



# TOWN OF TOPSFIELD

## OFFICE OF THE SELECTMEN & TOWN ADMINISTRATOR

8 West Common Street, Topsfield, MA 01983

T: (978) 887-1500 F: (978) 887-1502 selectmen@topsfeld-ma.gov

June 10, 2019

Gregory Watson  
Manager of Comprehensive Permit Program  
Massachusetts Housing Finance Agency  
One Beacon Street  
Boston, MA 02108

Re: Perkins Landing  
Topsfield, MA  
MH ID No. 1005

Dear Mr. Watson:

Kindly accept this correspondence and the accompanying documentation as the response of the Town to the Modification of Project Eligibility Application provided by Perkins Landing, LLC for the property at 57 Perkins Row, Topsfield, dated April 24, 2019. Thank you for affording us this opportunity. The Town of Topsfield is deeply concerned that Perkins Landing, LLC appears to have failed to address the principal issues/concerns documented in the Town's response to its previous submission.

The Town's demonstrated commitment to fair housing and sustainable development continues unabated. Diligent review by the Planning Board, other relevant Town Departments, Committees and Officials and commentary by residents have caused deep and far reaching concern for this revised project. This project modification proposes an intensive development to an isolated, environmentally sensitive property located on the edge of the Ipswich River, a unique, valuable and irreplaceable natural resource.

As stated above, since this project modification substantively fails to address the principal concerns enunciated by the Town in its response to the previous submission, the Town continues to unequivocally oppose the proposed Perkins Landing Project.

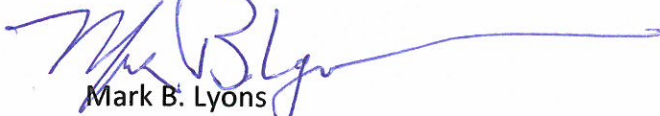
We respectfully offer for your consideration the following:

- The Town of Topsfield currently has two 40B developments: Little Brook Village, 100% affordable project administered by the Housing Authority, and Amberwood, a Local Initiative Project developed in collaboration with a very responsible developer. We currently have an official 7.2% of affordable housing and multiple group homes located in residential neighborhoods provide affordable housing to a number of disabled individuals who have been welcomed into our community. (See the Planning Board's description of Topsfield's Housing Stock for details, which follows.)
- Our bylaws and rules and regulations reflect the Commonwealth's Principles of Sustainable Development, including real mixed use districts and rigorous environmental regulations. Topsfield also embraced the Commonwealth's concepts of Sustainable Development many years ago. We must object to a project that violates these principles in veritably every category.
- The plan submitted on April 24, 2019 is dramatically denser with 44 units versus the original 28 units. This increases the Gross Density to 5.37 units per acre and Net Density to 6.46 per buildable acre. There appear to be discrepancies in the lot coverage which raises some concern for the application/plan as submitted. (See the Planning Board's description of Density for details, which also follows.)
- The Site Plan (revision date March 28, 2019) is significantly incomplete. It fails to include the required elements of Section 3.1, Preliminary Site Layout Plan, of the Application. In particular, the wetlands on the property and the correct Ipswich River front area have not been delineated. In addition, adjacent resource areas that impact the property are not noted on the Plan. The omission of many of these required elements eliminates the possibility of determining the feasibility of proposed roadways and buildings. Despite representation in the Plan, the actual buildable area of the property is unknown. Therefore, the proposed number of units is highly speculative and overly optimistic.
- State-level guidelines including Stormwater Management, MassDOT roadway design, preservation of environmentally significant sites, and sustainable development principles have all been virtually ignored.
- The burden to avoid or correct errors and omissions in this application is the responsibility of the Applicant, not the volunteer Zoning Board of Appeals or other segments of the Town. The Applicant is obligated to submit a plan that complies with Mass Housing's requirements to demonstrate realistic and feasible project development on this property.
- The Zoning Board of Appeals may only support a project that clearly demonstrates its economic feasibility. Errors in this application prohibit a reliable determination of this project's projected profitability.

The Town must emphasize and reiterate its disappointment with the proposed project modification's utter failure to address the Town's previously stated concerns.

Thank you again for providing Topsfield the opportunity to voice our concerns with this proposed project modification.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Mark B. Lyons', with a long horizontal flourish extending to the right.

Mark B. Lyons  
Chairman, Board of Selectmen