

November 13, 2025

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

Re: Applicant Comments on Conservation Commission Waiver Recommendations
444 East Central Street, Franklin, MA 02038

Dear Franklin Zoning Board of Appeals,

Goddard Consulting, LLC, (Goddard) is pleased to submit this letter on behalf of TAG Central LLC, (the Applicant), to provide clarifying comments regarding the requested waivers that have not been recommended for approval by the Conservation Commission.

Bylaw Regulations Section 2 (Waiver 4c. per Waiver Requests dated 10/29/25)

This waiver is required for the project to be constructed as currently proposed. Please note that the project will comply with MA Wetlands Protection Act, as required, and this is a customary waiver request for 40B projects; the same waiver was granted for a recent 40B project in Franklin (Refer to Decision for Grove Street Residences dated 4/16/24).

Bylaw Regulations Section 4.2 (Waiver 5c. per Waiver Requests dated 10/29/25)

The exact data requested has been provided as an attachment to this letter. The project has been designed to avoid and minimize impact to the buffer zone to the best extent practicable, and impacts have been sited over previously disturbed buffer zone areas everywhere possible. The project as proposed complies with MA Wetlands Protection Act. Please note the same waiver was granted for Grove Street Residences.

Bylaw Regulations Section 4.3 (Waiver 6c. per Waiver Requests dated 10/29/25)

The exact data requested has been provided as an attachment to this letter. The project has been designed to avoid and minimize impact to the buffer zone to the best extent practicable, and impacts have been sited over previously disturbed buffer zone areas everywhere possible. The project as proposed complies with MA Wetlands Protection Act. Please note the same waiver was granted for Grove Street Residences.

Bylaw Regulations Section 4.4 (Waiver 7c. per Waiver Requests dated 10/29/25)

The exact data requested has been provided as an attachment to this letter. The project has been designed to avoid and minimize impact to the buffer zone to the best extent practicable, and impacts have been sited over previously disturbed buffer zone areas everywhere possible. Project as proposed complies with MA Wetlands Protection Act. Please note same waiver was granted for Grove Street Residences.

Bylaw Regulations Section 7.4.4 (Waiver 9c per Waiver Requests dated 10/29/25)

The applicant requests if a waiver is to be granted, it'd be consistent with previous 40B Grove Street Residences.

Bylaw Regulations Section 7.11 (Waiver 10c per Waiver Requests dated 10/29/25)

As noted in Waiver Requests dated 10/29/25, the applicant has submitted a mitigation plan to the Conservation Commission and is only asking for a waiver from meeting certain instructions/requirements for said plan which is above and beyond what the MA Wetlands Protection Act requires. To reiterate, Applicant is not requesting a waiver from the submission of a mitigation plan entirely, even though this waiver was requested and granted for Grove Street Residences.

Bylaw Regulations Section 7.14 (Waiver 12c per Waiver Requests dated 10/29/25)

Isolated Vegetation Wetlands are non-jurisdictional under the MA Wetlands Protection Act and as such, there is no requirement to provide wetland replication for these impacts whatsoever. Despite that, as the Applicant pledged, we would do our best to meet the local wetland regulations/bylaws to the best extent possible. We cannot meet the 2 to 1 ratio, so we did our best to maximize replication as much as possible and the total replication proposed amounts to a +/- 1 to 1 ratio. Land suitable for potential wetland replication areas must meet certain criteria to be eligible for replication to be feasible and there are no further options onsite to utilize onsite for additional replication as we have studied. All necessary details for the replication area design have been submitted and peer reviewed by the Conservation Commission's peer review consultant, and we understand a condition of approval will be included in the Order of Condition which requires the replication and an agent of the Conservation Commission to review the replicated wetland during construction/once complete. The Applicant has done their best to comply with this local wetland bylaw and has shown that this waiver is necessary.

Bylaw Regulations Section 7.18.1.5 (Waiver 14c per Waiver Requests dated 10/29/25)

The size of the site and the extent of vegetation onsite would make this activity extremely cumbersome and in the Applicant's opinion is not necessary, as this information does not inform any decisions or other aspects of the project proposal. The Applicant has illustrated the limits of existing wooded areas on project plans. Plans show preserving as much vegetation as possible along the eastern property edge to serve as a vegetated buffer between the site and its residential abutters. Please note the same waiver was granted for Grove Street Residences.

Conservation Commission Regulations Chapter 271: Multiple Waivers (Waiver 15c-18c per Waiver Requests)

Waivers are necessary to conduct review of project under the process as governed by the MA Wetland Protection Act and regulations thereunder rather than the local process procedures, as is standard for Chapter 40B projects. Please note these same waivers were granted for the Grove Street Residences project.

Sincerely,
Goddard Consulting, LLC



Chris Frattaroli
Lead Wetland Scientist

Attachments:

Proposed Wetland Buffer Disturbance 0-25' Buffer (Sheet EXH-6), Allen & Major Assoc., Inc., 11/13/2025
Proposed Wetland Buffer Disturbance 25-50' Buffer (Sheet EXH-7), Allen & Major Assoc., Inc., 11/13/2025
Proposed Wetland Buffer Disturbance 50-100' Buffer (Sheet EXH-8), Allen & Major Assoc., Inc., 11/13/2025

Cc'd:
Conservation Commission

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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
ALLEN & MAJOR ASSOCIATES, INC.

REV	DATE	DESCRIPTION
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APPLICANT/OWNER:
TAG CENTRAL LLC
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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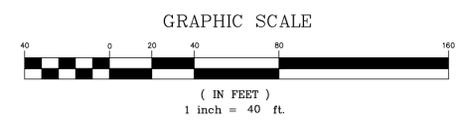
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DRAWING TITLE: PROPOSED WETLAND BUFFER DISTURBANCE 0-25' BUFFER	SHEET No. EXH-6
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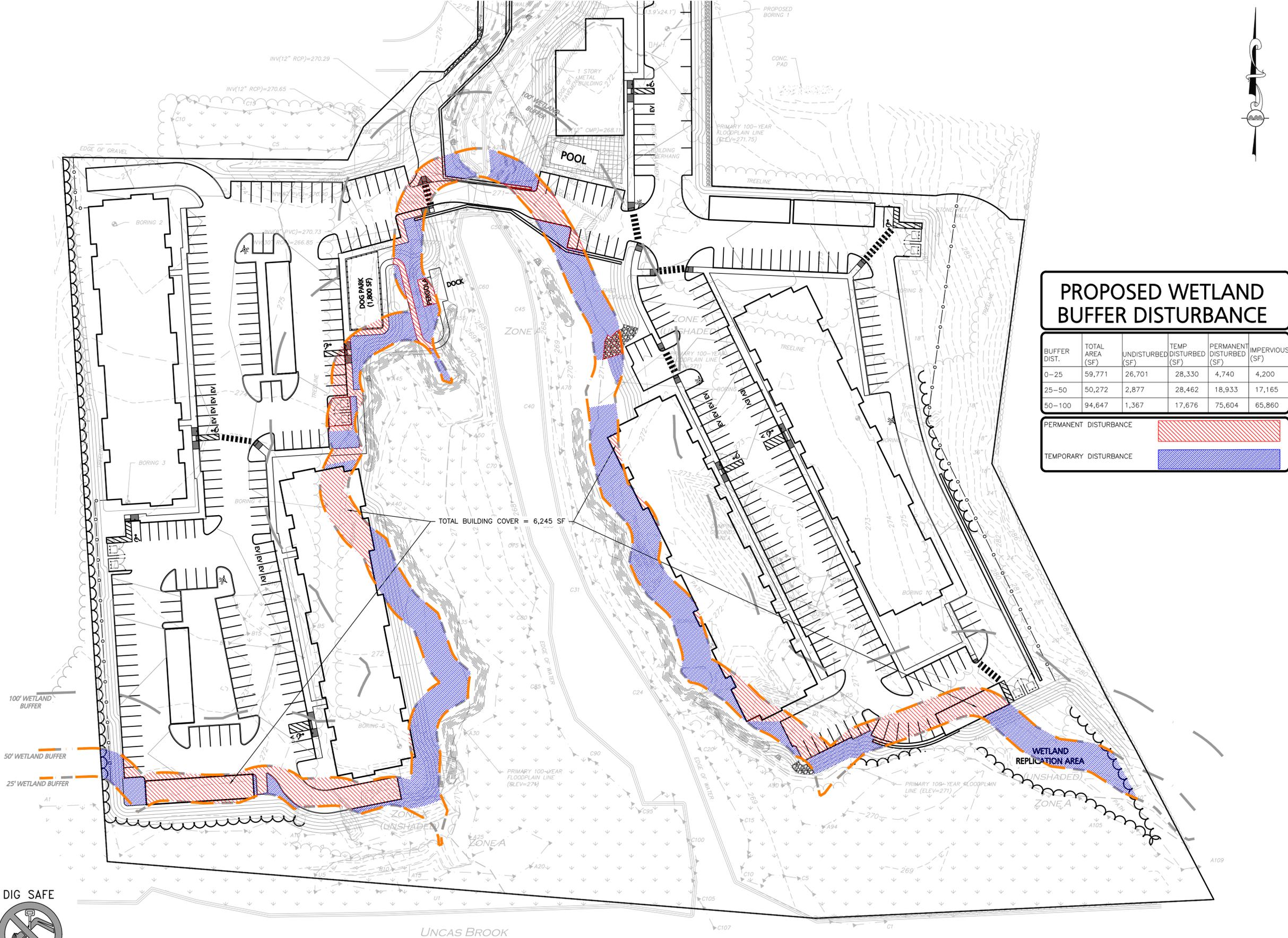
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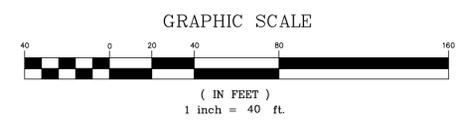
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DRAWING TITLE: **PROPOSED WETLAND BUFFER DISTURBANCE 25-50' BUFFER**
 SHEET No. **EXH-7**

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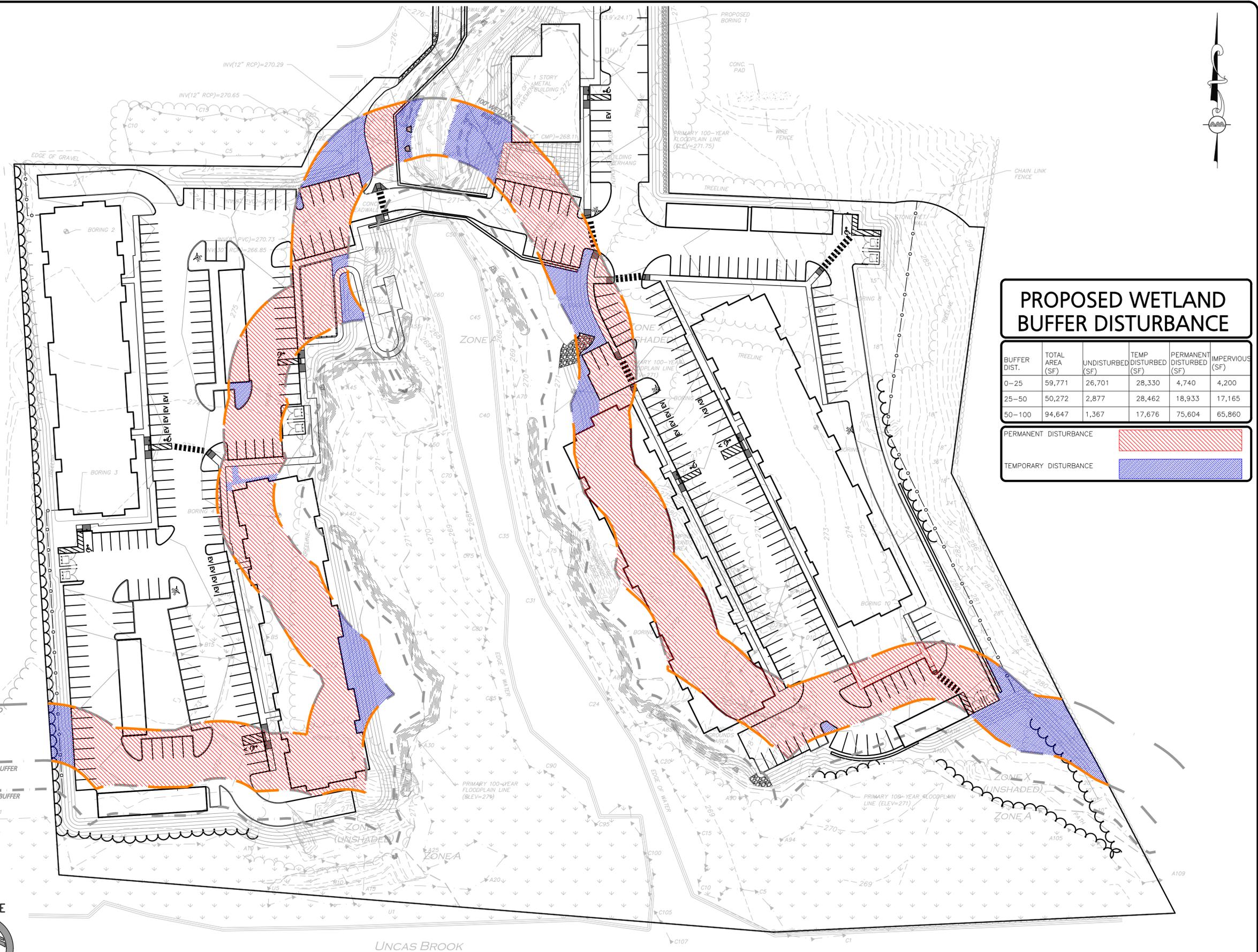
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