

March 21, 2024

Mr. Scott Wilson, Chairman
Groton Planning Board
Town of Groton
Groton, MA 01450

Regarding: Multi-Family (24 units) Age-Restricted Housing Special Permit
Application for 797 Boston Road from 119 Partners, LLC

Dear Chairman Wilson and Members of the Groton Planning Board,

Since becoming aware of the subject request of 119 Partners, LLC, (hereafter referred to as “the Developers”), area residents comprising the Four Corners Neighborhood Association have studied supportive documents and attended meetings of the Town’s Sewer Commission, Affordable Housing Partnership, and Earth Removal Stormwater Advisory Committee organized to discuss the request. While we share the Town’s goal of making available more residential options in Groton, we have several categories of concerns and questions pertaining to this proposal by Developers that we would appreciate being fully addressed by the Planning Board before consideration for approval advances. They are as follows:

1. High Density of Development on 2.7 Acre Site

- a. Is the proposed number (24) of parking spaces considered appropriate, considering § 218-9.3 B(4) (a) Page 80 - 81 “Parking areas shall not contain more than 12 spaces each” (i.e., 24). Refer to: https://portal.grotonma.gov/storage/Planning_Board/Zoning%20Bylaw/Updated_Zoning_Bylaw_5-1-2021_ATM.pdf
 - i. Only one space for 2-BR units whose total occupants of each unit are likely to own at least two cars
 - ii. No spaces for guests or service workers, including home visiting nurses, caregivers, etc.
 - iii. No spaces for delivery vehicles
 - iv. Where in the Application for a Special Permit (hereafter referred to as “the Application”) is an explanation of how USPS/mail/delivery services are to be managed for this development considering a single entry to each building and no security services?
- b. Due to the density, what is the potential impact of storm water and rainwater runoff? This deserves greater detail, clarification and discussion in light of the extensive, written review by Nitsch Engineering for the Town of Groton (March 18, 2024 Project #13346.29) of the Operations & Maintenance Plan (pp.9-12) in Appendix A prepared by Howard Stein Hudson for the Developers in the Application.

- c. What are the plans for HVAC, including the outdoor location of condensers if all-electric heating and cooling are envisioned by Developers? How might exterior aesthetics be negatively impacted by such outdoor equipment?
- d. If commercial laundromats are prohibited in the Four Corners sewer district, why would 24 active washers on only 2.7 acres be permitted? How is the 3,120 gallons of sewage flow calculated for this proposal? What maximum number of occupants is assumed in this calculation in the Application? Are there therefore any occupancy restrictions per unit for this proposed development? If so, how will this be enforced by the Developer and by the Town?
- e. How will 24 additional household units, representing 38 bedrooms and an unknown number of occupants, affect the quality of underground water in the vicinity for use by all of the private household dwellings with private wells?
- f. What is the impact of the Application on the natural environment, especially on ground and surface water quality and level, both for the proposed development and its environs and for the Town as a whole? (See § 218-9.3 B(5)(d))?
- g. Immediately following completion of the proposed construction, how is the market value of adjacent and nearby single-family property likely to be affected? Has a local residential real estate expert in Groton been consulted on this question? What objective support exists for the claim made in the Application for a Special Permit that “the Project will enhance the value ofabutting properties”?

2. Loss of Mature Vegetation under the Landscaping Plan and Related Concerns

- a. Why are there contradictory statements between the claims in the Application, e.g. “...no significant vegetation removal or removal of wildlife habitat...” compared to its Landscaping Plan that shows removal of all mature (some 50+ feet in height) evergreen trees at the roadside intersection of Boston Road/Forge Village?
- b. If the existing mature trees on Road 119 have not posed a problem for the State, what is the justification now for the Landscaping Plan that calls for removing “vegetation forincreased intersection visibility”? Similarly, what is the explanation for “existing wooded area [on southeast property line] to be cleared,” when all such removal of existing trees and wooded area threaten the existing wildlife habitat?

- c. While the Plant Schedule is admirable, other than cost to the Developers, why are more than two-thirds of new deciduous and evergreen trees to be planted under 7 feet in height? Is their survival beyond the first year of planting not threatened? Similarly, why are few, new trees and evergreens 7+ feet in height, comprising under one-third of all new such plantings, proposed only for the interior of the property and not roadside to help shield this commercial housing complex from view?
- d. Is there no in-ground irrigation proposed? Why not? Without an on-site manager and associated maintenance personnel, how will new plants be nurtured and watered particularly during dry seasons/drought conditions to ensure their survival and growth? To assure adherence to the Plant Schedule under the Application, will the Town continue to be responsible for inspection and oversight for the replacement of originally planted species but dying plants under the Application?

3. Potential for Exacerbating Traffic Congestion and Reducing Road Safety

- a. Is the proposed new entrance/egress on Forge Village Road too close to the busy intersection with turning lanes on Boston Road/Sandy Pond Road/ Forge Village Road? The intersection of Roads 225 and 119 is already experiencing the second highest number of accidents and traffic violations in Groton, based on the 2023 Traffic Study. To what extent will such statistics worsen? How might this be mitigated?
- b. Does the Plan meet the Town of Groton's requirements for a new "road" between the two newly constructed buildings? Without gates, what prevents this road from becoming a "cut through" between Roads 225 and 119 rather than solely for Emergency Vehicles? Given the relatively high traffic flow at this intersection, what assurance is there this emergency designation will be exclusive and safeguarded?
- c. Since the Four Corners Intersection is undoubtedly the visual gateway to Groton, is the Application the welcoming look we wish to impart? Has Destination Groton been consulted?
- d. What is the impact on the Sign Bylaws of the Application, if granted? What is the proposed roadside signage envisioned by the Developers for this commercial, rental property, upon completion? Why is this not included in the Proposal?
- e. Has the State of Massachusetts been consulted? We are concerned that crosswalks with flashing lights for safety should be added. Similarly, how are we assured that new sidewalks will be constructed contemporaneously with the project and contiguous to and connect with

existing sidewalks? Sidewalks that go nowhere do not enhance our neighborhood and its livability.

- f. Are not additional outdoor lights warranted for pedestrian, driver, and resident safety other than those proposed? How might wildlife sacrifices be mitigated due to such lighting? Will “Dark Sky” lighting be implemented for this project?
- g. Does the Groton Police anticipate additional calls and surveillance needs as a result of the Application? EMS? Fire? What additional costs to the Town are expected? Will the Developers (and any subsequent owners) bear this cost or will the tax burden on residents of Groton be increased?

4. Questionable Fit for 55+ Age Restriction

- a. How many of the 24 units meet ADA requirements, especially bathrooms? Is there adequate room for the use of a walker and wheelchair? How many units have walk-in showers, for example? Are both interior and exterior doorways ADA compliant? Although not required for the proposed number of units, why are elevators not included as enhancements to quality of life in plans if they are to be age-restricted to 55+?
- b. What is the plan for emergency evacuation of 2nd floor residents, especially those with mobility impairment as they age?
- c. While the Municipal Affordable Housing Trust Fund states among its objectives its “aim to provide affordable housing in Groton for the benefit of low and moderate income households for all...” can the Planning Board help us to understand how “affordability” in this case is similar to or different for 40b developments? How is affordability determined for rental units by the Developers? Since pricing is a function of supply and demand and thus constantly changing, how do the Developers intend to maintain the affordability of 12 of the 24 rental units in perpetuity? Where is assurance of this in the language of the Application provided?
- d. Should a legal document such as the Application given to the public contain promotional language? For example, its language misuses the term “age in place” which, when used correctly, refers to older adults remaining in their private home with in-home care or relocating to live in a continuing care, residential facility in which higher levels of care are accessible and available when needed as one ages and is unable to perform activities of daily living. Such marketing language that makes false or unsupported promises about the proposed project should be removed.

- e. What evidence is there that Groton needs more age-restricted housing, compared to more housing options for new/young families of low to moderate income? Groton's demographic trends and housing stock strongly suggest the latter. Where is the documentation supporting the Application's statement that this project "serves the need for more senior housing in the Town of Groton, which is essential and underserved"? Should the new units not be age-restricted, thereby allowing demand of the free, local marketplace determine age-suitability?

5. Lack of Assurance for On-going Maintenance and Upkeep of Rental Units

- a. Given the porosity of the paving material, how will critically important maintenance be assured without on-site management/maintenance personnel? Neither quality nor frequency of Town inspection can infuse integrity into owner oversight.
- b. What are the plans for emergency maintenance needs, such as clogged toilets in the night, of elderly residents?
- c. Given the lack of maintenance and upkeep of 797 Boston Road since it was purchased by the current owner in 2005, what assurance does the Four Corners neighborhood have that the Developers will begin caring for and maintaining the property henceforth? The last dwelling on this plot of land deteriorated to the point of being condemned by the Board of Health and thereafter demolished under the current owner's watch. For many years to follow, this site has remained an eyesore for our neighborhood.

As you can see, a reoccurring theme running throughout much of our above comments is concerned with upkeep, on-going maintenance, and oversight.

We realize that a review process is already underway. Nevertheless, we appreciate the opportunity to witness responses to concerns and questions raised herein, with the expectation and trust that appropriate modifications will be made to the Application and its accompanying documents prior to final approval. We are happy to meet with the Legal Counsel representing the Developers prior to your upcoming meeting on March 28th if this can be satisfactorily arranged with a representative number of us residents.

Thank you very much for your consideration.

Sincerely,

Four Corners Neighborhood Association