



10/8/2025

Franklin Conservation Commission
335 East Central Street
Franklin, MA 02038

Re: Variance Request
Lot 2 Forge Parkway, Franklin, MA 02038

Dear Franklin Conservation Commission,

Goddard Consulting, LLC (Goddard) is pleased to submit this variance request and accompanying alternatives analysis on behalf of the applicant, Brad Chaffee of Camford Property Group, for the property known as Lot 2 Forge Parkway in Franklin (Parcel ID: 272-001-000-000). This report is a supplement to the Notice of Intent filed by United Consultants, Inc. on behalf of the applicant as required by Section 5.3 of the Franklin Wetlands Protection Bylaw. Site constraints and the lack of upland space on the lot make it difficult to relocate or scale back the proposed construction of the proposed commercial building with associated parking, stormwater management improvements and other appurtenances.

The applicant requests a variance from the following sections of the Franklin Wetlands Protection Bylaw:

- **Section 4.2.1. – 0-25' Buffer Zone Regulations**
 - The project proposes impacts to the 0-25' Buffer Zone totaling approximately 7,600 square feet. This impact is comprised entirely of invasive species management and replanting, which is proposed as mitigation for other buffer zone impacts.
- **Section 4.3.1. – 25-50' Buffer Zone Regulations**
 - The project proposes impacts to the 25-50' Buffer Zone consisting of the construction of a retaining wall, parking surface and stormwater management system, totaling 5,061 square feet.

In all, Goddard believes that impacts to wetland resource areas and buffer zones have been avoided, minimized, and mitigated for, to the greatest extent practicable. Site constraints prohibit relocation of the proposed project. Impacts have been avoided by proposing a retaining wall, which is a more expensive alternative but allows the work to avoid the need for grading, which would require a much larger footprint. Impacts have been minimized by keeping the footprint of the proposed development small, and outside of the inner 0-50' buffer zone as much as possible. As mitigation for the above-mentioned impacts to the buffer zone, the applicant proposes invasive species management and replanting between the limit of work and the BVW. See Invasive Species Management Plan, prepared by Goddard Consulting LLC, dated 10/7/2025 for detailed information regarding this mitigation effort. Additionally, stormwater management is provided to not increase runoff.

Below is a table summarizing potential alternatives to the proposed work:

Summary of Alternatives			
Alternative option	Impact to buffer zone and/or BVW	Mitigation	Cost & Implications
<i>Alternative 1:</i> No change to existing conditions	No impacts to buffer zone.	None. Project would not include invasive species management as proposed and invasive vegetation continues to dominate the buffer zone.	No cost, but the applicant is unable to develop land as needed.
<i>Alternative 2:</i> Utilize grading instead of retaining wall within 0-50' buffer zone	Impact of the retaining wall in 0-50' buffer zone reduced slightly. Grading would be proposed instead, with very steep slope, possibly extending into BVW, and destroying all remaining vegetation in buffer zone, posing erosion concerns.	Project would likely need to provide wetland replication for BVW impacts. No opportunity for invasive species management.	Less expensive than current proposal but impacts to buffer zones/resource areas are much greater.
<i>Alternative 3:</i> Downsize overall footprint of development	Project avoids 0-50' buffer zone entirely or almost entirely.	Little or no invasive species management proposed. Buffer zone remains dominated by invasive vegetation. Drainage via gravity becomes more challenging to implement.	Slightly less expensive than current proposal, but proposed project becomes economically unviable.
<i>Alternative 4:</i> Current proposal	Impacts to buffer zone as described.	Project provides over 11,000 square feet of invasive species management, improving habitat value and capacity of the buffer zone to protect the interests of the Wetlands Protection Act and the Franklin Wetlands Protection Bylaw.	Current design is most costly but meets the needs of the applicant.



In summary, the proposed project provides an opportunity to enhance the wildlife habitat value of the vegetated buffer on site. Based on the above analysis, Goddard believes that adverse impacts to wetland resources and buffer zones have been avoided to the greatest extent practicable and respectfully requests that the Commission approve this request for variance.

Sincerely,
Goddard Consulting, LLC

A handwritten signature in black ink that reads 'Chris Frattaroli'. The signature is fluid and cursive, with the first name 'Chris' being more prominent than the last name 'Frattaroli'.

Chris Frattaroli
Lead Wetland Scientist