



February 2, 2026

Franklin Planning Board
355 East Central Street
Franklin, MA 02038

Re: Environmental Impact Analysis
Donovan Estates
47 Partridge Street, Franklin MA
Assessor's Map 220, Parcels 13, 14, 15

Dear Franklin Planning Board,

Goddard Consulting, LLC (Goddard) is pleased to submit this Environmental Impact Analysis on behalf of the applicant, the Donovan Family Realty Trust, for the property known as 47 Partridge Street in Franklin (Parcel ID: 220/13-15). The applicant proposes subdivision of the site and subsequent construction of seven new single-family homes. This analysis is being prepared in conjunction with the project's civil engineer, United Consultants, Inc., in accordance with §300-8 of the Franklin Subdivision of Land Bylaw. The Bylaw identifies six items to be addressed in such an analysis. A section evaluating each item is provided below, with text from the Bylaw provided in *italics*, and the project team's analysis provided subsequently in plain text.

1.0 Ground and Surface Water Quality

Impact upon ground- and surface water quality and level, including estimated phosphate and nitrate loading on groundwater and surface water from septic tanks, lawn fertilizer, toxic wastes, storage of petroleum products and other activities within the development. For all developments located in whole or in part within Water Resource Districts, this shall include analysis of open and closed drainage system alternatives, examining effects upon the basic water budget and upon the speed of transport of contaminants.

The proposed project will not include the installation of septic, with the proposed houses to be connected to existing sewer, resulting in no loading of phosphate or nitrate from septic tanks. The use of fertilizers and pesticides is expected to be limited, as a standard condition of approval in perpetuity from the Conservation Commission prohibits the use of pesticides, herbicides and fungicides, and requires that any fertilizers be a slow-release variety approved in advance by the Commission. Additionally, stormwater will be managed in accordance with the MassDEP Stormwater Standards, through the installation of a proposed water quality swale and stormwater basin, ensuring adequate storage, infiltration and treatment of stormwater runoff. Generally, a substantial amount of vegetation will remain unaltered beyond the limit of work, serving to provide further filtration of any potential contaminants.

No toxic waste is expected to be generated by the site's use as a residential development. No storage of petroleum products is expected to occur aside from the parking of personal vehicles or light machinery such as lawn mowers or snowblowers. Additionally, proposed catch basins will be deep sump catch basins fitted with oil separator hoods to limit the potential for transportation of oils, grease or other floatables. The site is not located within a Water Resource District.

The Drainage Report contains an Operation and Maintenance Plan that includes measures to limit the potential for adverse effects caused by discharges of contaminants or pollutants from the site. Some

components of this plan include good housekeeping measures, a long-term pollution prevention plan, routine maintenance protocols, and an illicit discharge statement. These components include (in part) provisions stating that minimal pesticides/fertilizers shall be used, paved surfaces shall be swept, the minimum amount of sand and salt shall be used, and that proper precautions will be taken during construction.

2.0 Wildlife Habitat and Outstanding Environs

Material effects upon important wildlife habitats, outstanding botanical features and scenic or historic environs.

In general, alteration of existing site conditions is limited mostly to the conversion of maintained fields/lawns to single-family homes, consistent with the neighborhood. As such, very minimal tree removal is required, and alteration to forested areas is extremely limited.

The installation of the proposed stormwater basin and the road to access the subdivision will require the removal of several trees. Along Partridge Street, several small trees will need to be removed for the installation of the water quality swale, with the proposed road requiring the removal of several more; the limit of work surrounding the stormwater basin clips slightly into the southern tree line. However, the swale is proposed to be planted with native vegetation, offering to provide compensatory habitat value. Additionally, three shade trees with a caliper of 2 ½" are proposed to be planted on each subdivided property. The tree plantings will provide further compensatory habitat value to help offset the proposed tree removal.

Importantly, the site is not located within Priority Habitat of Rare Species or Estimated Habitat of Rare Wildlife, as mapped by the Natural Heritage and Endangered Species Program. No mapped potential or certified vernal pools are present on the site, nor are any depressions that may function as vernal pool habitat known to exist on site.

No outstanding botanical features are present on the site. Nearly the entire work area is comprised of maintained field and lawn. No rare plants, specimen trees, or otherwise unique flora are known to exist on site.

The wetland system at the western side of the site can be considered a scenic feature. No work is proposed within the wetland or stream itself. Access to this wetland system will not be blocked, nor will views be impaired. As such, its scenic nature will not be altered.

The site contains no mapped points inventoried by MassHistoric Commission. According to the Franklin Assessor's records, the existing single-family home on the site was built in 1984 and is not a historic feature. No alterations to historic environs are proposed.

3.0 Soil Suitability and Erosion Control

Capability of soils, vegetative cover and proposed erosion control efforts to support proposed development without danger of erosion, silting or other instability.

The project proposes erosion control in the form of compost sock staked into the ground around the limit of work to prevent unintended runoff and sedimentation leaving the work area. Additionally, a sedimentation control mat is proposed to be placed at the entrance to the site prior to beginning work,

serving to limit the potential for tracking sediment offsite during construction. In following the construction sequence detailed in site plans, the proposed erosion control will protect the downgradient resource areas from unintended runoff and sedimentation. Catch basins, sediment forebays, open infiltration areas, and the roadway area will all be cleared following construction, with all collected sediment during and post-construction disposed of offsite at an approved location. Additionally, dust control will be managed by spraying water as necessary, with the use of oils, petroleum products, and toxic liquids being prohibited for dust control.

The general contractor will be responsible for the inspection and maintenance of the erosion control, with a report to be submitted to the Conservation Commission Office on a weekly basis, detailing the steps taken to address any issues that may arise with the failure of the erosion control barriers.

Grading on site, in conjunction with the existing topography onsite, will result in runoff heading downgradient west towards the resource areas. However, the proposed erosion control barriers around the limit of work will serve to capture any potential sedimentation and prevent unintended runoff depositing into the resource area. Additionally, due to the proposed grading for the subdivided lots and the stormwater management measures, including the compensatory flood storage, accumulated stormwater runoff will primarily drain or collect prior to reaching the downgradient resource area. The site is generally quite flat, which also serves to greatly limit the potential for erosion. Substantial vegetation will remain undisturbed around the perimeter of the work area, further limiting the potential for erosion.

4.0 Relationship to Wetlands Protection Regulations

Relationship to the requirements of MGL c. 131, §§ 40 and 40A, the Wetlands Protection Act and the Town of Franklin Wetlands Bylaw.

The proposed project is located entirely outside of the resource areas onsite, and mostly outside of the Riverfront Area, with proposed work occurring at the edge of this zone. The extent of work proposed in the Riverfront Area is limited to the stormwater basin, which is classified as exempt work within the Riverfront Area per 310 CMR 10.58(4)(d).

No work is proposed in the 25-foot “No Disturb” Zone jurisdictional under the Franklin Wetlands Bylaw. The proposed project is mostly outside of the 50-foot “No Build”, with the work proposed in this area limited to the creation of compensatory flood storage, as outlined further below, and a minor portion of the proposed stormwater detention basin. This will result in 5,961 square feet of alteration in the form of grading. Within the 50- to 100-foot Buffer Zone, alteration is primarily proposed associated with the creation of the stormwater basin, with the total alteration in this zone totaling 30,339 square feet. Additionally, part of the northernmost proposed house (the only impervious surface proposed within the 100-foot buffer zone) and the stormwater swale fall partially within this zone.

Additionally, a small portion of the proposed detention basin will be placed within Bordering Land Subject to Flooding (BLSF), with compensatory flood storage proposed north onsite at an almost 2:1 ratio; flood storage proposed to be filled totals 2,848 square feet, with the proposed compensatory area totaling 4,811 square feet. Likewise, the filled flood storage totals 570 cubic feet, with the

proposed compensatory storage totaling 962 cubic feet. Related to the creation of flood storage, alteration is limited to grading. The project is in compliance with all applicable state and local performance standards.

5.0 Impact to Water Supply and Distribution

Impact upon the existing water supply and distribution systems and well capacity of the Town.

The proposed single-family houses will be connected to the Town water supply, with water service connections to be finalized once a water map amendment is obtained. The site is not situated within a Zone I or Zone II Wellhead Protection Area. Furthermore, the proposed land use (single-family residential use) is consistent with the surrounding properties, with no disproportionate usage expected. As such, no impacts to the well capacity of the Town are anticipated.

6.0 Handling of Potential Hazardous Substances

Pretreatment of waste materials considered by the Department of Environmental Quality Engineering to be hazardous to the public, including but not limited to the proper containment and handling of petrochemical substances.

The site is proposed to be constructed as an eight-lot subdivision, with no proposed storage or containment of potentially hazardous substances, petrochemical or otherwise. The land use of the proposed project is in alignment with the surrounding single-family houses. Any potential hazardous material generated as a part of the construction or otherwise will be managed and treated in accordance with the Operation and Management plan to be included with the submittal (see also Section 1.0 above).

7.0 CONCLUSION

In summary, Goddard Consulting believes that the proposed project is in compliance with section §300-8 of the Franklin Subdivision of Land Bylaw, meeting the standards outlined above. The proposed project has additionally been designed in accordance with the Town of Franklin Best Development Practices; therefore, Goddard Consulting respectfully requests that the Franklin Planning Board takes the above into account throughout the permitting process.

If you have any questions, please feel free to contact us at (508) 393-3784.

Sincerely,

Goddard Consulting, LLC



Chris Frattaroli
Lead Wetland Scientist