



March 7, 2025

Franklin Conservation Commission
355 E. Central Street
Franklin, MA 02038

Re: Updated Alternatives Analysis
1 Paddock Lane, Franklin, Massachusetts (Map 211, Lot 118)
(DEP File # 159-1307)

Dear Franklin Conservation Commission,

Goddard Consulting, LLC (Goddard) is pleased to submit this updated Alternatives Analysis in response to review comments issued by the BETA Group in their 1/31/2025 review letter. Below is a summary of previously explored and potential alternatives to the proposed work at 1 Paddock Lane.

1.0 ALTERNATIVE 1: ORIGINAL DESIGN

Alternative 1 was the original design considered for the Notice of the Intent. Due to the amount of impact the project was scaled back from this option. Alternative 1 consists of approximately 2,520 sf of wetland fill with an approximate Limit of Work 19,810 sf as well as large amounts of replication. This design would have significant impacts to the Resource Area, 25-foot Buffer Zone, and 50-foot Buffer Zone. Impacts to the buffer zones include approximately 6,900 sf of impacts within the 25-foot Buffer Zone, 6,200 sf of impacts to the 25-50ft Buffer Zone area, and 4,300 sf of impacts to the 50-100-foot Buffer Zone. This option includes the greatest impacts and is the least preferred option.

2.0 ALTERNATIVE 2: FIRST PROPOSAL

Alternative 2 is the originally proposed layout filed as part of this Notice of Intent. The design includes a smaller limit of work, less wetland fill and replication, and a retaining wall design to reduce impacts from fill. This option includes approximately 262 sf of wetland fill and a limit of work of 14,510 sf. Impacts to the Resource Area, 25-foot Buffer Zone, and 50-foot Buffer Zone are less than those of Alternative 1. Impacts to the Buffer Zones include approximately 4,200 sf of impacts within the 25-foot Buffer Zone, 5,520 sf of impacts to the 25-50ft Buffer Zone area, and 4,270 sf of impacts to the 50-100-foot Buffer Zone. The location of the house remains the same in this option and the inclusion of the retaining wall was proposed to lessen impacts to the resource area. This alternative is not preferred due to the inclusion of wetland fill. The retaining wall is a more costly option but was incorporated into this design in order to reduce wetland impacts.

3.0 ALTERNATIVE 3: CURRENT PROPOSAL

Alternative 3 is the current proposed design. This option includes a smaller limit of work with a retaining wall, no proposed wetland fill, and orientation change of the driveway turnaround area. This option has a limit of work of approximately 10,700 sf. The Buffer Zone impacts of this alternative are less than Alternatives 1 & 2. Impacts to the Buffer Zone include approximately 2,210 sf within the 25-foot Buffer Zone, 4,300 sf to the 25-50ft Buffer Zone area, and 4,200 sf to the 50-100-foot Buffer Zone. This design provides the least amount of impacts and aligns with zoning setbacks. This proposal also includes the planting of approximately 2,140 square feet of area within the limit of work to serve as additional naturally vegetated buffer. Additionally, this option meets the needs of the applicant. Alternative 3 is the preferred option for this project.

4.0 ALTERNATIVE 4: SHIFTED FOOTPRINT

This design is similar to Alternative 3. Alternative 4 contains a smaller limit of work, retaining wall, no wetland fill, and orientation change of the turnaround area into the 50-foot Buffer Zone but is shifted further out of the buffer zones. In this Alternative, the house has been shifted outside of the 25-foot Buffer Zone. This design includes the following impacts to the buffer zones: approximately 800 sf within the 25-foot Buffer Zone, 3,300 sf to the 25-50ft Buffer Zone area, and 4,070 sf to the 50-100-foot Buffer Zone. Due to this option's Limit of Work being shifted further out of the Buffer Zones, this option would no longer comply with Zoning Setbacks. This alternative puts the house approximately 25 feet from the property line, where a 40-foot setback is required. Additionally, the proposed house would be approximately 40 feet from the neighboring home making this not a favorable design.

5.0 AVOID, MINIMIZE, MITIGATE

Unnecessary wetland impacts were minimized prior to filing by the dismissal of Alternative 1 described above. While the use of a retaining wall is more expensive than simple grading, this allowed the avoidance of over 2000 square feet of impact to BVW and thousands of square feet of buffer zone impacts. At the initial filing, Alternative 2 was proposed. This design minimized impacts by a reasonable and practicable amount but did not avoid impact as completely as possible. As such, Alternative 3 was proposed, which allows total avoidance of impact to BVW. While understanding that no project on this property can completely avoid impacts to the buffer zone, the current design, Alternative 3, has minimized those impacts to the greatest extent possible. As mitigation for unavoidable impacts, the Applicant also proposed the planting of a strip around the perimeter of the development area, to establish native vegetation in areas that will be disturbed for construction, totaling 2,140 square feet of planting and seeding. Further, despite not being required to provide any stormwater management, the construction of a roof runoff infiltration system is proposed to mitigate the effects of increased impervious surfaces.

6.0 CONCLUSION

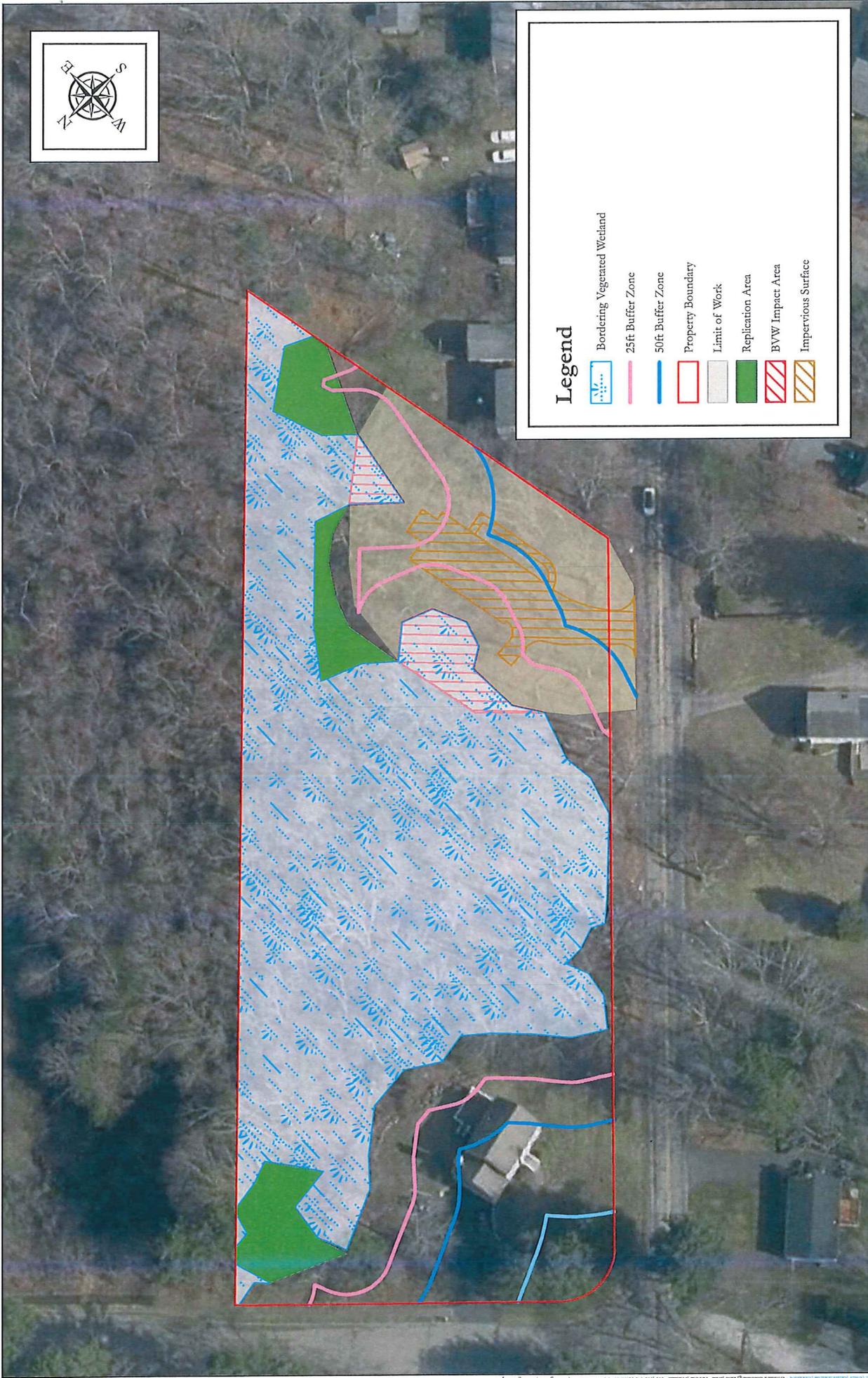
In summary, the current proposed project provides a balance of the interests of the WPA, Town of Franklin, and the applicant. Several of the proposed alternatives had greater impacts to the wetland resource and buffer zone as well as not compliant with zoning bylaw. Based on the above analysis, the applicant's project team feels confident that Alternative 3 is the preferred option.

Please feel free to contact us if you have any questions.

Sincerely,
Goddard Consulting, LLC



Chris Frattaroli
Lead Wetland Scientist



Legend

-  Bordered Vegetated Wetland
-  25ft Buffer Zone
-  50ft Buffer Zone
-  Property Boundary
-  Limit of Work
-  Replication Area
-  BWV Impact Area
-  Impervious Surface



1" = 100'

71.4407113°W, 42.1280237°N

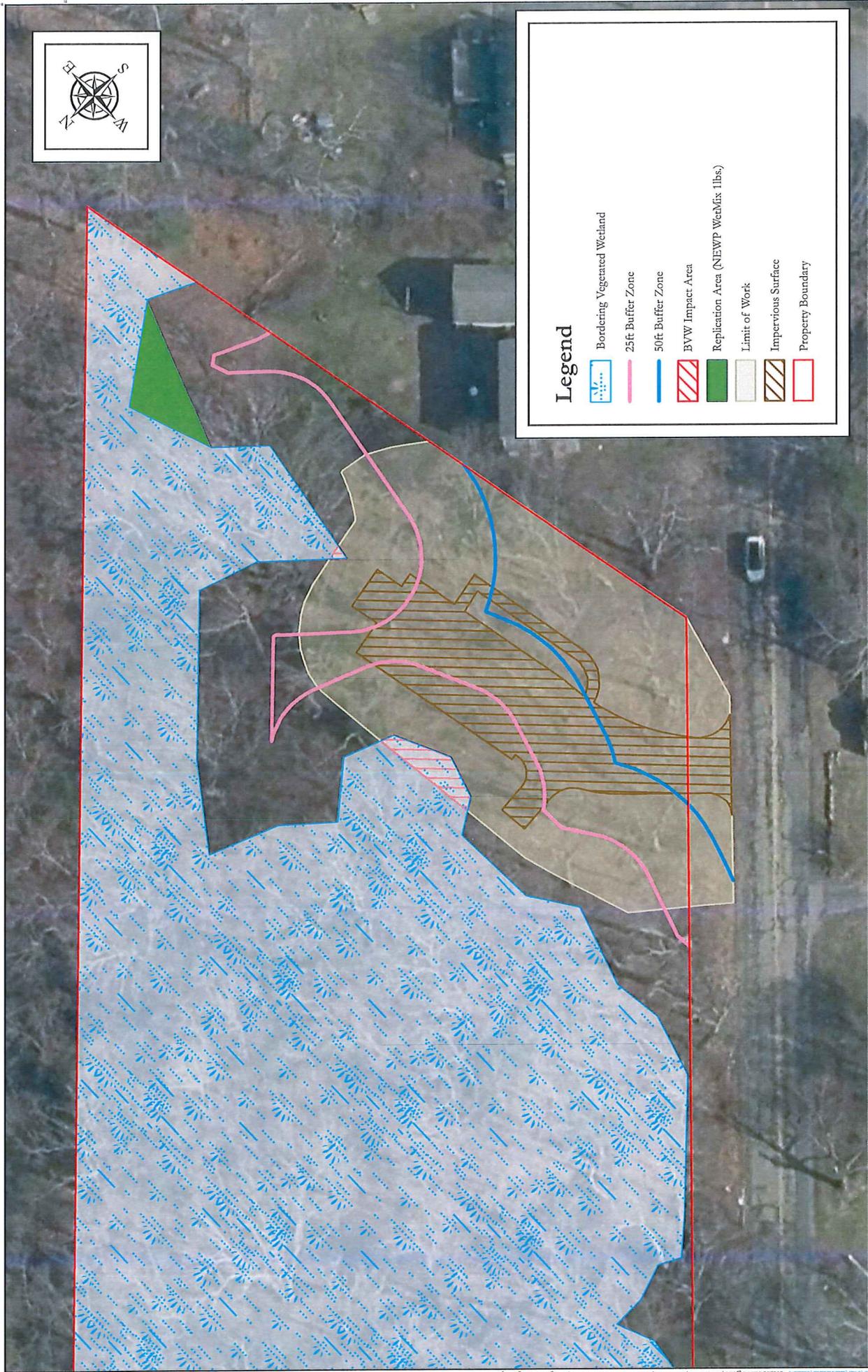
Parcel ID: 211-118

Alternative 1

1 Paddock Lane
Franklin, MA

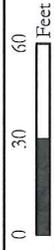


Date: 03/03/2025



Legend

-  Bordering Vegetated Wetland
-  25ft Buffer Zone
-  50ft Buffer Zone
-  BVW Impact Area
-  Replication Area (NEWP WetMix 1lbs)
-  Limit of Work
-  Impervious Surface
-  Property Boundary



1" = 60'

71.4405797°W, 42.1278859°N

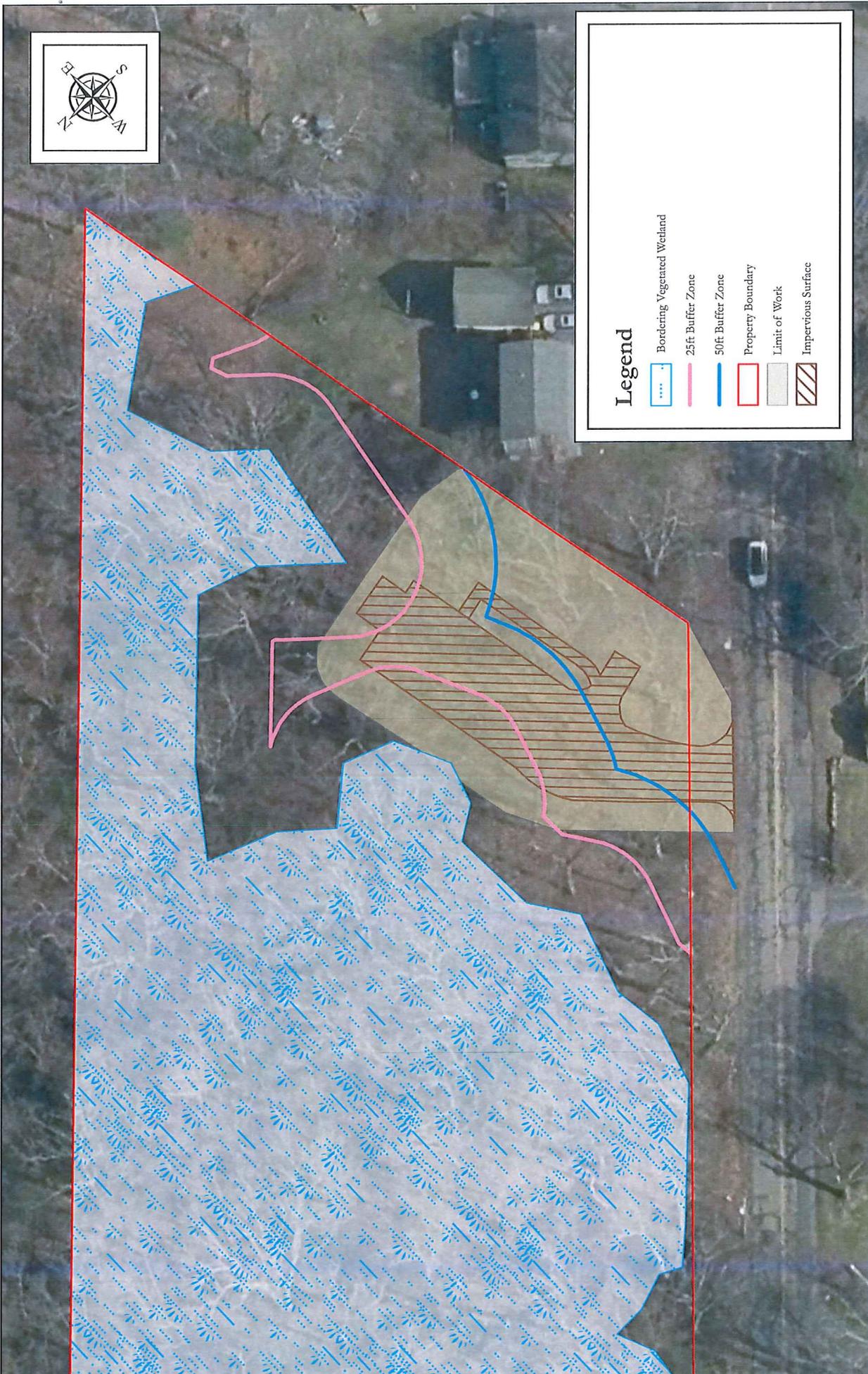
Parcel ID: 211-118

Alternative 2

1 Paddock Lane
Franklin, MA



Date: 03/03/2025



Legend

- Bordering Vegetated Wetland
- 25ft Buffer Zone
- 50ft Buffer Zone
- Property Boundary
- Limit of Work
- Impervious Surface

0 30 60 Feet
1" = 60'

71.4405797°W, 42.1278859°N

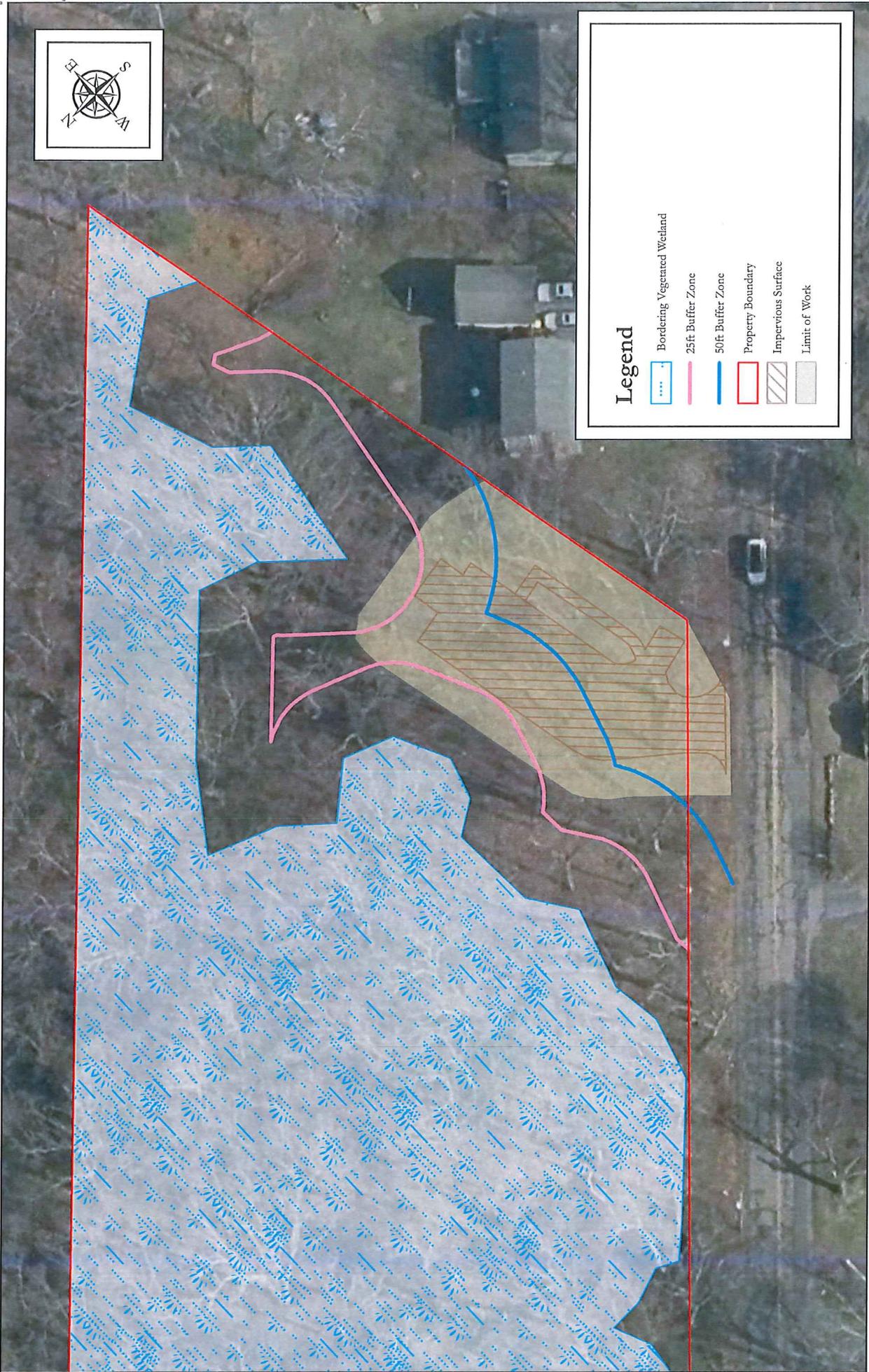
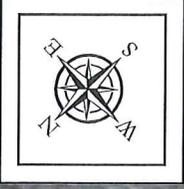
Parcel ID: 211-118

Alternative 3

1 Paddock Lane
Franklin, MA

GODDARD CONSULTING
Strategic Ecological Consulting

Date: 03/03/2025



Legend

- Bordering Vegetated Wetland
- 25ft Buffer Zone
- 50ft Buffer Zone
- Property Boundary
- Impervious Surface
- Limit of Work

0 30 60 Feet
1" = 60'

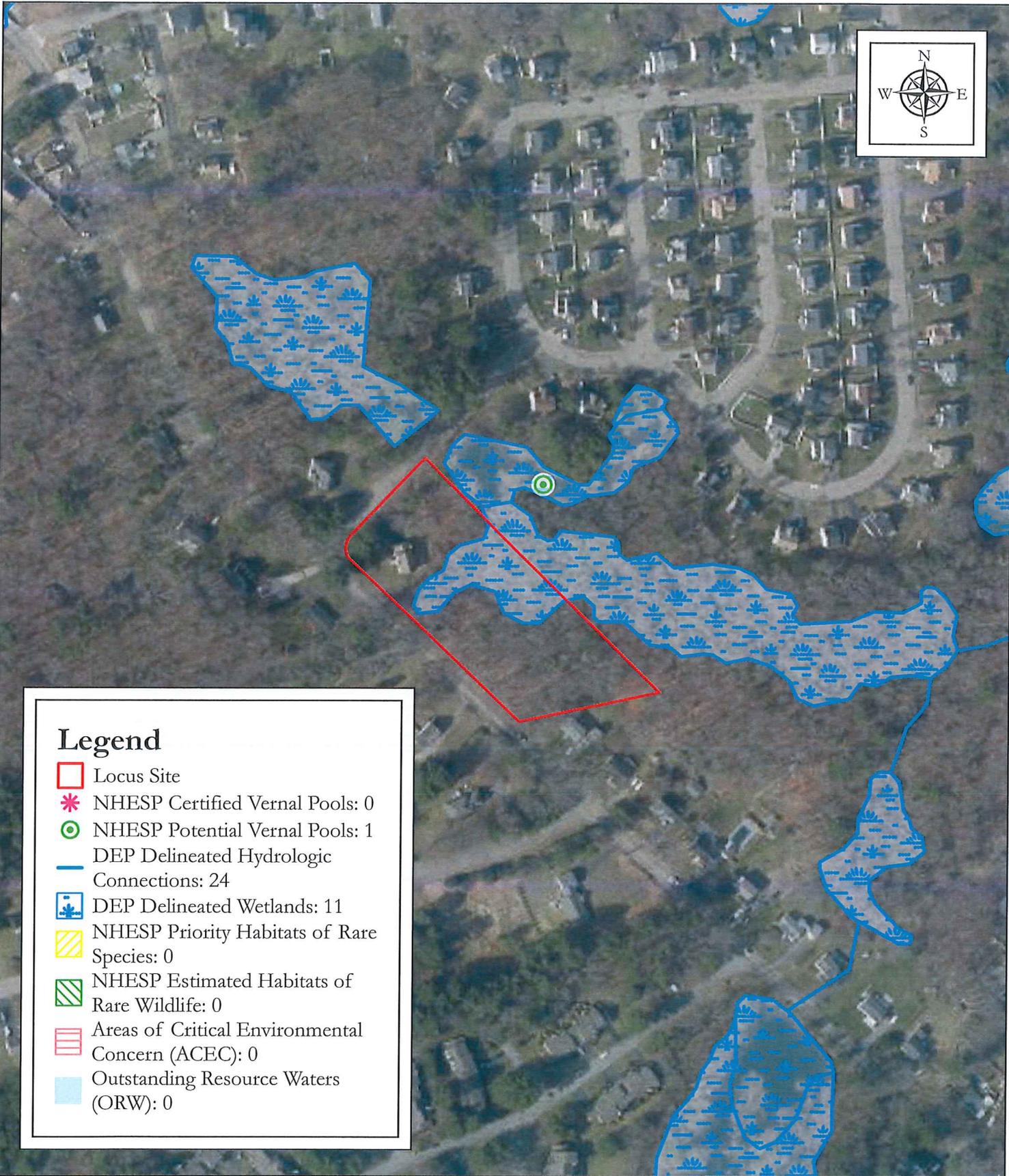
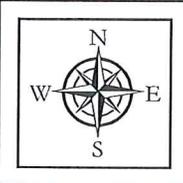
71.4405797°W, 42.1278859°N

Parcel ID: 211-118

Alternative 4

1 Paddock Lane
Franklin, MA

Date: 03/03/2025



Legend

- Locus Site
- * NHESP Certified Vernal Pools: 0
- NHESP Potential Vernal Pools: 1
- DEP Delineated Hydrologic Connections: 24
- DEP Delineated Wetlands: 11
- NHESP Priority Habitats of Rare Species: 0
- NHESP Estimated Habitats of Rare Wildlife: 0
- Areas of Critical Environmental Concern (ACEC): 0
- Outstanding Resource Waters (ORW): 0

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Orthophoto of Locus Site



71.4408543°W, 42.128281°N

Date: 02/06/2025

1 Paddock Lane
Franklin, MA 02038

Parcel ID: 211-118



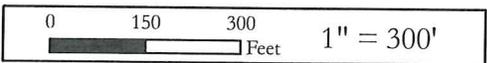
Legend

-  Locus Site
- FEMA National Flood Hazard Layer
 -  1% Annual Chance Flood Hazard: 1
 -  Regulatory Floodway: 0
 -  Area of Undetermined Flood Hazard: 0
 -  0.2% Annual Chance Flood Hazard: 0
 -  Area with Reduced Risk Due to Levee: 0
 -  Area Not Included: 0

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FEMA Flood Map of Locus Site



71.4408543°W, 42.128281°N

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