

# Town of Franklin

355 East Central Street  
Franklin, Massachusetts 02038-1352



Phone: (508) 520-4949  
[www.franklinma.gov](http://www.franklinma.gov)

OFFICE OF THE TOWN ADMINISTRATOR

May 31, 2024

**To:** Town Council  
**From:** Jamie Hellen, Town Administrator  
Amy Frigulietti, Deputy Town Administrator

**RE: Resolution 24-16: 444 East Central Street Local Initiative Program (LIP): Friendly 40B**

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The Council will consider its second Local Initiative Program (LIP) application in the past year. The first was 121 Grove Street and now 444 East Central Street, otherwise known as "Stobbarts" to reflect the project location at the Nursery.

This legislation originally appeared on the agenda for the April 10th Town Council meeting. After presenting, the project proponent (The Alevizos Group) received significant feedback from citizens expressing their concerns with the project and it was decided that the Council would table their vote to a future date. In the meantime The Alevizos Group has worked with Town staff to address some of the citizens' concerns by having a two hour neighborhood meeting in May to help educate the abutters, address some of concerns and questions and to further discuss the project.

Additional information is included in the April 5, 2024 dated memo from Jamie and the presentation materials from The Alevizos Group which are included in the agenda packet for the June 5th Town council meeting.

Please let us know if you have any questions.

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## OFFICE OF THE TOWN ADMINISTRATOR

April 5, 2024

**To:** Town Council  
**From:** Jamie Hellen, Town Administrator  
Amy Frigulietti, Deputy Town Administrator

**RE: Resolution 24-16: 444 East Central Street Local Initiative Program (LIP): Friendly 40B**

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The Council will consider its second Local Initiative Program (LIP) application in the past year. The first was 121 Grove Street and now 444 East Central Street, otherwise known as "Stobbarts" to reflect the project location at the Nursery.

The project proponent has included a powerpoint presentation that they will give at the meeting. They have also presented the most current plans that are proposed.

The Planning Board and Conservation Commission have both held hearings on the project. As a reminder, their reviews are non binding and not legally part of the "Friendly 40B" process, but as part of Franklin's process, we have asked them for their review as they have greater expertise that may help the community make more informed decisions. Both boards unanimously support the project. The project proponent has received feedback from both boards and staff and incorporated much of that feedback into the project. Board, Committee and staff letters are included in the packet.

Quick project overview:

- 265 total rental units; 67 permanently deeded affordable.
- All units count toward the Town's SHI Index to ensure we maintain our 10% affordable housing stock to prevent "unfriendly 40B's" from occurring.
- Elimination of all invasive species, introduction of native species, walking trails and preservation of the area in the rear of the parcel for our wellhead protection district.
- Location is within walking distance to all day-to-day retail needs like shopping centers, pharmacies, coffee shops, retail, restaurants and other amenities. It is also less than one mile from Downtown and the train station with excellent sidewalks on both sides of the road for pedestrian travel.
- While mitigation will be firmly permitted by the ZBA, the proponent has signaled a willingness to work with the town on potential investments toward studies to fix the King Street/140 Intersection AND possibly work with us on funding a GATRA "Route 140" bus route. Staff are far from finalizing these specifics, but based on the results of tonight's hearing, our staff will continue to work with them on these initiatives. They have been very receptive to these ideas.

I have also included two recent articles from the past couple of weeks relating to home sales and the troubling trends the state is seeing from a lack of housing. The trends are becoming even more challenging with extremely high housing costs, a lack of housing inventory, a microscopic statewide housing vacancy rate of almost 1.5%, a lack of affordable housing and now a study showing ¼ of all those young professionals are moving away from Massachusetts due to the high cost of living.

Staff are keenly aware that new development, in general, in town is not popular. We have all heard the complaints and concerns. However, at some point, housing needs to be created in order for our state, and community, to stay competitive. The project proponent and staff are committed to working with the developer to mitigate the concerns of the neighboring residents. In fact, the proponent is aware of the concerns and has worked to address them to the best of their ability and you can see those concessions and comments in the letters and presentation. We hope the feedback given can be constructive to mitigate those concerns, as opposed to obstructionism to prevent the project from moving forward.

May 24, 2024

*Via E-mail:* afrigulietti@franklinma.gov

Chairman Tom Mercer  
Town Council  
Town of Franklin  
355 East Central Street  
Franklin, MA 02038

**Re:** Response to Comments from 4/10/24 Town Council Public Meeting and 5/20/24 Neighborhood Meeting  
**Applicant:** TAG Central LLC  
**Project/Property:** Central Street Residences/444 East Central Street

Dear Chairman Mercer and Councilors,

We appreciated the helpful feedback during the 4/10/24 Town Council Public Meeting from the Council and residents of Franklin. Since then, we attended a Neighborhood Meeting on 5/20/24 where we met and discussed the Project in more detail with residents and answered their questions and comments. We have prepared a list below of the Town's comments from both the Council Meeting and Neighborhood Meeting followed by our responses to each comment. All comments have been carefully considered, including conducting follow-up meetings with various Town Departments to ensure our responses have been properly coordinated with the Town. The Applicant also went ahead with preparing the attached rendering of the Project from the perspective of E. Central Street so the Town can form a better understanding of the aesthetics of the Project once it is completed. Please note while we have done our best to respond to all comments raised to date, the intent of this initial review process is to provide an introduction to the Project through initial conceptual plans and studies, and gain preliminary feedback. A detailed review of all aspects of the Project will occur at a later date once fully engineered plans and studies are available during the rigorous permitting process to follow.

We look forward to attending the next Town Council Public Meeting where we hope to continue moving this exciting redevelopment opportunity forward to the next stages of the approvals process alongside the Town.

- **Comment: Concern whether the public wellhead offsite will be adversely impacted by the Project.**
  - **Response:** The Applicant is aware the subject Property is located in a Water Resource Overlay District, specifically, Zone II, which dictates specific requirements for development designed to protect the water supply and prohibit any use that would have an adverse impact. Per the Town's Water Resource Districts Map, the Zone II overlay encompasses a substantial amount of property in Franklin including where a recent, similar development has been constructed. The Applicant's Civil Engineer, Allen & Major Associates, has thoroughly reviewed the requirements of the Water Resource District in Chapter 185 Section 40 of the Town's Zoning By-laws to confirm all aspects of the redevelopment project comply with the regulations of Zone II.

Furthermore, the Project will result in substantial improvements over existing conditions relating to stormwater management and ultimately water quality. Existing stormwater conditions present unmitigated, direct surface runoff directly into the ground without any infiltration system whereas the redevelopment will provide a modern stormwater management and infiltration system in compliance with MassDEP Stormwater Management Standards. The Conservation Commission will conduct a full review of stormwater and require specific landscaping species be incorporated to further improve infiltration and ultimately water quality. In short, all parties agree that the redevelopment project will improve both the ecological and stormwater conditions of the site.

- **Comment: Further explanation needed for the Applicant’s waiver requests, specifically, as it relates to the Town’s local Stormwater Management By-law.**
  - **Response:** As is customary for projects permitted under Chapter 40B, necessary waivers are requested and often granted. As for the stormwater waiver request specifically, the Applicant must meet all statewide requirements related to stormwater including MassDEP Stormwater Guidelines which are in this case more stringent than the local stormwater requirements overall. The Applicant has reviewed and discussed the stormwater waiver request with the Town’s Water and Sewer Department and Conservation Agent and the Applicant confirms the Project is not seeking a waiver from either the Stormwater Utility Fee nor the MS4 Permit requirement. Please note all the preliminary waiver requests submitted to date were reviewed with the Planning Board and Conservation Commission, both of which voted unanimously to support the Project. That said, waivers will be thoroughly reviewed and vetted once again in the extensive permitting process to come.
  
- **Comment: Concern about fiscal impacts of the Project.**
  - **Response:** The Applicant’s Planning and Fiscal Impact Consultant, Mark Fougere, AICP, has updated the Project’s estimated fiscal impacts to incorporate recent updates to the property assessment data just released for FY 2024 and other ancillary revenue. Based on review of the latest assessment for like-kind, comparable communities in Franklin, the redevelopment is anticipated to generate approximately ~\$826K in annual property tax revenue to the Town. In addition to property taxes, there are other ancillary revenue generators such as vehicle excise taxes, which are projected to total ~\$60K annually, CPA surcharge estimated at ~\$16K annually, and EMS calls projected to total ~\$45K. In total, the Project is estimated to generate nearly ~\$950,000 in revenue per year to the Town.

	Units	Assessment/Unit*	Est. Assessment
Project's Estimated Assessment	264	\$265,434	\$70,074,576
Property Tax Rate	\$11.79		
<b>Estimated Property Taxes</b>			<b>\$826,179</b>
<b>CPA Surcharge 2%</b>			<b>\$16,524</b>
<b>Vehicle Excise Tax**</b>			<b>\$59,252</b>
<b>EMS Service Calls Revenue***</b>			<b>\$45,649</b>
<b>Total Estimated Revenues</b>			<b>\$947,603</b>

\*Represents the average of the comparable properties, Westerly and Station 117

\*\*avg. vehicle tax of \$175/yr per Franklin Tax collector. Assumes 5% parking vacancy.

\*\*\*avg. of 46 EMS calls per year based on comparable properties at \$992.36/call per Fire Dept.

There are other less quantifiable revenue generators for the Town such as increasing revenue for surrounding small businesses, increasing market values for local residential and commercial

property owners, and creating jobs in Town through both the construction and operation of the new community. The Project will also help with attracting and keeping young professionals and other qualified workforce in Town, which is a major problem across the State broadly. This is accomplished by creating much-needed rental housing which increases supply and, in turn, eases rents making housing more affordable overall. In addition, the Project will create 66 affordable housing units which may be specifically designated/prioritized for local Franklin residents through Local Preference\* (\*up to 70% of the affordable units can be set aside for Franklin residents).

Regarding school costs, the Applicant met with the School Business Administrator of Franklin Public Schools to better understand and clarify the incremental school costs contributed by the Project. Based on Town Appropriations, the gross per student cost is approximately \$17,375; this expense includes many costs that have no direct connection with enrollment including school building expenses and administration personnel. Using this gross per pupil cost to estimate future school costs has no basis in projecting budgetary increases from new students. Given enrollment has steadily declined over the years, with this trend expected to continue based on School Department demographic studies, the school system has the capacity to accept new students. New students entering the school system are replacing empty seats without, in most cases, incurring additional costs. A starting teacher, with benefits, ranges in cost between \$80,000 – \$100,000/year. Should additional staff be required as a result of this project, actual costs will be significantly less than the gross per student cost noted above.

Overall, in the experience of the Applicant's Planning and Fiscal Impact Consultant, communities similar to the proposed Project consistently deliver net fiscally positive results for the Town, typically by a substantial margin.

- **Comment: Concern that if the Project is ultimately approved, the development may not be built due to an inability to capitalize and/or phasing construction over a lengthy period which would result in the property remaining an eye soar and a blight.**
  - Response: The Applicant is investing substantial resources into pursuing approvals for the Project and would not be doing so if we did not have full confidence the Project will ultimately be capitalized. While a detailed construction schedule has yet to be completed, the Project is intended to be constructed all at once as quickly as possible, delivering units for occupancy upon the completion of each building. The longer the development takes to complete, the less economic it becomes due to ongoing, accruing capital costs. As such, the Applicant is incentivized to complete construction and transform the current blighted state of the Property into a first-class project as soon as possible.
  
- **Comment: Can the Project help facilitate a connection between the Town Forest Recreation Area's walking trail network and the new conservation land to be conveyed to the Town by the Applicant, expanding an important public open space for the Town as well as improving pedestrian connectivity for the Project?**
  - Response: As previously requested by the Town, the Applicant is willing to convey a portion of the southerly side of the Property that is outside the development limits to the Town. Since this land is near the Town Forest, the Town could potentially utilize it to expand the Town Forest Recreation Area or as conservation land. The Applicant met with the Conservation Commission and Water & Sewer Department to analyze the potential for the Town to expand

the public walking trail network and the Town Forest Recreation Area overall. Based on that preliminary discussion, there appears to be a potential opportunity to expand the Town Forest and its walking trail network by utilizing the land to be conveyed. The Applicant has prepared the attached concept to illustrate this (Exhibit A). Please note this has been prepared for conceptual illustration purposes only to advance further discussion and feasibility analysis. The Applicant is committed to supporting the Town with this endeavor in a variety of ways during the permitting process to follow to confirm feasibility and help make this opportunity a reality. The expansion of the Town Forest and its trail system would not only benefit the Project by providing additional pedestrian connectivity, but would also benefit the public by expanding an important open-space amenity commonly used in Town by residents as well as the youth who attend the local Camp Haiastan, which abuts the Town Forest.

- **Comment: Further clarification requested on the reasoning behind not relocating the clubhouse closer to the street.**
  - **Response:** We acknowledge further detail is needed to clarify the previous response provided in our letter dated 2/19/24 to the Planning Board and at previous meetings regarding relocating the clubhouse closer to the street. It is not possible to relocate the clubhouse closer to E. Central Street due to the location of wetlands onsite, specifically, the stream which runs down the center of the property. As illustrated by the graphics attached as Exhibit B, there is a small section of the stream in front of the clubhouse near the street which cannot be built or improved upon as confirmed with the Conservation Commission/Agent. The current site plan accounts for this constraint by designing around it, keeping the stream intact in its current condition, which has been coordinated with the Conservation Commission/Agent. As such, the clubhouse and associated parking and turnaround area must remain in its current configuration. The Applicant believes the current location is better from both a design and functionality standpoint anyways; the clubhouse, housing the community's amenities and essential operating functions such as property management, leasing and mail/package delivery, should be central to residents and positioned safely away from street traffic.
  
- **Comment: A resident asked whether a fence could be incorporated into the Project near the segment of the easterly property line that abuts the properties at the end of Red Gate Lane.**
  - **Response:** The Applicant is happy to consider incorporating a fence at this location during the comprehensive permitting process in the coming months.
  
- **Comment: Concern about traffic impacts contributed by the Project.**
  - **Response:** It is important to note that a comprehensive Transportation Impact Assessment will be prepared for the Project that will be subject to peer review by a third party, independent Traffic Engineer. That said, while we do not have all the data necessary to understand the full scope of traffic impacts yet and adequately address all of the Town's concerns, we wanted to provide some additional context as to, 1) the Project's initial anticipated traffic volumes and associated impacts and, 2) outline the opportunities for improvement strategies that can benefit the Town.
    - 1) Initial Assessment of Traffic Volumes/Impacts:
      - Without adjustment (reduction) to account for the use of transit, pedestrian/bicycle use or residents that work-from-home, the Project is predicted to generate approximately 123 vehicle trips during the weekday

morning peak-hour, 126 vehicle trips during the weekday evening peak-hour and 105 vehicle trips during the Saturday midday peak-hour;

- Based on the latest (2022) U.S. Census data, approximately 19 percent of residents of the Town of Franklin reported that they worked from home. Assuming that a similar percentage of residents work-from-home, the Project would generate between 82 and 102 vehicle trips during the weekday and Saturday peak hours;
- For comparison, an as-of-right retail development of 200,000 sf would generate 252 vehicle trips during the weekday morning peak-hour, 930 vehicle trips during the weekday evening peak-hour and 1,126 vehicle trips during the Saturday midday park-hour, or up to 10 to 11 times the number of trips that are expected to be associated with the Project without the benefit of a comprehensive mitigation program;
- The Project will be less impactful than a comparable size commercial development located on the same site as trips associated with residential uses are dispersed over the day and not concentrated during the same peak hours as those of the existing commercial uses along the Route 140 corridor;
- No safety deficiencies were noted with respect to the motor vehicle crash history along the Route 140 corridor in the vicinity of the Project;
- The predicted traffic volume increase along the Route 140 corridor is expected to be less than 10%, which is within the range on normal daily traffic volume fluctuations and would not be expected to result in a significant impact (increase) on motorist delays or vehicle queuing over existing or anticipated future conditions without the Project, and;
- The Project is ideally situated to promote pedestrian trips and the use of transit given the close proximity (1 mile) to the Franklin MBTA Station and the advancement of specific improvements such as the new sidewalk connecting the Project to the retail opportunities to the west and working with the Town to establish the GATRA bus service along Route 140.

## 2) Improvement Strategies

- Grant Opportunities – The creation of affordable housing provides the Town opportunities for state grant programs which are typically in the order of \$2 million under the HousingWorks and/or MassWorks Infrastructure Programs to complete potential improvements along Route 140 and Chestnut Street;
- Mobility – The missing sidewalk connection in front of the Project site along the south side of Route 140 will be constructed and/or funded by the Applicant and will connect the Project and residential areas to the east to the recreational and shopping opportunities to the west;
- Transit Access – The Applicant will work with the Town for the establishment of GATRA bus service along Route 140 to provide connectivity to shopping opportunities, Dean College, Town Center and the Franklin MBTA Commuter Rail Station, which is located within ~1-mile of the Project, and;
- Capacity & Traffic Flow Improvements – Applicant is willing to prepare a Conceptual Design Report to assist the Town to advance the formal design



and construction of improvements at the Route 140/Chestnut Street/ King Street intersection, and implement traffic signal timing improvements.

In summary, the Project will result in the creation of additional trips along the Route 140 corridor; however, the increase in traffic is within the range of normal daily traffic volume fluctuations and the associated impacts will be far less than those that would be attributable to a comparable size as-of-right commercial development. The creation of housing at this location, particularly affordable housing via the collaborative Friendly 40B approach as opposed to an as-of-right commercial development, provides opportunities for the Town to advance improvements along the Route 140 corridor to address existing traffic conditions.

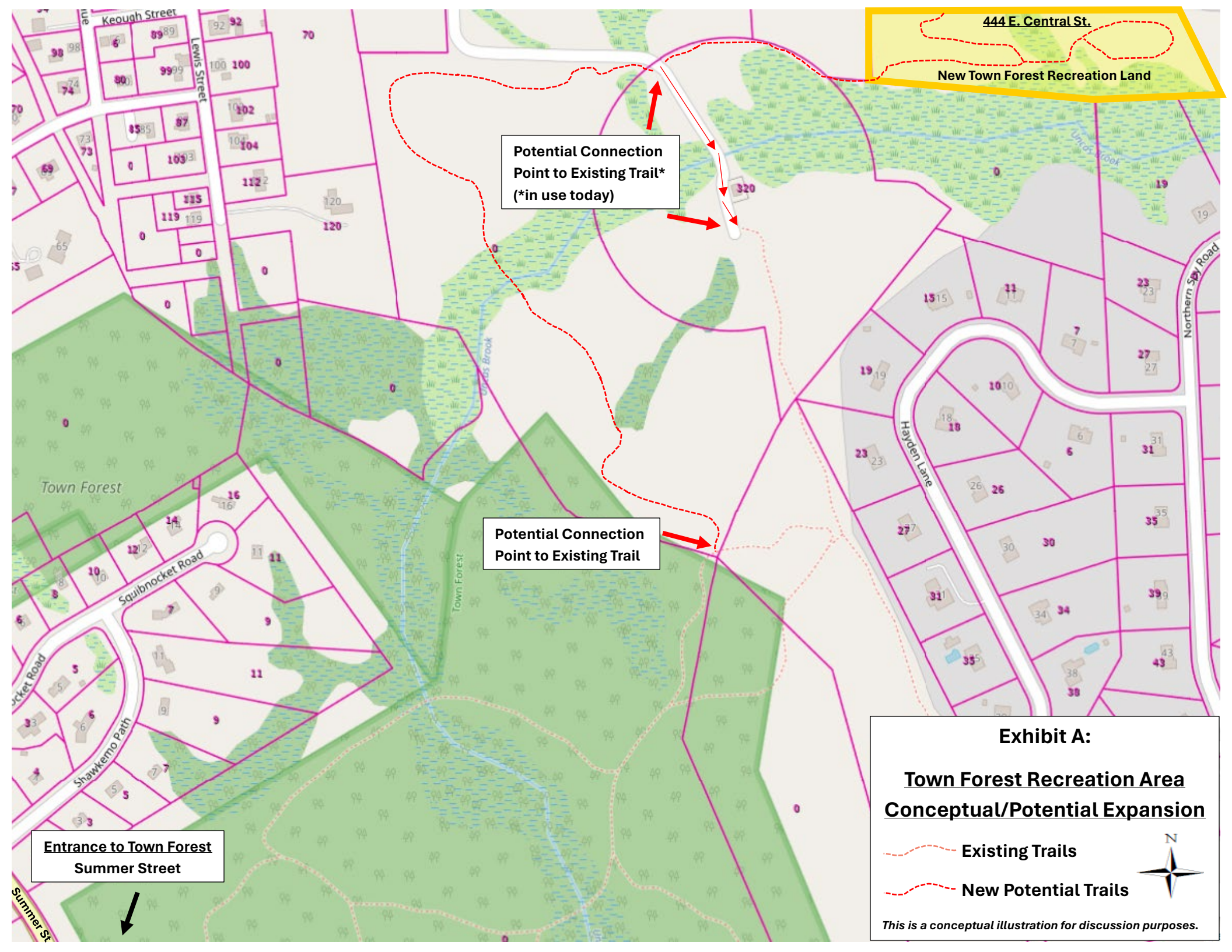
A detailed Transportation Impact Assessment will be prepared as a part of the permitting process which will be subject to a rigorous review by an independent Traffic Engineer, ensuring that the interests of the Town and residents are addressed.

- **Comment: What is the Town’s current Subsidized Housing Inventory (SHI)?**
  - **Response:** The Town’s current SHI is 10.86%, as confirmed with the Executive Office of Housing and Livable Communities (EOHLC). The State mandates all towns to have a minimum of 10% of their housing stock be affordable, so the Town currently meets the required threshold by a slim margin which is anticipated to become slimmer when the housing stock figure is reset upon the release of the next census. Although only 25% of the Project contains affordable units which equates to 66 units, under Chapter 40B all of the 264 total units, including the market rate units, count towards the Town’s SHI. The additional 264 SHI units from the Project offer meaningful protection to the Town from being exposed to future, “unfriendly” 40B applications. If/when the Town falls below the 10% threshold, the Town would be rendered more or less powerless over those potential “unfriendly” 40B proposals.
  
- **Comment: Question of whether the Town’s water system has the capacity to serve the Project.**
  - **Response:** The Town Engineer has confirmed “the Town’s water system has the capacity to serve the proposed development” in a letter to the Applicant’s Civil Engineer dated 2/9/24.

Respectfully,



A.J. Alevizos  
TAG Central LLC



444 E. Central St.

New Town Forest Recreation Land

Potential Connection Point to Existing Trail\* (\*in use today)

Potential Connection Point to Existing Trail

Entrance to Town Forest Summer Street

**Exhibit A:**  
**Town Forest Recreation Area**  
**Conceptual/Potential Expansion**

Existing Trails  
New Potential Trails

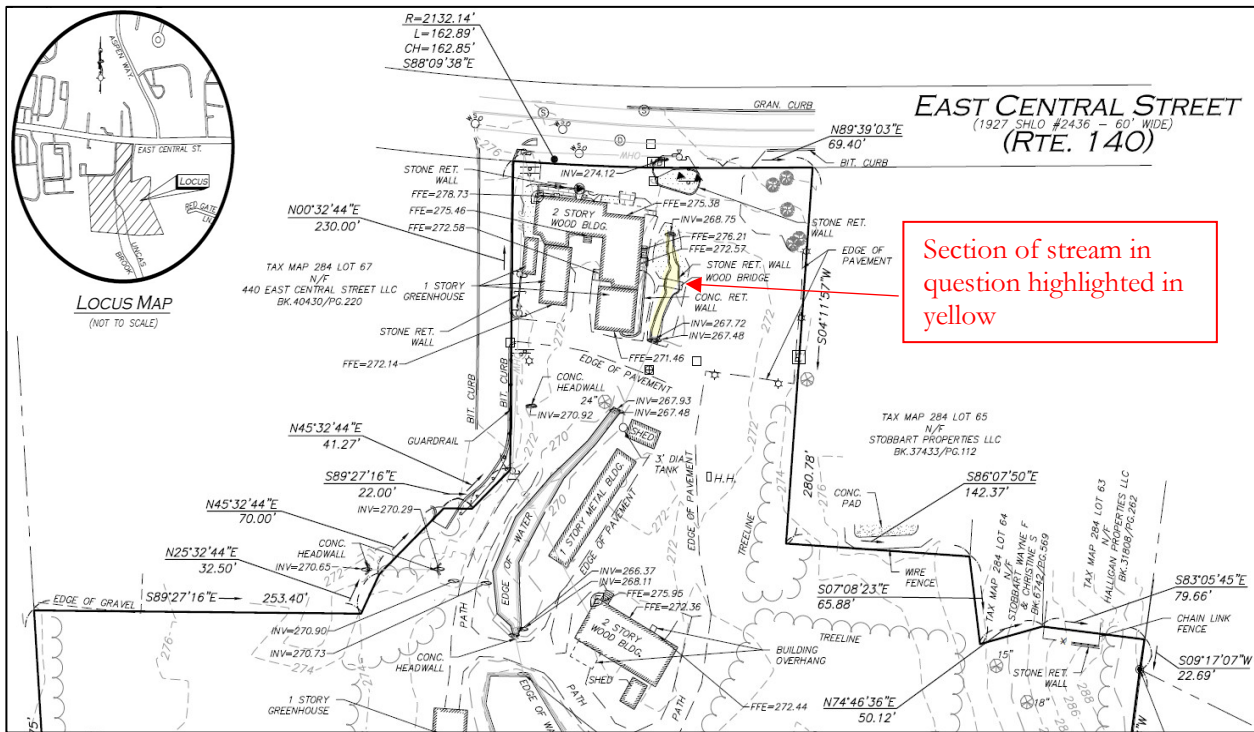
*This is a conceptual illustration for discussion purposes.*



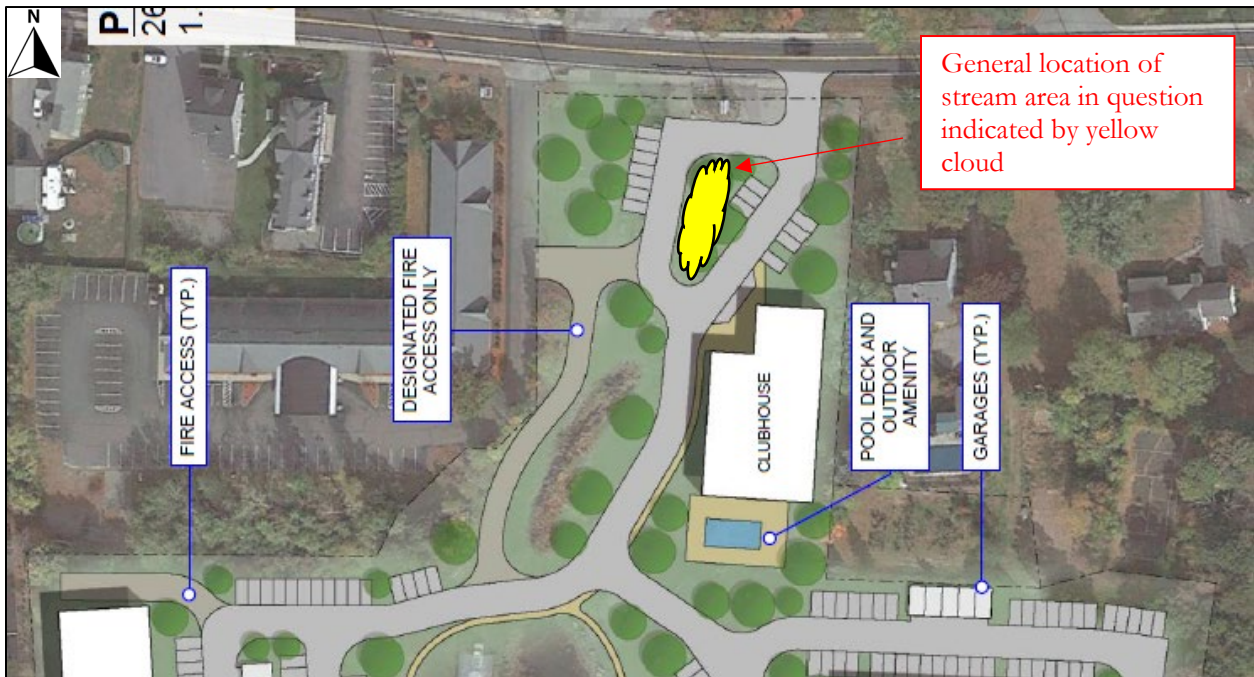


**EXHIBIT B**

Current Survey/Existing Conditions Plan



Current Site Plan



\*The plans above do not share the same scale.





Central Street Residences  
Franklin, MA  
4/30/2024

View From E Central Street  
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# TOWN OF FRANKLIN RESOLUTION 24-16

## FRANKLIN TOWN COUNCIL SUPPORT FOR PROPOSED GL CHAPTER 40B AFFORDABLE HOUSING PROJECT AT 444 EAST CENTRAL STREET PURSUANT TO DHCD'S LOCAL INITIATIVE PROGRAM (LIP): FRIENDLY 40B

- WHEREAS,** GL Chapter 40B Sections 20-23 provide a legal framework for the creation of local affordable housing which is administered by the Massachusetts Department of Housing and Community Development (DHCD) and DHCD has enacted a regulation creating the Local Initiative Program (LIP) which allows a Chapter 40B developer to work collaboratively with a municipality to obtain its support for a proposed affordable housing project; and
- WHEREAS,** DHCD's LIP regulation provides that a municipality demonstrate its support through its Chief Executive Officer's signing a letter of support, and Franklin's Home Rule Charter provides that the municipality's Chief Executive Officer is the Town Administrator; and
- WHEREAS,** The Franklin Town Administrator has created a voluntary process and checklist for a developer who proposes a Chapter 40B LIP affordable housing project to follow, which includes informal reviews by Town staff, the Planning Board and Conservation Commission, and a presentation to the Franklin Town Council; and
- WHEREAS,** The Alevizos Group has proposed to develop a Chapter 40B affordable housing project on approximately fifteen acres of land located at 444 East Central Street consisting of up to two hundred, sixty-five (265) rental units; and
- WHEREAS,** The Alevizos Group has submitted an application to Town pursuant to the above-described voluntary LIP approval process and participated in above-referenced reviews and made a presentation to the Franklin Town Council at a duly posted public meeting thereof.

**NOW THEREFORE** the Franklin Town Council, acting on behalf of the Town of Franklin, hereby expresses its support for The Alevizos Group's proposed affordable rental housing project of up to two hundred, sixty-five units to be developed on approximately fifteen acres located at 444 East Central Street and directs the Town Administrator to prepare and sign a letter of support to DHCD for the proposed project and to sign any DHCD Applications and/or other forms and to take any other action which DHCD requires to demonstrate Town's support for the project.

This resolution shall become effective according to the provisions of the Town of Franklin Home Rule Charter.

**DATED:** \_\_\_\_\_, 2024

**VOTED:** \_\_\_\_\_

**UNANIMOUS:** \_\_\_\_\_

**A TRUE RECORD ATTEST:**

**YES:** \_\_\_\_\_ **NO:** \_\_\_\_\_

**ABSTAIN:** \_\_\_\_\_ **ABSENT:** \_\_\_\_\_

**RECUSED:** \_\_\_\_\_

**Nancy Danello, CMC**  
Town Clerk

**Glenn Jones, Clerk**  
Franklin Town Council