

November 13, 2025

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

PROJECT #: Project #3317-01  
RE: Comprehensive Permit  
Technical Review Response  
444 East Central Street  
Franklin, MA

Dear Mr. Hunchard,

On behalf of our client, TAG Central LLC, and in coordination with Beals Associates, Allen & Major Associates, Inc. (A&M) is providing the following responses to outstanding items noted in the letter dated November 10, 2025, from Hancock & Associates regarding the Comprehensive Permit. A&M's responses to final comments are shown below in **bold**.

The original Hancock comment is noted with follow-up Hancock comments shown in *italics*.

### 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. **Item closed.***

- *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. **Item closed.***

- *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.*

*An updated table has been submitted with the latest plans. **Item closed.***

- *A preliminary subdivision plan if the project involves a subdivision.*

*A Preliminary ANR Plan (revised through 8/25/25) has been submitted to the Board which served to create Parcel C on the west and south sides of the abutting lot at 454 East Central Street, intended to be deeded to the owner of 454 Est Central. We assume this has been the subject of a negotiation between the neighbor and applicant. The ZBA is being asked to endorse this plan as not being subject to the Subdivision Control Law (Approval Not Required). A condition should be included in any approval requiring final submission of a mylar of this plan for ZBA endorsement.*

**A&M Response: Mylar plan has been submitted to the Zoning Board of Appeals with the understanding that the plan shall be endorsed and filed contemporaneously with the vote and filing of the Decision. The date of the endorsement block has been left blank so that the Board may fill in the date of the endorsement block to match the same date as the Decision.**

- *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. **Item closed.***

- *A list of Waivers from local bylaws and regulations.*

*The Applicant has submitted a revised List of Waivers dated October 29, 2025. At the last hearing on October 23, 2025, the Board requested clarification and to quantify the relief regarding the Wetland Franklin Wetlands Protection Regulations for the work within 25' of the wetland, structures within 50' of the wetland, the quantity of impervious within the buffer zone. Hancock suggests the Board require submission of alternatives analysis per Section 7.13 of the Wetlands Regulations to allow for proper deliberation of the other requested waivers.*

**A&M Response: As requested, please find attached a copy of the alternatives analysis per Section 7.13 of the Wetland Regulations to allow for proper deliberation of the other requested waivers; this was already submitted to and reviewed by the Conservation Commission and their peer-review consultant as a part of our Notice of Intent Application revised through 11/4/25. For brevity purposes, we extracted the alternatives analysis section only from the Notice of Intent Application and attached it to this letter. As for the Board's comment from the last hearing on 10/23/25, we've prepared an analysis entitled Proposed Wetland Buffer Disturbance analysis, which is attached hereto, that quantifies the work to take place within the 25' wetland buffers, 50' buffers, and quantity of impervious within the buffer zone. Given that the requested information has now been submitted, the Applicant considers this item closed.**

## TECHNICAL REVIEW

### 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.

*Response Z1: The Applicant acknowledges the site's location within multiple overlay districts and the Commercial II zoning district. A waiver was initially requested from Section 185-13 to allow buildings of four stories and a maximum height of 57 feet, in lieu of the 3-story/40-foot standard. However, since the design modification was made for a flat-roof system in lieu of the initially proposed sloped roofs, this waiver will be adjusted to reflect a lower maximum height of 48 feet. A revised waivers list based on the modified plans will be submitted based on the final plans. The additional height is necessary to achieve the project's density and architectural design goals. Comparable multifamily projects in Franklin, including adjacent buildings along the E. Central Street corridor, feature similar or taller heights.*

*Hancock Response: The Applicant has revised the plan in the southeast corner of the site to have the building closest to the easterly property line and neighboring residents at 3-stories. The Applicant performed a ballon test witnessed by members of the Board. Retention of mature trees along the property helps mitigate the height. Hancock defers to the Board for final deliberation on sufficiency of the proposed mitigation.*

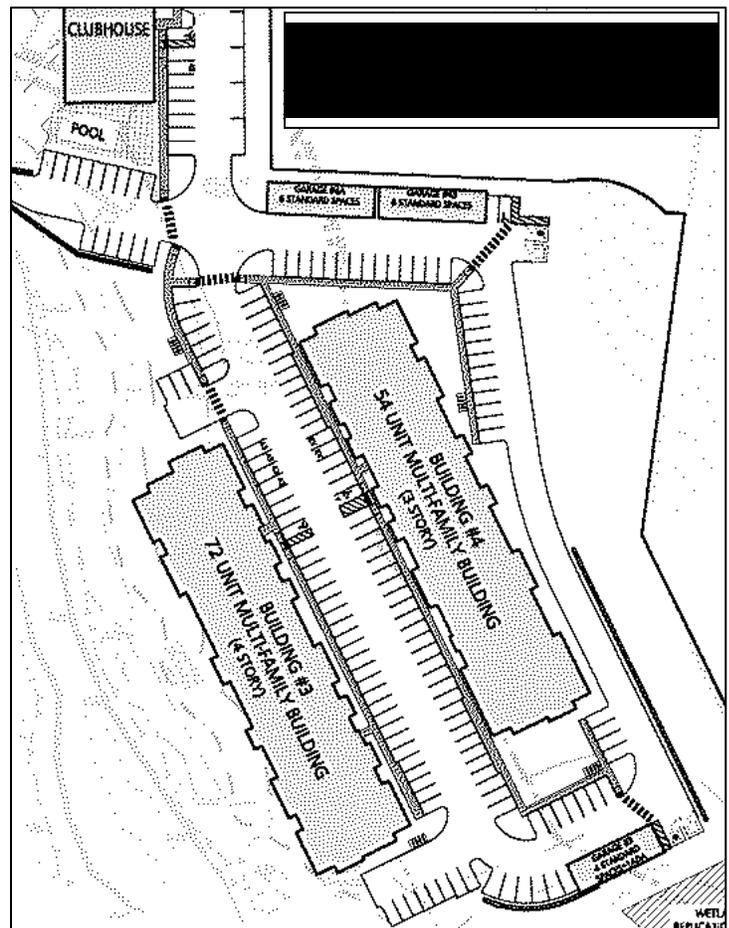
**A&M Response: Applicant considers this item closed and agrees with Hancock that the "retention of mature trees along the property helps mitigate height" as does the shorter 3-story building. The eastern buffer area has been maximized in the latest, proposed final Plans to benefit the abutters.**

**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.

*Response Z2: Initial plans have already been revised to increase the parking ratio from 1.35 parking spaces per dwelling-unit (PS/DU) to 1.62 PS/DU in response to the ZBA's comment. Multiple factors were carefully considered to determine the appropriate parking ratio for this project, specifically the unit mix, the anticipated number of onsite staff, proximity to public transportation, visitor parking and market data. The proposed parking ratio is further verified by a Parking Demand Analysis prepared by the Project's Traffic Engineer, VAI, which is a study of the actual parking demand at existing comparable communities in similar New England suburban settings. Per the attached Parking Demand Analysis, the average peak parking demand ratio of these comparable communities is 1.34 PS/DU, with a range of 1.23 PS/DU to 1.49 PS/DU across the data set. The Project's proposed 1.62 PS/DU exceeds the actual demand ratio for all the communities observed by a significant margin. Furthermore, the Board's transportation peer review engineer, Howard Stein Hudson (HSH), agreed that even the lower initially proposed parking ratio of 1.35 PS/DU was adequate, stating in their letter dated 5/30/25: "...referring to the ITE Parking Generation, where the proposed parking ratio falls within the range of observed parking demands of similar residential developments, HSH generally agrees with the Applicant's proposed parking plan and waiver's request." Based on all these factors, the Applicant is confident the proposed parking ratio of 1.62 PS/DU will exceed the demand for parking at the Project.*

*Hancock Response: The revised plan reduces the parking ratio to 1.52. This is still within the acceptable ratio offered by HSH, the Board's traffic consultant. Hancock is concerned with the plan providing sufficient parking in the area of the 54 and 72-unit buildings in the southeast corner of the site and with the overall adequacy of snow storage on site. It appears the parking ratio proximate to this building is 1.25 spaces per unit. Given the reduced parking ratio, it is imperative ample area outside parking areas be available for adequate snow storage. The Conservation Commission may further restrict locations for snow storage within their decision. The Board should condition any approval that Final Plans include snow storage that does not decrease the available parking, is in areas that would promote snow-melt into the proposed stormwater system and that comply with any restrictions imposed by the Conservation Commission and that total at least 5% of the paved areas on site. Furthermore, in the event snow storage at any time occupies parking spaces or impedes circulation, snow must be removed from the site and disposed of in accordance with applicable regulations and that any landscaping damaged by snow storage is replaced each spring.*

**A&M Response: The parking ratio was reduced slightly with the sole purpose of increasing the buffer area along the eastern edge of the site to the maximum extent possible in response to comments from the abutters and the Board. As noted, at 1.52 spaces/unit, the parking ratio remains above 1.50 spaces/unit and is sufficient to service the project. In regards to parking proportionality for the 54 and 72-unit buildings located on the eastern side of the site, we believe the proportional parking ratio for these buildings is actually 1.47 spaces/unit, based on the graphic entitled East Side Parking Distribution included to the right. As illustrated, all the spaces shown on the graphic are proximate to the residential buildings in question. The balance of the parallel parking spaces along the driveway next to the clubhouse (not shown) totals eight spaces, which is sufficient to meet the minimal parking needs of the clubhouse. Applicant acknowledges that the discussion of parking proportionality is subjective in nature, but is confident that the proposed parking program overall is ample to service the community, as evidenced by prior correspondence/studies/peer review mentioned above in response Z2.**



**In regard to snow removal, a Snow Storage Plan has been properly designed and submitted with the final, revised Comprehensive Permit Plans. As per plan, all snow storage areas are located outside of parking spaces, and all conflicts between snow removal locations and landscaping have been updated and corrected in the Revised Comprehensive Permit Plans submitted. Note, an ample snow storage area is available in the northeastern corner of the site. Applicant will comply with the Order of Conditions requirements regarding snow removal (for example, applicant has already contemplated this by including a note on the Snow Storage Plan stating snow storage shall be located outside of 100' buffer zones where snow melt will run-off directly to resource areas" and "Note #5: UNDER NO CIRCUMSTANCES SHALL SNOW BE STORED IN ANY WETLAND RESOURCE AREA...". Furthermore, as per Hancock's comment above, included on the previously submitted Snow Storage Plan already is note #3, which states: "... IF NECESSARY: SNOW WILL BE STOCKPLED ON SITE UNTIL THERE IS NOT ENOUGH SPACE. AS NECESSARY, THE SNOW WILL BE REMOVED AND DISPOSED OFF SITE. IT WILL BE THE RESPONSIBILITY OF THE SNOW REMOVAL CONTRACTOR TO PROPERLY DISPOSE OF TRANSPORTED SNOW ACCORDING TO MASS DEP...SNOW DISPOSAL GUIDANCE...".**

**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. Response Z3: Unit counts per building are shown on the Layout and Materials plan. The unit types (1-, 2- and 3-bedroom units) are more or less evenly distributed across the four buildings as per the Building Type 1 and Type 2 floor plans on the Architectural Plans sheet A-100 and A-101. As the Civil sheets relate to the Architectural sheets, Buildings #1, #2 and #3 with 64 units shown are Building Type 1's, and Building #4 with 72 units is a Building Type 2. As illustrated on the Architectural plans, Building Type 1 has 28 x 1-bedroom, 28 x 2-bedroom and 8 x 3-bedroom units and Building Type 2 has 36 x 1-bedroom, 33 x 2-bedroom and 3 x 3-bedroom units. Based on this, parking has been designed to be evenly dispersed amongst the buildings to the maximum extent possible to ensure appropriate proximity and accessibility of parking to each building.

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

**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 impact of the proposal on the neighbors.

*Response Z4: The site plan and recent modifications have been thoughtfully designed to minimize impacts to abutting properties, in direct response to feedback from the Board and neighboring residents. A cross-section illustrating the relationship between the Project and the Easterly abutting properties was presented at the 7/31/25 Hearing and subsequently submitted to the Board on 8/19/25.*

*As demonstrated in the submitted materials, the abutting properties to the east are situated approximately 19 feet above the Project site's proposed finished grade. To address concerns about screening and privacy, the Applicant has proposed the addition of a new vegetation buffer, which will supplement the existing vegetation buffer, and be accompanied by a new six-foot-high stockade fence near the eastern property line. These elements were presented in detail at the 7/31/25 Hearing. In further response to community and Board input, the Applicant also modified the building design by replacing the original sloped roof with a flat roof to reduce the overall building height and increased the residential building's east setback from 62 feet to 74 feet.*

*There are two (2) structures requiring waivers for property line setbacks on this project. The first is a residential building, adjacent to the westerly property line, which abuts vacant commercial land. The Applicant coordinated with the owner of this property and, at their request, incorporated a fence along the westerly property line. No concerns were raised regarding the side lot line of the building. The second is the garage in question, which is located behind the single-family home of the same owner as the Project site and this garage location has been mutually agreed upon with the Applicant and the property owner.*

*Additionally, the Applicant will be requesting the attached Approval Not Required (aka ANR) subdivision plan to be endorsed as part of the Comprehensive Permit by the Zoning Board of Appeals. The purpose of the ANR plan is to convey two separate portions of the subject site to the Town as per the Conservation Commission's request and to the Seller, respectively. While the project's design and waiver list already incorporated the proposed property boundaries per the ANR plan, the waiver request list will be updated with an additional waiver allowing the ZBA to endorse the ANR plan as the Planning Board is typically the authority that endorses ANR plans per Franklin by-laws.*

*Hancock Response: The Applicant has revised the plan in the southeast corner of the site to have the building closest to the easterly property line and neighboring residents at 3-stories. The Applicant performed a ballon test witnessed by members of the Board. The plan also calls for the retention of mature trees along the property to help mitigate the height. Hancock defers to the Board for final deliberation on sufficiency of the proposed mitigation.*

**A&M Response: Applicant considers this item closed and agrees with Hancock that the "retention of mature trees along the property helps mitigate height," as does the 3-story building. The eastern buffer area has been maximized in the latest proposed final Plans to benefit the abutters.**

**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.

*Response Z5: The Applicant is proposing one tree for every 18 parking stalls, or 24 trees total that comply with the zoning tree sizing standard. The waiver list will be updated to reflect this specifically.*

*Hancock Response: The Waiver List has been revised to eliminate the request for this waiver. The Landscape Plan does not enumerate the trees being proposed to meet this requirement. The Applicant should detail how compliance is met.*

**A&M Response: The Landscape Plans do enumerate the trees proposed to detail how compliance is met (see below excerpt from Sheet L2). Please refer to sheet L2 Key Planting Plan of Landscape Plans, as included in Revised Comprehensive Permit Plans dated 10/29/25. The minimum required number of shade trees is 39, and the proposed number of shade trees is 44.**

### **PARKING LOT SHADE TREE REQUIREMENT**

TOTAL NUMBER OF PARKING SPACES: 207  
 REQUIRED SHADE TREE RATIO: 1 TREE PER 18 PARKING SPACES (APPLIES TO LOTS WITH 10 OR MORE SPACES)

MINIMUM REQUIRED NUMBER OF SHADE TREES: 39 TREES

PROPOSED SHADE TREES: 44 TREES (MEETS & EXCEEDS MINIMUM REQUIREMENT)

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

*Response Z6: The minimum lot width circle diameter will be added to the site layout plan. A waiver will not be required.*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

### **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 predevelopment subcatchment area and a suitably sized temporary sediment basin provided at the lower end of the area with appropriate outlet control.

*Response EC1: Temporary sedimentation basins sized for each pre-development subcatchment will be included in the erosion control plan. Sizing calculations and locations will be shown on updated grading and drainage plans with appropriate outlet control measures.*

*Hancock Response: The revised plans provide sizing for the proposed temporary sediment basins. While Hancock agrees with the methodology of providing ample volume. Four distinct basins are shown on the plan, all being labeled TSB #4. These should be broken into four with the required volumes of each provided based on the contributing area to each.*

**A&M Response: The attached plan has been updated to illustrate the TSBs broken into four, with required volumes of each provided based on the contributing area to each.**

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

*Response EC2: An estimated construction sequencing plan is provided on Sheet C-002 specifying key phases of site preparation, grading, utility installation, and stabilization.*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

**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.

*A&M Response: The Erosion Control Notes will be revised to require daily street sweeping during construction along East Central Street in accordance with EPA CGP standards.*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

### **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.

*Response L1: The Applicant has coordinated with the Franklin Fire Department on site plan layout and access during both the LIP Review and Comprehensive Permit processes, and revisions were previously made to respond to the Fire Department's comments during the LIP Review Process. The Franklin Fire Department confirmed they have no further comments as per their letter, which was submitted to the Board by the Applicant on 3/28/25 (attached). The Applicant is happy to provide the swept path analysis plans to the Fire Department for review.*

*Hancock Response: The Board is in receipt of correspondence from the Franklin Fire Department. **Item closed.***

**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.

*Response L2: The fire truck turning plans will be updated to show the East Central Street centerline consistently. Revised paths will demonstrate compliance with MA Fire Code, including restrictions on crossing the centerline.*

*Hancock Response: The Board is in receipt of correspondence from the Franklin Fire Department. **Item closed.***

**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 though this path. Are there any existing easements associated with this access point? How long has this access point been in use?

*Response L3: There is an access easement in place with the neighboring property (440 E Central St) which necessitates keeping this drive-way connection in place although it is the Applicant's understanding that this access point is not currently in use nor has it been in use in many years.*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

**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.

*Response L4: Preliminary dock details are attached and have already been submitted to the Conservation Commission and their peer reviewer under separate cover. The landscape and civil plans will be reconciled to ensure consistency. The Applicant acknowledges that dock permitting will be subject to Conservation Commission review.*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

**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.

*Response L5: Accessible parking space locations will be redistributed to ensure coverage at Building 2 and the dock amenity area. Revised plans will confirm compliance with ADA slope, signage, and dimensional standards.*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

### **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.

*Response G1: The requested information will be prepared by the general contractor in coordination with the geotechnical and civil engineers once the general contractor has been engaged and selected. The Applicant is amenable to a condition of approval requiring this information be provided to the Building Department as a part of the site work/grading and/or building permit application(s).*

*Hancock Response: The Board should condition any approval the Final Plan be accompanied by an estimated quantity of total earthwork as well as import and/or export anticipated with number of daily/weekly trucks anticipated, duration of fill operations and trucking routes. The Board should further condition that trucks adhere to any operational hours conditioned given the proximity of the site to residential neighborhoods.*

**A&M Response: Acknowledged. No further response is necessary.**

**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).

*Response G2: See Sheet D-507 Detail #6 for proposed retaining walls, including typical sections, heights, materials, and safety features such as guardrails (freestanding wall section acts as vehicular guard rail).*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

### **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.

*Response U1: See the attached will-serve letter provided by the Town Engineer. The letter notes adequate water available and potential need for on-site temporary storage for sewer impacts. The applicant has provided a place holder on the plans for this potential on site sewer holding tank. The Applicant has coordinated with the Town Engineer and DPW and has determined that a condition of approval will be incorporated into the Decision, similar to the condition included in the Grove Street 40B Decision, which dictates a study will be performed and funded by the Applicant to evaluate the sewer pump station in question (directly across the street from the subject site) and options for mitigation by the Applicant including either through a sewer holding tank or funding pump station upgrades, if necessary, to be determined by the study. The Applicant will coordinate with the Town Engineer and DPW to determine the exact language of this condition during the process of drafting a Decision.*

*Hancock Response: The Board should condition any approval that prior to application for a Building permit, the Applicant shall provide a study funded by the Applicant evaluating the municipal sewer pump station directly across the street from the subject site and determine suitable mitigation by the Applicant including either an onsite sewer holding tank for off-peak pumping or funding pump station upgrades, if necessary. The Franklin DPW shall review the study and advise as the adequacy of the mitigation chosen by the Applicant. All mitigation shall be at the sole expense of the Applicant.*

**A&M Response: Acknowledged. No further response is necessary. Applicant notes a very similar condition was drafted for the Grove Street Residences 40B 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.

*Response U2: Existing utilities will be fully depicted on an updated survey and site utility plan, including locations and inverts of existing sewer infrastructure.*

*Hancock Response: The Board should condition any approval that Final Plans include full details of all proposed sewer infrastructure. The Board should reengage civil engineering peer review at the Applicant's expense to review Final Plans.*

**A&M Response: The final ZBA plans, Revised Comprehensive Permit Plans dated 10/29/25, prepared by Allen & Major Associates, Inc., include full details of all proposed sewer infrastructure and have been submitted to the Board. Final building permit plans for construction purposes shall be submitted to the Building Department for the Building Department's review at the building permit application.**

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

*Response U3: Information on the next downstream sewer manhole in East Central Street will be added to the plans.*

*Hancock Response: The Board should condition any approval that Final Plans include full details of all proposed sewer infrastructure. The Board should reengage civil engineering peer review at the Applicant's expense to review Final Plans.*

**A&M Response: The Revised Comprehensive Permit Plans dated 10/29/25 already had added this information to the plans, as previously requested. Please refer to the Existing Conditions Plan sheet.**

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

*Response U4: As is the regional standard civil engineering practice, the civil sewer design uses "TR-16 Guides for the Design of Wastewater Treatment Works" as guideline for sewer pipe design. "TR-16" recommends a minimum velocity (when flowing full) of not less than 2.0 feet per second based on Mannings formula using an "n" value of 0.013. This minimum velocity equates to a minimum slope of 0.5% for 6" PVC piping. Plumbing code does not dictate sewer designs outside of the building's plumbing.*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

**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.*

*Response U5: See response to U1. Depending on the sewer pump station study and permit condition, the sewage holding tank may not be required; it has been shown as a placeholder on the plans to enable preliminary review by the Conservation Commission and Board. That said, Applicant requests the additional information requested including maintenance plans, etc. be provided at a later date as a part of the condition of approval.*

*Hancock Response: See response to Comment U1.*

**A&M Response: Acknowledged. No further response is necessary. Applicant notes similar condition was drafted for Grove Street Residences.**

**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.*

*Response U6: See attached hydrant flow test that was performed on May 21, 2025, illustrating adequate volume and pressure for this project. The plans will be updated to illustrate the existing 12" water main the project is proposing to tie into.*

*Hancock Response: Hancock is satisfied with this response. **Item closed.***

**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.

*Response U7: The plans will be revised to provide a minimum 10-foot separation between sewer and water lines where feasible. In constrained areas, sewer pipes will be concrete encased and pressure-tested per DEP and local standards. Cross-sectional details will be added.*

*Hancock Response: The Board should condition any approval that Final Plans include full details of all proposed sewer infrastructure. The Board should reengage civil engineering peer review at the Applicant's expense to review Final Plans.*

**A&M Response: The Revised Comprehensive Permit Plans dated 10/29/25 already incorporated the requested details into the plans. Building permit plans will be submitted to the Building Department for their review during the building permit application.**

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

*Response U8: Utility and tree layout conflicts are under review. Updated plans will be submitted to address all conflicts.*

*Hancock Response: The Board should condition any approval that Final Plans include full details of all proposed utilities and landscaping. The Board should reengage civil engineering peer review at the Applicant's expense to review Final Plans.*

**A&M Response: The Comprehensive Permit Plans dated 10/29/25 already incorporated this comment. All utility and tree layout conflicts were already corrected as illustrated in the Plans submitted to the Board. Building permit plans will be submitted to the Building Department for their review during the building permit application.**

### **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.

*Response SW1: The Applicant acknowledges BETA Group's role in reviewing stormwater and wetlands issues and will coordinate closely to address their findings. Detailed responses will be provided as BETA's review progresses.*

*Hancock Response: Hancock has been following the progress of the Applicant through the Conservation Commission process, reviewing all correspondence from the commission's peer review engineer, Beta Group. We understand the Applicant's team has resolved all of the outstanding issues as of an email dated 10-22-25 from Carlton Quinn of Allen & Major to Matthew Crowley from Beta dated 10-16-25. The Board should condition any approval on compliance with all conditions of the Franklin Conservation Commission.*

**A&M Response: Acknowledged. No further response is necessary.**

### **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.

*Response T1: The Applicant defers to Howard Stein Hudson for peer review on traffic-related matters.*

*Hancock Response: Hancock understands HSH is satisfied that all traffic related issues have been resolved. **Item closed.***

A&M believes these responses, along with the previously submitted Revised Comprehensive Permit Plans dated 10/29/25, address all of Hancock's comments received to date. If you require additional information, please feel free to contact us.

Very Truly Yours,

**ALLEN & MAJOR ASSOCIATES, INC.**



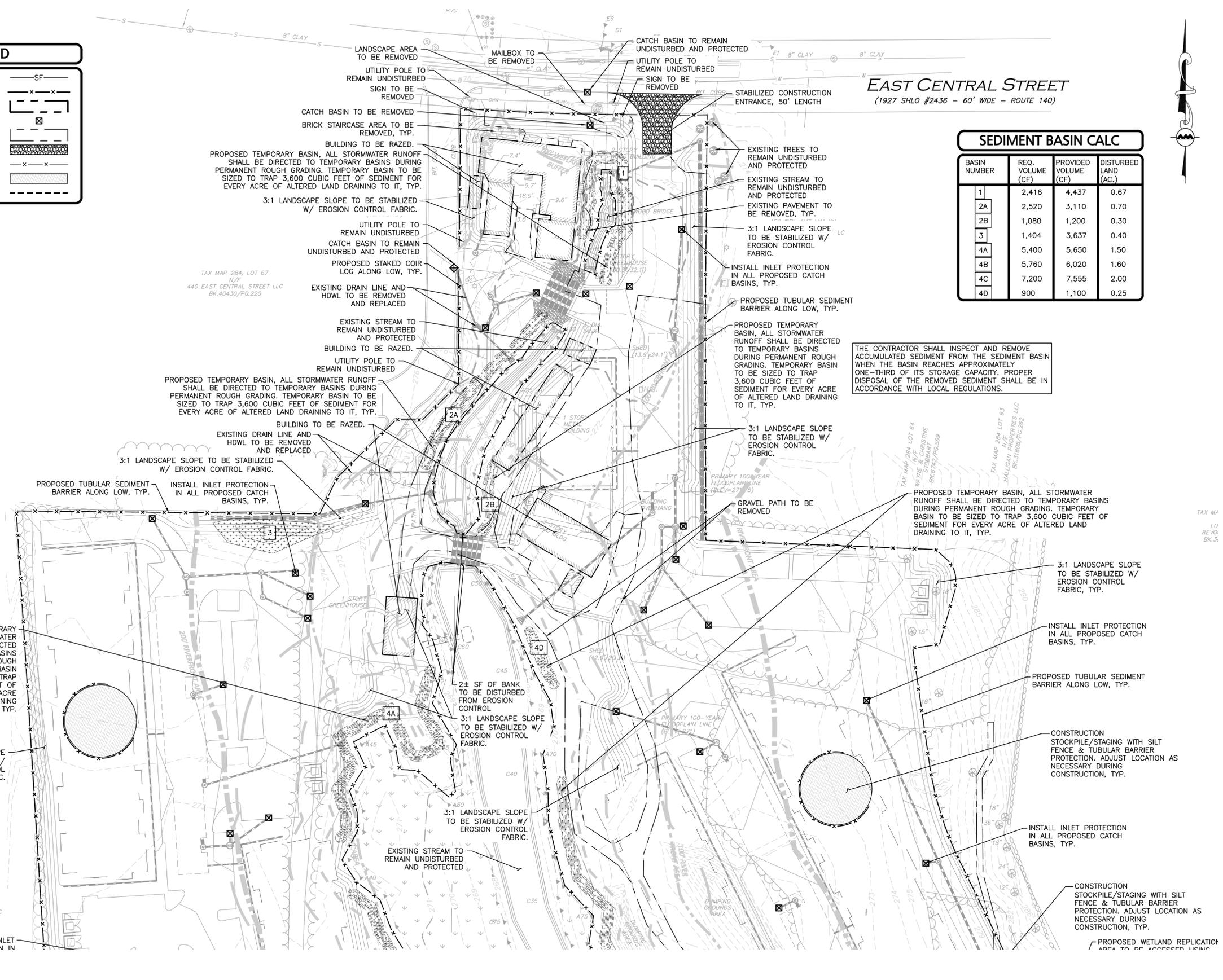
Carlton M. Quinn, PE  
Principal

Copy: TAG Central LLC - Alexander Alevizos - [aj@tagdevco.com](mailto:aj@tagdevco.com)

Enclosure      Erosion Control & Site Prep Plans (Sheets C-101A & 101C), revised November 13, 2025  
Proposed Wetland Buffer Disturbance dated 11/13/25  
Alternatives Analysis section of Notice of Intent Application previously submitted to Con. Comm.  
Please refer to previously submitted:  
Civil/Landscape Site Plans, dated October 29, 2025  
Drainage Report, dated October 29, 2025

**LEGEND**

SILT FENCE	—SF—
TUBULAR BARRIER	—X—X—
BUILDING TO BE REMOVED	—X—X—
CATCH BASIN FILTER	—X—X—
PAVEMENT TO BE REMOVED	—X—X—
STABILIZED ENTRANCE	—X—X—
CONSTRUCTION FENCE	—X—X—
STOCKPILE/STAGING AREA	—X—X—
SAWCUT LINE	—X—X—



*Carlton M. Quinn*  
PROFESSIONAL ENGINEER FOR ALLEN & MAJOR ASSOCIATES, INC.

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APPLICANT/OWNER:  
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275 REGATTA DRIVE  
JUPITER, FL 33477

PROJECT:  
**40B MULTIFAMILY**  
444 EAST CENTRAL STREET  
FRANKLIN, MA

PROJECT NO.	3317-01	DATE:	02-11-2025
SCALE:	1" = 40'	DWG. NAME:	C-3317-01
DESIGNED BY:	MTB	CHECKED BY:	CMQ

PREPARED BY:

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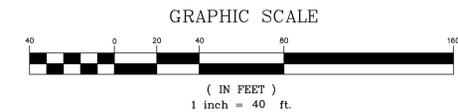
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DRAWING TITLE: **EROSION CONTROL & SITE PREP PLAN** SHEET No. **C-101A**

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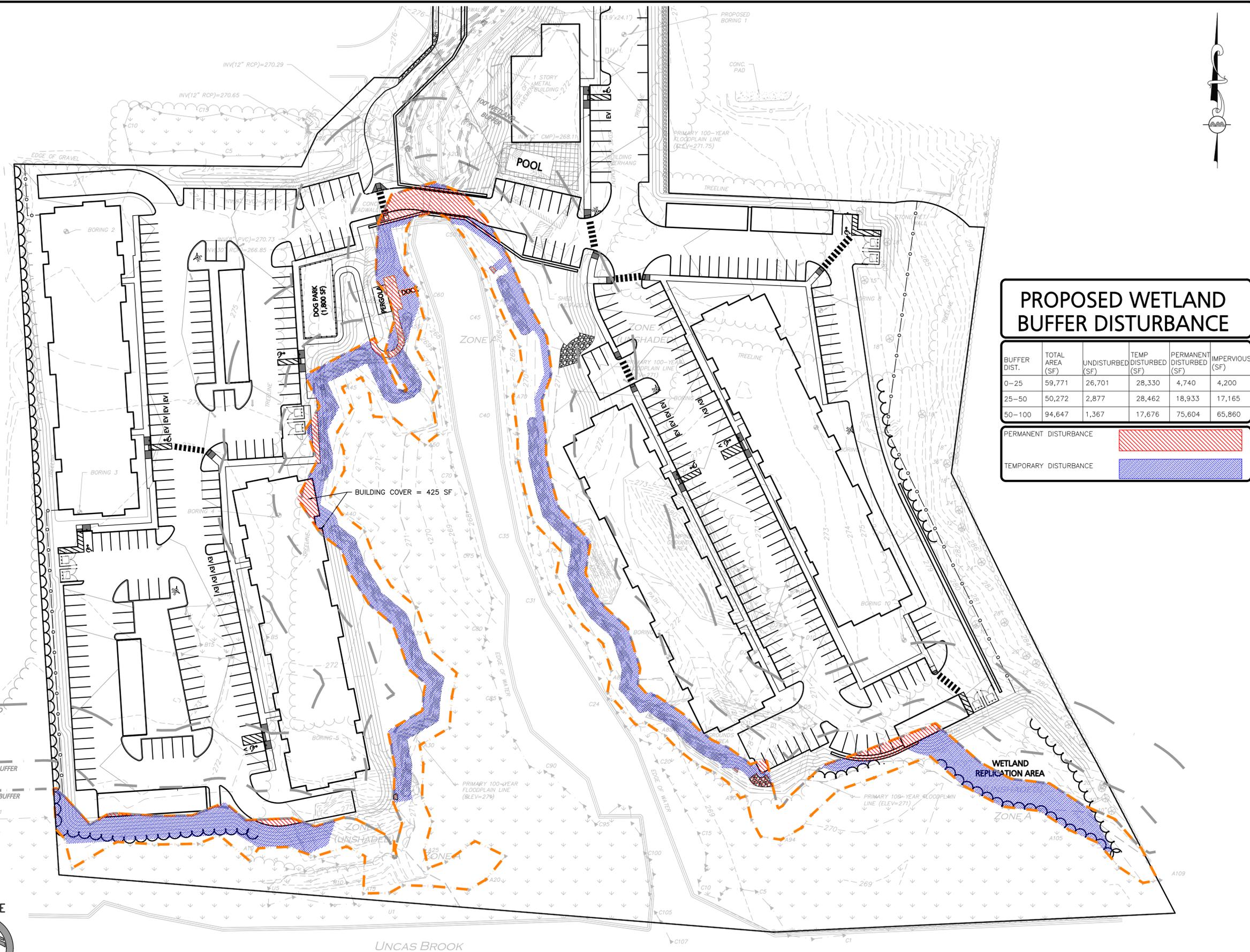
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### PROPOSED WETLAND BUFFER DISTURBANCE

BUFFER DIST.	TOTAL AREA (SF)	UNDISTURBED (SF)	TEMP DISTURBED (SF)	PERMANENT DISTURBED (SF)	IMPERVIOUS (SF)
0-25	59,771	26,701	28,330	4,740	4,200
25-50	50,272	2,877	28,462	18,933	17,165
50-100	94,647	1,367	17,676	75,604	65,860

PERMANENT DISTURBANCE

TEMPORARY DISTURBANCE



*Carlton M. Quinn*  
 PROFESSIONAL ENGINEER FOR  
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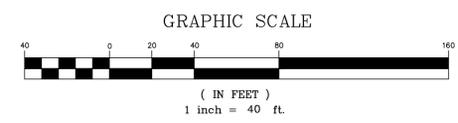


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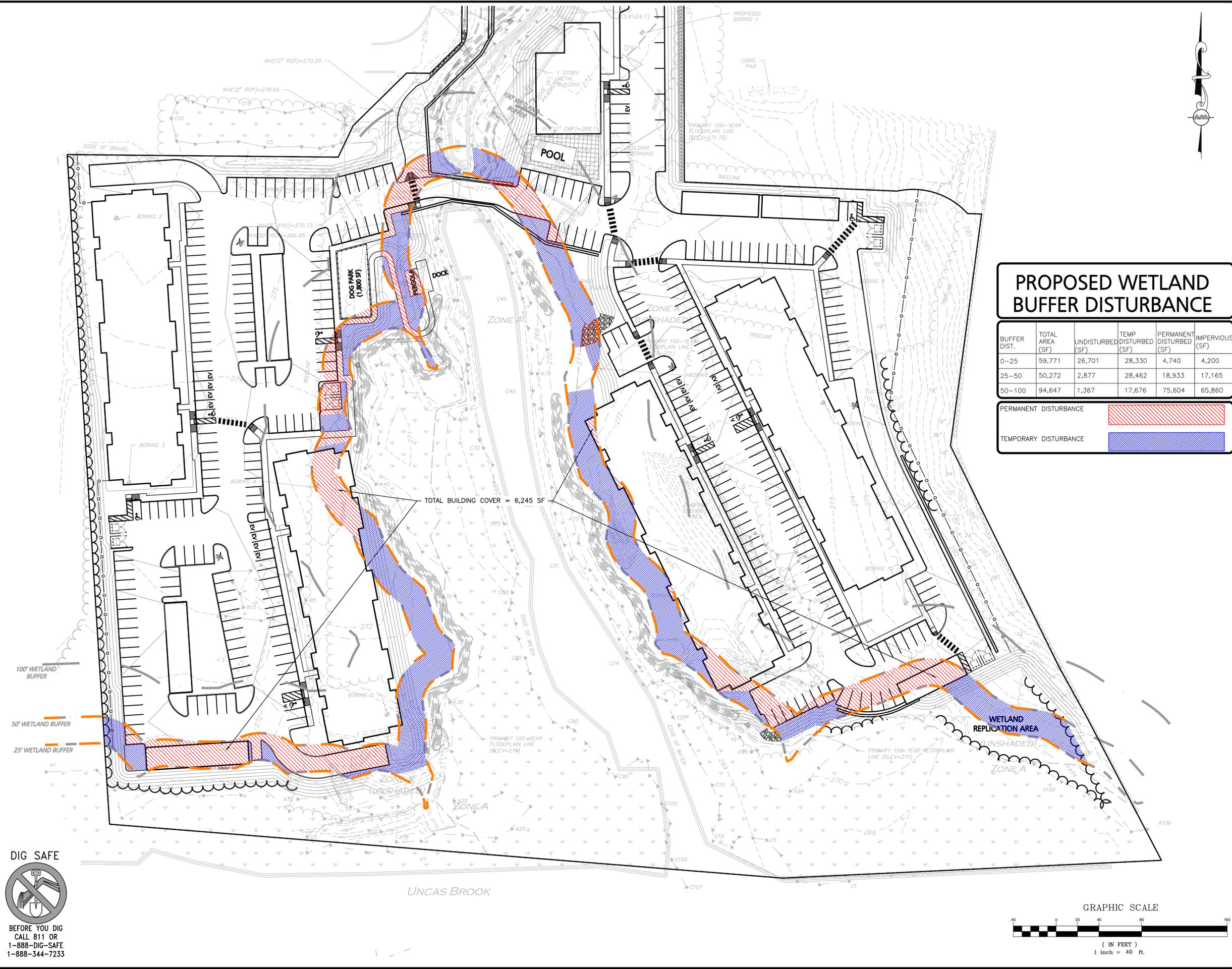
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DRAWING TITLE: **PROPOSED WETLAND BUFFER DISTURBANCE 0-25' BUFFER**  
 SHEET No. **EXH-6**



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PERMANENT DISTURBANCE	
TEMPORARY DISTURBANCE	



*Carlton M. Quinn*  
PROFESSIONAL ENGINEER FOR  
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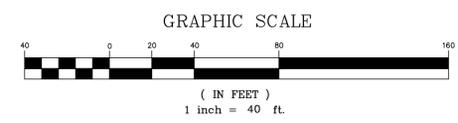
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DRAWING TITLE: <b>PROPOSED WETLAND BUFFER DISTURBANCE 25-50' BUFFER</b>	SHEET No. <b>EXH-7</b>
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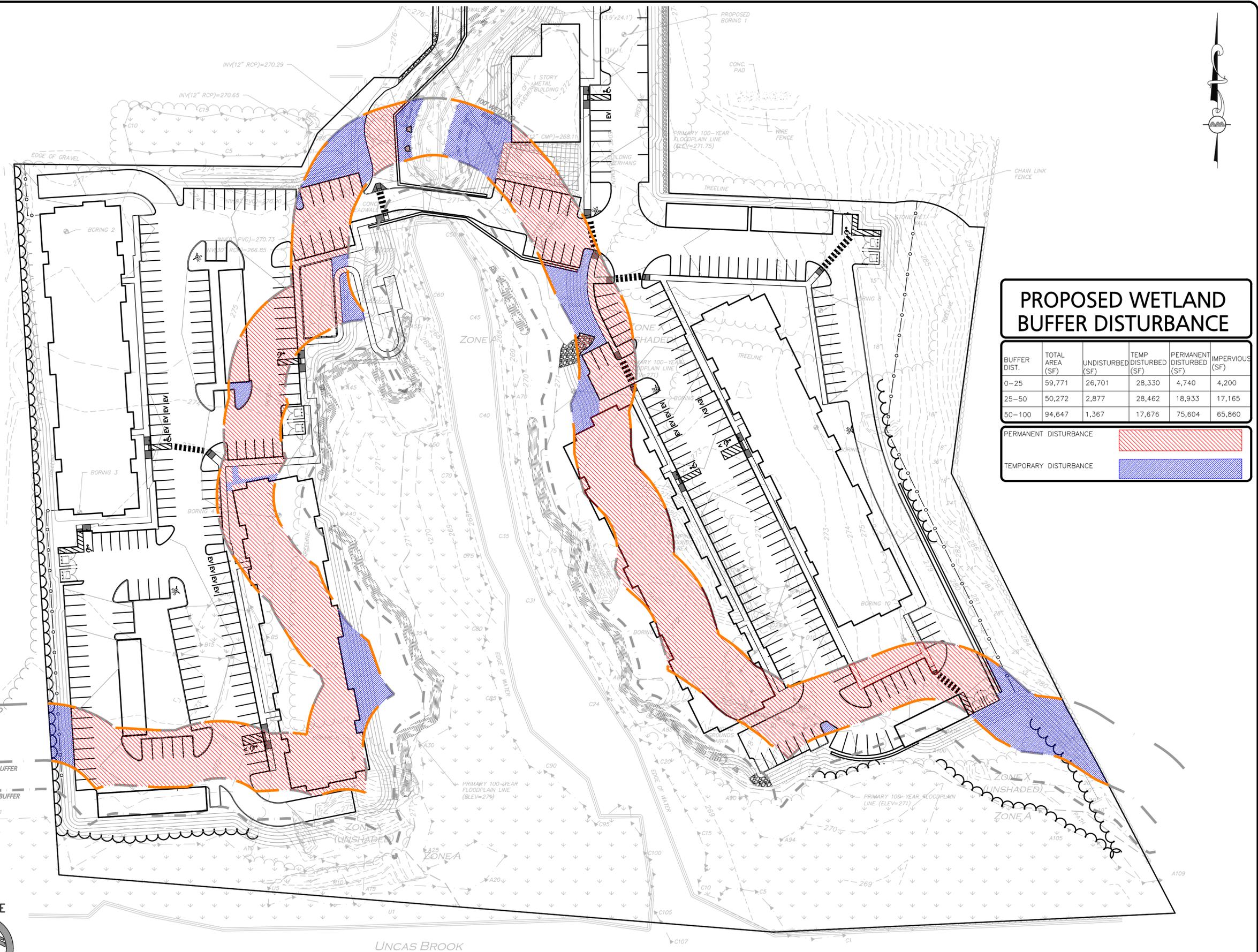
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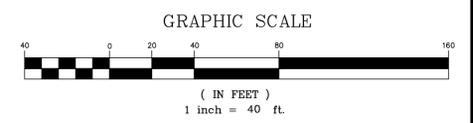


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DRAWING TITLE: **PROPOSED WETLAND BUFFER DISTURBANCE 50-100' BUFFER**  
 SHEET No. **EXH-8**



10.58 (5)(h)	<i>The issuing authority shall include a continuing condition in the Certificate of Compliance for projects under 310 CMR 10.58(5)(f) or (g) prohibiting further alteration within the restoration or mitigation area, except as may be required to maintain the area in its restored or mitigated condition. Prior to requesting the issuance of the Certificate of Compliance, the applicant shall demonstrate the restoration or mitigation has been successfully completed for at least two growing seasons.</i>	The Applicant is amenable to such a condition. The Restoration, Replication and Mitigation Plan also outlines monitoring protocols to ensure success of the restoration areas for at least three growing seasons. This monitoring program consists of documenting a variety of items to demonstrate the health of the restoration and mitigation areas including assessment of invasive species growth, survival and establishment of native vegetation, stabilization of soils and more.
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### Alternatives Analysis

The alternatives analysis below has been provided to demonstrate that the Applicant has evaluated options to avoid and minimize impacts to wetland resource areas per Section 310 CMR 10.55(4)(b). The alternatives presented include the 1) No-Build Alternative, 2) Five Story Building Alternative, and 3) Parking Alternative.

#### *No-Build Alternative*

The site would not be developed under the No-Build Alternative. The proposed buildings could not be built. The No-Build Alternative's effects make it impossible to build sizable upland areas and disregards the necessity for mixed-income housing development on a local and regional level. A no-build alternative also would preclude cleanup of the site, installation of stormwater management, control of invasive species, and native plantings as proposed.

#### *Five Story Building Alternative*

This alternative proposes increasing the building heights to five stories to achieve a similar unit density and parking count, which would in turn yield less impact to the 100-foot Riverfront Area and the 200-foot Riverfront Area. This alternative would not be feasible due to conflicts with previously granted approvals based on lower maximum building heights. The proposed project as designed currently requires a zoning waiver due to the 4-story height. Increasing the maximum height of the buildings to five stories would make the project even more zoning-nonconforming and would be inconsistent with local neighborhood character, aesthetics and prior project approvals.

#### *Parking Alternative*

This alternative proposes placing parking at the ground floor of the proposed buildings and elevating the buildings by one story to achieve the same required density. This alternative would allow for less impervious surface on-site as well as less impact to the Riverfront Area. As mentioned above, the additional height required in this alternative would conflict with Franklin's Zoning Bylaw and impact the neighborhood aesthetics. Locating the parking below grade underneath the buildings is similarly not feasible due to shallow depth to estimated seasonal high groundwater.

### **3.0 BORDERING VEGETATED WETLAND**

A small amount of fill (+/- 31 square feet) is proposed within the delineated Bordering Vegetated Wetland (BVW) along the proposed improved southern stream crossing. Impacts to BVW associated with the installation of the dock totals 32 square feet. Other than a *de minimis* impact for the installation of pilings, this impact otherwise consists only of shading caused by the overhanging dock gangway, not a direct impact. ECB will be installed around the limit of work in accordance with approved site plans prior to any earth disturbance to limit the potential for any erosion or sedimentation to leave the work area and travel offsite or towards resource areas on site.