

Commonwealth of Massachusetts  
EXECUTIVE OFFICE OF HOUSING &  
LIVABLE COMMUNITIES

Maura T. Healey, Governor ♦ Kimberley Driscoll, Lieutenant Governor ♦ Edward M. Augustus, Jr., Secretary

February 4, 2025

Mr. Jered F. Stewart  
Bethany Community Services  
10 Phoenix Row, 4<sup>th</sup> Floor  
Haverhill, MA 01832

Re: Garrison Village, Groveland, MA – Project Eligibility Letter

Dear Mr. Stewart:

We are writing to inform you that your application for project eligibility determination for the proposed Garrison Village project located in Groveland, Massachusetts, has been approved under the Low-Income Housing Tax Credit (LIHTC) program. The project is located at 36 Garrison Street in Groveland, Massachusetts. This approval indicates that the proposed plan includes 90 units of mixed-income senior housing. The rental units will be restricted as follows:

- 24 units at or below 30% of area median income (AMI),
- 52 units at or below 60% AMI,
- eight units at or below 80% AMI, and
- six units at market rate.

The proposed rental project will consist of 90 one-bedroom units. The rental structure as described in the application is generally consistent with the standards for affordable housing to be included in the community's Chapter 40B affordable housing stock. This approval does not constitute a guarantee that LIHTC funds will be allocated to the Garrison Village project. It does create a presumption of fundability under 760 CMR 56.04 and allows Bethany Communities, Inc. to apply to the Groveland Zoning Board of Appeals for a comprehensive permit. The sponsor should note that a One Stop submission for funding for this project must conform to all Executive Office of Housing and Livable Communities (EOHLC) program limits and requirements in effect at the time of submission.

As part of the review process, EOHLC has made the following findings:

1. The proposed project appears generally eligible under the requirements of the Low-Income Housing Tax Credit program.
2. EOHLC has performed an on-site inspection of the proposed Garrison Village project and has determined that the proposed site is an appropriate location for the project. The housing will be built on 6.7 acres of wooded and open field areas.

3. The proposed housing design is appropriate for the site. The project will create two new three-story buildings about 0.7 miles south of Groveland Town Hall. The buildings will be situated in the midst of the parcel of land and set back from the road and the abutting uses. The buildings will be designed to Passive House standards.
4. The proposed project appears financially feasible in the context of the Groveland housing market.
5. The initial proforma for the project appears financially feasible and consistent with the requirements for cost examination and limitations on profits on the basis of estimated development and operating costs. Please note again that a One Stop+ submission for funding for this project must conform to all EOHLC program limits and requirements in effect at the time of submission.
6. No appraisal has been commissioned. The sponsor listed no acquisition cost. The Low-Income Housing Tax Credit Program Guidelines state that the allowable acquisition value of a site with a comprehensive permit must be equal to or less than the value under pre-existing zoning, plus reasonable carrying costs. If this project is submitted for funding under the Low-Income Housing Tax Credit Program, the acquisition price in the proposed budget should reflect these program guidelines.
7. The ownership entity will be a single-purpose entity controlled by the applicant, subject to limited dividend requirements. It will meet the general eligibility standards of the Low-Income Housing Tax Credit program. The applicant will need to demonstrate sufficient capacity to successfully develop the project under the Low-Income Housing Tax Credit program.
8. The applicant has an option to enter into a ground lease agreement with the current owner of the land.
9. The town of Groveland and town residents have submitted numerous letters or e-mails to HLC regarding the project. Numerous town residents have expressed concern about the scale of the project (90 total units), the possible impact on traffic, and other matters. HLC urges Bethany Community Services to directly address these concerns as part of the public hearing process before the Groveland Zoning Board of Appeals.

The proposed Garrison Village project will have to comply with all state and local codes not specifically exempted by a comprehensive permit. In applying for a comprehensive permit, the project sponsor should identify all aspects of the proposal that will not comply with local requirements.

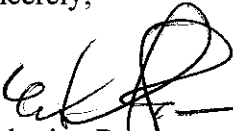
If a comprehensive permit is granted, construction of this project may not commence without EOHLC's issuance of final approval pursuant to 760 CMR 56.04 (7) and an award of LIHTC

funds. This project eligibility determination letter is not transferable to any other project sponsor or housing program without the express written consent of EOHLC. When construction is complete, a Chapter 40B cost certification and an executed and recorded 40B regulatory agreement in compliance with EOHLC's requirements pertaining to Chapter 40B must be submitted and approved by EOHLC prior to the release of a Low-Income Housing Tax Credit form 8609.

This letter shall expire two years from this date, or on February 4, 2027, unless a comprehensive permit has been issued.

We appreciate your efforts to work with the town of Groveland to increase its supply of affordable housing, including affordable housing with services for seniors. If you have any questions as you proceed with the project, please feel free to call or email Rebecca Frawley Wachtel at (617) 573-1318 or at [rebecca.frawley@mass.gov](mailto:rebecca.frawley@mass.gov).

Sincerely,

  
Catherine Racer  
Undersecretary  
Housing Development

cc: Kathleen Kastrinelis, Groveland Select Board Chair