

HANCOCK
ASSOCIATES

August 7, 2025

Franklin Zoning Board of Appeals
Bruce Hunchard, Chair
355 East Central Street
Franklin, MA 02038

Subject: 444 East Central Street – Comprehensive Permit

Dear Mr. Chairman:

Hancock Associates has been retained by your Board to perform a civil engineering technical review of the 444 East Central Street Comprehensive Permit. Hancock Associates has reviewed the Comprehensive Permit submission and offers the following as initial guidance to the Board.

RECEIVED
2025 AUG 21 P 3:48
TOWN OF FRANKLIN
TOWN CLERK

Documents Reviewed

1. Original Application for Residences at 444 Central dated February 27, 2025
2. Cover Letter and Narrative description for Comprehensive Permit Application by TAG Central LLC and dated February 27, 2025
3. ZBA Application Form dated February 11, 2025
4. Plan submission containing 43 sheets prepared by Allen & Major Associates, Inc. and Kyle Zick Landscape Architecture, Inc. and dated February 11, 2025, and revised July 21, 2025. The site plans are stamped by Carlton M. Quinn, P.E. and the Survey Plan is stamped by Andrew J. Ruggles, P.L.S.
5. Landscape drawings were stamped by Kyle Zick, Registered Landscape Architect.
6. Architectural layouts, Affordable Unit Location, Elevations, Renderings, Unit Layouts prepared by Cube 3 dated February 11, 2025
7. Tabulation of Proposed Buildings
8. Project Eligibility Letter from Massachusetts EOHLIC dated February 12, 2025.
9. Notice of Purchase and Sale Agreement dated September 12, 2024
10. Requested Waiver List dated February 11, 2025
11. Project Statement of Impact
12. Copy of Deed Dated December 12, 2019
13. Statement of Local Need
14. Certified Abutters List dated February 3, 2025

DANVERS OFFICE
185 Centre Street
Danvers, MA 01923
Phone: (978) 777-3050
Fax: (978) 774-7816

MARLBOROUGH OFFICE
315 Elm Street
Marlborough, MA 01752
Phone: (508) 460-1111
Fax: (508) 460-1121

CHELMSFORD OFFICE
34 Chelmsford Street
Chelmsford, MA 01824
Phone: (978) 244-0110
Fax: (978) 244-1133

Regulations Reviewed

1. Franklin Zoning By-Law Chapter 185
2. Franklin Housing Production Plan April 2022.
3. Franklin Zoning Board of Appeals Comprehensive Permit Rules March 31, 2005.
4. Franklin Water Regulations (Town Council) Chapter 179
5. Franklin Water Regulations (Board of Health) Chapter 263

Materials to be Reviewed by Others

1. Drainage Report prepared by Allen & Major Associates, Inc. dated February 7, 2025 and revised July 21, 2025
2. Traffic Impact Assessment prepared by Vanasse & Associates Inc. and dated February 2025.

Regulations to be Reviewed by Others

1. Franklin Stormwater Regulations Chapter 153
2. Franklin Vehicles and Traffic Regulations Chapter 170
3. Franklin Public Way Access Permit Regulation Chapter 131
4. Franklin Sidewalk and Street Regulations Chapter 155

Initial Review of Submission

760 CMR 56.05 contains the required elements of a submission of a Comprehensive Permit to the Zoning Board of Appeals. The following is a review of the submission with regard to my civil review of these requirements:

- Preliminary site development plans with the locations and outlines of proposed buildings; the proposed locations, general dimensions, and materials for streets, drives, parking areas, walks and other paved areas; and proposed landscaping improvements. Any project of five or more units must have a site plan stamped by a registered professional architect or engineer.
The applicant has satisfied this requirement. A plan set has been submitted.
- An existing condition report on the proposed site and the surrounding areas.
The applicant has complied with this requirement. An existing condition plan is part of the site plan set.
- Tabulation of proposed buildings by type, size, and footprint, impervious coverage, and open space, including percentage of tract to be occupied by buildings, parking and paved vehicular areas.
The applicant has submitted tabulations for the buildings within the application.
- A preliminary subdivision plan if the project involves a subdivision.
A subdivision is not proposed here.

- A preliminary utilities plan (water, wastewater, drainage, and storm water management facilities).

The applicant has satisfied this requirement within the site plan set referenced above.

Technical Review

Hancock has reviewed the plans and supporting documentation for soundness of methodology and calculations and conformity to standard engineering practice. We have also reviewed conformity to or deviation from by-laws, regulations, and any other applicable standards as they apply to issues of on-site engineering including zoning, grading, drinking water, and sewage. Lastly, we looked at off-site impacts. The review is all done within the context of the regulation's call for only the submission of preliminary plans. Our goal is to give the Board comfort that ultimately the project can be built in a manner that will protect the general public and future residents and visitors to the site through review, requests for additional information and suggestion of certain conditions of approval that will aid in meeting that goal.

Zoning Compliance

Comment Z1: The site is located in the Commercial 2 Zoning District with Single-Family III and Rural Residential I Districts abutting the property to the west and south, respectively. The site is located within a Zone II Water Resource District, Commercial and Business Corridor Sign District, Senior Village Overlay District, and Flood Hazard Overlay District. Section 185-13, Schedule of Lot, Area, Frontage, Yard and Height Regulations limit building to 3 stories and 40 feet in height. The applicant asks for a waiver for this regulation to construct 4 story / 57-foot high buildings.

Comment Z2: The proposal requests a waiver from Section 185-21.B.3.A.1 Parking Loading and Driveway Requirements for two spaces per unit, proposing 1.62 per unit. Given the project is ~1 mile from the Dean College/Franklin Station MBTA Station, we feel this parking ratio is a bit low. Suburban multi-family projects should provide 1.75 spaces per unit.

Comment Z3: Please provide unit counts per building to confirm adequate parking proximate to each building given the proposed dispersion of one-, two- and three-bedroom units.

Comment Z4: The proposal requests waivers from setback from structures (Garages) to side lot lines. We question the necessity of a separate garage to be placed 8.9 feet from a lot line given that the garage can be placed elsewhere on the property outside of the site setbacks. The nearest multifamily building to a side lot line is 20 feet. Provide a context plan showing neighboring lots and structures. The Board may ask the applicant to be more sensitive to the proximity of structures to residential neighbors to the east in deliberating waiver requests and considering the appropriateness of the overall layout

with four story buildings. The Board may request cross sections from the Applicant through the site and easterly residential neighbors to better understand the visual impacts of the proposal on the neighbors.

Comment Z5: The applicant asks for a waiver for Section 185-21.C.5 – Parking Lot Tree Schedule. The applicant should enumerate how many trees per parking space will be provided.

Comment Z6: The Applicant should show the minimum lot width circle diameter on the layout plan and request a waiver if required.

Erosion Control

Comment EC1: The site development involves a significant amount of earthwork on land with marginal soils that drains into a Bordering Vegetated Wetland centrally located on the lot. The applicant should provide temporary construction period sedimentation basins onsite. Sediment basin sizing calculations should be performed for each pre-development subcatchment area and a suitably sized temporary sediment basin provided at the lower end of the area with appropriate outlet control.

Comment EC2: A construction sequencing schedule should be added to the Erosion and Sedimentation Control Notes.

Comment EC3: Per the EPA's construction general permit, east central street should be swept daily during construction. The Erosion Control Notes should be revised.

Site Layout

Comment L1: The project proposes five distinct building areas accessed from a single main entrance. The National Fire Protection Association recommends two points of access for housing projects exceeding 100 units. The Board should seek input from Franklin Fire Department regarding the site layout and fire truck swept path analysis plans.

Comment L2: On the fire truck turning plans, the East Central Street center line is shown on only one of the two plans. Massachusetts Fire Access Regulations prohibits vehicle swept paths crossing centerlines of oncoming traffic.

Comment L3: What is the intent of the dead-end drive on the north side of the site? Why does it extend beyond the fire truck access path? Also, under existing conditions, there appears to be access to 440 East Central Street through this path. Are there any existing easements associated with this access point? How long has this access point been in use?

Comment L4: The project proposes one pedestrian dock through wetland areas. The Applicant should provide preliminary details of the dock and how wetland impact and ADA accessibility will be addressed. Also, there is some inconsistency between the civil and landscape plans regarding this amenity area. We understand that approval for this

dock is subject to local and state permitting outside the jurisdiction of the Zoning Board, however, the Applicant is presenting this as a critical part of the site's amenity and open space package.

Comment L5: Applicant should review the distribution of accessible parking spaces throughout the site. While the site meets the required number of accessible spaces, no accessible spaces are proposed at Building 2 or the pergola/dock amenity area. Also, confirm slope, signage, and dimensions of the accessible parking spaces including access aisles.

Site Grading

Comment G1: The project includes a great deal of earthwork. According to the Geotechnical report, 5-6 feet of fill across the site is required. The Applicant should provide the Board with an estimated quantity of total earthwork as well as import and/or export anticipated with number of daily/weekly trucks anticipated and duration of fill operations.

Comment G2: Retaining walls with fall protection are proposed abutting the Bordering Vegetated Wetland range in height from a few feet to 10 feet. The Applicant should provide preliminary details including heights, materials, and safety features (guardrails).

Utilities

The project proposes connections to the municipal sewer and water systems in East Central Street.

Comment U1: The Applicant should provide sewer design flow and water demand and comment on the capacities of the municipal systems to service the project.

Comment U2: Existing condition information on the site utility plan appears to be missing from the survey provided such as existing sewer line information.

Comment U3: The applicant should provide information on the next downstream sewer manhole (easterly) in East Central Street.

Comment U4: Sewer services exiting the proposed building are sloped at 0.5%, less than the 2% required by plumbing code.

Comment U5: The onsite sewer system leads into a proposed 35,000-gallon sewage storage tank. The Sewer Storage tank then connects to the public sewer manhole in South Main Street. The public sewer manhole invert is elevation 270.08. The grade differential between the final onsite manhole and street manhole inverts is 1.32 feet.

The intent of the storage tank is to pump sewage off peak times to reduce impact on the municipal system including a downgradient municipal pump station. The Applicant should provide a detailed description of the system's intent and operation. This should

include emergency power provisions, maintenance plans, and emergency response protocols. The Board and Conservation Commission may have concern given the proximity to the wetlands downhill from this tank.

Comment U6: The proposed development features elevation changes from 276.0 at the intersection of the site drive with East Central Street and the elevation of the fourth floor of Building 4 at 310.75 (34.75 feet). The Applicant should perform hydrant flow testing proximate to the site and determine the sufficiency of the existing municipal system to supply adequate volume and pressure for fire suppression systems. The Applicant should consult with the Franklin Water Department in this preliminary review.

The Applicant proposes to connect an 8" water connection to the town's 6" line. Hancock is concerned that the lateral exceeds the main size. The applicant is requesting a waiver from 263-4, pertaining to the town's ability to deny a project given the available water supply. The municipality is under no obligation to bear the costs of additional utility infrastructure. The Applicant should consult with the Franklin Water Department to review the adequacy of the existing 6" water main.

Comment U7: The separation of water and sewer lines is less than 10 feet in some areas. In these areas, the sewer line should be concrete encased, and pressure tested for water tightness. Also, the Applicant should confirm that the vertical separation between the invert of the water pipe and the crown of the sewer line is at least 18 inches and provide a detail of water-sewer crossings. Hancock recommends maintaining a 10-foot separation where feasible.

Comment U8: The Applicant should coordinate utility line and tree location conflicts.

Stormwater and Wetlands

The proposed stormwater system includes five underground infiltration systems, eleven water quality devices and associated outlet control structures, flared end outlets, catch basins and a trench drain. The Applicant is requesting extensive waivers from the Franklin Wetlands Bylaws and Regulations. The Board should seek comprehensive input from the Conservation Commission regarding the waiver requests.

Comment SW1: We defer to BETA Group, Inc., who have been engaged by the board to review stormwater and resource area aspects of this project.

Traffic Assessment

The Applicant has provided a Traffic Impact Assessment in accordance with the Massachusetts Department of Transportation (MassDOT) Guidelines for traffic impact assessments and the standards of the Traffic Engineering and Transportation Planning professions for the preparation of such reports. The report presents information regarding anticipated trip generation, historic crash data and some evaluation of intersection safety with regard to safe sight distances.

Comment T1: We defer to the Traffic Engineering firm Howard Stein Hudson who has been engaged to review the project by the board from a transportation engineering perspective.

Hancock suggests the Applicant's team compile a point-by-point response letter to this report to assist the Board with their review.

We look forward to assisting the Board in this complex and dynamic process. Please do not hesitate to contact me should you have any questions or comments.

Sincerely,
Hancock Associates,



Joseph D. Peznola, PE
Director of Engineering



David White, PE
Project Engineer