



TOWN OF BOXFORD
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March 31, 2022

Mr. Michael Kennealy, Secretary
Executive Office of Housing & Economic Development
100 Cambridge Street, Suite 300
Boston, Massachusetts 02114

RE: Town of Boxford's Comments on MBTA Communities Draft Guidance

Dear Secretary Kennealy:

On behalf of the Boxford Select Board, I offer the following comments on the proposed Draft Multi-Family Zoning Guidance for MBTA Communities.

Massachusetts has an undeniable housing issue which contributes to the high cost of housing in the State and our region. The Town of Boxford understands the need to increase the supply of market and affordable housing in Massachusetts. But we do not believe applying the same standard across all 351 communities makes sense. A one size fits all approach is rarely the best or most effective approach.

The Town of Boxford is considered by state definition as a rural community with a population density of 340 people per square mile, below the 500 people per square mile threshold. Over the decades there has been strong commitment to establishing long-range planning efforts centered on the town's residents, environment and rural character. Boxford has engaged over the years in numerous efforts at long-range planning, including the development of Master Plans, Municipal Vulnerability Plans, Housing Production Plans, and Open Space and Recreation Plans, among others. In all of these plans, there is a conscious effort to balance the needs of the community, including both increasing and diversifying housing inventory, while preserving the Town's character and identity.

Section 3.b. of the Draft Guidelines sets forth general principles that should inform more specific compliance criteria, and states:

“Reasonable size” is a relative rather than an absolute determination. Because of the diversity of MBTA communities, a multi-family district that is “reasonable” in one city

or town may not be reasonable in another city or town. Objective differences in community character must be considered in determining what is “reasonable” for each community.

Unfortunately, the Draft Guidelines requires a one-size-fits-all multi-family zoning district of at least 50 acres in all MBTA communities and adjacent communities, such as Boxford. This 50-acre minimum area, multiplied by the 15 units per acre minimum density, yields a minimum unit capacity of 750 units.

For Boxford, the minimum unit capacity of 750 units represents over 27% of the existing housing stock. This is greater than the proportion of multi-family units required of larger communities with transit that need to only meet a 10% proportion of multi-family units compared with existing housing stock. For Boxford and many other smaller communities, the Draft Guidelines are not reasonable, and we request they be changed to reflect the general principles as articulated in section 3.b. of the Draft Guidelines.

With regard to the density requirements in the Draft Guidelines, existing wetland and title 5 requirements would make it prohibitive for Boxford to be in compliance, not without resorting to multi-story apartment buildings out of character with the community. Boxford relies on private wells and on-site septic waste disposal systems to serve individual residences, necessitating large lots and strict bylaws for the protection of water resources, wetlands and the environment. In addition to these reasonable development limitations, Boxford has many areas of wetlands and poor soils that are not suitable for development and are protected by regulation. To achieve a gross unit density of 15 units per acre in Boxford is to stack units vertically in multistory apartment-style buildings so that as much land area as possible can be left available for septic, wells and other infrastructure. None of Boxford’s long-range planning to date contemplates the density in the Draft Guidelines, and such densities pose special needs for town services and infrastructure, including increased fire and police services, traffic control, roads, and school capacity.

The Town of Boxford is actively planning for the future, and the plans identified above, among others, have all been reviewed and approved by the state at various capacities. With regards to Housing, the Town’s Housing Partnership Committee is actively working on projects to address housing cost and affordable housing production, including the creation of a housing trust and a feasibility study to create affordable housing on public lands. The Town will also be working with the Merrimack Valley Planning Commission to update our Housing Production Plan. The Town of Boxford recognizes the need for housing within our region, but the draft guidelines do not acknowledge communities such as Boxford that are rural in character and lack any of the infrastructure necessary for smart growth and transit-oriented development. We ask that the draft guidelines be revised to provide reasonable yield and density goals. Furthermore, communities such as the Town of Boxford would need more time to conduct the necessary community outreach and planning to adopt zoning for compliance. An additional year to the timeline for compliance would be more appropriate for communities like Boxford.

We hope that the state will continue to focus on integrated planning to achieve more housing in rural areas while also strengthening soil conservation, floodplain preservation, aquifer and water quality protection, water supply management, habitat restoration, and agricultural preservation, among others.

Thank you for consideration of the Town of Boxford's comments.

Sincerely

A handwritten signature in black ink that reads "Matthew Coogan". The signature is written in a cursive style with a large, prominent "M" and "C".

Matt Coogan

Boxford Town Administrator