



April 23, 2025

Franklin Conservation Commission
355 East Central Street
Franklin MA 02038

Re: Notice of Intent Supplemental Flood Storage Calculations
444 East Central Street, Franklin MA

Dear Franklin Conservation Commission,

On behalf of AJ Alevizos of TAG Central LLC (the Applicant), Goddard Consulting LLC (Goddard) is pleased to submit this supplemental submittal consisting of flood storage volume calculations and diagrams. In sum, the existing flood storage capacity of the Bordering Land Subject to Flooding (BLSF) on site totals 23,053 cubic feet. The proposed capacity of BLSF to contain floodwaters will be 27,144 cubic feet. Therefore, the project proposes an increase in flood storage capacity of 4,091 cubic feet. An increase is provided at each contour interval. This means that the site will be capable of storing a greater volume of floodwater than under existing conditions.

Please refer to attached engineering drawings entitled as follows:

- *Existing Flood Plain Volume Exhibit* (4 sheets), Allen & Major Associates, Inc., 4/22/2025
- *Proposed Flood Plain Volume Exhibit* (4 sheets), Allen & Major Associates, Inc., 4/22/2025

A summary of existing and proposed flood storage capacities is provided in the table below:

<u>Contour Interval</u>	<u>Existing Volume</u>	<u>Proposed Volume</u>	<u>Net Change</u>
268'-269'	610.5 cf	655 cf	+44.5 cf
269'-270'	4,545.5 cf	4,662 cf	+116.5 cf
270'-271'	17,897 cf	21,827 cf	+3,930 cf
Total:	23,053 cf	27,144 cf	+4,091 cf

An analysis of the BLSF performance standards is provided below.

§ 10.57	Bordering Land Subject to Flooding: An area with low, flat topography adjacent to and inundated by flood waters rising from creeks, rivers, streams, ponds, or lakes.	
Performance Standard		Compliance
10.57 (4)(a)(1)	<p><i>Compensatory storage shall be provided for all flood storage volume that will be lost as the result of a proposed project within Bordering Land Subject to Flooding, when in the judgment of the issuing authority said loss will cause an increase or will contribute incrementally to an increase in the horizontal extent and level of flood waters during peak flows.</i></p> <p><i>(1) Compensatory storage shall mean a volume not previously used for flood storage and shall be incrementally equal to the theoretical volume of flood water at each elevation, up to and including the 100-year flood elevation, which would be displaced by the proposed project. Such compensatory volume shall have an unrestricted hydraulic connection to the same waterway or water body. Further, with respect to waterways, such compensatory volume shall be provided within the same reach of the river, stream or creek.</i></p>	<p>Some fill of BLSF is proposed, primarily around the existing crossing to be improved at the center of the site. The project's engineer, Allen & Major Associates, Inc. has incorporated compensatory flood storage in the grading plan design. Please refer to attached engineering drawings, which graphically and numerically depict the existing and proposed flood storage capacity at each 1-foot contour interval. In all, the project will result in an increase of 4,091 cubic feet of flood storage capacity.</p> <p>Compensatory flood storage will have an unrestricted hydraulic connection to the perennial stream on site. Compensatory storage is provided nearly immediately adjacent to areas where flood storage is lost.</p>
10.57 (4)(a)(2)	<p><i>(2) Work within Bordering Land Subject to Flooding, including that work required to provide the above-specified compensatory storage, shall not restrict flows so as to cause an increase in flood stage or velocity.</i></p>	<p>No work within BLSF will restrict flows to increase flood stage or velocity. Under proposed conditions, floodwater will be able to fill a slightly larger lateral space, serving to reduce flood stage and velocity.</p>
10.57 (4)(a)(3)	<p><i>(3) Work in those portions of bordering land subject to flooding found to be significant to the protection of wildlife habitat shall not impair its capacity to provide important wildlife habitat functions. Except for work which would adversely affect vernal pool habitat, a project or projects on a single lot, for which Notice(s) of Intent is filed on or after November 1, 1987, that (cumulatively) alter(s) up to 10% or 5,000 square feet (whichever is less) of land in this resource area found to be significant to the protection of wildlife habitat, shall not be deemed to impair its capacity to provide important wildlife habitat functions. Additional alterations beyond the above threshold, or altering vernal pool habitat, may be permitted if they will have no adverse effects on wildlife habitat, as determined by procedures contained in 310 CMR 10.60.</i></p>	<p>In the area of proposed work within BLSF, no significant wildlife habitat is present. No vernal pools or NHESP mapped habitats exist therein. Furthermore, the area of BLSF to be impacted is comprised primarily of degraded riverfront area (i.e. lacking topsoil and vegetation) or a near monoculture of common reed (<i>Phragmites australis</i>) in areas that do contain vegetation.</p>



If there are any questions regarding this submittal, please do not hesitate to contact us.

Sincerely,
Goddard Consulting, LLC

A handwritten signature in black ink that reads 'Chris Frattaroli'.

Chris Frattaroli
Lead Wetland Scientist

CC:
AJ Alevizos, TAG Central LLC, 275 Regatta Drive, Jupiter FL, 33477
MassDEP Central Regional Office, 8 New Bond Street, Worcester, MA 01606