

Town of Franklin

355 East Central Street
Franklin, Massachusetts 02038-1352



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OFFICE OF THE TOWN ADMINISTRATOR

April 10, 2024

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

Re: 121 Grove Street

Dear Mr. Hunchard and members of the ZBA:

I am writing to express my sentiments on the proposed development at 121 Grove Street. I sincerely hope the ZBA will take my comments under consideration in order to properly mitigate impacts that do not necessarily show up on paper. I rarely ever get involved in permitting issues before an independent board, as I don't believe that is my usual place to intervene in any permitting matter. However, as I have been involved in this project since its conception, I wanted to relay my concerns on the impacts to the Grove Street Corridor. I have concerns for the safety and size of the project and wanted to ensure the board was aware prior to closing any public hearing or making any final decisions.

It is important to note that through the Town's "Friendly 40B process", the Planning Board did not endorse this project, as proposed. The Conservation Commission is still reviewing this project and has also opined on significant concerns about the sustainability of the project site due to the extremely high water table, networks of wetlands and ecological impacts of this development. The Town Council rejected the Local Initiative Program (LIP) proposal by a 4-5 vote, thus not supporting the project. The proponent took minimal feedback from the public committees that reviewed the project and incorporated very few ideas that were asked of them during these public discussions. Unfortunately, the project proponents have not worked with town officials, town boards, or stakeholders on very many of our concerns. Hence, the nexus of my letter to you.

Concern #1: Size of the project

The proposed housing project is too large. At 330 units, this project would be the largest housing development in town and will set the tone for future development being this size or, most likely, larger.

The Town of Franklin has met its Statutory Minima set forth in 760 CMR 56.03(3) as our SHI Eligible Housing (SHI) units exceed 10 percent of our total year round housing units. Even though Franklin has obtained the ten percent affordable housing level, Town staff continue to work with property owners to permit additional affordable units when the proposed units are in the appropriate location, and when a project appears to be in the best interest of Franklin's residents. I am concerned that this project is in the wrong location, and its large size is not in the best interest of Franklin's residents because it will signal a willingness to build larger buildings. As you well know, an overwhelming majority of citizens in town are concerned about too much development and have voiced this at numerous meetings and hearings on proposed development.

We are trying to manage the balance between supporting needed housing projects and considering the concerns residents all over town are having. The potential impacts from this proposed project, as well as the impacts from several other approved and proposed housing projects, are substantial.

With so many citizens upset or concerned about any new construction, especially the spread of apartments, a lower unit count is needed. If ZBA approves the proposed project, I request approval of a smaller project with a unit count preferably no larger than the Town's largest apartment complex, the 280 housing units at the Westerly. This would help to ensure the Town's apartment complexes do not get exponentially larger.

As mentioned above, the Town's subsidized housing inventory currently exceeds 10% of our total year round housing units. But in addition, the proposed project is considered a "Large Project" per 760 CMR 56.03(3)(a), as it is more than 300 housing units (or equal to more than 2% of all year round housing units in Franklin). The proposed 330 units represent over 2.6% of the Town's current year-round housing units (12,551 per 2020 U.S. Census).

Given the Town has achieved its Statutory Minima (per 760 CMR 56.03) the ZBA can vote to deny this Comprehensive Permit, or grant the Comprehensive Permit with conditions. If the ZBA does vote to approve the Comprehensive permit, please do so with a lower unit count and with conditions.

Concern #2: Appropriate Traffic Mitigation

The traffic studies for this project were just completed a couple of months ago and were never shared with my office to discuss how this project may affect the overall conditions on Grove Street. The mitigation package suggested by the applicant meets none of the actual needs of the corridor. Grove Street has been zoned as an industrial corridor with industrial scale traffic, such as UPS trucks, delivery trucks, 18-wheeler trucks and more. With the introduction of 330 units of housing, the town, through its ZBA, is now considering making Grove Street into a combination Industrial/Residential corridor. This change in character is very noteworthy and will forever change the nature and flow of traffic and people on that street. This is a substantial change from the current norm where trucks and cars use this street as a cut through and as a major delivery corridor for business. The Grove Street Corridor is one of the Town's major employment centers with many busy manufacturing, warehouse and distribution facilities.

The road is used as a cut through for a lot of traffic. People speed through these areas all day. In fact, when we did a site visit with the proponents, most of the attendees, including the staff at MassHousing, clearly noted the volume and pace at which traffic flew by the 121 Grove Street site. It is incumbent on the proponent to provide appropriate traffic-calming mitigation for the fact that the ZBA is considering making this street a combination industrial/residential street. The proponent has even promoted the fact this site is near the SNETT Trail, State Forest, Breweries and other retail. But once you live at 121 Grove Street, you will be walking in the street to these places with major public safety concerns for those residents and others who want to safely navigate down this road. As far as adults and children residing there, Beaver Pond Recreation Area is a close walk from 121 Grove Street without sidewalk access. I sincerely hope the ZBA is sensitive to this fact and requires proper mitigation traffic calming measures to ensure future residents at that site will have safe measures to get to those places and also assist the town in slowing down traffic.

Town Engineer, Mike Maglio, commented that in order to provide for safer pedestrian and bicycle access, consideration needs to be given to traffic calming along this section of Grove Street, possibly in the form of median islands and turn lanes, as well as providing for greater non-vehicular connectivity. The proponent's traffic consultant responded that the addition of turn lanes would allow through vehicles to maintain or increase speeds as vehicles pull into turn lanes to wait for a gap before turning into the driveway and that turn lanes themselves were not warranted. Given that, raised median islands without the added turn lanes should still be installed as a traffic calming measure to reduce speeds in this area of the proposed 330 residences.

Additionally, at the March 28th hearing, the proponent indicated that although they show the

multi-use path along the frontage of their property, they show that for illustrative purposes only and they do not intend to construct it as part of the project. Given the scope of the project and the need for pedestrian access, the proponent should be required to construct this portion of the multi-use path along their frontage as part of the overall project. We estimate the cost for the Town to construct this section to be around \$600,000, whereas the developer could most likely complete this at a much more economical rate, whereas they are not restricted by public procurement laws and prevailing wage rates.

Town Engineer, Mike Maglio, has prepared a proper mitigation estimate for appropriate road improvements, traffic calming to slow down all traffic on Grove Street and to provide a proper, safe avenue to allow for residents at 121 Grove Street to access the community amenities that promote safe pedestrian access. These investments help their future customers! The estimate broken down here:

121 Grove Street - Proposed 40B Residential Development

<u>Proposed Mitigation</u>	<u>Distance (in feet)</u>	<u>Estimated Cost</u>
Traffic Calming Median Islands along Site Frontage	700	\$150,000
Multi-Use Trail:		
From Old Grove St to the Site	4400	\$2,000,000
Along the Site Frontage	1200	\$600,000
From the Site to Beaver St	750	\$400,000
Along Beaver St to Beaver Pond Beach and Playground	2150	<u>\$1,300,000</u>
	Total	\$4,450,000

Concern #3: High Groundwater levels and wetlands preservation

The site is very wet with high groundwater. Portions of all five buildings and associated amenities are proposed within the 100-foot Buffer Zone to resource areas, with amenities such as the communal pool requiring the partial fill of Bordering Vegetated Wetland. Building #4 will specifically require the complete fill of a 2,015 square foot Isolated Vegetated Wetland. While the proposed project is definitely permissible, significant mitigation and stormwater design is required to ensure site stabilization, resource area protection, hazard mitigation, and climate resilience. As Franklin continues to be victim to increased storm surges and flooding concerns, protection of wetland resource areas that function as stormwater receptors, and construction that utilizes optimized engineered stormwater designs will be ever more critical. The increased impervious area near sensitive resources, in lieu of vegetative cover, and pan ultimate

stormwater infrastructure can only stand to exacerbate these concerns. It is to the Applicant's interest and Town's benefit that the site be designed to fully capture, retain, and infiltrate stormwater while maintaining the integrity of its resource areas. The high groundwater at this site is a cause for concern and has yet to be mitigated. The original submission of the stormwater design did not meet current stormwater standards and was not in the best interest of the onsite resource areas. The Applicant has since provided revised designs that are in the process of being reviewed under the Commission.

It is worth noting, as well, that this site has historically functioned as a farm with full vegetative cover. The removal of this vegetative cover and root structure can completely destabilize the site and alter the function of the resource areas if not mitigated appropriately.

Positive aspects of the project

Despite the concerns above, there are many reasons this is a worthy project, including:

- 25% of all units will be deeded affordable units in perpetuity. Deeded housing units are the ONLY 100% full proof way to protect housing units from being sold at market rates. These units will be preserved for years to come as actual affordable housing.
- The modern design and quality is a very attractive product for younger families, which is something the town needs for a myriad of reasons.
- The unique location is both a negative, but it is also a positive with the rural character of that site being a former farm next to a State Forest provides great recreational amenities for prospective tenants (if pedestrians can access those safely with proper mitigation); and
- A builder with a proven track record in Franklin. The Dean Avenue project was a huge success and we would expect the same from Fairfield in this instance as well.

I would note that Fairfield will likely sell the permitted project to another entity before or after construction. It is imperative the ZBA properly condition this project to significant mitigation in order to make sure whoever manages this parcel that there are conditions that protect the community and the future residents of that area.

Thank you for all of that you do for the Town of Franklin. I appreciate your consideration of my comments in the final issuance of a permit.



Warm regards,

Jamie Hellen

Town Administrator

CC: Franklin Planning Board,
Franklin Conservation Commission
Franklin Town Council
Mass Housing