Mr. Michael Busby Relationship Manager MassHousing Finance Agency (MHFA) One Beacon Street Boston, MA 02108

September 16, 2022

RE: Proposed 40B- Residences at Park Central, Southborough, MA MH ID No.1155

Dear Mr. Busby,

The Southborough Planning Board has reviewed the application submitted to MHFA and we have several concerns regarding the inaccuracies presented by the proponent in the application as fact and truth and additional concerns regarding the site proposal, most prominently around safe access, and egress. This is the second attempt by the proponent to develop a landlocked property as a 40B.

EXECUTIVE SUMMARY

In the applicant's prior 40b/40a development submission to the Town of Southborough, the applicant failed to effectively collaborate with the Planning Board and local bylaws resulting in the Planning Board denial of site plan. Further, the applicant failed to work with the Conservation Commission to adhere to local and state requirements and was not issued an Order of Conditions for the site. On March 16, 2021, Worcester County Land Court judge William Ritter posted judgement that annulled and revoked a comprehensive permit issued by the ZBA in August 2016.

Based on our prior experience and voiced concerns about the significant impact on health and safety as well as feasibility of a dense project on town infrastructure and utilities including water, schools, and public safety, we recommend that MFHA deny the application as submitted.

Planning Board Commentary

The Planning Board has exposure and experience with the principal and signatory of the MFHA application, William A. Depietri of Park Central LLC. The developer has come before the Southborough Planning Board for several developments in Southborough, over the years. The developer has previously attempted a 40B with a large 40A component in Town at the Park Central Location. While he did receive a comprehensive permit by the Zoning Board of Appeals in August of 2016; the developer failed to work collaboratively with the Town's elected Planning Board and appointed Conservation Commission and was subsequently denied site plan and Order of Conditions for the development. The Southborough Town citizens did appeal the comprehensive permit decision and on March 16, 2022, in Worcester Land Court, Judge William Ritter annulled the decision and revoked the comprehensive permit.¹ Importantly, the Judge also indicated in his judgement, "the legislature likely would not condone the manipulation of c. 40B so that major development can bypass local authority under the pretext of affordable housing."

After reviewing the application and supportive content, we have captured inaccuracies in Table 1. Importantly, the application requires certification and acknowledgement that all "information set forth in this application (including attachments) is true, accurate, and complete as of the date hereof to the best of my/our knowledge, information, and belief." This Board is concerned with the applicant's misrepresentation of information and clear lack of commitment to submitting a strong, fact-filled, quality application that both the applicant and our Town would be proud to receive.



After intense review, we submit the following as serious concerns relative to the 40B development:

1. Flagg Road Access/Egress and Traffic: The applicant indicates that the "The development has proposed direct access from Flagg Road via Route 9 westbound in Southborough to Park Central Drive, a gently winding roadway which is also accessible from Blackthorn Drive."

Planning Board Comment: The Select Board, Planning Board, MASSDOT, Southborough residents, and State Representative, Carolyn Dykema, have clearly communicated in public forums that Flagg Road is <u>not a safe</u> road for direct egress of a major residential development at Park Central. Barring any willingness from MassDOT to deposit egress traffic on to Route 9, Southborough will deny egress to Flagg Road to Park Central. The impact of egress on to a rural, windy scenic road imperils the health and safety of our residents and neighbors living on and around Flagg Road.

Supportive Rationale:

- Flagg Road is a designated a Scenic Road in Southborough under Massachusetts Law MGL. CH. 40 Sec. 15-C; with privileges for protection of public shade trees and historic stonewall bestowed to the Planning Board and oversight of the roadway to the Select Board of Southborough.²
- Flagg Road can be found on maps dating back to 1831 and notably narrows to 15 feet wide approaching Route 9, importantly of the 7 roads connecting to Flagg, five lead to dead end neighborhoods and only two roads in a non-linear fashion (Lovers and Deerfoot) through to connecting main roads, Route 30 and Parkville Road, via Clifford Street.³
- Flagg Road connects with Deerfoot Road, where an entrance exists for two public schools; P.
 Brent Trottier Middle School and Margaret A. Neary Elementary School
- Based on the November 2013, Final Report from the MassDOT Study, Section 4.2.5, A new connector road was proposed to "allow egress to Route 9 Westbound and left turns from that connector would be prohibited to reduce traffic on Flagg Road, a narrow roadway which serves a residential neighborhood"; MassDOT would not allow for egress from Park Central, nor traffic from Park Central on to the local, scenic road, Flagg.⁴
- In June 2015, six property owners from the abutting neighborhood entered a covenant with Park Central LLC, which restricts use of access to Blackthorn Drive (a proposed egress from the development) to "emergency use only" whereby eliminating broad, public, secondary access and egress from Park Central Road⁵
- Southborough worked with State Representative, Carolyn Dykema, to appeal to MassDOT to seek relief and support however, at a June 28, 2016 meeting of the Select Board in Southborough, provided a summary from the MassDOT meeting, minutes state; "State Representative, Caroline Dykema, also attended the meeting and was present to offer additional comments and address concerns regarding Park Central and Flagg Road. She stated that MassDOT is very aware of the concerns in the area and that there will be continued conversation on what needs to be done. Her hope was to find a technically feasible short-term solution but there seems to be very limited options."
- On August 5, 2016, The Select Board consolidated resident letters of safety concerns and communicated to Secretary Matthew A. Beaton of the Executive Office of Energy & Environmental Affairs in Massachusetts to communicate raising serious safety concerns associated with routing major residential development traffic through a rural, windy, scenic road, with an acknowledgement, "The Board has also reached out to MassDOT, District 3, and our State legislative delegation, to see what assistance the State may be able to provide us in addressing our safety concerns and improving the traffic flow in the area of Flagg Road and Route 9 Unfortunately, any assistance from the State on this issue is at least 5-7 years away, and would come well after the proposed Park Central Development is permitted and/or constructed."⁷



- Residents of the Town continue to raise serious concerns about the pedestrian, bike, and vehicular safety of Flagg Road and the Board of Selectmen responded on October 4, 2016, by voting to deny access to Flagg Road if the developer failed to meet resolutions with MassDOT regarding access/egress to and from Park Central from Route 9.8
- At a Special Town Meeting held on October 8, 2016; warrant article #8 was proposed by citizen's "if in the event of future development, the terminal end at Flagg Road would be gatedno access, no left turn from any future development, except Emergency vehicles" for the Select Board and Planning Board to consider implementing passed 232 in favor; 103 opposed.⁹
- Massachusetts Department of Transportation "Transportation Improvement Plan" has removed 495/Park Central/Flagg intersection as a current, completed, or future project for redesign and construction.¹⁰
- **2. Zoning:** The proposal is on land currently zoned as Industrial and Industrial Park. ¹¹ The property is approximately 750' set back from Route 9 and has Mass Route 495 intersecting the property. Route 495 has a high traffic volume and is expected to increase volume 20-30% by 2030. T
 - **Planning Board Comment:** Route 495 is a 6-lane highway with speed set at 65 miles per hour and generates significant vehicular noise and light pollution concerns for any residential use on that property.
- **3. Lower Impact Development:** The applicant has expressly indicated that it will request a waiver for Southborough zoning Chapter 174-13.3 Lower Impact Development.
 - Planning Board Comment: The applicant has proposed a large residential development with the intent of housing ~900 individuals, representing almost 10% of the entire town's population. The Town does NOT have a sewer infrastructure and therefore wastewater disposal would be an essential component for the feasibility of a development this size on a parcel with significant topographic and conservation challenges. The preliminary design has not sufficiently addressed the design nor location of the wastewater treatment plan which restricts any Town authority from assessing the risk-benefit tradeoff for the proposed community at Park Central and its impact on abutters.
- **4. Water Resources:** The applicant has suggested that it will leverage existing water infrastructure from Flagg Road and Blackthorn Drive. Based on the Town of Southborough's Water Plan prepared by Pare Corporation in April 2022¹² "the total future daily water demand is estimated to be 1.2 MGD, or 31% more than the current average day demand" and these estimates did not include a supplemental 10% population increase from a proposed Park Central development.
 - **Planning Board Comment:** Water resources are a concern. Global warming and negative environmental impacts are affecting our current population globally and locally. The proposed residential development at Park Central will impact infrastructure and the applicant has made no effort to delineate the impact and requirements of water resources sufficiently in this plan which restricts any Town authority from assessing the risk-benefit tradeoff for the proposed community at Park Central and its impact on water infrastructure.
- **5. Existing Covenant with Abutting Neighbors**¹³: The applicant entered into a covenant agreement with six abutters and the Southborough Town Counsel, Jason (Jay) Talerman reviewed the document, specifically noting Section 9 (below) and provided the following commentary:
 - a. "Assuming that Park Central served adequate notice of termination when it chose not to appeal the Superior Court action, it may not submit another application for 2 years."



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- b. That section also says that the covenants will remain intact for any substantially similar development. I don't have sufficient familiarity with the prior development to make an assessment as to whether the new project is substantially similar.
- c. Notwithstanding the above, this is a private restriction that is not enforceable by the Town. Nonetheless, I think it is something that should be brought to the attention of MassHousing in the Town's comment letter, and I think you should provide a copy with your comment letter."

Exhibit 1: Excerpt from Covenant

9. Abandonment of Project.

In the event that, for any reason Developer determines not to construct the Townhouse Component or the Apartment Component of the Project, including Developer's decision to abandon the Project (either prior to or following approvals) and/or Developer's election not to prosecute or defend any appeal regarding any aspect of the Project, Developer and PCLLC may terminate this Agreement upon written notice to Abutters, provided that no termination shall be effective unless and until the Developer and PCLLC have relinquished all rights in all Necessary Permits that have issued for the Project (either Component) in a form satisfactory to Abutters' counsel, and withdrawn all pending applications for Necessary Permits for the Project. After terminating this Agreement pursuant to this Section 9, the Developer, PCLLC, and any party financially-related thereto shall not submit any application for any permit or approval from a local, state or federal governmental entity for the development of the Project Site in the same or substantially similar manner as set forth in the Concept Plan for a period of two years commencing on the date of the termination notice. If after terminating this Agreement under this Section the Developer, PCLLC, and any party financially-related thereto attempts to develop the Project in the same or substantially similar manner as shown on the Concept Plan, or otherwise breaches this Section 9, the Abutters may restrain and enjoin said party from such further conduct including further prosecution of any such permit applications, it being understood and agreed that (i) the Abutters' damages from such actions may at that time be difficult to ascertain and may be irreparable, and (ii) the breaching party waives any defense that the Abutters cannot demonstrate damage and/or can be made whole by the awarding of damages.

6. Previous Applicants for Property Development: Over the last fifty years, several attempts have been made to develop the land currently owned by Park Central LLC. In the years from 1984 through 1987, Flatley Co., attempted to develop office buildings in the Industrially zoned property and ultimately was abandoned due to the limitations associated with residential safety and traffic concerns. In, 2007, Trammell Crow proposed to develop Alexan, Southborough on the Flatley Co. land. Trammell Crow ultimately withdrew its application to Southborough ZBA in 2008, after recognizing the unavoidable challenges of providing safe ingress and egress to the development.

Planning Board Comment: Based on the history, the Planning Board can reflect on fifty years of attempted development on this land. With each new applicant and subsequent discussion, the feedback from the Town and its residents has been directed to the fundamental constraints associated with the property which are ingress and egress, lower impact development, and safety of residents.

The Planning Board acknowledges the need for diversity in housing and increased affordability in Southborough as both are goals of the Master Plan and the Housing Production Plan. The Board was optimistic that since this is the second time this project has come before the Town that the feedback received from the previous project would have been considered and the proposal would minimize impact to the abutting neighborhoods and offer a solution to the access/egress issues that came to light the first time around. Unfortunately, the current proposal appears to have ignored all the valuable feedback previously

provided to the applicant, is very similarly designed, and as such continues to imperil the health, safety, and environmental concerns of the Town of Southborough. The overall site is over 100 acres yet the essentially five story urban style apartment buildings are tucked up on top of the abutting residential homes with negligible screening creating maximum negative impact on those homeowners. Additionally, the major objection to the previous plan, lack of adequate access/egress has been ignored.

The Planning Board respectfully request that MassHousing Finance Agency recognize that this proposal is untenable and imperils the health, safety and environment of Southborough and encourage the applicant to resubmit an application with factually accurate content that addresses the access/egress issue and removes the imperiled impact on the abutting residences and Town.

Sincerely,

The Southborough Planning Board Meme Luttrell, Chairperson Andrew Mills Jesse Stein Marnie Hoolahan Debbie DeMuria

Attachments/ML

Table 1

Application	Inaccuracy	Fact	Source:
Section, page #			
1.4 Dev't Narrative, pg.2, Paragraph 2	Proposed commuter friendly, "accessible to and from Turnpike Road/Route 9"	MassDOT has not allowed egress to Route 9 from Park Central	November 2013, Final Report from the MassDOT Study, Section 4.2.5
1.4 Dev't Narrative, pg.2, Paragraph 2	"Additionally, the site is within 1.5 miles of Worcester Regional Transportation Authority Bus Routes"	On April 6, 2020, the limited service for the Westborough shuttle service <u>was</u> <u>suspended</u> until further notice.	https://www.therta.com /routes/west/ Exhibit 2
1.4 Dev't Narrative, pg.2, Paragraph 2	"within 2 miles of an MBTA Commuter Rail Stop	The Southborough MBTA station is 4.9 miles The Westborough MBTA station is 6.0 miles; both require vehicles to access safely	Exhibit 3
1.4 Dev't Narrative, pg.2, Paragraph 3	The site is located in "close proximity to shopping opportunities, municipal services, restaurants, etc"	The site would have access to The Red Roof Inn, Cumberland Farms, and Nan's Kitchen (restaurant). All other amenities require a	Exhibit 4



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		vehicle to access safely	
1.4 Dev't Narrative, pg.2 Paragraph 6	"The dev't has proposed direct access from Flagg road via Route 9 westbound in Southborough to Park Central Drive, a gently winding roadway which is also accessible from Blackthorn Drive.	MassDOT has denied egress to Route 9 from Park Central (see 1st discrepancy) Southborough Board of Selectmen voted on to deny access to Flagg Road as an egress for Park Central Development	October 4, 2016 Southborough Board of Selectmen voted 3-1-1 (page 21)
1.4 Dev't Narrative, pg.3, "Affordable Housing"	"To Meet its 10% mandate, the Town is required to produce an additional 57 units"	Based on DHCD 2010 data, the town requires 49 additional units	Southborough Housing Plan, Table 26 https://www.mass.gov/doc/southborough-plan/download
1.6 Property Record Cards, Application for Chapter 40B Project, pg. 6 of 24 "see figure 2.6 Previous Applications"	"CGP also appeared before the Southborough Conservation Commission numerous times seeking an Order of Conditions ("OOC") for the overall project.	Applicant has chosen not to include the important detail that Southborough Conservation Commission with a 7-0 vote count denied Order of Conditions, September 10, 2020	https://www.southborou ghtown.com/sites/g/files /vyhlif7351/f/minutes/6. _denial_conditions _park_central.pdf
1.6 Property Record Cards, Application for Chapter 40B Project, pg. 7 of 24: Existing Utilities and Infrastructure	Roadway access to Site: Yes; Blackthorn Dr, Flagg Rd, Park Central Dr	There is NOT existing access to the site from Blackthorn Dr	Exhibit 5 Google Earth View
1.6 Property Record Cards, Application for Chapter 40B Project, pg. 7 of 24: Existing Utilities and Infrastructure	Sidewalk access to street: Yes; Tara Rd., Flagg Rd., Blackthorn Dr.	Tara Road, Flagg Road, and Blackthorn Drive do NOT have existing sidewalks. The Town Public Works has stated that sidewalks cannot be constructed on Flagg Road due to dimensional limitations. All three roads are designated "scenic" roads with MGL. CH. 40 Sec. 15-C protection	August 5 th , 2016 Southborough Board of Selectmen Letter to MEPA, addressed to Secretary Matthew A. Beaton
1.6 Property Record Cards, Application for Chapter 40B Project, page 7 of 24: Public Transportation near the Site: "See Figure	The site transportation is located at the back of the Southborough Zoning Bylaws, not in section 2.6.	Of the map markers indicated on the visual, WRTS shuttle station has not been in service since April 6, 2020 and should not be shown. Driving mileage to Southborough MBTA is 4.9 miles, this map makes it appear in an around a 2 mile	Exhibits 2-5



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2.6"		radius, this is inaccurate.	
3.5 Municipal Support	"The applicantwill engage the Office of Town Administrator, Select Board and the Town Planning & development Departments and any other interested local boards to present this application and the civil and design plans during the municipal comment period	This application has not been presented to any Town entity. In fact, when the Town received notification from MassHousing that the application was under review the Town had to reach out to the applicant to receive a copy of the application and site plans.	
4.1 Evidence of site control, Letter of Intent	Signature page states "If this Agreement is acceptable to you, please indicate with your approval and return it on or before November 21, 2021, failing which this Letter of Intent shall be deemed revoked."	The signatures are dated 7/15/22 which is outside of the 11/24/21 time frame. This Letter of Intent is therefore invalid and subsequently revoked.	MHFA Submission
6.1 Development Team Qualifications pg.7 The Residential Properties Include	#11 Park Central Southborough, MA is listed as a part of the Capital Group Properties where it has "acted as the development, management or construction management partner for each of the following properties"	This is NOT an approved development and should not be included in the properties listed. On March 16 th , Judge William Ritter annulled and revoked the comprehensive permit issued by the Southborough ZBA for the prior attempted 40B development; citing "The legislature likely would not condone the manipulation of c. 40B so that major development can bypass local authority under the pretext of affordable housing" Further, Capital Group is listed as an affiliated company on the application not as the development team.	¹ Trial Court of Massachusetts Docket # 1685CV01359 Yan Huang et al vs. Southborough ZBA
6.6 Previous Development Attempts, last sentence	"The use variance for the market rate project was not appealed and remains in effect"	The use variance is not in effect as the conditions for applicability no longer apply. Subsequently At Annual Town Meeting in 2015, the town removed Use Variances	Southborough Special Town Meeting, Article 6; October 8, 2016. Use Variance ATM Decision to remove Use Variance from Zoning Code Page 9



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		from Town Zoning Code	
MHFA application pg. 19: Sustainable dev't scorecard	Under Method 1- If New Construction, applicant indicates Walkable to: (a) transit, (c) school, and (e) retail, services, or employment center	As demonstrated previously, this site is not walkable to any public transit. The schools (Neary grades 4 and 5, and Trottier Grade 6-9) are ~3.9 miles on a scenic, rural road (Flagg) with no sidewalks. Finally, the retail, services, or employment center include a Cumberland Farms convenience store and gas station; Red Roof Inn, and some office buildings.	Exhibits 2-5
MHFA application pg. 19: Sustainable dev't scorecard	Under Method 2- (1) Concentrate Dev't and Mix Uses. Indicates "pedestrian friendly" Reference 3.6 Sustainable Development Scorecard Narrative; reference Figure 3.6	Only the site contained in itself and the adjacent businesses are pedestrian friendly. All evidence provided to support (1) have been identified as inaccuracies; including "short distance" to schools, etc. (~3.9 mile on non-side walked streets). The bus line has not been active since April 6, 2020 and both MBTA commuter stations requiring crossing Route 9 and traveling a minimum of 4.9 miles by vehicle.	All previously sourced
MHFA application pg. 19: Sustainable dev't scorecard	(3) Protect Land Ecosystem and (4) Use Natural Resources Wisely- "Uses low impact dev't" and "other"; reference Figure 3.6	Has provided no indication that he is seeking to use natural resources as he has requested all waivers for LID (174-13.3) Has requested all waivers from Outdoor Illumination (174-12.1) bylaw on responsible Dark Skies Illumination of property, and stormwater and erosion control (174-13.5).	3.4 Tabular Zoning Analysis, #8 LID waiver #5 174-12.1 Outdoor illumination, #9 174-13.5 Requests waivers on Stormwater and erosion control Of the 17.38-acre site area, they have only factored in 1.72 acres as Wetland and surmise that 15.66 is buildable, the applicant has not included any acreage for open space/passive recreation nor conservation of sensitive
			land in his development calculations.



19: Sustainable are near jobs, transit and other "services" and serious Section (7) Increase Job dev't scorecard other service"; reference scrutiny should be applied to and business "jobs" as there are limited Figure 3.6 opportunities where potential employers in the applicant indicated "no" vicinity for permanent jobs, permanent jobs for lowmoderate-income persons MHFA (6) Provide There is no safe pedestrian See previously provided application pg. Transportation Choice; or bike access surrounding source document answered "yes" on three 19: Sustainable the development. While in dev't scorecard bullets; reference Figure close proximity to Route 9, 3.6 MassDOT has not allowed egress from property to Route 9. MHFA (7) Increase Job and There is no documentation application pg. **Business Opportunities**; to support how this 19: Sustainable answered "yes" on five development will support dev't scorecard bullets; reference Figure local business and or utilize 3.6 locally produced resources contained in the application. All other bullets related to job creation and proximity to an "employment center" have been previously addressed, again insufficient evidence to presume any job creation. MHFA (8) Promote Clean Energy The water flow and pressure application pg. "Other" reference Figure is compromised according to the Blackthorn/Tara/Bantry 19: Sustainable 3.6 "low-flow plumbing dev't scorecard fixtures, including shower road residents. Without a heads, will be used" water pressure and resource study, the applicant has provided insufficient evidence to presume low flow plumbing could provide

adequate flow for residents.



Exhibits

Exhibit 2: Westboro Shuttle Suspended effective 4/6/2020

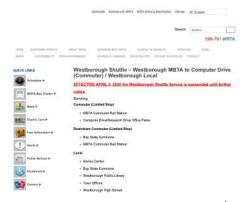
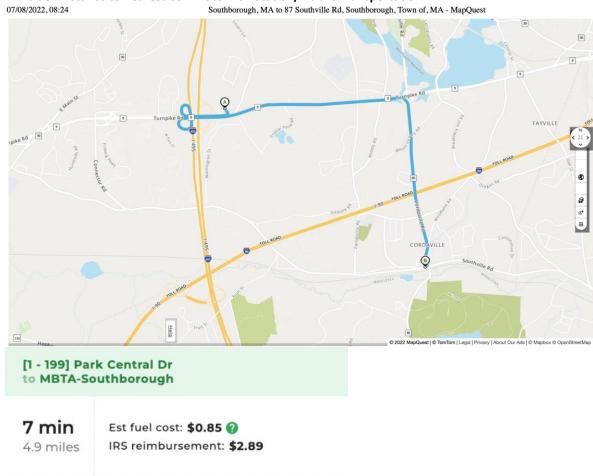


Exhibit 3: Distance to nearest Commuter Rail Station/ Public Transportation

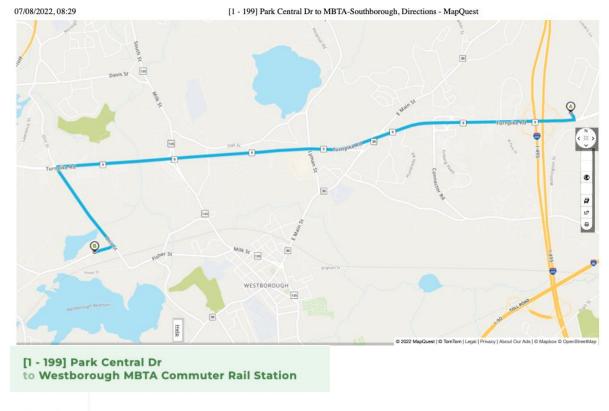


7 min (4.94 miles)

[1 - 199] Park Central Dr to MBTA-Southborough



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8 min 6.0 miles

Est fuel cost: \$1.02 @ IRS reimbursement: \$3.48

8 min (5.95 miles)

[1 - 199] Park Central Dr to Westborough MBTA Commuter Rail Station

Exhibit 4: "Close Proximity to Shopping opportunities, etc..."

Not according to the map of available amenities from Google

Restaurants

Restaurants

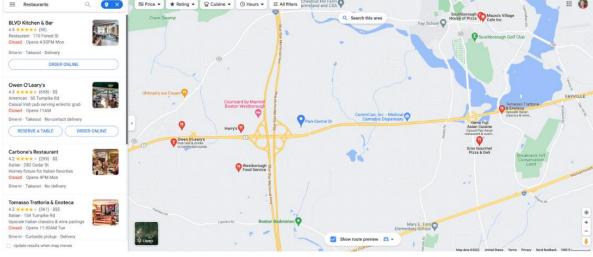
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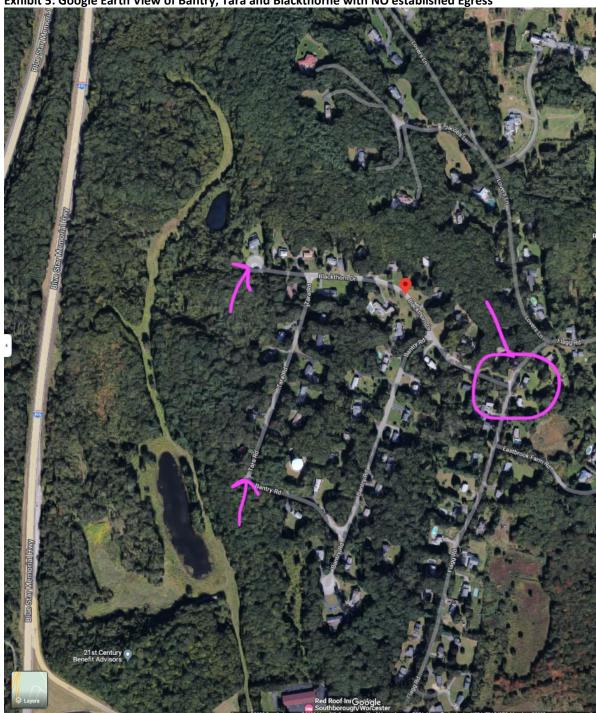
Restaurants





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Exhibit 5: Google Earth View of Bantry, Tara and Blackthorne with NO established Egress





End Notes

- ¹ Court Ruling Yan Huang vs. Southborough ZBA March 16, 2021
- ² Town of Southborough Annual Town Meeting, May 19, 1976 Warrant Article #63; Flagg Road accepted by 2/3 vote of the hall for designation as a Scenic Road
- ³ https://southboroughhistory.org/historic-maps-of-southborough/
- ⁴ November 2013, Final Report from the MassDOT Study, Section 4.2.5
- ⁵ Abutter covenant link
- Town of Southborough Tuesday, June 28, 2016 Board of Selectmen Meeting Minutes https://www.southboroughtown.com/sites/g/files/vyhlif7351/f/minutes/selectmens minutes 6-28-16.pdf
- Office of The Board of Selectmen of Southborough letter to Secretary Matthew A. Beaton, Dated August 5, 2016;
 - $\underline{\text{https://www.southboroughtown.com/sites/g/files/vyhlif7351/f/uploads/080516\ ltr\ to\ mepa\ with\ comments.pdf}$
- Town of Southborough, Tuesday, October 4, 2016 Board of Selectmen Meeting Minutes; https://www.southboroughtown.com/sites/g/files/vyhlif7351/f/minutes/selectmens minutes 10-4-16.pdf
- Southborough Special Town Meeting October 8, 2016 Warrant Article #8, Page 10; https://www.southboroughtown.com/sites/g/files/vyhlif7351/f/uploads/10.8.16_stm_minutes.pdf
- MassDOT Project Information Website: City Selected: Southborough; https://hwy.massdot.state.ma.us/projectinfo/projectinfo.asp
- 11 Southborough Zoning Map
 - https://www.southboroughtown.com/sites/g/files/vyhlif7351/f/uploads/zoning map 11 x 17.pdf
- ¹² Southborough Water System Master Plan; April 25, 2022; page VI; Pare Project No:08176.20 https://www.southboroughtown.com/sites/g/files/vyhlif7351/f/uploads/southborough-water-system-master-plan-2022-4-25 w appendices 3.pdf
- ¹³ Agreement and Declaration of Restrictive Covenants of Park Central and Abutters, June 1, 2015: Doc#10741, Book 54060, Page 303. (attached)
- ¹⁴ Compilation of Planning Board Minutes of Park Central Applications from September 1984-1987 (attached)