

Town of Franklin Conservation Commission

RESOURCE AREA IMPACT SUMMARY FORM

**The Franklin Wetlands Protection Bylaw
Franklin Town Code Section 181**

Resource Area	Alteration Proposed	Mitigation Proposed
Bordering Vegetated Wetland (SF)	0	0
Bank (LF)	0	0
Land Under Water Bodies (SF)	0	0
Isolated Wetland (SF)	264	1,000 (invasive species management)
Vernal Pool (SF)	0	0
<i>25-foot</i> Buffer Zone (SF)	5,000	10,000 (invasive species management)
Riverfront (SF)	0	0
100-Year Floodplain (CF)	0	0
(SF) = Square Feet (LF) = Linear Feet (CF) = Cubic Feet Flood Storage		

May 24, 2023

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

Re: Request for Variance - 15 Liberty Way, Franklin MA (Map: 320, Parcel: 4)

Dear Franklin Conservation Commission,

On behalf of Atlantic Oliver 15 Liberty Way LLC (the applicant), Goddard Consulting, LLC (representative) is hereby submitting this request for variance for a project which consists of the expansion of a parking lot and associated stormwater management at 15 Liberty Way, Franklin MA. This report is a supplement to the Notice of Intent application submitted concurrently as required by the Franklin Wetlands Protection Bylaw. Site constraints, including zoning requirements for provided parking area and the lack of usable space on the lot, make it unfeasible to relocate or scale back the proposed parking and driveway expansion.

As noted in this Notice of Intent submittal, the proposed project requires alteration to the existing IVW onsite. This will be in the form of supplemental riprap added to the existing riprap present in the IVW. This alteration totals 264SF. In addition, encroachment of pavement into the 25-foot buffer zone is required to provide the necessary parking. This alteration of the 25-foot buffer zone totals approximately 5,000SF.

As mitigation for these alterations, the applicant proposes to manage invasive plant species in the IVW and surrounding area. The proposed invasive species management area is approximately 11,000SF. Invasive species present in this area include oriental bittersweet (*Celastrus orbiculatus*), multiflora rose (*Rosa multiflora*), purple loosestrife (*Lythrum salicaria*), and common reed (*Phragmites australis*). These species are known to outcompete native plant species that are important to native wildlife for food and habitat. Management of these species will allow native vegetation present in the area to thrive. It is Goddard's opinion that the proposed mitigation will result in a net improvement of habitat value in this area.



Figure 1: Photo showing proliferation of invasive plant species in proposed invasive species management area.

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

Summary of Alternatives			
Alternative option	Impact to wetland resources and buffer zone	Mitigation	Cost
Alternative 1: No change to existing conditions	No impacts to buffer zone or wetland resources.	None required. Project would not include invasive species management or improvement of stormwater management as proposed.	No cost, but applicant is unable to develop land as needed.
Alternative 2: Scale back proposed parking and driveway area to avoid buffer zones	No impacts to buffer zone, but proposed alteration to IVW onsite would still be necessary to support stormwater management system for the area.	Project would provide significantly scaled-back mitigation.	Similar cost, but applicant is unable to develop land to extent needed.
Alternative 3: Current proposal	Impacts to buffer zone and IVW onsite as described.	Project provides approx. 11,000SF of invasive species management, improving habitat value of the wetland resource and surrounding area.	Current design is most costly but meets the needs of the applicant.

In summary, the proposed project provides an opportunity to improve the IVW onsite and its surrounding area over existing conditions. 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



Chris Frattaroli
Wetland Scientist