



Town of *Dracut*
MASSACHUSETTS

Michael Busby
40B Specialist
MassHousing Finance Agency
One Beacon Street
Boston, MA 02108

December 6, 2022

Dear Mr. Busby:

I appreciate the opportunity to comment on the application for Project Eligibility submitted by Riverbank Properties, LLC (Ken Lania of Cornerstone Land Associates serving as representative) for units at 135 Greenmont Ave. in Dracut. The application has been shared with the Board of Selectmen and the Planning Board and their comments are included in this response. The current concept is demolition of the existing home and construction of 28 3-bed rental units.

The parcel includes 2.45 acres in an R1 Zone in central Dracut. Greenmont Avenue is a very busy small local road with a 20' wide paved surface. There are currently 15 single-family homes and two two-family homes on Greenmont Ave. on lots between 1/3 of an acre and 1-1/3 acres. Greenmont Ave is a popular walking route to the nearby school and is serviced as part of a LRTA bus route.

The Town of Dracut is committed to increasing our stock of Affordable Housing Units. We are undertaking a rewrite of our Zoning Bylaw and anticipate creating opportunity for affordable development in new areas. This process is recommended in our Housing Production Plan and Master Plan documents. In recent years, there has been public support of municipal spending to meet this goal and the following 40B projects are underway here in Dracut with Town support:

- The Centre School has been sold to Coalition for a Better Acre to create 9 units of Affordable housing for veterans. Town Meeting voters approved \$680,500 of housing reserve and \$530,500 of historic reserve for this project. Construction on this project is complete and a ribbon cutting was held over the summer.
- 144 Greenmont Ave./1530 Bridge St. is a 17+ acre site under lease agreement to Common Ground to create 56 units, all affordable, for residents over 62 years of age. Town Meeting voters have approved borrowing of \$3 million in support of this project, nearly a million dollars to purchase the land and the Town has received a MassWORKS grant of \$650,000 for design and construction.

Given our clear commitment to expanding options for affordable housing in our community it is difficult to find ourselves unable to support this proposed development. The existing property is in keeping with the neighborhood and the single family home is in good condition, appearing recently renovated. This parcel could support two single family residences in compliance with the zoning bylaws of the Town of Dracut.

The decision criteria to issue a Project Eligibility Letter (PEL) are listed in 760 CMR 56.04, and they include:

- the project appears generally eligible under the requirements of the housing subsidy program;
- that the site of the proposed project is generally appropriate for residential development;
- that the conceptual project design is generally appropriate for the site on which it is located;
- that the proposed project appears financially feasible;
- that the applicant is a qualifying entity and meets the general eligibility standards; and
- that the applicant controls the site.



The proposed development at 133 Greenmont Ave is not generally appropriate for the site in terms of density, lot coverage or appearance. In Section (1) of the 'Discussion of Sustainable Development Principles' the application states that the development is not "Compact and/or clustered so as to preserve undeveloped land". The proposed development renders approximately half of the site impervious (either buildings or pavement) and open space consists largely of 30'-40' deep swaths behind the buildings along the property line. This open space is anticipated to include drainage swales which will eliminate any passive recreation in these areas.

The buildings proposed for 133 Greenmont Avenue are approximately 40' deep and 80' – 120' wide (depending on the number of 20' wide units). In addition to this significant footprint, the buildings are taller than other residences in the area, and in excess of what our zoning bylaw would permit for single family or multi-family residential developments. The overall massing of the structures is dramatically different from the surrounding neighborhood and there is no attempt made to add visual buffering. Where abutters now have a single neighbor there will be 14 units overlooking the shared property line, virtually eliminating their privacy. While stormwater and traffic are not reviewed for the PEL the proposed development is likely to be significantly altered when these are considered.

Within the 'Sustainable Development Criteria Scorecard' there are missing explanations and incorrect statements. To date there has been no concerted public participation effort that we are aware of. The proposed development does not improve the neighborhood – it is in fact out of keeping with the area and seeks to demolish an attractive single-family home which has increased in value (the structure alone) more than \$55k in the past two years. The proposed development does not mix uses or add new uses to an existing neighborhood. The proposed development does not reduce dependence on private automobiles; no new shared alternatives are suggested. Lastly, there is no increased bike or pedestrian access due to this development.

The applicant has claimed that this site is appropriate for the proposed development and references the comprehensive permit approval issued for 144 Greenmont Ave, across the street. The project at 144 Greenmont is very different in a handful of important ways. The approved project is for 56 units of housing available for rent to individuals over 62 years of age. Each unit will meet affordable housing requirements. The site is more than 17 acres in size and the proposed single building will be more than 500' from Bridge Street and more than 800' from Greenmont Avenue. The setbacks retain existing mature vegetation and the site will not appear dramatically altered from the public ways. Sidewalks and walking paths will connect the two public streets through the proposed development. The vehicle access allows for emergency building access from three sides and fire apparatus can enter and leave without needing to back up at any point.

One of the hallmarks of a proposed development under Comprehensive Permit is that the local zoning bylaws are not in effect. Recognizing this, a review of compliance with such is helpful to show the Zoning Board of Appeals where there are elements that are beyond the typical allowances. Some of these elements include:

- Multifamily housing is not allowable in this zone and the proposed development would not meet the criteria to allow such if it were in the appropriate zone.
- The minimum rear yard setback is required to be 35'; the plan shows a 20' currently.
- The maximum permissible height in an R1 zone is 2.5 stories and 36' – this project is 3 stories and 32'.
- There are concerns about emergency vehicle access to these units and to navigate within the site.
- Nearly half of the proposed parking spaces do not qualify as one space is not allowed to block another.



There are a number of errors and omissions in the application materials that need to be addressed:

- To avoid future confusion, the revision dates should be stated on the cover with the original submission date. While the original date of application is listed as August 19, 2022, the initial application reached the Dracut Town Hall in mid-September and was missing significant financial information. The current application materials were received at Dracut Town Hall by email on December 2, 2022.
- There has never been any night club operation on this parcel, which is referenced in multiple statements.
- Section (1) of the 'Discussion of Sustainable Development Principles' the application states that the development is not "Compact and/or clustered so as to preserve undeveloped land", which they list as an accomplished goal/objective in the Development Proposal section of the application.
- The header on the List of Exceptions pages references "The Pines at Marsh Hill" and should be corrected.
- The List of Exceptions references Dracut Bylaws through June of 2017 which is not the current bylaw.
- The List of Exceptions references Zoning Bylaw through June of 2007 which is not the current bylaw.
- The List of Exceptions lists 34 residential dwelling units as a waiver request in the B-4 Zoning District. This isn't within the B-4 district and 28 units are referenced in other places in these materials.
- Similarly, the List of Exceptions lists 80 parking spaces as a waiver request in the B-4 Zoning District which is inconsistent with other references in the document.
- Dracut Bylaws do not include the referenced section '2.12.60 – Dimensional Relief for Affordable Housing'.
- The List of Exceptions references "...ground signs of no more than fifteen (48) square feet in size...".

Again, we recognize the importance of increasing housing in Dracut and affordable opportunities in particular. We hope to see refinement of the proposal to be more appropriate for the site. I am happy to discuss the project as it moves forward and can be reached at amanugian@dracutma.gov or 978-453-4557.

Sincerely,

A handwritten signature in blue ink that reads "Alison Manugian".

Alison Manugian
Community Development Director