



Town of *Dracut*
MASSACHUSETTS

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

February 23, 2023

Dear Mr. Busby:

The Town of Dracut has received notice that MassHousing is currently reviewing an application for Site Approval submitted by Kevin O'Brien (the Applicant). I am replying on behalf of the Town and have included comments from town department heads, the Planning Board and Board of Selectmen, and the Affordable Housing Partnership. Community emails are included as an appendix and their comments have been incorporated where shared by others. The proposed development will consist of 300 units of rental housing on approximately 50 acres of land located at 5 Poppy Lane in Dracut, MA. I will be requesting assistance through the MHP Ch. 40B Technical Assistance Program due to the size and scope of this project.

The Town of Dracut is committed to increasing our stock of Affordable Housing Units. We are undertaking a rewrite of our Zoning Bylaw as recommended in our Housing Production Plan and Master Plan documents. In recent years, there has been public support of municipal spending to generate affordable housing and the following 40B projects are underway here in Dracut. Additionally, a map of current residential projects here in Dracut is provided at the end of this letter.

- 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 expenditure of \$680,500 of CPC affordable housing funds and \$530,500 of CPC historic funds for this project. Construction on this project is complete and a ribbon cutting was held over the summer. All 9 units will be added to the SHI this year.
- 144 Greenmont Ave./1530 Bridge St. is a 17+ acre Town owned site under lease agreement to Common Ground to create 56 units, all affordable, for residents over 62 years of age. Town Meeting approved borrowing of \$3 million in support of this project, and nearly a million dollars of CPC affordable housing funds were expended to purchase the land. Additionally, Dracut has received a \$650,000 MassWORKS grant. While all are SHI eligible, these units will not be added until occupancy permits are issued.
- 341 Broadway Road has an approved Comprehensive Permit for 278 rental units, including 78 age-restricted units. This permission was originally granted in 2005 and extended through December of 2023. The project Order of Conditions lapsed in 2018 and the applicant is again before the Conservation Commission. Because of construction delays these 278 units will not count toward the SHI until occupancy permits are issued.
- 133 Phineas Street is a site of just under 21 acres with significant wetland and riverfront areas. The project is currently before the ZBA seeking a comprehensive permit for development of 20 owner occupied units in duplex structures. The units are age restricted (55+) and 25% will be affordable. I anticipate approval of a comprehensive permit with conditions by Spring of 2023 and 5 units will then be added to the SHI.
- 135 Greenmont Avenue is a site of approximately 2.5 acres located in a single family residential neighborhood. The project, with Riverbank Properties, LLC as the applicant and Kenneth Lania of Cornerstone Land Associates, LLC as the engineer and primary contact, is currently under review by MHP for eligibility. Twenty eight rental units are proposed in 6 unit structures and all should count on our SHI.



The current project proposal is for 300 units, each of which will have 4 bedrooms. Excepting a single duplex structure, the residential units are proposed to be in buildings of 5 and 7 units each. Two clubhouses and multiple pavilion structures are proposed for the site.

The parcels for this project total 50.75 acres which are located on the extreme Eastern edge of the Town of Dracut. The project application references their location on the Western edge of Dracut, which is incorrect. The property is undeveloped with a subdivision approval (2017) for 22 single family homes. The site includes just over 5 acres of wetlands, located in three separate areas. There are significant areas proposed for development within the 100' wetland buffers under the jurisdiction of the local Conservation Commission and DEP. A stream/wetland crossing is proposed to provide access to 75 units at the southern end of the proposed development.

Access to the main development is proposed via Poppy Lane and Elizabeth Drive with most traffic impact expected to be within the City of Methuen. Poppy Lane feeds via Rinzee Road to Wheeler Street in Methuen. Elizabeth Drive feeds via Wilshire Circle to Wheeler Road in Dracut whereby vehicles turning right are approximately a half mile from Wheeler Street, in Methuen. Wheeler Street is owned by the City of Methuen and a commercial truck exclusion was recently put in place. The condition and narrow, winding nature of this road were of concern and this proposed project will only exacerbate these issues. A traffic study of impacts in both Dracut and Methuen will be needed.

One of the hallmarks of a Comprehensive Permit project is that strict compliance with local zoning is waived. As local zoning is a primary tool to guide future development patterns and locations this creates conflict. Multifamily housing is not allowed in this zone, so there is none in the area. A proposed multifamily development of this size is not in keeping with the current neighborhoods. Where multifamily development is permitted in town a minimum of 10,000sf of lot area is required. This would cap development on this parcel at approximately 195 units, well below the 300 proposed.

The 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.

Sustainable Development Criteria Scorecard Comments

The applicant has indicated that the project neither rehabilitates structure or infrastructure nor does it revitalize a center or neighborhood. The project is not walkable to any listed amenity and does not conserve land, or protect historic resources. As proposed the project adds 300 four-bedroom units into the existing single-family neighborhood without mixing in commercial, civic, cultural, educational, recreational activities or open spaces. A mix of unit styles, bedroom counts and price points would promote diversity and social equity balance while being compatible with the community character overall.

The concept plan shows various areas where the structures appear to be on the 50' wetland buffer setback. Construction impacts and grading will take place within the 50' setback, well within protected limits administered by the Conservation Commission. A preferred design would consider preserving larger wetland buffers and leaving larger sections of the parcel unaltered.



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The project location is miles from public transportation stops and provides no alternatives to private automobile traffic. There are no sidewalks or bicycle alternatives that connect this project site to the greater neighborhood. With each unit having four bedrooms it is anticipated that many units will have more than two vehicles and the provided parking will be insufficient. The project includes no significant energy conservation strategies or renewable alternatives.

Impacts within the Proposed Development

The location of the project raises concerns that will impact potential new residents directly.

The project proposes parking for two vehicles per unit. This is likely to be insufficient for many of the units given that each will have four bedrooms. It is unclear how parking will be regulated and how far it may be from a specific tenant unit.

The development identified as Region 5 on the Site Plan is in very close proximity to the Brox Industries Quarry Operation. Approximately 300' separates the proposed development from the active quarry. This site has been in operation as a quarry for decades and is anticipated to continue in active use for many decades to come. Blasting is permitted here and there are noise and vibration impacts in the vicinity of this long-time business.

Generally, with larger residential and commercial projects the Fire Chief requires access to at least three, if not all, sides of a structure. There are numerous units here that are accessible only from one side, with parking situated between the structure and the fire truck access. Additionally, there are large sections of the site that are accessible only via a single access road. Should there be an emergency at these pinch points additional emergency vehicle response would be impossible and residents would not be able to exit their immediate area.

The property includes a 50' easement to the Tennessee Gas Pipeline Company that crosses the northwestern corner and again at the junction with Elizabeth Drive. There is also a 20' wide easement for other utilities in that section of the property. A review of the current and possible future impacts will be needed and the risks of proximate development will be considered.

Impacts to the Neighborhood

In sharing the project concept at local board meetings there has been significant input from the public, primarily those residents in the two nearby existing neighborhoods. Access is proposed via Poppy Lane and Elizabeth Drive, both small local roads ending currently in cul-de-sacs. Poppy Lane serves seven single-family homes and Elizabeth Drive has nine. It is likely that neither road was constructed in anticipation of the proposed traffic that this development will generate. The capacity of the streets and levels of service will need to be considered along with the increase in vehicle counts. Access to the site from each of these streets and along Wheeler Street will need to be reviewed for private vehicles, emergency response vehicles and school busses.

The eastern side of Dracut has been identified as needing additional playground and recreational facilities. An updated Open Space and Recreation Plan (OSRP) is underway and feasibility of sites for such expansions is ongoing. The addition of 300 four-bedroom units is anticipated to increase the number of children in this area adding to the already noted lacks. Consideration of including a playground or recreation fields would benefit the future residents as well as the existing neighborhood.

Impacts to the Larger Community

Several concerns have been raised repeatedly by community members in response to this proposal.

While Town reports identify a need for family housing there is also demand for smaller units that would serve the needs of elderly residents who wish to remain in Dracut on limited incomes, veterans and residents needing



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physical accommodations. The proposed development proposes to create units that would not be viable for or appealing to many residents who need housing.

Traffic in the immediate area is of concern. A significant traffic study will be needed to review the immediate access roads and impacts in both Dracut and Methuen. Road capacity, sight lines, snow conditions and other safety issues will be considered. Dangerous intersections already exist where Wheeler Road and Wheeler Street meet and where Wheeler Street ends at Route 113 in Methuen. Improved configurations and signalization may be needed at these locations.

The proposed development is anticipated to bring many students to the Dracut Schools. Currently the middle school and all four elementary schools are at capacity. The Dracut School District has an open Statement of Interest (SOI) with the MSBA for core program consideration of the Campbell Elementary School, which serves this area of Town. The District is in the process of submitting a SOI for accelerated repair of the Greenmont Elementary School, which is the next closest option. In addition to concerns about the tremendous cost of renovations and construction the timing is problematic. The MSBA programs take several years and the proposed project could be completed before the schools are ready. Additional spending on temporary measures that are only needed for a short duration is concerning.

In addition to school related costs, the need to rapidly and dramatically expand the capacity of many Town of Dracut services is problematic. Police and Fire capacity and response times should be considered in the context of this development. A large development on the very edge of town may be more difficult to serve than a similar one nearer to the headquarters. Given the location and size of the development an additional fire station, with staffing and equipment, will need to be considered.

The long-term rentability of 300 identical units may be problematic and there may be initial market saturation if all units hit occupancy at the same time. A mix of unit sizes and styles would provide more balance in the face of future market unknowns. The current project is proposed to 25% affordable and all of the rental units will count toward our SHI. Discussion must include future measures should the market drive transition of some or all units to owner-occupied status. A marketing plan and projections will help show that the proposed project is viable in both the near future and in decades to come.

A project of this size requires a skilled team with significant experience for construction and ongoing management. Additional information regarding team qualifications and organization roles will be needed to ensure that the construction and management do not introduce additional concerns or liabilities.

Overall, we recognize the importance of increasing housing in Dracut and affordable opportunities in particular. We ask that MassHousing request refinement of the proposal to be more appropriate for the site. I am happy to discuss the project and can be reached at amanugian@dracutma.gov or 978-453-4557.

Sincerely,

A handwritten signature in blue ink that reads "Alison Manugian". The signature is fluid and cursive, with the first name "Alison" and last name "Manugian" clearly visible.

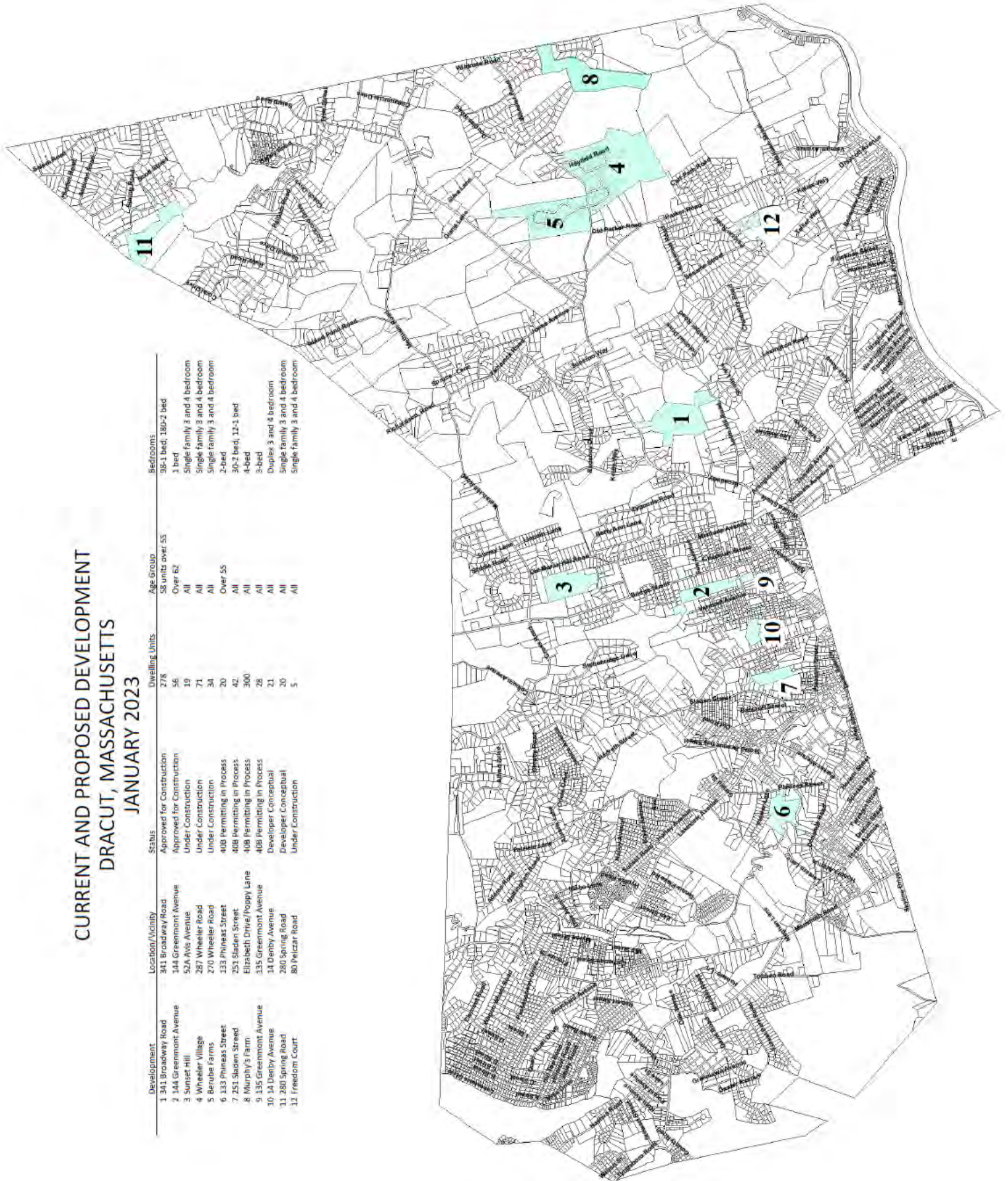
Alison Manugian
Community Development Director



Town of *Dracut*
MASSACHUSETTS

CURRENT AND PROPOSED DEVELOPMENT
DRACUT, MASSACHUSETTS
JANUARY 2023

Development	Location/Vicinity	Status	Dwelling Units	Age Group	Bedrooms
1 341 Broadway Road	341 Broadway Road	Approved for Construction	278	55 units over 55	30-1 bed, 180-2 bed
2 144 Greenmont Avenue	144 Greenmont Avenue	Approved for Construction	56	Over 62	1 bed
3 Sunset Hill	52A Axis Avenue	Under Construction	19	All	Single family 3 and 4 bedroom
4 Wheeler Village	287 Wheeler Road	Under Construction	71	All	Single family 3 and 4 bedroom
5 Berube Farms	270 Wheeler Road	Under Construction	34	All	Single family 3 and 4 bedroom
6 133 Pineas Street	133 Pineas Street	408 Permitting in Process	20	Over 55	2-bed
7 251 Sladen Street	133 Pineas Street	408 Permitting in Process	42	All	30-2 bed, 12-1 bed
8 Murphy's Farm	Elizabeth Drive/Poppy Lane	408 Permitting in Process	300	All	4-bed
9 135 Greenmont Avenue	135 Greenmont Avenue	408 Permitting in Process	28	All	3-bed
10 14 Denby Avenue	14 Denby Avenue	Developer Conceptual	21	All	Duplex 3 and 4 bedroom
11 280 Spring Road	280 Spring Road	Developer Conceptual	20	All	Single family 3 and 4 bedroom
12 Freedom Court	80 Pelczar Road	Under Construction	5	All	Single family 3 and 4 bedroom



Re: Murphy Farm- affordable?

Renee Tanguay <rbtanguay21@gmail.com>

Tue 2/14/2023 11:51 AM

To: Alison Manugian <amanugian@dracutma.gov>

[EXTERNAL] This message originated from outside the Town of Dracut. Use caution when opening attachments, clicking links or responding to requests for information.

My questions and thoughts were still fresh in my mind this morning so I thought it would be beneficial to us both if I jotted them down in advance of tonight's meeting, though I don't expect we would be going into this much detail. Overall, the theme here is that we need to ensure long-term stability of the Property. I'm happy to talk through my notes with you once you've had a chance to review.

Renee

Site Approval Application ("SAA")

TIMING

- What is the anticipated Closing date?
- The SAA indicates that construction will be done in phases. What is the overall construction timeline for the Property?

FINANCING

- Will the construction of the Property be financed with one construction loan?
- Will the Property be financed using a construction to permanent loan? What are the anticipated conversion requirements (DSCR, occupancy, etc.)?
- The soft Letter of Interest from LowellFive suggests that the Property could be up to 75% leveraged with hard debt. What is the projected stabilized breakeven occupancy for the Property?
- How many months of operating expenses, debt service, and required replacement reserve deposits does the capitalized operating reserve represent?

GUARANTOR

- Who is the Guarantor and how is the Net Worth and Liquidity of the Guarantor verified?

DEVELOPER/GENERAL CONTRACTOR EXPERIENCE

To ensure the long-term stability of the Property, it is imperative to ensure that the Developer has commensurate experience with operating a multifamily Property of this magnitude with income and rent restriction.

- How many affordable and/or mixed-income multifamily Properties and units has Kevin O'Brien developed?
 - Is a Schedule of Real Estate Owned available for review?
 - Will the Property be managed by a third-party property manager? If so, is the name of the proposed property manager available to verify qualifications?
- Is an Organizational Chart available for review?
- The SAA highlighted that experience of the Development Consultant who doesn't appear to have ownership interest in the Property. What is the extent of Kevin O'Brien's experience with similar projects? How have they performed?

DEVELOPMENT COSTS

- Per the SAA, hard costs per unit are estimated to be approximately \$593,326. The affiliated relationship between the applicant and the General Contractor raises questions of how the proposed hard costs are verified by DHCD during the 40B process. How do these costs compare to similar projects in DCHDs purview? In essence, the greater the cost to construct the Property, the greater the need to pro forma the highest rent possible for "projected" long-term financial stability of the Property.

- Hard Cost Contingency is estimated to be 59% of the Building Structure Costs! Typical underwriting guidelines for new construction of affordable multifamily properties equals 10% of hard costs.
 - What % of work will be subcontracted out to other firms?
 - What % of the contract value will have been bid to other subcontractors?
 - When is it expected that the total contract value be bought out to other subcontractors?
- The SAA states that 600 parking spaces will be provided. Is street parking considered to be a necessary factor given the 4BR unit size?
 - How does the proposed number of parking spaces measure up to Town requirements?

MARKET DEMAND

- Is a third-party market study available for review?
- The lack of comparable data to support the pro forma rents puts into question both the affordability and achievability of the proposed rent levels. Receipt of a comprehensive market study should provide the information needed.
- What is the pro forma vacancy rate (market rate and affordable) for the units?
- What is the anticipated turnover rate based on market data?
- What are the annual inflation factors assumed for both rent and operating expenses?

LOCAL SUPPORT

- The SAA states that the Applicant has NOT concerted public participation efforts beyond the minimally required public hearing. This is incredibly concerning given the long-term impact the Property will be on our community. The Applicant is not a local resident and has not expanded any effort to garner knowledge of the Town's affordable housing vision and needs.
- Has BROX Industries, an abutting neighbor, been notified of the proposed Property and given an opportunity to comment?

MISREPRESENTATIONS IN THE SAA

- Contrary to the SAA, the Property is located in east Dracut, which is significantly different from the stated western Dracut by way of density and land use.
- The SAA suggests that the Property will be serviced by the Lowell Regional Transit Authority. Where is the nearest public bus stop?
- The Property's rental nature WILL be a new use to the existing neighborhood as all surrounding land uses are owner occupied single family homes along with an adjacent active stone yard (Brox Industries).
- The Property will not be visible from any major thoroughfare.
- The Property will not satisfy the regional need for low income housing, which is defined by HUD as 50% of AMI. The concern is that the Applicant may be using the 40B comprehensive permitting process solely for personal gain rather than proposing a Property that truly reflects the Town's needs.
- Contrary to the SAA, it is not evident on how this Property and its amenities will reduce the dependence on private automobiles.
- The SAA suggests that the Property will provide affordable housing to those that work at abutting farms. What is the average wage of the farm employees? At the suggested rents for units restricted to 80% of AMI, a household would need to earn between \$101,960 - \$117,280 per year (assuming an affordability factor of 30% towards housing costs) to afford the monthly rent for the affordable units, which equates to a gross hourly rate of \$49-\$56/hour.
- Have Impact Fees been considered by the Town of Dracut?
- Has the Town assessed the extent of how this Property will impact the school system?
- It's assumed that a traffic study will be conducted.
- Will the Property offer on-site supportive services? If so, what services will be offered? Will there be a cost to the residents for these services? Who will administer the services?
- How will compliance with the Property's affordability restriction be monitored? Who will be responsible to ensure annual compliance?

Poppy Lane 40B project - neighbor concerns

Heather Araskiewicz <haraskie73@gmail.com>

Fri 2/17/2023 11:11 AM

To: Alison Manugian <amanugian@dracutma.gov>

[EXTERNAL] This message originated from outside the Town of Dracut. Use caution when opening attachments, clicking links or responding to requests for information.

Dear Alison,

Thank you, for allowing residents on the East side of Dracut who will be impacted by the proposed 40B development plan on Poppy Lane to submit their concerns in writing.

I reside at 1046 Methuen Street. I have many concerns about the quality of life impact this development will have on me and my neighbors. I have noted my concerns (with context) below. I would like to receive any updates on this proposal as it moves through the process.

Thank you,
Heather Araskiewicz
508-932-3455

Traffic implications (East Dracut would become more densely populated, congested, traffic-plagued, and urbanized). We are already experiencing traffic impacts due to the following:

Campbell School: I live directly across from the Campbell Elementary School. The exit of the bus loop is across from my front yard and the entrance to the gravel parking lot adjacent to the bus loop is directly across from my driveway. During school drop off and pick up times it is almost impossible to safely enter and exit my driveway due to the vehicle and bus traffic associated with the school.

- If this development is approved, it will increase the number of students attending an already at capacity school. This will ultimately result in the increase of bus traffic and vehicle traffic and possibly foot traffic near my residence.
- In March 2022 the School Department learned it can enter the first phase of a major construction project for the Campbell School. This will be the start of a five- to seven-year process and we don't know what the result will be. This could be a renovation of the Campbell, a renovation with an add like the high school, or a new building. It could also be a consolidation with the Greenmont Avenue School. Regardless of the outcome, during the "construction phase" there will be increase in the number of construction-related vehicles. In the event of an addition to the school or the merger of the Greenmont school there will be a guarantee in school related traffic that will affect residents in the area of the school.

Brox Industries: This traffic is in addition to the truck and vehicle traffic associated with Brox Industries located at the Methuen end of Methuen Street. The employees (250) at the plant use Methuen Street to access the employee parking lot and often are driving at rates of speed above the posted limit. The truck traffic has increased significantly in the past few years. It is not uncommon to see the drivers driving while looking down at a cellphone. The Town of Methuen has banned Brox Industry and associated trucks from turning left down Wheeler Street. This prevents them from using the residential road as a short cut to Route 113.

- In January 2022 Brox Industries submitted a proposal to expand its manufacturing on Methuen Street. They presented a "concept plan" to "discontinue 1,900 feet of Methuen Street" and replace that with a 4,000-

square-foot Y-shaped extension. In addition, the project will open up two other parcels of land for commercial or industrial development. One is 12 acres and the other 36 acres. In the event this proposal is granted permits there is a likelihood of an increase in employee and truck traffic.

Verizon: This facility is located at 28 Dana Lane, Dracut, MA , off Route 113 and employees Verizon Contractors (line men) who drive the large company bucket trucks and use Methuen Street as a cut through from Route 110 to 113.

East Dracut Housing Developments: In the past 5 years the East side of Dracut has had several large housing developments built which have increased the vehicle traffic on roads including but not limited to Wheeler Road, Wheeler Street, Methuen Street, Old Parker Road, Parker Road, Varnum Ave, Stuart Ave, Pickney Street, Percy Street, Huron Street, Camden Street and Nassau Street.

- New housing developments include:
 - o Meadow Creek Drive (29 homes)
 - o Regency Drive (50 homes)
 - o Schiripo Way (18)
 - o Brentwood Drive (18 homes)
 - o Sycamore Drive (19 homes)
 - o Cart Path Road (45)
 - o Barn Road (11 homes)
 - o HoneyBee Road (26 homes)
 - o Laurel Road (7 homes)
 - o Hayfield Road (36 homes)

Broadway Village: fully permitted 40B, 278 unit apartment development at 341 Broadway Road and is in the Campbell School district.

Environmental impact (Build on existing open space): The most attractive aspect of living in Dracut is the amount open space most of which is/was farmland. As farmers have died off the property has been sold off. In some cases, for development (see above) and in others it has been deeded as conservation land by the town. A major concern is the impact on open space, wetland, and the environment.

- o Some 40B developers have been known to violate environmental safeguards
- o Site prep impact to local wildlife/vegetation and water reserves
- o Long term impact to surrounding woodlands and wildlife
- o Build on existing open space
- o 40B project can override zoning districts within our zoning ordinance and are not required to comply with:
 - height limitations & required distances from property boundaries.
 - how much green space must be left on a parcel.
 - Are allowed certain latitudes with building ordinances such as solar and net zero requirements
- o There will be concern about the maintenance of clean groundwater servicing local private wells

Town Services:

- o Strain on Kenwood Water District water mains. The main on Methuen Street is 50+ years old and has already had to have repeated repairs to due main breaks over the past 3 years. Additional tie ins from a 300-unit complex is going to put added pressure on the main and increase the potential for more frequent main breaks.
- o A 300-unit complex is going to put a strain on our Fire Department and Police departments.

Quality of Life impact (for both neighbors and other town residents):

- Increase pressure on parks, playgrounds, and infrastructure.
- The roads in this area do not have adequate sidewalks which would allow residents to walk or exercise safely on streets that will see an increase in traffic. Roads without sidewalks include but are not limited to:
 - Methuen Street from Presidential Lane to Wheeler Street
 - Wheeler Street
 - Parker Road
 - Old Parker Road
 - Wheeler Road
 - Varum Ave
 - Stuart Ave
 - Pickney Street
 - Percy Street
 - Huron Street
 - Camden Street
 - Nassau Street
- Increased residential taxes, potential increase in Kenwood Water District Bills and town Sewer Bills.
- Increase in homeowner and car insurance. With the addition of 300 rental units there is a definite likelihood for an increase in crime and car thefts. The increase in vehicular traffic will most likely lead to more car accidents which will impact insurance rates.
- Devaluation of existing homes due to the proximity of a large 40B development.

In an effort to make housing affordable to people not currently living the town, this proposed development could possibly make it unaffordable for current town residents (elderly and single income households in particular). The town of Dracut has an aging population who live on fixed incomes and will not be able to afford increases in taxes and utilities that will result from the construction of this development. Single resident or households with no children will be saddled with the financial burden of school department budget increases that will result in additional students being sent to our schools.

Services and businesses in town will be strained with the addition of 600 – 1200 new residents on the east side of town. The Post Office and Circle Health Urgent Care are two that come immediately to mind.

Will these units truly be “affordable” or is the developer using the 40B application to build a community with fewer building restrictions. Will any of them be specified as over 55 or affordable senior housing?

Wouldn’t this development be better suited for an area within walking distance to local amenities?

When the town of Boxborough was faced with a large 40B project they took the approach of buying market-rate condos in 40B projects and making them affordable units. Is there an opportunity for Dracut to take a similar approach?

*Included per
request of
Tony Archinski
- Selectman*

OPINION > EDITORIALS

Editorial: Affordable housing within reason



A rendering by Gienapp Architects LLC shows a prototype of a seven-unit multifamily building in the O'Brien Homes application for the proposed Murphy's Farm Chapter 40B development in Dracut. The project, which seeks to build 300 four-bedroom units, would include 34 such seven-unit buildings. Other proposed structures include 12 five-unit buildings and one duplex. (Courtesy Town of Dracut)

By **EDITORIAL** |

February 22, 2023 at 1:15 a.m.

Critics will tell you most people in Massachusetts favor affordable housing — just not in their neighborhood.

That NIMBYism that paved the way for the passage of Chapter 40B, the state's affordable housing law.

Enacted in 1969, 40B allows local zoning boards of appeals to approve affordable housing developments under flexible rules if at least 20-25% of the units have long-term affordability restrictions.

No other municipal authority, including select boards or city councils, can exert any direct influence in these cases beyond offering opinions on how such a project would impact their community.

That doesn't mean affordable-housing developers simply get carte blanche to build whatever size project they want, or that a community has no say in a project's ultimate approval or alteration.

Dracut currently faces an affordable-housing situation where the size of the development — and how it came to be — concerns town officials and residents alike.

Last week, before a packed house at Town Hall, both groups aired their misgivings over a proposed 300-unit Murphy's Farm housing development in East Dracut.

The plan presented by Andover-based developer O'Brien Homes includes 1,200 bedrooms — four bedrooms per unit — on 50 acres.

This wasn't the developer's initial plan for this parcel.



In 2017, O'Brien Homes was granted a permit for a single-family home subdivision on the same property. As recently as 2019, an Engineering Department document shows the project was in progress. Apparently, though the land had been cleared, the project was abandoned.

Now, instead of about two dozen single-family homes spread over those 50 acres, the application for this revised development states that these 300, four-bedroom units, comprising 47 residential buildings, will be a mix of flats and townhouses, along with two clubhouses.

Of the 300 units, 75 — 25% — would be designated as affordable, which meets Chapter 40B requirements.

By comparison, Toll Brothers plans to build a 100-unit, high-end, age-restricted condominium development on 56 acres of the former Tyngsboro Country Club property.

Though admittedly apples and oranges, that density difference plays into Dracut's concerns about this project's scale and effect on town services, a factor addressed by Alison Manugian, the town's economic development director.

In a letter responding to this affordable-housing application, Manugian stated: "All of the Dracut Public Schools are near their capacity currently," she wrote. "The additional student enrollment anticipated from 1200 new bedrooms could drive the need for an additional elementary school or significant expansion of the Greenmont School. In addition to the tremendous cost for taxpayers, the timing of such work is of concern."

Dracut's in the early stages of working with the Massachusetts School Building Authority about plans for the Campbell Elementary School, and has just submitted a statement of interest for work on the Greenmont School. Working through the complex MSBA process can take years, and requires approval from both voters and Town Meeting to fund the project.

Manugian added the municipal side of town government would also feel the impact of such a development.

"Of greatest concern to the community is the need to rapidly and dramatically expand the capacity of many Town of Dracut services. Police and Fire capacity and response times should be considered in the context of this development. A large development on the very edge of town may be more difficult to serve than a similar one nearer to the headquarters."

This proposed cluster of housing units lies on the Methuen line, in the same Wheeler Road/Wheeler Street neighborhood where last year that city raised serious concerns about traffic coming from Brox Industries.

The goal of Chapter 40B — to encourage the production of affordable housing in all cities and towns throughout the state — is an admirable one.

And according to the Department of Housing and Community Development, as of December 2020, Dracut had just 5.2% in subsidized housing inventory, well below the state's 10% threshold.

The commonwealth's lack of affordable housing already weighs on businesses' ability to fill job openings, as young workers especially opt to move elsewhere.

However, each affordable housing application should be judged on its own merits.

Dracut's Zoning Board of Appeals can attach conditions relative to the impact a project of this scope would have on East Dracut in particular and the town as a whole.

As Selectman Tony Archinski stated during that Town Hall discussion, without affordable housing, the town's younger residents will be forced to move away.

"Everyone wants to provide affordable housing," he said. "The issue here is going from 22 single-family homes to 300 homes.

"That math doesn't work."

Just as that single-family housing plan didn't work for O'Brien Homes, neither does this 300-condominium village work for Dracut.

We urge both sides to find a compromise that works for both the town and developer.



Editorial