

June 27, 2024

Town of Franklin Conservation Commission
ATTN: Breeka Li Goodlander
355 E. Central Street
Franklin, MA 02038



Re: Tri-County Regional Vocational Technical High School
147 Pond Street
Bylaw Variance Request letter

SCI#: 52033.00

Dear Ms. Goodlander:

As part of our Notice of Intent resubmission, we are respectfully submitting this Variance Request Letter for the Franklin Conservation Commission considering in accordance with Section 7.10 of the Franklin Wetlands Protection By-Law Rules and Regulations. The local jurisdictional isolated wetland resource area flagging Northeast Basin (IVW 200-219) and Southwest Basin (IVW SW1-SW-106; BA1-BA9) are included within the calculations provided below and are proposed to be filled as part of the project. Work in these area include: new school building, pavement, sidewalks, and landscaping. On-site wetland Replication areas are proposed and a wetland replication plan has been provided to the Franklin Conservation Commission, in accordance with the Franklin Wetlands Protection By-Law Rules and Regulations.

0 TO 25 FOOT BUFFER ZONE RESOURCE AREA

(4.2.1 Town of Franklin Conservation Commission Regulations)

- An applicant shall demonstrate that no work/disturbance including grading activities is proposed within the 0-25 foot buffer zone resource area. Any applicant proposing a project within the 0-25 foot buffer zone resource area will have an irrefutable presumption of significant adverse impact to the functions and characteristics of the resource area, unless otherwise determined by the Commission under the minor buffer zone activity criteria set forth in Section 2 of these regulations, or as approved by the Commission by the variance procedures set forth in Section 5 of these regulations.
 - 0-25 foot buffer zone area to be affected entails a total of 27,229 sf of total disturbance while 7,138 sf will be of pervious impacts and 20,091 sf will be of impervious impacts. Pervious impacts consist of landscaping, grading, and planting areas, while the impacts from the impervious consists mainly of a new emergency access road to help assist emergency response vehicles to the school.
 - Of the total 0-25 foot buffer zone impacted and noted above, the local jurisdictional isolated wetland flagging northeast Basin (IVW 200-219) and southwest Basin (IVW SW1-SW-106; BA1-BA9) has a total of 6,220 sf of pervious area that will be impacted and 20,091 sf of impervious impact to the 0-25ft isolated wetlands buffer area, which entails paved roads, sidewalks, landscaping, and the proposed school building.
 - See attached Alternative Analysis response for more information regarding the variance request.

25 TO 50 FOOT BUFFER ZONE RESOURCE AREA

(4.3.1-4.3.2 Town of Franklin Conservation Commission Regulations)

- Any applicant proposing a project within the 25-50 foot buffer zone resource area shall indicate that there are no structures including but not limited to, concrete, stone, or other impervious foundations and/or slabs for construction purposes that for all intents and purposes would significantly increase runoff. Alteration in the 25-50 foot buffer zone resource area is limited to grading and tree clearing. Private Water Supplies – Based on our

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research all surrounding developed parcels are serviced by town water. It is assumed no private potable water wells are in the immediate surrounding areas. Furthermore, the proposed work would have no impact on private wells.

- 25-50 foot buffer zone area to be affected entails a total of 36,963 sf of total disturbance while 7,012 sf will be of pervious impacts and 29,951 sf will be of impervious impacts. Pervious impacts consist of landscaping, grading, and planting areas, While the impacts from the impervious consists mainly of a new emergency access road to help assist emergency response vehicles to the school.
- Of the total 25-50 foot buffer zone impacted and noted above, the local jurisdictional isolated wetland flagging northeast Basin (IVW 200-219) and southwest Basin (IVW SW1-SW-106; BA1-BA9) has a total of 3,315 sf of pervious area that will be impacted and 28,332 sf of impervious impact to the 25-50 ft isolated wetlands buffer area, which entails paved roads, sidewalks, landscaping, and the proposed school building.
- See attached Alternative Analysis response for more information regarding the variance request.

50 TO 100 FOOT BUFFER ZONE RESOURCE AREA

(4.4.1 Town of Franklin Conservation Commission Regulations)

- 4.4.1. Alterations including structures are allowed in the 50-100 foot buffer zone resource area. The Commission may require additional mitigation offsets when the slope within the buffer zone is steeper than 10%. Additionally, mitigation offsets may be required by the Commission when the applicant proposes that more than 30% of the 50 to 100 foot buffer zone resource area is proposed to be impervious surface.
 - 50-100 foot buffer zone area to be affected entails a total of 121,350 sf of total disturbance while 54,259 sf will be of pervious impacts and 67,091 sf will be of impervious impacts.
 - Of the total 25-50 foot buffer zone impacted and noted above, the local jurisdictional isolated wetland flagging northeast Basin (IVW 200-219) and southwest Basin (IVW SW1-SW-106; BA1-BA9) has a total of 15,189 sf of pervious area that will be impacted and 57,468 sf of impervious impact to the 50-100 ft isolated wetlands buffer area, which entails paved roads, sidewalks, landscaping, and the proposed school building.
 - See attached Alternative Analysis response for more information regarding the variance request.

REPLICATION PLAN & PROTOCOL

(7.14.1-7.14.2 Town of Franklin Conservation Commission Regulations)

- When wetland alteration is necessary, the commission shall require that the applicant replicate the altered wetland at a minimum 2:1 ratio (the replication area must be at least twice the square footage of the natural wetland area impacted). The plan submitted shall comply with the requirements as presented in the most recent revision of the MassDEP wetland replication manual. The replication plan, protocol and schedule shall also appear in the approved plan set along with cross sections of altered and proposed replicated areas, ground water elevation data and planting lists and details.
 - A Wetland Replication plan has been provided to the Conservation Commission for response and acceptance with rules and requirements fulfilled. The team is requesting the replicate altered local jurisdictional wetland resource area to be a 1.3:1 ratio due to overall practical space available within the impacted area, as well as site constraints. The wetland replication area has been located and sized to accommodate the proposed impacted areas. The project proposes to replicate these areas with an 8,000 sf wetlands replication area to be located to the southwest of the proposed school building. Please see Sheet C506 within the NOI plan set for details.
 - See attached wetland application plan within the Notice of Intent Site Plan.

STORMWATER MANAGEMENT

(Town of Franklin Code; Division 4: Miscellaneous Rules and Regulations section 300-11 Part B.2.(a))

- The drainage pipe shall be reinforced concrete, with bell and spigot gasketed joints. The pipe shall be Class III in accordance with ASTM C-76. The gaskets shall be O-ring type in accordance with ASTM C-443. The minimum diameter shall be 12 inches.
 - The proposed Tri County Regional Vocational HS has depicted PVC and RCP piping for the stormwater conveyance to be sufficient and cost effective for the Client. All regulations of the code hereon have been followed per the code 300-11 B.2.(a)

EROSION AND SEDIMENTATION CONTROL

(Tri-County Regional Vocational Technical High School Notice of Intent Peer Review Update, Dated June 13, 2024; comment SW65)

- Provide detail for compost filter sock and clarify if silt fence is proposed per the “silt fence with straw wattle” detail. BETA notes that use of silt fence is typically prohibited in the Town of Franklin.
 - Proposed compost filter socks have been proposed in lieu of straw wattle. Currently Siltation Fences are also proposed at any erosion control limit of work that impacts the wetland resource areas or wetland replication locations with a downgradient slope. We believe siltation fence (along with compost filter socks in many locations) will help maintain and provide erosion and sediment control protection downgradient as the building phases are implemented throughout construction.

If you have any questions regarding this report or other issues, Stephen Powers, PE can be reached at 508-877-6688.

Sincerely,

Stephen Powers, P.E.
Director of Civil Engineering