

# Town of Franklin

355 East Central Street  
Franklin, Massachusetts 02038-1352



Phone: (508) 520-4907  
[www.franklinma.gov](http://www.franklinma.gov)

## PLANNING BOARD

February 27, 2024

Zoning Board of Appeal  
355 East Central Street  
Franklin, MA 02038  
Attn: Bruce Hunchard, Chair

Town Council  
355 East Central Street  
Franklin, MA 02038  
Attn: Tom Mercer, Chair

### **RE: 444 East Central Street – LIP Friendly CH40B Development**

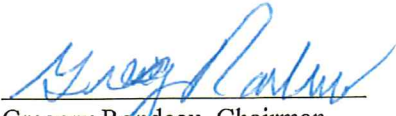
Please accept, on behalf of the Franklin Planning Board, the following letter, outlining the Board's recommendations pertaining to the proposed friendly 40B development at 444 East Central Street. This letter sets forth the Planning Board's recommendations related to the Board's review of the project, pursuant to the Town's recently adopted guidelines for reviewing Friendly 40B projects – Local Initiative Program.

The Planning Board voted 5-0 to recommend the project as currently presented with the ability to include changes listed in the attached letter, with a compromise between Central Street Residences and the Town of Franklin to create a project that would be better suited for the community.

The Planning Board's recommendations are based on (1) the Board's review of the Friendly 40B application submitted on December 22, 2023, (2) presentation made by the applicant, Central Street Residences, to the Planning Board on January 22, 2024 and February 26, 2024, (3) comments provided by DPCD at the February 26, 2024 Planning Board meeting (attached) and a letter from a resident, Gino Carlucci dated February 26, 2024 (attached). The Planning Board notes that most of items listed in the DPCD letter were addressed with the exception of moving the clubhouse.

The Planning Board looks forward to the applicant, as well as the Town Council and other Boards reviewing this project working together, to create a project that is reflective of a Friendly 40B project.

Thank you for providing the Planning Board an opportunity to provide feedback



Gregory Rondeau, Chairman  
Franklin Planning Board

CC: Jamie Hellen, Town Administrator  
Conservation Commission  
Bryan Taberner, Director of Planning and Community Development  
Gus Brown, Building Commissioner  
Catherine Racer, Director DHCD  
Reiko Hayashi, LIP Director, DHCD

# Town of Franklin

355 East Central Street  
Franklin, Massachusetts 02038-1352



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## DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

**DATE:** February 21, 2024  
**TO:** Central Street Residences  
**FROM:** Department of Planning and Community Development  
**RE:** 444 East Central St  
Preliminary Plan

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DPCD has gathered the comments from the January 22, 2024 meeting and have provided them below:

- Turn the clubhouse main entrance towards the street and provide parking behind the building.
- Consider the 56-unit building located on the east side and closet to an abutter be three-stories.
- Apply with Design Review.
- Use elevation on the site to hide the buildings or ways to make the buildings look smaller, by providing an elevation study.
- Provide a shadow study for the four-story building to see the shadow cast onto the abutters.
- Suggested parking requirement of 1.35 seems low, and 1.5 would seem a little better.
- Look to add more 3 story buildings and less 4 story buildings, decreasing the unit count.
- Drop off and pick area for bus/GATRA
- Show the free standing garages on the concept plan.
- What is the total impervious coverage amount

### Comments:

- Applicant has provided a response and revised Site Plans included in the submission.

Gino D. Carlucci, Jr.  
1 Toni Lane  
Franklin, MA 02038

February 26, 2024

Greg Rondeau, Chair  
Franklin Planning Board  
355 East Central Street  
Franklin, MA 02038

Dear Mr. Rondeau and members of the Planning Board,

TAG Central, LLC is on your 2/26/24 agenda seeking support for its upcoming request to Town Council for support of a housing development at 444 East Central Street as a "Friendly 40B". While acknowledging that the town and the region is in dire need of additional housing, the Town should be careful to approve such housing in a manner that is beneficial and helps the Town achieve its long-term goals. This is especially true when such housing is discretionary and not as-of-right as is the case here.

The proposed 444 East Central Street project is in a location that is appropriate for housing in that it is close to services and amenities. The site offers an opportunity to help fill a housing need while also advancing other Town goals such as creating pedestrian and bicycle friendly opportunities, as well as helping to establish the East Central Street corridor as an inviting entrance to the downtown area.

Unfortunately, rather than advancing these goals, the current proposal significantly detracts from them. The totally traffic-inducing design will have a negative impact on this section of East Central Street for generations, and detract from Town efforts to become more walkable.

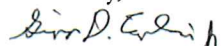
At this point, cars are a necessity in Franklin, and they need to be accommodated in this project. However, there is one relatively minor site change that could help mitigate the negative impact of the cars and the project. That change would be to relocate the proposed clubhouse to be close to and parallel to East Central Street with parking behind it. While there is no scale on the plan, the proposed clubhouse appears to be well over 100 feet from the street. Pedestrians would be passing a large open area consisting primarily of a driveway loop and parking spaces. This is the opposite of pedestrian-friendly. The building should be set back no further than the existing buildings on the site. Moving the building close to the street would have multiple benefits. It would:

- help frame the corridor (along with the other nearby buildings),
- advance the Town's pedestrian-oriented goals,
- identify the project as a part of the community rather than as an isolated complex separate from the rest of the town, and
- screen the parking as well as most of the large buildings behind it.

It is disappointing that the developer chose to decline the request of DPCD to make that change. As documented in the attached photos from Google Maps, most of the other buildings in the vicinity are close to the street and most have parking to the rear or side. This proposal would break from this pattern to the detriment of the neighborhood and the town. A Friendly 40B is supposed to attain that status because it helps the Town to achieve some of its goals besides the housing. This plan falls short of that.

For these reasons, I urge the Planning Board to withhold support of this project as a Friendly 40B unless the design is changed as outlined above.

Sincerely,

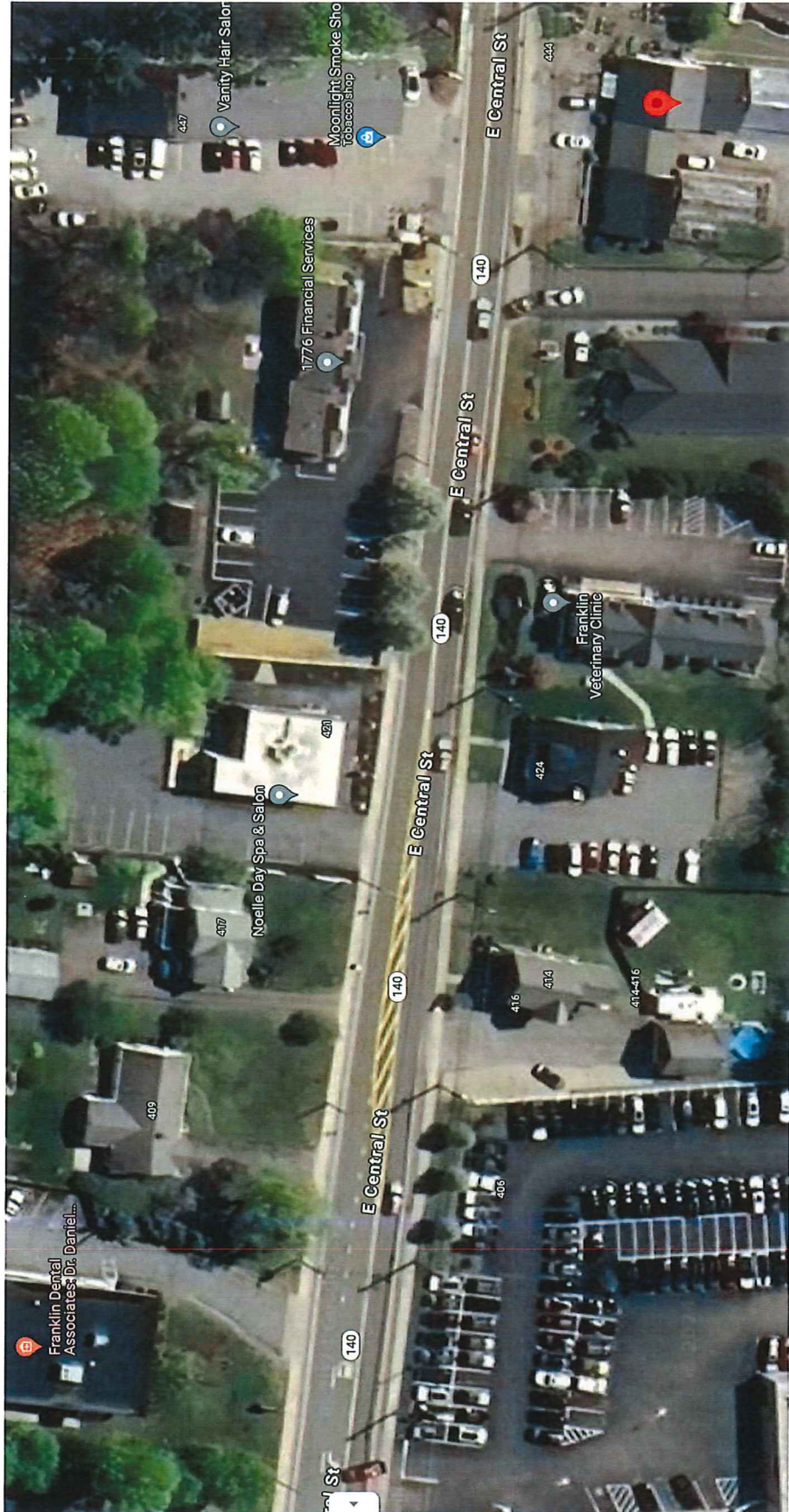


Gino D. Carlucci, Jr.

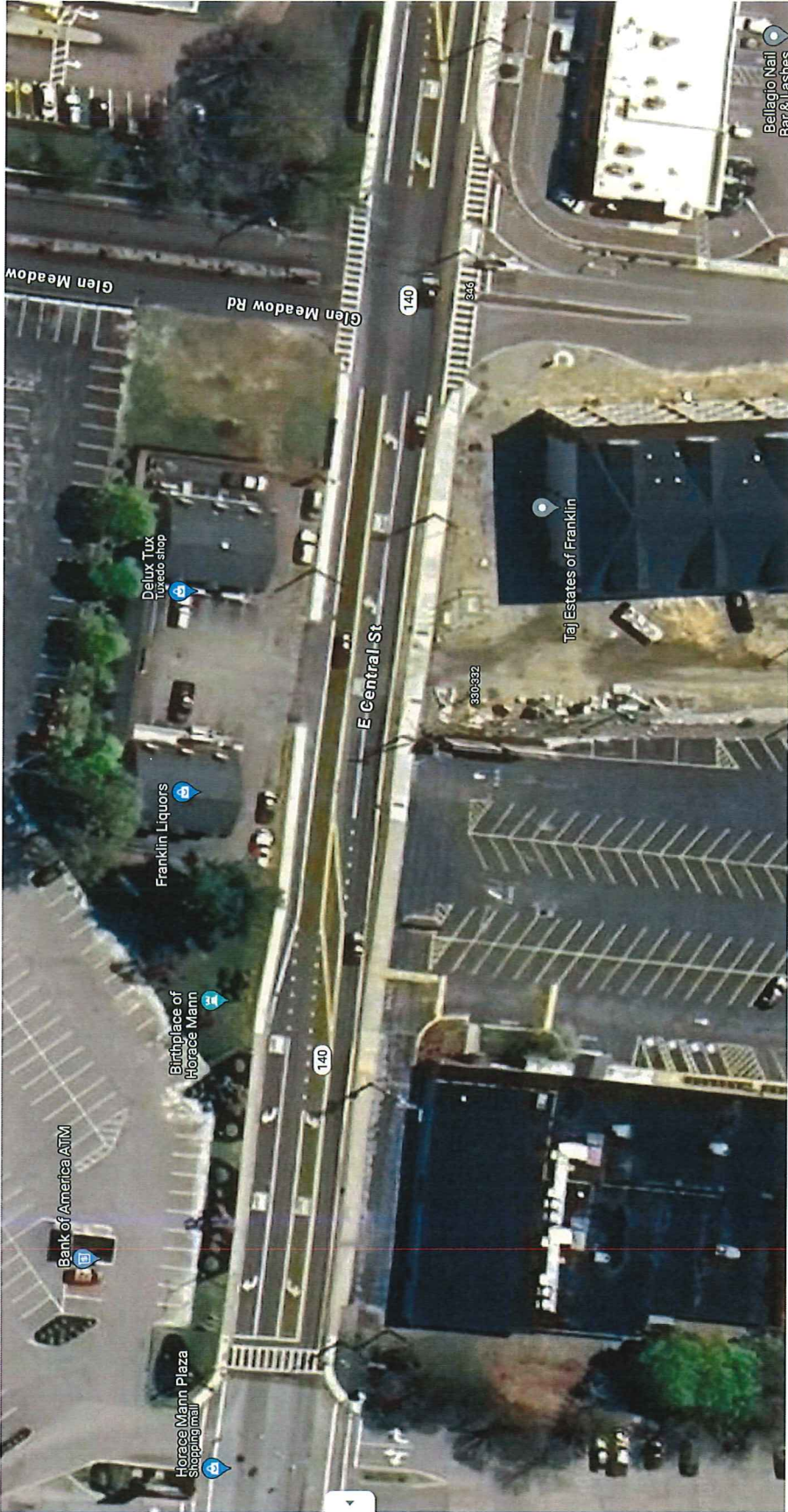












Tel: (508) 520-4929

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## Town of Franklin



### Conservation Commission

February 8, 2024

Town Council  
355 East Central Street  
Franklin, MA 02038  
Attn: Tom Mercer, Chair

RE: 444 East Central Street

Dear Chair Mercer, and Members of the Council,

This letter is being delivered on behalf of the Franklin Conservation Commission (the "**Commission**") with respect to the proposed development of 444 East Central Street, Franklin, MA (the "**Property**") as a so-called Friendly 40B project (the "**Project**"). This letter sets forth the Commission's recommendations with respect to the Council's review of the Project, pursuant to the Town's recently adopted guidelines for reviewing Friendly 40B projects.

The Commission **recommends** the Project as it is currently presented, and further recommends that the Council adopt the Commission's recommendations set forth below as it pertains to the application of Chapter 153 of the Town of Franklin Bylaws (the "**Stormwater Management Bylaw**"), Chapter 181 of the Town of Franklin Bylaws (the "**Wetlands Protection Bylaw**"), and the Conservation Commission Regulations (the "**Wetlands Regulation**") to the Project.

The Commission's recommendations set forth below are based on (1) presentations made by the applicant, The Alevizos Group (the "**Applicant**") and Goddard Consulting at the Commission's January 25, 2024 meeting; (2) testimony provided by Breeka LÍ Goodlander, Conservation Agent/Natural Resource Protection Manager (the "**Conservation Agent**"), at said January 25, 2024 meeting; and (3) the Commission's review of the Friendly 40B Project Preliminary Review Application dated December 22, 2023, and accompanying materials submitted by the Applicant (the "**Preliminary Application**").

As you know, the Project will be subject to the Commission's review as it pertains to the application of the Wetlands Protection Act, M.G.L. Chapter 131, Section 40, and corresponding regulations at 310 CMR 10.00 et seq. (the "**Act**"), to the Project.

### ***Requested Waivers***

Based on the Preliminary Application, the Applicant is requesting the following waivers from the Stormwater Management Bylaw, Wetlands Protection Bylaw, and the Wetlands Regulation:

- Bylaw Chapter 153
- Bylaw Section 181-2 (Jurisdiction)
- Bylaw Section 181-8(C)(1) (Work in Riverfront Area)
- Regulations 4.2.1 (Work in 25' No Disturb Buffer Zone)
- Regulations 4.3.1 (Work in 25-50' Buffer Zone)
- Regulations 4.4.1 (Work in 50-100' Buffer Zone)
- Regulations 7.13 (Alternatives Analysis)
- Regulations 7.14.2 (Functions and values)
- Regulations 7.15 (Construction Sequence and Schedule)

### ***Commission's Recommendations***

1. The Applicant should be required to provide further clarification as to which sections of the Stormwater Management Bylaw that they are requesting waiver from as a blanket waiver from the entire Bylaw is not recommended.

*Please note that the Stormwater Management Bylaw includes, among other things, the MS4 stormwater permit and the Stormwater Utility Fee. Waiver from the MS4 stormwater permit would put the Town at undue risk by not being in compliance with the required permit, and the Town could be held liable for fines or other enforcement action by the EPA for any illicit discharge from the Project. Waiver of the Stormwater Utility Fee is not in the best interest of the Town. This would not be equitable as all Town residents, the Town, State, and Federal governments, and businesses, both for-profit and non-profit, are required to pay the Stormwater Utility Fee. As the Town has one of the highest requirements for phosphorus removal from water resources, proper stormwater management and payment of Stormwater Utility Fees are imperative to meet EPA goals. The Town of Franklin must pay the EPA \$30.5 million over the next five years. Allowing exemption from the Stormwater Utility Fee is not in the best interest of the Town meeting these required goals.*

2. The Applicant should be required to submit an Abbreviated Notice of Resource Area Delineation ("ANRAD") to the Commission to confirm the Resource Area boundaries and designations on the Property during normal environmental conditions, as well as any subsequent Notice of Intent ("NOI").

*Due multiple Resource Areas including riverfront, bank, land under water, bordering land subject to flooding (BLSF) BVW, IVW and stream crossing, proper delineation will assist with confirmation of impact areas and planning of mitigation and replication. Following the ANRAD and NOI process allows the Commission to*

*maintain oversight of the Project in order to best protect the Town's natural resources and interests.*

3. The Project should be subject to peer review by BETA in connection with the submission of an ANRAD and any subsequent Notice of Intent ("NOI").

*Note that based on the nature of the Project and the Resource Areas located on the Property, peer review would typically be required by the Commission were the Project to proceed through the ordinary permitting process rather than as a Friendly 40B project.*

4. The Project, as presented, will be working within the 200-foot riverfront and bank resource areas. Due to the nature of expansive pre-disturbed riverfront and bank resource areas on site, the Project plans presented to the Commission include extensive restoration of said pre-disturbed riverfront area. The Commission will work with the Applicant to review variance requests to work within the stated riverfront and bank resource areas, taking into consideration the amount of restoration to be completed.
5. The Applicant should minimize disturbance within 25' of any on-site Resource Areas (i.e., the 25' "no touch" zone under the Wetlands Regulation) to the greatest extent practicable, and should consider opportunities to minimize and avoid impacts to the intermittent stream, BVW, and on-site IVW.

*Note that while work within 25' of a Resource Area is permitted under the Act, the Wetlands Regulation establish a 25' "no touch" buffer zone, within which no disturbance is permitted without the issuance of a variance pursuant to Section 5 of the Wetlands Regulation.*

6. To the extent the Applicant proposes to fill or otherwise permanently disturb IVW, the Board should consider requiring additional wetland replication on the Property to the extent practicable. To be noted, the Applicant has already suggested replication for impacted IVW.

*Note that IVW are subject to regulation under the Wetlands Bylaw as freshwater wetlands, but not under the Act. Therefore, while a proponent who proposed to fill IVW would typically be required to provide replication on a 2:1 basis pursuant to Section 7.14 of the Wetlands Regulation, a proponent only subject to the requirements of the Act would not be required to provide for any wetland replication in respect of filled IVW.*

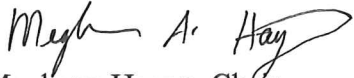
7. The Commission is willing to waive Regulation 7.13 as the Alternatives Analysis required by the Act is sufficient for this project.
8. The Applicant should be required to submit a Wetlands Functions & Values analysis as required by Regulation 7.14.2. This specific requirement will allow the Commission to assess impacts of onsite wetlands, including IVW as regulated under local Bylaw. Understanding these elements will aid in the preparation of replication planning.

Franklin Zoning Board of Appeals  
February 8, 2024

- 9 The Applicant should be required to submit a construction sequence and schedule to the Conservation Agent in accordance with Section 7.15 of the Wetlands Regulation.

Please feel free to reach out to me with any questions or to discuss any of the above recommendations further.

Sincerely,



Meghann Hagen, Chair  
On Behalf of the Franklin Conservation Commission

Cc: Bryan Taberner, Director of Planning & Community Development  
Amy Love, Town Planner  
Breeka LI Goodlander, Conservation Agent/Natural Resource Protection Manager



Tel. (508) 528-2323  
Fax. (508) 520-4912

Town of Franklin  
Fire Department  
40 West Central St.  
Franklin, Massachusetts 02038

James G. McLaughlin, Fire Chief

Joseph S. Barbieri, III, Deputy Fire Chief  
James P. Klich, Deputy Fire Chief

March 25, 2024

Franklin Town Council  
Attn: Chairman Tom Mercer  
355 East Central St.  
Franklin, MA 02038

Dear Chairman Mercer,

The Franklin Fire Department has reviewed the latest site plan for the proposed development at 444 East Central St. The developer has provided access roads to make sure that we are able to place our apparatus on at least three sides of each apartment building. The roads around the apartment buildings will be asphalt and are at least 20 feet wide to accommodate our trucks. They have also added a secondary designated fire access road to the project to ensure that we have more than one way into the development. By providing us proper access they have met our requirements.

Please feel free to contact me if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "J. Barbieri III".

Joseph S. Barbieri III, Deputy Fire Chief

*The Franklin Fire Department is committed to providing the highest level of public safety services for our community. We safely protect lives and property through fire suppression, training, emergency medical and transportation services, disaster and crisis management, fire prevention and public education.*



# TOWN OF FRANKLIN

## DEPARTMENT OF PUBLIC WORKS

257 Fisher Street  
Franklin, MA 02038-3026

February 9, 2024

Mr. Carlton Quinn, P.E.  
Civil Engineer  
Allen & Major Associates, Inc.

VIA email: [cquinn@allenmajor.com](mailto:cquinn@allenmajor.com)

Subject: Water and Sewer Service for Central Street Residences at 444 East Central Street

Dear Mr. Quinn:

As requested, the Town of Franklin Department of Public Works has reviewed the availability of water and sewer service for the proposed 265 unit residential housing complex to be located at 444 East Central Street in Franklin, MA. Quinn provided an estimated average water usage of 48,180 gallons per day (gpd) based on 438 bedrooms and the Title V criteria.

Based on the estimated flows, the Town's water system has the capacity to serve the proposed development via an existing 12-inch diameter water main in East Central Street. A full evaluation of domestic pressure and available fire flow at this location is the responsibility of the proponent.

The Town's sewer system is also located at this location on East Central Street, however, due to the proximity of a downstream sewer lift station and force main, the sewer system will need to be evaluated for capacity and the potential need for on-site temporary storage.

This letter confirms that water and sewer service is available at the street at the proposed development. It does not constitute an approval of the project from the Franklin DPW or any other Town department. The proponent must obtain and pay for all required permits and approvals from the Town of Franklin prior to construction. If you have any questions, feel free to contact me at 508-553-5500.

Sincerely,

Michael Maglio, P.E.  
Town Engineer

cc: Mr. Jamie Hellen, Town Administrator  
Mr. Robert Cantoreggi, DPW Director  
Mr. Doug Martin, Water & Sewer Superintendent

# TAG Central, LLC

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February 19, 2024

*Via E-mail:* [alove@franklin.ma.us](mailto:alove@franklin.ma.us)

Ms. Amy Love, Town Planner  
Franklin Planning & Community  
Development Town of Franklin  
355 East Central Street  
Franklin, MA 02038

**Re:** Response to Comment Letter from Department  
of Planning and Community Development (DPCD) Dated 1/30/24  
**Applicant:** TAG Central, LLC  
**Project/Property:** Central Street Residences/444 East Central Street, Franklin, MA

Dear Ms. Amy Love and Members of the Department of Planning and Community Development (DPCD),

In response to the 1/30/24 DPCD Letter and the 1/22/24 Planning Board Meeting, the Applicant provides the following responses organized and formatted pursuant to the 1/30/24 DPCD Letter accompanied by supporting documentation including a revised Conceptual Site Plan.

- **DPCD Comment:** Turn the clubhouse main entrance towards the street and provide parking behind the building.
  - **Applicant Response:** The clubhouse, housing the community's amenities and essential operating functions such as property management, leasing and mail/package delivery, should be central to the residential buildings and away from street traffic. As such and due to site restrictions related to the wetlands, the clubhouse must remain in its current configuration proximate to the residential buildings with necessary parking provided for employees and visitors and an essential turnaround function in front of the clubhouse.
  
- **DPCD Comment:** Consider the 56-unit building located on the east side and closest to an abutter be three-stories.
  - **Applicant Response:** The site plan has been revised accordingly. Not only has this building been reduced to three-stories, but it has also been relocated towards the center of the site resulting in an increased setback to the easterly abutting properties.
  
- **DPCD Comment:** Apply with Design Review.
  - **Applicant Response:** As discussed at the 1/22/24 Planning Board Meeting, Design Review is not applicable to the project given its status as a Friendly 40B and resulting jurisdiction under the Zoning Board of Appeals (ZBA). Should the project progress to the ZBA level, Applicant will produce further detailed, developed design plans including renderings, perspectives, and complete building elevations. Please note Applicant has submitted typical building elevations contained in the Preliminary Plans dated 12/20/23.



- DPCD Comment: Use elevation on the site to hide the buildings or ways to make the buildings look smaller, by providing an elevation study.
  - Applicant Response: While detailed grading plans have yet to be developed for the project, the vast majority of the site is flat featuring minor topographical changes which affords flexibility in grading the site and locating the proposed buildings. The four-story buildings have been strategically located to be shielded both from the residential abutters to the east and from the perspective of East Central Street. As part of the site plan improvements made, the closest residential building to Central Street, which remains at three-stories, has been pulled 110' further inbound to the site from Central Street causing the building to appear smaller from the street. Please note Applicant has submitted typical building elevations contained in the Preliminary Plans dated 12/20/23.
  
- DPCD Comment: Provide a shadow study for the four-story building to see the shadow cast onto the abutters.
  - Applicant Response: The four-story building in question has been reduced to three-stories. Furthermore, this building has been relocated internal to the site resulting in an increased setback from the easterly abutters. Both of these improvements significantly mitigate the existence of shadows cast onto the abutters.
  
- DPCD Comment: Suggested parking requirement of 1.35 seems low, and 1.5 would seem a little better.
  - Applicant Response: Site plan has been updated to increase the parking ratio to 1.45 spaces/unit. Multiple factors are weighed to determine the appropriate parking count including 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 comparable parking analysis, specifically, a review of parking demand ratios at existing comparable communities in similar MA suburban settings (ie. the number of parking spaces actually utilized divided by the number of units at the subject property). Further, Traffic Engineer, VAI, has reviewed the proposed parking ratio and verified it “is within the range of values documented by the ITE for a multifamily residential community in a similar setting” (Preliminary Transportation Impact Assessment, Page 3). As such, Applicant is confident the proposed parking ratio is sufficient to service the community.
  
- DPCD Comment: Look to add more 3 story buildings and less 4 story buildings, decreasing the unit count.
  - Applicant Response: The site plan has been updated accordingly. One of the four-story buildings has been reduced to three-stories. This building has also been relocated internal to the site rather than along the easterly property line which results in a greater setback to the abutters.
  
- DPCD Comment: Drop off and pick area for bus/GATRA
  - Applicant Response: As a result of a 2/5/24 phone call with Dr. Robert Dutch, the Interim School Business Administrator of Franklin Public Schools and members of his staff, the Applicant has confirmed the current proposed site plan is sufficient for school bus drop-off and pick-up. School bus drop-off/pick-up will occur along East Central Street in front of/proximate to the site whereby current school bus routes exist. The site plan provides unimpeded pedestrian connections to this location via sidewalks stemming from the residential buildings to East Central Street.

## TAG Central, LLC

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- DPCD Comment: Show the free-standing garages on the concept plan.
  - Applicant Response: The site plan has been updated accordingly to illustrate the proposed free-standing garages.
- DPCD Comment: What is the total impervious coverage amount?
  - Applicant Response: The total proposed impervious coverage is +/- 282,391 square feet which equates to an impervious coverage ratio of +/- 43.2%.

Respectfully,



A.J. Alevizos of  
TAG Central, LLC