



November 19, 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 final guidance to the Board. We had been awaiting revised plans prior to providing a response to the Allen & Major response letter dated November 13, 2025. We were informed today that the Applicant does not intend to submit revised plans and requests the Board act on the plans to date including the alternative plan depicting changes to the

Revised Documents Reviewed

1. Civil Site Plans containing 43 sheets prepared by Allen & Major Associates, Inc. revised through October 29, 2025, stamped by Carlton M. Quinn, P.E.
2. Revised Waiver List dated October 29, 2025
3. Revised Architectural Plans prepared by Cub 3 Architects dated October 29, 2025 (partial set containing 6 sheets).
4. Letter from Allen & Major to Franklin Conservation Commission dated November 3, 2025 responding to BETA Group review letter dated October 29, 2025.
5. Letter from Goddard Associates to Franklin Conservation Commission dated November 4, 2025, responding to BETA Group peer review of October 29, 2025 and MassDEP comments.
6. Letter from Beals Associates to A.J. Alevios dated October 31, 2025 re: BLSF peer review comments
7. Regulatory Compliance Analysis prepared by Goddard Associates revised through November 4, 2025
8. Proposed Flood Plain Exhibits prepared by Allen & Major Associates dated September 16, 2025.
9. Stormwater Management Report prepared by Allen & Major revised through September 18, 2025.

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10. Letter from Franklin Conservation Commission to Franklin ZBA dated October 30, 2025.

Prior Documents Reviewed

1. Civil Site Plans containing 28 sheets prepared by Allen & Major Associates, Inc. revised through September 18, 2025, stamped by Carlton M. Quinn, P.E.
2. Alternative Site Layout Eastern Side prepared by Allen & Major Associates, Inc. not dated, depicting a 54 unit 3-story building along the easterly side of the southeast portion of the development site and a 72-unit four story building to the west of that building.
3. Letter from TAG Central, LLC to the Board of Appeals dated 8/19/25 re: responses to comments from the 7/31/25 hearing.
4. Letter from TAG Central, LLC to the Board of Appeals dated 9/25/25 regarding the Alternative Plan.
5. Letter from Allen & Major, Associates, Inc. dated 9/23/25, re: Sewer Holding Tank in Water Resource District
6. Technical Memorandum from Beals Associates, Inc. revised through 8/27/2025 re: Flood Plain Elevation
7. Draft Cross Section Central Street Residences prepared by Cube 3 undated.
8. Approval Not Required Plan prepared by Allen & Major dated 7/31/25 and revised 8/25/25.
9. Response Letter from Allen & Major to the Board of Appeals dated 8/21/25
10. Letter from Moriarty, Bielan & Mallow to the Board of Appeals dated October 22, 2025 re: the Alternative Site Plan
11. Revised Comprehensive Permit Site Plan (Sheet C-100) only dated October 22, 2025, prepared by Allen & Major Associates, Inc. depicting a total of 254 units.
- 12.
13. Original Application for Residences at 444 Central dated February 27, 2025
14. Cover Letter and Narrative description for Comprehensive Permit Application by TAG Central LLC and dated February 27, 2025
15. ZBA Application Form dated February 11, 2025
16. 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.
17. Landscape drawings were stamped by Kyle Zick, Registered Landscape Architect.
18. Architectural layouts, Affordable Unit Location, Elevations, Renderings, Unit Layouts prepared by Cube 3 dated February 11, 2025
19. Tabulation of Proposed Buildings
20. Project Eligibility Letter from Massachusetts EOHLC dated February 12, 2025.
21. Notice of Purchase and Sale Agreement dated September 12, 2024
22. Requested Waiver List dated February 11, 2025
23. Project Statement of Impact
24. Copy of Deed Dated December 12, 2019

25. Statement of Local Need
26. Certified Abutters List dated February 3, 2025

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

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.

Item Closed

- 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.

Hancock Response: We believe this satisfies the submission requirement eliminating the need for the associated waiver. We defer to the Board with regard to the content of the alternatives analysis as this information will be used during your deliberation on the remainder of the wetland waiver requests.

Item Closed.

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.

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.

Item closed.

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 STOCKPILED 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...".

Hancock Response: A shortage in parking in the east area will manifest itself as an on-site problem with residents parking where they should not or just complaining to management. If parking additional parking in this area is proposed to alleviate issues, Hancock recommends the Board consider this a significant change as defined under 760 CMR 56 as the additional parking would most likely be against the east side and impact the mitigation of impacts to the residential neighbors. We suggest the Board include this as a finding in the decision. We also suggest the condition prior offered language regarding snow storage and the addition of signage prohibiting snow storage in any area as conditioned shown on Final Plans prior to construction.

Item closed.

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.

Item closed.

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.

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

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 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.

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.

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.

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.

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 through 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.

Item closed.

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.

Hancock Response: Item closed.

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.

Hancock Response: Item closed.

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.

Hancock Response: Item closed.

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. Item closed.

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.

Hancock Response: Item closed.

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.

Hancock Response: Item closed.

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.

Hancock Response: Item closed.

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.

The Applicant has satisfactorily responded to all open issues. Hancock will be happy to assist the Board with the items noted above as proposed conditions of any approval.

Please do not hesitate to contact me should you have any questions or comments.

Sincerely,
Hancock Associates,



Joseph D. Peznola, PE
Director of Engineering