

# *Town of Lancaster*

## *Office of the Select Board*

*701 Main Street, Suite 1*

*Lancaster, MA 01523*

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*Jason A. Allison, Chair  
Stephen J. Kerrigan, Member  
Alexandra W. Turner, Member*

*Kate Hodges, Town Administrator  
Kathleen A. Rocco, Executive Assistant*

May 26, 2022

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Mr. Michael Busby, Relationship Manager  
Massachusetts Housing Finance Agency  
One Beacon Street  
Boston MA 02108

Dear Mr. Busby

On behalf of the Town of Lancaster, I wish to thank you and your colleagues at MassHousing for the opportunity to comment on the 40B application presented by Capital Group Properties dated April 26, 2022. After receiving Capital Group's complete application, the Town solicited feedback from residents, Town Boards, Committees, and other interested parties. Responses from individual citizens were aggregated for ease of review. Many who commented highlighted the need for additional information, dialogue within the community and amongst the regulatory boards, and a better understanding of how the proposed 40B may fit into a larger scale project at the site. Comments and responses received from Town Boards and Committees were provided in their entirety to the Select Board and are attached hereto. I have attached comments from individual members of the public who specifically requested I do so. Many respondents asked that their personal information not be shared and while their correspondence is public record, I hope to respect their collective wishes. This letter serves to summarize the common themes received from all interested parties for your information and consideration.

I believe the community's response to be mixed. The respondents clearly took a great deal of time to go through the application and its many appendices. The feedback received was thoughtful, insightful, and inquisitive. There are several questions regarding the projects' viability and appropriateness which I believe stems from the community's desire to explore other options such as the 40R development discussed months ago. There were several respondents who questioned the environmental impact and how the project may be perceived through an Environmental Justice lens. Over the past several months, many possibilities for the site have been presented to the community varying in both size and scope. It is difficult to fully separate the idea of a stand-alone 40B project from any other of the development initiatives proposed. The idea of a 40B existing in a vacuum and subsequently asking the community to opine on its appropriateness alone, without taking into consideration the surrounding site, is implausible.

The Select Board, during their meeting on May 23, 2022, reviewed much of the feedback received to date relative to the 40B application. The Board also heard from interested parties during their public comment period. Overall, the community supports the idea of increased affordable housing. Currently, Lancaster is at 5.5% Subsidized Housing Inventory (SHI) which is expected to decrease when the updated census data is released later this year. There has been a great deal of very noticeable progress in Town relative to Affordable Housing. Lancaster now has a housing production plan, adopted inclusionary zoning, appointed an Affordable Housing Trust, and approved a large project at Goodridge Brook Estates which is unfortunately halted due to a legal matter, but underwent a comprehensive MEPA review and an environmental impact assessment.

The 40B application is noticeably silent relative ‘other’ types of development for the adjacent areas, as alluded to previously. 50 of those acres are zoned as residential. The idea that these acres *could* be used to accommodate future large-scale residential development is a matter of public interest and needs to be fully explored before any universal opinions on the 40B application can be made. Secondly, a masterplan was not provided as part of the 40B application and would have been a welcome addition to the application as it would have allowed residents the ability to fully understand and appreciate the location of the 40B relative to the proposed area amenities (i.e., the anticipated bus stops and trail access points referenced in the application narratives). Lastly, my office received several calls from residents wanting to comment on the application. Many of them mentioned their desire to see a plan for the redevelopment of the former sand and gravel operation relative to the 40B location. Specifically, there is a concern that the location of the housing may be less than ideal for new residents particularly *if* the surrounding area are mixed-use zones. Should the 40B concept proceed, Lancaster residents will require a more comprehensive plan and impact analysis to fully consider the long-lasting impacts of any type of development not only for its potential environmental impacts, but also development impacts to town services, schools, traffic, and other quality of life considerations.

While not directly related to the 40B application, it is important to note for the record that the MA Department of Housing and Community Development is currently reviewing an Application for North Lancaster’s Smart Growth Overlay District (G.L. c40R). We are awaiting a Town Meeting to vote on both a rezoning proposal – aimed to change the land proposed for the 40B to enterprise use, *and* a 40R district overlay bylaw. Many of the Boards/Committees (and interested residents) have noted that the idea of creating a 40R zoning district *may* provide a longer lasting and more positive financial impact in Lancaster.

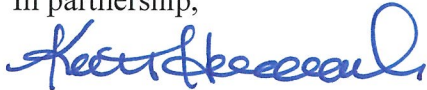
I attended the mandatory walkthrough of the proposed 40B site on May 10, 2022. It’s worth mentioning, I believe, that during that meeting, MassHousing representatives were candid regarding their belief that while a 40B application would *likely* receive preliminary approval, but the agencies’ preference would be to locate a 40R development somewhere on the site. The Town appreciates that this notion is not a reason to deny or discourage the 40B application and wants to ensure our comments are perceived in that way. However, it is important that Lancaster can ensure the highest and best use of the area which will work to benefit the Town for years to come. Considering this, the notion of exploring all ideas relative to different zoning authorizations, site plans, or the creation of multi-use districts may prove more beneficial to Lancaster than one stand-alone 200-unit project.

Thank you once again for the opportunity to submit our comments relative to Capital Group's 40B application. I reiterate that Lancaster remains supportive of the application process and the notion of adding affordable housing in our community. As more information becomes available and further discussions are had, the community hopes to engage all parties to better understand the project(s) as a whole.

In closing, while this 40B initiative outlined in the application does help to fulfill one of Lancaster's goals relative to affordable housing, the notion of a more comprehensive and financially beneficial development is certainly more appealing to the Town.

Should you need any additional information, please do not hesitate to contact me directly.

In partnership,



Kate Hodges, Town Administrator

Town of Lancaster

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