



# TOWN OF FRANKLIN

DEPARTMENT OF PUBLIC WORKS

Franklin Municipal Building  
257 Fisher Street  
Franklin, MA 02038-3026

May 9, 2024

Ms. Breeka Li Goodlander, Conservation Agent  
Members of the Franklin Conservation Commission  
355 East Central Street  
Franklin, MA 02038

## **Re: Beaver Pond Hydro-Raking – MassDEP Amendment – 159-1293**

Dear Conservation Commission Members:

On behalf of the Recreation Department, the Department of Public Works (DPW) is filing this Notice of Intent with the Conservation Commission for the hydro-raking of Beaver Pond at Chilson Park on Beaver Street in Franklin. The NOI was initially discussed at the March 7, 2024 meeting and was continued at each meeting since as the MassDEP file number was not yet issued.

Below are the May 9, 2024 comments from MassDEP with responses identified in red:

*How frequently will hydroraking be performed under this NOI (one time only, annually, another frequency)?*

Hydro-raking under this NOI is anticipated to be performed once this year and every three to four years following. This would be the same frequency that hydro-raking has been executed in Beaver Pond since the 1980's.

*The applicant should evaluate whether hydroraking is an appropriate technique for controlling the target plant species, particularly fanwort.*

Hydro-raking has been an effective method for removing the disruptive plant species from Beaver Pond in the past. In our alternatives analysis we did consider other methods including no action, dredging, and aquatic herbicides but ultimately felt that hydro-raking was best.

*A barrier should be installed to control the migration of plant fragments and turbidity from the hydroraking area into adjacent areas of Beaver Pond.*

The company that would perform the work, Solitude, will contain turbidity and floating debris within the hydro-rake management area with a turbidity / fragment curtain.

*Your project involves dredging amounts greater than 100 cubic yards of sediment from Land Under Water and will require a 401 Water Quality Certification (WQC) (314 CMR 9.00). 401 WQC forms are available online at: <https://www.mass.gov/lists/water-quality-certification-forms-massdep>.*

The proposed area to be hydro-raked is 26,722 square feet. Assuming that an average depth of 1-inch of sediment remains attached to the root system over the entire area to be raked, that would result in a volume of 82.5 cubic yards of material, which is less than the 100 cubic yard requirement that would trigger an individual 401 Water Quality Certification (WQC) filing. Based on this calculation we feel that a WQC would not be required.

If you require additional information, please contact this office at 508-553-5500.

Sincerely,



Brooke Morganelli, P.E.  
Assistant Town Engineer