: In the HydroCAD analysis of Basin 1, provide interim elevations in the stage storage calculations. It should also be noted that the sediment forebay area cannot be used to determine both storage volume and exfiltration.*

Response: The stage storage volumes have been added to the stormwater report.





SW8. *Comment: BETA recommends that the design review the pretreatment provided for the runoff collected by Trench Drain B in front of Unit 10. The runoff collected by the trench drain flows through 2 area drains (F & G) are shown with no explanation as to what SCM they represent.*

Response: The area drains have deep sumps and hoods, which qualifies them for 25% TSS removal each. By placing them in series, 44% TSS removal pretreatment is achieved.

SW9. *Comment: See Comment SW2 above regarding the impervious surface area tributary to the deep sump catch basins.*

Response: See response to comment SW2.

SW10. *Comment: Provide sequence of construction (§153-12.M).*

Response: The construction sequence can be found in the Sediment and Erosion Control Notes on sheet C-1.

SW11. *Comment: Provide tracking pad at construction entrance.*

Response: A construction entrance has been added to sheet C-12. The detail can be found on sheet C-16.

SW12. *Comment: The applicant is reminded that a Stormwater permit from the Franklin DPW is required based upon the size of the disturbance.*

Response: The applicant will do so prior to construction.

SW13. *Comment: Provide means of protecting proposed infiltration structures from construction-period sediment.*

Response: Infiltration Basin #1 will be protected by erosion controls installed upgradient of the basin once it has been constructed. Notation has been added to sheet C-12 regarding this. All new drain inlets (i.e. catch basins) will be provided with silt sacks as noted on sheet C-1, Erosion Control Note #3.

SW20. *Comment: Provide owner signature (§153-18.B(5)).*

Response: The O&M is signed in the enclosed revised stormwater report.

SW21. *Comment: Operations & Maintenance manuals for the proposed proprietary separators should be incorporated into the manual.*

Response: The First Defense maintenance manual has been added to the O&M.





SW22. Comment: BETA recommends that the maintenance description for the subsurface infiltration structures be expanded to include a description of the observation ports.

Response: The O&M has been revised to include language regarding the inspection ports.

SW23. Comment: Provide estimated operations and maintenance budget.

Response: The estimated O&M budget can be found on sheet A-11 of the O&M Plan.

In addition, based on discussions with the Town, the following changes were made:

- ✓ The sewer design has been revised to include a gravity component at Summer Street discharge.
- ✓ As requested by a Board member, Infiltration Field 5 has been rotated.
- ✓ We have inquired with DPW about obtaining specifications for the Town streetlight across from the proposed driveway. It is unknown at this time whether we will be able to obtain the necessary photometric data from the lighting manufacturer to incorporate it into our photometrics plan.

Do not hesitate to contact me should you have any questions or comments.

Yours Truly,

LEGACY ENGINEERING LLC

Daniel J. Merrikin, P.E.
President

cc: File

