

[CPC Use Only: Date Received 2/16/2021 By: SAMMIE KUL
Assigned CPC #2022- 01]

If possible, use word processor to fill out form. Please answer all questions, use "N/A" if not applicable.

1. a.) Applicant Name and Organization: Last **Stanley First Fran**

and Organization(s) (if appropriate) **Town of Groton Affordable Housing Trust**

b.) Regional Project: Yes or No? **No** If Yes, Town/Organization:

2. Submission Date: **January 11, 2021**

3. Applicant Address: St. **Town Hall, 173 Main Street**

City/ State: ZIP: **Groton, MA 01450**

4. Ph. # **978-732-1913** Email: **fstanley@grotonma.gov**

5. CPA Purpose. Check all that apply:

Community Housing: ☒ (Affordable Housing: ☒ Historic Preservation*: Open Space:
Recreation

* As per MA General Law Chapter 44B, proposed historic projects that are not on the structures listed on the state's registry of historic places require a determination by the Groton Historic Commission that the proposed project is of historic significance.

6. Town Committee or boards participating: **N/A**

7. Project Location/Address: **Surrenden Farm Reserve Parcel on Shirley Road and various other Groton sites (public and private). These publicly owned sites were highlighted in the current Housing Production Plan and will be considered by the Affordable Housing Trust.**

LOCATION	PARCEL ID	ACRES	ZONING DISTRICT
145 Main Street	113-43-0	3.6	RA/TCOD
Bridge Street	248-9-0	34.7	RA
Hoyt's Wharf Road	249-51-0	10.4	RA
Nashua Road	227-135-0	7.1	RA
Nashua Road (owned by the Groton Housing Authority)	227-93-0	14	RA
Shirley Road (portion of Surrenden Farm)	220-35-0	14.5	RA
Townsend Road	205-9-1	16.9	RA

8. Project Name: **Affordable Housing Site Assessment Study (formerly Site Assessment)**

9. Additional Responsible Parties (If applicable): **For any town-owned land, the Select Board will be a responsible party. To date, no consultants have been engaged.**

10. As appropriate, indicate if proposal requires P&S agreement ___ Deed___

Option agreement ___ Other-describe:

There are no preconditions for this proposal. When the Affordable Housing Trust intends to conduct site assessment activities on town-owned land, then the Select Board's permission will be sought. The Select Board voted to submit a letter to allow testing and review of Town-owned land (see attached).

For investigations of privately owned land, the Trust will seek permission of the land owner. Irrespective of location, all Trust activities advanced with CPC funding will adhere to all limits set by the bounds of the Community Preservation Act, other applicable state law and the Affordable Housing Trust's Declaration of Trust which is the Trust's own foundational document¹.

11. a.) Assessor info. (map/ block/ lot id.(s)): **220/33/2 (Surrenden Reserve Parcel) Note that funds may be used on other properties, which are not identified at this time.**

b.) Tax classification type: **Residential-Agricultural District [for Surrenden Farm Reserve Parcel]**

12. Permits required: Zoning: **N/A** Historic Preservation: **N/A** Other: **N/A**

13. Historic Commission Approval signoff (when required): **N/A** Date: **N/A**

c.) Committed from other sources: **\$ Approximately 25,000 worth of technical assistance, primarily in the form of engineering work, has been offered by Massachusetts Housing Partnership (MHP). MHP is a public nonprofit that promotes the development of affordable housing.**

e.) Annual anticipated total expense: **\$ Unknown**

14. Funding:

a.) Project Cost: **\$ Variable** Estimate: **\$ Similar to the way the Groton Conservation Commission spends the funds it receives from the CPC, the Affordable Housing Trust may or may not expend the entire amount of the funds being requested by the completion date, June 30, 2022. The AHT**

¹ https://portal.grotonma.gov/storage/Affordable_Housing_Trust/Declaration_of_Trust.pdf

requests that it be allowed to retain funds remaining at the completion date, to be spent for the same purposes described in this application.

Professional Quote: \$ **N/A**

b.) Requested from CPC: \$ **150,000**

c.) Committed from other sources: \$ **25,000 (MHP verbal commitment)**

d.) Annual anticipated total income: \$ **None**

e.) Annual anticipated total expense: \$ **Unknown**

f.) Anticipated net income (loss): \$ **None**

g.) Estimator name/company: **N/A**

15. CCP Objectives - use codes from Section 5 to indicate all that apply:

5.2.1 Encourage diversity of housing types for range of income levels and ages

- **Provide housing for people with disabilities.**
- **Use CPA funds to address broader range of affordable housing needs, even if the CPA assisted units do not qualify for Chapter 40b requirements.**

16. Project Timelines: Proposed Start Date: **July 1, 2021** Projected Complete Date: **June 30, 2022**

17. Estimated Delivery Date of Completion Report to CPC: **July, 2022**

18. Project description and explanation (attach additional sheets as needed):

The Affordable Housing Trust is exploring the development of low income housing tax credit (LIHTC) rental housing. As these projects typically yield about 50 units of housing and are rental projects, the total unit count and not just the subset of affordable units would be added to the Town's Subsidized Housing Inventory². The Surrenden Farm Reserve Parcel (SFRP) is town-owned and was purchased with CPC funds. While most of Surrenden Farm was set aside for open space, the Reserve Parcel was allowed to retain development potential and community housing is one of the allowed uses of parcel. Therefore, the Trust may continue its exploration of the site using some of the requested CPC funds.

Expanded Scope

As noted in the complete draft proposal, this final application expands upon the scope of the initial two-page application. During the pendency of this application cycle, the Trust took preliminary no cost steps

² Many tax credit projects are mixed income developments. The type of tax credit project that is most likely to be built on the Reserve Parcel is a mixed income development with some deeply subsidized rental units. Currently, a one-bedroom apartment rented by a household earning up to 60% of the area median income costs approximately \$1,440 a month. That is an example of a lightly subsidized rental unit. While qualifying as affordable housing by the Department of Housing and Community Development and qualifying as allowable community housing under Community Preservation Act requirements, the rents will fall upon a spectrum.

to research the Reserve Parcel. The Trust held a site walk, initiated early community outreach through several housing trust meetings, gathered published environmental information, reviewed past subdivision plans, and examined a 2006 era legal agreement concerning the development of this parcel.

The Trust heard from individual community members and there was reportage as well as editorial comment in the *Groton Herald*. Some of this early feedback urged more community outreach and suggested that the process for securing community buy-in should include both an exploration of other locations as well as alternative project types. It was suggested that the Trust would be unwise to zero in on one parcel without a more comprehensive prior review to ensure an affordable housing outcome that meets community needs. In addition to the Surrenden Farm Reserve Parcel, the Affordable Housing Trust would like to use requested CPC funds to investigate affordable housing feasibility for certain town-owned parcels with development potential³ and also the potential acquisition of any suitable parcels that are now in private ownership.

Assembling necessary financing for affordable housing projects is complicated. Following all legal requirements governing the actions of a municipal affordable housing trust is also complex. The Trust will need to contract for expert advice on feasibility and obtain specific legal advice in order to sift through its options and present a sound project to the Town. In order to explore available options, the Trust will need to expend time and money and, since every site is unique, snags and unknowns may present that will need to be resolved. For all of these reasons, the Trust would like to retain any unspent funds remaining at the June 30, 2022 conclusion of this proposed project so that the Trust will have the flexibility to make effective progress for the acquisition or creation of affordable housing as the process unfolds.

Initial Site Planning and Site Assessment

The Affordable Housing Trust needs to answer basic questions about each site under consideration in order to assess its development potential. Information gathered and advice received will help the housing trust and the public decide what is wanted for the site and how best to create desirable affordable housing.

The Affordable Housing Trust anticipates that it would use CPC funding to engage one or more consultants to advise the Trust on predevelopment issues such as

- bringing utilities to the site (water, sewer, etc.)
- advising on necessary infrastructure (road improvements, etc.) to access the site
- advising on initial financial feasibility (majority of development funding will be from a combination of outside funding such as grants and tax credits)
- advising on MGL c. 40B permitting and potentially local multi-family zoning
- considering the preparation of a master plan to guide future development of larger sites (ex. identifying portions of the site for phased development)
- structuring Requests for Proposals (RFPs) to meet legal requirements while inviting development proposals advantageous to Town interests.
- conducting preliminary engineering (may include title searches, surveys, perc tests, conceptual site plan)
- appraising site for future disposition
- conducting environmental reviews such as wetlands delineations, Natural Heritage, etc.
- conducting market analysis to guide decisions regarding the appropriate mix of one-, two-, and three-bedroom units, and/or age-restricted units.

The Affordable Housing Trust has explored alternative funding sources for feasibility and predevelopment. The results of that research are as follows:

³ See current Housing Production Plan for details.

- Massachusetts Housing Partnership (MHP): verbal commitment of \$25,000. When investigating a target site, it is recommended that the MHP consultants act first so that local dollars can follow up and be used to address further work that MHP experts recommend.
- Community Economic Development Assistance Corporation (CEDAC): not an option. CEDAC works with private developers not municipalities.
- MassWorks Infrastructure Program: if an affordable housing project is dependent on public infrastructure improvements, then this type of project would be eligible for MassWorks funding.

19. Feasibility: **This proposal is feasible. Based on a review of other towns⁴ and the Community Preservation Coalition website, funding applications for initial site planning, site assessment and the acquisition or creation of affordable housing are common funding requests.**

20. List of attachments:

1. February 9, 2021 letter from the Select Board
2. January 25, 2021 letter from the Groton Housing Authority
3. February 10, 2021 letter from the Diversity Task Force
4. February 16, 2021 letter from the Planning Board

21. Additional Information: **For town-owned parcels, any reports made or data gathered will be submitted as part of the final report.**

22. Management Plan:

Overall, the Affordable Housing Trust strives to direct the expenditure of these funds in the most cost-effective way possible to achieve the goal of creating a significant amount of affordable housing.

METHODOLOGY

The Affordable Housing Trust will maintain regular contact with the CPC liaison. The Affordable Housing Trust will coordinate with the Town Manager, who also serves as Chief Procurement Officer, and the Town Accountant to ensure that its actions adhere to public procurement law as well as municipal rules for spending public funds. More specifically, the Trust will vote on expenditures and only spend CPC funds on allowable expenses.

Trust will direct the Housing Coordinator to assist with Trust activities as needed. If professional advice is required to ascertain the legal or prudent course of action, then the Affordable Housing Trust intends to contract for that advice whether it comes from legal counsel, engineering firms, affordable finance experts, etc. A selected member or members of the Affordable Housing trust will be physically on site to monitor any assessment work occurring in situ.

SELECT SITE

The Affordable Housing Trust will evaluate the merits of each opportunity to create affordable housing and, by majority vote, select an appropriate site [an appropriate site is defined as a combination of either a site with developable land or a site with existing structure/s suitable for use as affordable housing

⁴ Acton, Billerica, Chelmsford, Harvard, Stow, Sudbury and Westford.

together with an evaluation of financial feasibility to accomplish this goal]. Occasionally a resident may approach the Trust or respond to invitations from the Trust to propose new affordable housing. If or when the Town is notified of its right to first refusal on a parcel under the M.G.L. Ch. 61 tax program, the Affordable Housing Trust may consider and evaluate the property for affordable housing.

The following is a more detailed look at the some of the elements of site selection.

- Property Size: Will the property accommodate a building or series of buildings that will work for affordable housing? How much parking space will be needed? Will a development require retention ponds to address stormwater runoff from impervious surfaces such as parking areas or rooftop? Is there adequate space to manage emergency services access, turnarounds, trash containers, snow removal and landscaping?
- Environmental Elements: Is there bedrock or ledge that may require blasting? Is the site in a flood zone? Are there protected wetlands, streams, ponds, vernal pools? Are there any protected animal species in the area? Is there any known soil contamination?
- Utilities: Will electricity, telecom/internet, natural gas, municipal water, and municipal sewer be available? If yes, what is the proximity for hook ups. If not, for any essential utilities like water and sewerage, can the site accommodate a public water supply well and septic system(s)?
- Road and Transportation Access: How will the site be accessed – public road, private road, shared driveway? Will the access be on site owned land or via easement? What is the estimated length of the entrance way? For anticipated development, how much traffic volume will be added? Will the existing road need to be improved? Road improvements may involve paving or installation of traffic lights, curbs, or catch basins.
- Zoning and Regulations: How will the site's present zoning influence the development in terms of height limitations, setbacks, green space, noise requirements? Will rezoning be necessary to accommodate affordable housing?
- Local Support: Is the site located in an area where the community is likely to buy in and support the acquisition and development of affordable housing?

IDENTIFY SUPPLEMENTAL FUNDING ALTERNATIVES

The Massachusetts Housing Partnership (MHP) has made a verbal commitment to provide \$25,000 worth of engineering work on behalf of the Affordable Housing Trust. When investigating a target site, it is recommended that the MHP consultants act first so that local dollars can follow up and be used to address further work that MHP experts recommend.

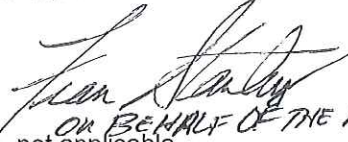
With the marked cost of creating below market rate housing and the desire to maintain long-term affordability (30 years or perpetual), the Affordable Housing Trust understands that almost all housing beyond the production of a single unit will depend on the identification and utilization of non-local funding alternatives. For example, the Low Income Housing Tax Credit program (LIHTC), which is the primary federal program for funding new affordable housing, requires local municipal support. That local support could take the form of the provision of Town owned land and/or funding available through the Affordable Housing Trust.

Another example of useful outside funding is the Commonwealth's MassWorks grants which can fund infrastructure projects such as road improvements or sewer. In rural communities such as Groton, town sewer is limited, town water is not always available and existing roads may not be adequate for site access.

ONGOING SITE ASSESSMENT

The Affordable Housing Trust might purchase a site and arrange for the development of affordable housing or it may contribute funds to a project undertaken by a developer who has already devised a credible project. Regardless of the path, the Trust must engage in ongoing assessment of feasibility, one element of which is site assessment, in order to ensure that efforts are productive and cost effective.

23. Applicant Signature:



Date:

FEBRUARY 16, 2021

Co Applicant Signature: not applicable

ON BEHALF OF THE AFFORDABLE HOUSING TRUST

Co Applicant Signature: not applicable



TOWN OF GROTON

173 Main Street
Groton, Massachusetts 01450-1237
Tel: (978) 448-1111
Fax: (978) 448-1115

Select Board

Alison S. Manugian, *Chair*
Joshua A. Degen, *Vice Chair*
Rebecca H. Pine, *Clerk*
John R. Giger, *Member*
John F. Reilly, *Member*

Town Manager
Mark W. Haddad

February 9, 2021

Groton Community Preservation Committee
Groton Town Hall
173 Main Street
Groton, MA 01450

RE: CPC # 2022-04
Site Assessment Study

Dear Members of the Community Preservation Committee:

On behalf of the Groton Select Board, I am writing to you with regard to project *CPC# 2022-04, Site Assessment Study*. The Select Board voted three (3) in favor, with two (2) abstentions, to support testing on and review of Town owned land in the furtherance of providing Affordable Housing in the Town of Groton.

One of the Select Board's Goals this year is to examine options and alternatives for affordable housing. This funding will allow the Affordable Housing Trust to investigate properties owned by the Town of Groton. The Select Board will grant permission to the Trust for testing on Town property.

The Select Board appreciates the opportunity to provide this recommendation and would request that the Community Preservation Committee bring this project to the Spring Town Meeting for approval.

Thank you for your attention and consideration.

Sincerely,

Mark W. Haddad
Town Manager

MWH/rjb

cc: Select Board
Affordable Housing Trust

GROTON HOUSING AUTHORITY
19 Lowell Road, Groton, MA 01450
Phone (978) 448-3962 ~ Fax (978) 448-5845
Email: grotonhousing@verizon.net

January 25, 2021

Bruce Easom, Chair
Community Preservation Committee
173 Main Street
Groton, MA 01450

RE: 2022 application
Site Assessment
sponsored by Affordable Housing Trust

Dear Mr. Easom:

I am writing on behalf of the Groton Housing Authority to register our Board's support for the Affordable Housing Trust's pending application for community housing funds.

Formed in 1982, the Groton Housing Authority is the Town's original housing organization. The Groton Housing Authority leases apartments to low-income households. Positioned as it is, the Groton Housing Authority recognizes the importance of affordable housing and the great need for more affordable units. The Affordable Housing Trust's application to do site assessment work represents a good early step on the path to creating more affordable housing.

At the Groton Housing Authority's January 20, 2021 meeting, our Board voted unanimously in support of this application.

Thank you for your attention to this matter.

Sincerely,



Lisa Larrabee
Executive Director
Groton Housing Authority

cc: Becky Pine, Chair of the Affordable Housing Trust



Diversity Task Force

Raquel Majeski, Chair
Nii-Ama Akuete
Michelle Collette
Joshua Degen
Deborah Dowson
Rafael Glod
Nadia Madden
Tim Manugian
James Moore
Paul Shay
Audra Waiters

February 10, 2021

Bruce Easom, Chair
Community Preservation Committee
173 Main Street
Groton, MA 01450

RE: 2022 application
Site Assessment
sponsored by Affordable Housing Trust

Dear Mr. Easom:

I am writing on behalf of the Town's Diversity Task Force to register the Diversity Task Force's support for the affordable housing trust's pending application for community housing funds.

At the outset of the Diversity Task Force, our committee recognized the importance of affordable housing and have made affordable housing a focus of our work. There has been a longstanding need for more affordable housing and this CPC application represents a step in the direction of creating more affordable housing.

At the Diversity Task Force's January 14, 2021 meeting, our Committee voted in favor of sending this letter of support.

Thank you for your attention to this matter.

Sincerely,

Raquel Majeski, Chair

February 15, 2021

Groton Affordable Housing Trust
Town Hall
173 Main St.
Groton, MA 01450

Re: Letter of Support for the Proposed grant to investigate sites for Affordable Housing in Groton, MA

Dear Groton Affordable Housing Trust,

The 'A Better Community – Affordable Housing' Working Group (ABC-AH) and its members hold significant concerns about the Town of Groton meeting compliance under the Mass DHCD's Housing Production Plan Regulation (M.G.L. 760 CMR). As of February 2021, the Town of Groton is meeting approximately half (Exhibit A) of the Mass DHCD required minimum of Chapter 40B SHI (based on 2010 housing counts).

Based on the Massachusetts Department of Housing and Community Development's most recent data on the Chapter 40B Subsidized Housing Inventory (SHI), Groton has 3,930 year-round housing units, of which the state currently counts 222 units as affordable, representing 5.65% of the year-round housing stock. Of the 222 units, 177 are rental units and 45 are ownership units; 63 units are restricted as affordable in perpetuity and the remaining 159 units have varying dates of restriction expiration, the earliest being 2029. The DHCD's SHI is based on 2010 housing counts and when the 2020 census is completed, the percentage of affordable units will decrease based on the increased number of housing units. Groton has been proactive in steering its own destiny regarding affordable housing in working with developers and others to have built only what the town feels is appropriate for Groton. To meet the 10% required minimum of affordable housing units, Groton will need an additional 173 units. The following affordable housing units were added to the town's SHI since the last HPP in 2014:

- Boynton Meadows 3 Ownership Units
- Reedy Meadow Estates 2 Ownership Units

(Exhibit A)

With specific reservations, ABC-AH supports all opportunities not just limited to exploring the Surrendon Farms site for Groton to meet its mandated levels of Affordable Housing. As noted in the Groton Housing Production Plan (HPP) 2020-2025, *"to meet certification requirements, Groton will need to produce 20 units in a year, or 39 units in two years."* It is the opinion of ABC-AH that Groton should immediately embark upon a balanced program to ensure that affordable housing is created to equally meet the needs of both young and old, empty-nesters and young families, existing residents and those that are sure to find Groton attractive in the years ahead. It is the opinion of ABC-AH that additional weight should be afforded to the preference of mixed-age and mixed affordability, with good access to community resources.

The Groton HPP states, "The GDRSD is ranked highly in the State as an excellent district for education and this fact brings families to the community, creating a housing demand, which in turn increases housing prices and creates an ever-increasing need for affordable housing." Embracing this driver of continued population growth and housing needs, Groton should craft policy that allows it to retain the power to direct the type of housing needed and to ensure that affordable housing for young families is an equal part of the Subsidized Housing Inventory (SHI) mix.

The Town of Groton has an important opportunity to achieve compliance with MA 760 CMR while simultaneously increasing the affordability for lifelong residents and new families alike, as well as easing the tax burden on each and every household. Groton should be expeditious in purpose and execution of its needs but the Town Boards should be prescriptive, ensuring to retain enough control to guarantee the necessary successful outcome of affordable housing for all age and family types.

Respectfully,

ABC-AH Members