

March 14, 2024 (Revised June 20, 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

SCI#: 52033.00

Alternative Analysis Letter

Dear Ms. Goodlander:

As part of our Notice of Intent resubmission, we are respectfully submitting this alternative analysis (per Section 7.13 of the Town of Franklin Wetlands Protection bylaw) as part of our waiver request for the Franklin Conservation Commission in accordance with the Franklin Wetlands Protection By-Law Rules and Regulations.

Based on the on-site resource areas noted within the Wetlands Protection By-Law, which includes the 25' No disturbance from the affected resource area, 25'-50' foot No Build buffer zone, and 50'-100' buffer zone, the design team is constrained in siting the Tri-County Regional Vocational Technical High School project within the 60.5-acre parcel, while keeping the existing school in operation as the new school and proposed site features are constructed. In addition to constructing a compact three-story, rectangular design fitting into the available buildable area into the sloping behind of the existing school (currently developed as an extensive solar field), we have attempted to configure the site layout, grading, stormwater design to the greatest extent possible to comply with the applicable rules and regulations within jurisdiction of the Commission. In short, there have been many site layout design iterations during the design phase that have attempted to balance site and constraints code (including limiting resource area impact) to provide a functioning new school development.

It should be noted that almost all the on-site areas included in the post-development scenario are areas that have been previously developed. Only the area designated for the secondary emergency access route includes minor expansion into undeveloped areas (Note: the existing gravel road is currently developed to provide maintenance access for the overhead electric service from Tri-County Road up the hill to the school). See below for alternative layout scheme that was reviewed and reduced to limit disturbance to wetlands resource areas and the associated buffer zones.

Below includes narrative to the categories listed in Section 7.13.1

- Riverfront resource Area – There is no riverfront area within the property
- Alteration of riparian zone – There is no riverfront area/riparian zones within the property
- Septic system components within the 100-foot buffer zone resource areas – There is no on-site septic system, as the property is served by Town sewer
- Wetlands filling up to 5,000 square feet – The project proposes to fill local wetland (IVW) resource areas totaling 6,274 sf (IVW 200-219 and IVW SW1-SW106/BA1-BA9). Please note the proposed resource areas to be filled are not considered wetlands as defined by MassDEP under the MA Wetlands Protection Act, but are considered wetland resource areas under the Town of Franklin Wetlands Protection Bylaw. 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.
- Structures proposed within the 50' buffer zone resource area – Structures (including impervious area) are proposed within the 50' buffer zone area for Series IVW 200-219,

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IVW SW1-SW106/BA1-BA9 (local jurisdictional resource areas to be filled), as well as the D-Series BVW wetlands (1,619 sf). Alternative options/layouts are described below on the design iterations attempted to reduce impacts to these areas.

- Variance requests – Our office is requesting variances for consideration by the Conservation Commission. See separate Variance request letter as required.

All resource areas will be protected throughout construction and currently no documented rare species habitat is present on the property.

As the existing school is looking to be redeveloped with the same intended use, there is no economic alternative for this project.

Below describes the Scope of Alternatives investigated as part of the design process. Overall, we have proposed the redevelopment of the Tri-County High School to remain predominantly within the previously developed areas with no significant adverse impacts to the surrounding resource areas (i.e. erosion and sediment control measures proposed throughout the site as required). Stormwater Management is being designed in accordance with the Massachusetts Stormwater Management Policy, as well as the Town of Franklin Stormwater Bylaw to the greatest extent practicable.

Alternative Layout Development:

A number of alternative site and building layouts were investigated in order to accommodate Town regulations, including the Conservation Commission Bylaw and Franklin Town Code. The solar field was selected as the location of the new school as it satisfied a number of criteria for construction, including: 1) Phasing (could be constructed in an isolated area of the campus with limited impact to ongoing school program; 2) Originally away from other valuable on-site wetland resource areas; 3) Construction costs – Mass grading had already been performed to level out the topography as part of the solar field construction. Many areas throughout the campus for new construction were considered. The solar field was determined to be the best option for many of the reasons noted below, including environmental impacts.

During the course of the design process, site layout, grading, utility routing was revised to limit environmental impacts. Two examples are included within this Alternative Analysis to show the progression of design:

Tri-County Reg. Vocational Technical High Topographic Plan of Land Wetland Update (02-28-24)

Additional resource areas under local Con-Com bylaw were delineated. A revised version of the Topographic Plan of Land by Samiotes Consultants Inc. was submitted to include this delineation, and submitted to the Town for review. The proposed building was shifted north and proposed parking was reconfigured to preserve as much of the local resource area as possible, while creating a potential future outdoor learning environment (SW and BA series flagging)



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

Sincerely,

Stephen Powers