



September 7, 2023

Franklin Conservation Commission
Franklin Municipal Building
355 East Central Street
Franklin MA, 02038

Re: Peer Review Comment Response
15 Liberty Way, Franklin MA

Dear Franklin Conservation Commission,

Goddard Consulting, LLC, (Goddard) is pleased to submit this response letter and revised site plans on behalf of Atlantic Oliver 15 Liberty Way LLC (the Applicant), to provide responses to the initial project review comments issued by BETA Group, Inc. in regard to the Notice of Intent (NOI) filed for 15 Liberty Way, Franklin MA.

Two hard copies have been mailed and a digital copy has been submitted for the Commission's review and approval. If you have any questions, please feel free to contact Chris Frattaroli at (617) 620-2740.

Sincerely,
Goddard Consulting, LLC

Chris Frattaroli
Wetland Scientist

CC: Mike Shunta, Oliver Street Capital, 125 High St, Boston, MA 02110
Dan Campbell, Level Design Group, 249 South St, Plainville, MA 02762
Elyse Tripp, BETA Group, Inc., 315 Norwood Park South, 2nd Floor, Norwood, MA 02062

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Prepared by Kelly Engineering Group, dated 2/18/21

1.0 BETA GROUP COMMENTS

Goddard and the project's engineer, Level Design Group (LDG), reviewed the BETA Group's comments and offer the following responses.

BETA Peer Review Comment		Goddard Response
ADMINISTRATIVE AND PLAN COMMENTS		
A1	<p><i>MassDEP has not issued a file number for this Project as the Applicant has not submitted this filing to MassDEP. Although asserting that the Project is only subject to Bylaw approval, the Applicant may still be required to file under the Act, depending on the outcome of the resource area boundary determinations (comments W1 – W6).</i></p>	<p>An interior intermittent stream was identified within the F-series wetland, which means that work is proposed within the Buffer Zone to BVW, and, in the opinion of BETA, is under the jurisdiction of the Wetlands Protection Act. The project will be filed with MassDEP after local approval is granted.</p>
A2	<p><i>The existing conditions topography should include the following:</i></p> <ul style="list-style-type: none"> <i>a. A survey benchmark;</i> <i>b. Topographic features including interior drainage ditches (see comments W7 and W8) and the upland berm (see comment W4); and</i> <i>c. A registered Professional Land Surveyor (PLS) stamp.</i> 	<ul style="list-style-type: none"> a. A survey benchmark is shown on previously submitted site plans titled Liberty Parking Expansion, dated 1/13/23 – a hydrant bolt near the northwestern corner of the existing building. b. The interior drainage ditches have been flagged with J-, K-, and L-series flags and are shown on site plans. Per BETA, these ditches are non-jurisdictional. The upland berm was not flagged, but the wetland areas on either side of the upland area were flagged and are shown on site plans titled Liberty Parking Expansion, dated 1/13/23. c. The updated site plan, titled Liberty Parking Expansion, dated 1/13/23, has been stamped with a PLS stamp and is attached to this document.

A3	<p><i>Two IVW's are described within the NOI narrative; however only one is shown on the Project plan. Furthermore, associated 0-25', 25-50', and 50-100' Buffer Zones are not depicted on any of the plan sheets as required per Section 7.18.1.8 of the Bylaw.</i></p>	<p>All wetland resource areas have been flagged in the field and are now shown on site plans. Updated site plans show flagging as agreed upon by BETA Group and Goddard on a site visit that occurred on August 2, 2023.</p>
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WETLAND RESOURCE AREAS AND REGULATORY REVIEW

Intro	<p><i>BETA conducted an onsite and completed a regulatory review of the submitted documents and plans, focusing on compliance with Resource Area definitions and Performance Standards set forth in the Act and the Bylaw. The Project is proposed within a resource area identified by the Applicant as an IVW that is not Subject to Jurisdiction under the Act but is Subject to Protection under the local Bylaw. Work is proposed within Buffer Zones associated with the identified IVW under the local Bylaw. Although the Applicant has not filed the NOI with MassDEP, the Project is subject to the MassDEP Stormwater Standards and a review of compliance with these Standards has been completed as part of the Planning Board Review.</i></p> <p><i>The NOI application includes narrative information describing the Project, and the proposed impacts within the buffer zone have been quantified and generally described but not shown on the Project plans. Mitigation measures include use of erosion controls, proposed invasive species management, and installation of Stormwater Best Management Practices (BMP's) to manage stormwater runoff from the new paved areas. Additional information is required to determine if areas subject to jurisdiction under the Act are present, and to describe the effects of the work on the interests of the Act and the Bylaw, including demonstration of compliance with the Stormwater Management Standards, demonstration of compliance with the Bylaw, and reassessment of Resource Area boundaries.</i></p>	<p>The applicant has provided revised site plan sheets (titled Liberty Parking Expansion, dated 1/13/23) and updated documents as described herein to address BETA's comments. WPA jurisdiction has been identified by BETA, compliance with Stormwater Management Standards and the Town of Franklin's Bylaw has been demonstrated, and resource area boundaries have been reassessed and confirmed by BETA.</p>
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<p>W1</p>	<p><i>As discussed in Section 1.1 of the NOI narrative, the wetland referenced as an IVW was not flagged in the field. Although the boundary appears to be generally defined by a rip-rap slope, the Applicant should flag this area for BETA to confirm the delineated boundary. Existing conditions as shown on the Project plan are not sufficient to determine the accuracy of this Resource Area as observed in the field. The boundary of the IVW should be determined in the field so it can be confirmed. In addition, the Applicant should provide additional information on the location of the existing underground stormwater management system discussed in Section 1.1.</i></p>	<p>The IVW discussed in Section 1.1 of the NOI narrative dated 5/25/23 has been flagged in the field and its extent was confirmed by BETA in the field. This flagging is now shown on site plans titled Liberty Parking Expansion, dated 1/13/23.</p> <p>A site plan titled “ALTA/NSPS Land Title Survey Plan” prepared by Kelly Engineering Group, dated 2/18/21, shows the location of underground stormwater management features located on the project site. This plan is attached to this document.</p>
<p>W2</p>	<p><i>South and east of the wetland described in comment W1 within the easement area and along the existing chain link fence (see attached sketch), BETA observed hydric soils consisting of a depleted matrix with redoximorphic features within 12” of the soil surface. Hydrologic indicators observed included leaf staining, saturation, and hydrophytic vegetation such as purple loosestrife (<i>Lythrum salicaria</i>), common reed (<i>Phragmites australis</i>), deer-tongue (<i>Dichanthelium clandestinum</i>), and pointed broom sedge (<i>Carex scoparia</i>). Based on BETA’s observations, the Applicant should re-evaluate this area and flag the boundaries of additional wetlands in accordance with the definition at 310 CMR 10.55(2).</i></p>	<p>These wetland areas have been flagged in the field and their extent was confirmed by BETA in the field. They are now shown on site plans titled Liberty Parking Expansion, dated 1/13/23.</p>
<p>W3</p>	<p><i>A man-made channel (identified as Channel 1 on the attached sketch), as evidenced by sections of rip rap, was observed upgradient of and connected to the resource area described in comment W1. Hydric soil indicators consisting of organic streaking with depletions and redoximorphic features within 12” of the soil surface, as well as a dominance of hydrophytic vegetation including sensitive fern (<i>Onoclea sensibilis</i>), jewelweed (<i>Impatiens capensis</i>), purple loosestrife and sallow sedge (<i>Carex lurida</i>) was observed. Additionally, evidence of prior flow was observed within the channel including eroded banks, organic debris deposits, and drift marks. Based on BETA’s observations, the Applicant should re-evaluate this area and flag the boundaries of additional wetlands and/or bank in accordance with the definition at 310 CMR 10.54(2) and 10.55(2). The source of water flowing to this channel should also be provided by the Applicant.</i></p>	<p>This wetland area has been flagged and its extent was agreed upon by BETA and Goddard in the field. It is now shown on site plans titled Liberty Parking Expansion, dated 1/13/23.</p> <p>A thorough search of Registry of Deeds records and Conservation Commission documents/plans did not yield any information about the source of the water flowing to this channel. Based on the information that is available and multiple site visits conducted by Goddard and Level Design Group, we believe that the source of this water is roof and/or parking lot runoff from adjacent properties.</p>

<p>W4</p>	<p><i>An offsite ditch running parallel to the northern property line, referenced in Section 1.2 of the NOI as an unmaintained stormwater ditch (identified as Channel 2 on the attached sketch), was observed in the field. This ditch is separated from the remainder of the parcel by an upland berm until its outlet to the easement directly northwest of the Project parcel, upgradient of the channel described in comment W3. Pockets of standing water were observed along the length of the ditch, in addition to channelized flow observed near its western limit (see attached sketch and Photos 4 through 7). The Applicant identified this area as an IVW, but its boundary was not observed to have been flagged in the field; therefore, BETA cannot confirm the accuracy of this delineation. The boundary of the IVW should be determined in the field so it can be reviewed, and buffer zones can be shown accordingly.</i></p>	<p>As stated in Goddard’s response to comment A1, an intermittent stream was identified interior to the F-series wetland (the channel identified as Channel 2 by BETA). Therefore, this wetland was identified by BETA as a Bordering Vegetated Wetland (BVW) and thus is jurisdictional under the Wetlands Protection Act.</p> <p>The boundary of this wetland was reviewed in the field and confirmed by BETA.</p>
<p>W5</p>	<p><i>A rip rap mound was observed between the start of the channel discussed in comment W3 and the end of a channel discussed in comment W4. Although these areas have been discussed separately and a rip rap mound was observed to visually separate these two areas, an apparent hydrologic connection was observed as evidenced by ponded water and saturation on either side of the rip-rap mound. This is further supported by the evidence of prior flow discussed in comment W3. Based on BETA’s observations, the Applicant should re-evaluate this area and flag the boundaries of bank in accordance with the definition at 310 CMR 10.54(2).</i></p>	<p>The rip rap mound discussed here is located downgradient of flags F17-18. The flagging shown on site plans titled Liberty Parking Expansion, dated 1/13/23 was confirmed by BETA in the field, thus making the F-series and H-series wetlands separated.</p>

W6	<p><i>Hydric soil indicators consisting of a depleted matrix underlying a dark mineral layer within 12" of the soil surface, as well as stained leaves and ponding were observed within the northern portion of the site (see attached sketch). A dominance of hydrophytic vegetation including royal fern (<i>Osmunda regalis</i>), cinnamon fern (<i>Osmundastrum cinnamomeum</i>), black tupelo (<i>Nyssa sylvatica</i>), red maple (<i>Acer rubrum</i>) and Sphagnum moss were observed despite some upland ground cover including Canada mayflower (<i>Maianthemum canadense</i>) and princess pine (<i>Lycopodium obscurum</i>). Based on BETA's observations, the Applicant should re-evaluate this area and flag the boundaries of additional wetlands in accordance with the definition at 310 CMR 10.55(2).</i></p>	<p>The wetlands identified in this comment have been flagged in the field. They were determined to be two distinct IVWs and are flagged with C-series and G-series flags. The extent of these wetlands was confirmed by BETA in the field, and they are shown on updated site plans titled Liberty Parking Expansion, dated 1/13/23.</p>
W7	<p><i>The interior drainage ditch described as non-jurisdiction in Section 1.3 of the NOI narrative (see attached sketch) was generally observed to be dry and sparsely vegetated with upland species such as hay-scented fern (<i>Dennstaedtia punctilobula</i>) and partridge berry (<i>Mitchella repens</i>). BETA concurs with the Applicant that this drainage ditch is not jurisdictional under the WPA or the Bylaw.</i></p>	<p>Non-jurisdictional drainage ditches were marked with J-, K-, and L-series flags and are shown on site plans titled Liberty Parking Expansion, dated 1/13/23.</p>
W8	<p><i>The project as currently depicted will disturb more than one acre of land, therefore, a Notice of Intent (NOI) with EPA and a Stormwater Pollution Prevention Plan (SWPPP) are required.</i></p>	<p>After approval for the project is granted and a contractor selected, the appropriate paperwork will be filed with EPA. No work will begin until EPA approval is received.</p>
W9	<p><i>Material stockpile and laydown areas should be labeled on the Project plans.</i></p>	<p>Stockpile areas will be determined by the selected contractor after the project is approved. No material will be stockpiled for more than 14 days. Any stockpile location will be situated outside of the 100-foot Buffer Zone to any wetland resource area.</p>

W10	<p><i>Proposed erosion controls include inlet protection measures and 12-inch diameter Silt Sox. These controls are appropriate for this Project, however, Sheet C-5.0 of the plans includes a detail depicting silt fence and straw wattles for stockpile protection and Sheet C-4.0 references use of erosion control fencing under the Erosion Control Plan Notes. BETA defers to the Commission on whether they will approve the use of these controls.</i></p>	<p>Goddard and Level Design Group maintain that the erosion controls depicted are appropriate for this project.</p>
W11	<p><i>The Applicant is proposing approximately 11,000 sf of invasive species management as a form of mitigation. To support this, the Applicant should submit a comprehensive Invasive Species Management Plan (ISMP) that includes the following:</i></p> <ul style="list-style-type: none"> <i>a. Species-specific treatment methods (mechanical, chemical, or a combination of the two) for each species identified on site;</i> <i>b. Proposed methods to prevent the accidental spread of any invasive removed while clearing and grubbing;</i> <i>c. Monitoring of the areas subject to the ISMP; and</i> <i>d. Seed mix and/or native plantings proposed to revegetate areas where invasive species were removed.</i> 	<p>An invasive species management plan, dated 9/7/23, has been developed and is attached to this submittal. Invasive species management proposed now totals 37,621 square feet.</p>
<p>WPA PERFORMANCE STANDARDS COMMENTS</p>		
	<p><i>The Applicant asserts that Project does not propose any work within Resource Areas Subject to Protection under the Act; however, the Project does propose work within the locally jurisdiction IVW and its associated buffer zone Resource Areas. Depending on the outcome of the resource area boundary review (comments W1 – W6), an evaluation of compliance with the WPA Performance Standards may be necessary.</i></p>	<p>Based on the reevaluation of WPA jurisdiction, BETA has determined that the F-series wetland is a jurisdictional BVW under the WPA due to the presence of an internal intermittent stream.</p> <p>Work is proposed only within the buffer zone to this BVW. There are no Performance Standards for buffer zones listed in the WPA.</p>
<p>BYLAW REGULATORY COMMENTS</p>		
W12	<p><i>The Applicant has requested a variance for management of invasive species within resource areas. A variance should additionally be requested for work proposed with the 0-25' No Disturb and the 25-50' buffer zones of the IVW per the Bylaw.</i></p>	<p>The request for variance, initially dated 5/24/23, has been revised and is attached here.</p>
W13	<p><i>Section 4.4.1 of the Bylaw indicates that "mitigation offsets may be required by the Commission when the applicant proposes that more than 30% of the 50-100 foot buffer zone resource area is proposed to be</i></p>	<p>The project proposes the creation of 18,894 square feet of impervious area in 50-100' Buffer Zone. Goddard believes that the stormwater management features proposed will provide</p>

	<p><i>impervious surface". The Applicant should provide the Commission with calculations of proposed impervious area within the 50-100 foot buffer zone for the Commission to determine appropriate mitigation measures.</i></p>	<p>sufficient mitigation for the increase in impervious area in the 50-100' Buffer Zone.</p>
<p>W14</p>	<p><i>The Applicant states that 264 sf of work is proposed within the onsite IVW associated with two proposed stormwater outlets and associated rip-rap apron. Work proposed within a wetland is subject to the requirements of section 7.14 of the Bylaw for the submission of a Replication Plan and Protocol.</i></p>	<p>The impacts proposed to the IVW consist of only the placement of additional riprap in areas that already have a riprap substrate. Therefore, the applicant does not propose wetland replication. Additionally, the fill of two small IVWs within the work area is proposed. Mitigation for impacts to IVW is achieved by the proposed invasive species management, which will improve the habitat value of the area, and construction of a stormwater management system, which will provide the benefits of improving water quality, reducing pollutant and nutrient loading to nearby wetland resources, increasing groundwater recharge, and attenuating peak surface water flows. Impacts to IVW total 2,680sf. Of the IVW proposed to be impacted, 2,416sf consists of IVW that have developed as a result of the unmaintained stormwater management features present at the site's north; therefore, Goddard believes that installation of new stormwater management infrastructure constitutes a functional replacement of the impacted IVW.</p>
<p>STORMWATER MANAGEMENT</p>		
	<p><i>The Project proposes one subsurface infiltration system, a Stormtech SC-740 subsurface detention basin, to capture, store, and infiltrate stormwater. Conveyance to these Best Management Practices (BMPs) will be achieved via deep sump catch basins. Stormwater BMPs are proposed to connect to each other in series; overflow from these systems will ultimately discharge to the rip-rap lined jurisdictional IVW in the northern portion of the Site through a High-Density Polyethylene (HDPE) pipe.</i></p> <p><i>A review of the Project's compliance with the Massachusetts Stormwater Management Standards and the applicable local Regulations was issued to the Planning Board on March 8, 2023. Currently, the Project does not fully comply with the Massachusetts Stormwater Standards, and revisions to the design are required to comply with the Standards.</i></p>	<p>Stormwater management comments are being addressed with Planning Board. Some comments will not be able to be addressed until Conservation permitting is completed. No work will begin until all necessary approvals are received.</p>

Invasive Species Management Plan

for
15 Liberty Way
Franklin, MA
(Map 320, Lot 4)

September 7, 2023

ADDRESSED TO:

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

PREPARED BY:

Goddard Consulting LLC
291 Main Street, Suite 8
Northborough, MA 01532

PREPARED FOR:

Atlantic Oliver 15 Liberty Way LLC
c/o Oliver Street Capital
125 High Street, Suite 220
Boston, MA 02110

1.0 INTRODUCTION

As described in the Notice of Intent submission, invasive species management is proposed as mitigation for impacts to the 25' Buffer Zone, which total 16,553sf, and impacts to Isolated Vegetated Wetlands, which total 2,680sf. The area proposed for invasive species management is largely within the easement area located at the west of the project site, as shown on the attached graphic, and totals 37,621sf. The primary invasive species on the site consist of oriental bittersweet (*Celastrus orbiculatus*), multiflora rose (*Rosa multiflora*), purple loosestrife (*Lythrum salicaria*), common reed (*Phragmites australis*), and honeysuckle (*Lonicera spp.*) 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 the area.



Figure 1: View of invasive plant species in proposed invasive species management area.



Figure 2: View of invasive Phragmites reeds to be treated.

2.0 SUPERVISION AND METHODS

All activities in the invasive species management area will be supervised by a qualified wetland scientist with experience in invasive species management. Before work begins, the wetland scientist will coordinate with the selected contractor to flag or otherwise clearly identify the limits of work for the entirety of the invasive species management area. All proposed invasive species management activities will be conducted by hand only. The use of machines in this area is likely to result in increased impacts. Grubbing and cut-stem herbicide treatments as described below will be conducted by hand.

2.1 MANUAL GRUBBING

Grubbing is the simplest invasive species management technique. This technique is most effective on species that do not have expansive root systems. Species proposed to be managed with this approach include honeysuckle shrubs and multiflora rose. Simply digging out the plant and the majority of its root system with hand tools is effective in achieving long-term control. Any invasive species present onsite that are not explicitly addressed in this plan will be managed with this technique.

2.2 CUT-STEM TREATMENT

A cut stem herbicide treatment is proposed for the remaining species that are not adequately addressed with manual grubbing. These species include Phragmites, purple loosestrife, and oriental bittersweet. These species have extensive root systems, and root material not physically removed is likely to resprout, resulting in ineffective control. The herbicide product to be used is EPA-approved for aquatic use – RoundUp Custom (EPA Reg. No. 524-343). This is a simple method that consists of cutting the target plant to the ground and applying a 50% diluted RoundUp formulation to the cut stem. The herbicide will be absorbed by the plant and transported throughout the plant tissue, effectively killing the plant from the inside. This method is exceptionally effective and rarely requires substantial follow-up treatments. All herbicide use will be overseen by a MA Licensed Pesticide Applicator. All stipulations of the product's label will be followed at all times.

2.3 DISPOSAL

All cut plant material will be exported from the site and disposed of appropriately. In order to minimize the spread of invasive plant seeds or roots, cut plant material will be moved to an impervious surface as soon as possible (i.e., by the end of the workday). No soils originating from areas known to support invasive plant species will be moved elsewhere on site.

2.4 REVEGETATION

Because a majority of the invasive species management area is located within an existing easement area that is regularly mowed, planting of trees and shrubs is not proposed. Instead, the entire area will be seeded with the New England Conservation/Wildlife Mix from New England Wetland Plants at the recommended rate of 1lb/1750sf. This mix provides a lasting cover of grasses, wildflowers, and legumes. The seed will be spread after the initial invasive removal effort and raked into the soil. This will establish high-quality herbaceous vegetation that will aid in preventing the spread of invasive species. Existing native vegetation in the invasive species management area is expected to fill in any remaining gaps.

2.5 MONITORING AND REPORTING

As described above, the ISMP areas will be inspected for invasive species during the spring and fall growing seasons during each year of implementation (during Step 1 and Step 4 of each phase). Monitoring reports shall be prepared

for the ISMP by a qualified wetland scientist once a year with the results of these inspections. If the report has deemed the management successful, treatment may cease. If the management has been unsuccessful, adjusted spring and fall treatments will be scheduled and the qualified wetland scientist will inspect the site the following spring.

Monitoring reports will include photographs and details about the vitality of the success of the invasive species management in the area and shall be submitted to the issuing authority by December of each monitoring year. Monitoring reports shall describe, using narratives, plans, and color photographs, the physical characteristics of the management area. Any invasive species present will be noted, flagged, and removed or treated.

For this ISMP to be deemed successful, 75% of the present invasive species cover must be removed, with the regeneration of native plant species in their place. If these terms are not met, the applicant shall submit a remediation plan to the issuing authority for approval that will achieve management/restoration goals under the supervision of a wetland specialist. This plan must include an analysis of why the areas have not successfully re-vegetated with native species and how the Applicant intends to resolve the problem.

This ISMP is for the removal of invasive plants in the area identified on the attached map within the subject parcel, with a goal of establishing a primarily native plant community and improving wildlife habitat adjacent to the soon to be developed portions of the site. To achieve these goals, this plan has proposed an approach consisting of physical and chemical management methods. It is our professional opinion that the distinction in removal methods specified previously in this report will allow for the efficient removal of invasive species from the area while affording maximum protection to wetland resource areas. We therefore respectfully request that the Commission approve this ISMP in conjunction with Notice of Intent for the project at 15 Liberty Way in Franklin, MA.

If there are any questions concerning this ISMP, please do not hesitate to contact us.

Sincerely,




Goddard Consulting LLC






Chris Frattaroli
Wetland Scientist



Legend

-  ISMA
-  Property Boundary
-  Proposed Parking Expansion

Date: 9/7/2023	GC Job Number: 101-082	<h2 style="margin: 0;">Invasive Species Management Area</h2>		
 GODDARD CONSULTING Strategic Ecological Consulting			1 in = 100 ft	
15 Liberty Way Franklin MA				

May 24, 2023

Revised: September 7, 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 impacts to the existing Isolated Vegetated Wetlands (IVWs) onsite. These impacts total 2,680 square feet. A total of 16,553 square feet of alteration to the 0-25' buffer zone, and 12,940 square feet of impacts to the 25-50' buffer zone, is proposed.

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 37,621 square feet. Invasive species present in this area include oriental bittersweet (*Celastrus orbiculatus*), multiflora rose (*Rosa multiflora*), purple loosestrife (*Lythrum salicaria*), honeysuckle (*Lonicera spp.*) 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 some 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 37,621sf of invasive species management, improving habitat value of the wetland resource and surrounding area. Project provides stormwater management where none currently exists, improving water quality, reducing pollutant and nutrient loading to nearby wetland resources, increasing groundwater recharge, and attenuating peak surface water flows.	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

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)	2,680sf	5,360sf (invasive species management)
Vernal Pool (SF)	0	0
<i>25-foot</i> Buffer Zone (SF)	16,553sf	32,261sf (invasive species management)
Riverfront (SF)	0	0
100-Year Floodplain (CF)	0	0
(SF) = Square Feet (LF) = Linear Feet (CF) = Cubic Feet Flood Storage		