



Devens Housing Working Group

Section 298 of Chapter 238 of the Acts of 2024

Final Report

May 2025

Devens Housing Working Group Final Report

May 2025

Table of Contents

1. Introduction
2. Regional Context and Background on Devens and the Surrounding Communities
3. The Working Group's Process for Building Consensus
4. Strategies for Increased Housing at Devens
5. Process for Amending the Zoning By-laws
6. Framework and Guiding Principles for a Zoning Amendment

Appendix A: Regional Context

Appendix B: Proposed/Draft Zoning Amendment

Appendix C: Devens Enterprise Commission Regulation Revision/Adoption Process

Appendix D: Public Comments

1. Introduction

The Devens Housing Working Group (Working Group) was created by the Legislature (Section 298 of Chapter 238 of the Acts of 2024) with the following charge:

The working group shall determine a strategy and plan to provide for increased housing production within Devens, including, but not limited to, the feasibility of allowing not more than 400 multi-family residential units in the Innovation and Technology Center zoning district established by Article V(A)(13) of the zoning by-laws of the Devens Regional Enterprise Zone.

The Working Group consists of the following members: Secretary of Economic Development – Chair; Director, HLC Livable Communities Division; Director/Land Use Administrator, Devens Enterprise Commission; Chair of the Devens Committee; President and CEO of Mass Development; Select Board Member, Town of Ayer; Select Board Member, Town of Harvard; and Select Board Member, Town of Shirley.

As presented in each meeting, the goal of the Working Group is: *Provide a vision for increasing housing production within Devens.*

This final report was approved unanimously by the Working Group on May 14. The Working Group considered a preliminary draft report at its meeting on April 1. An updated draft that was expanded to incorporate feedback from Working Group members, the public, and surrounding towns was presented to and discussed by the Working Group at its meeting on May 8.

Like the prior drafts, this updated and final report: provides some context about Devens and the communities that surround it; explains the process by which the Working Group gathered information and built consensus around its recommendations; sets forth a strategy and plan for increased housing production in Devens; and proposes the framework for an amendment to the Devens Zoning By-laws to achieve that objective.

This final report also includes a section addressing the process by which the Zoning By-laws can be amended, as well as a draft of a zoning amendment that would achieve the goal of promoting increased housing production at Devens. It also includes a section addressing the process by which the Zoning By-laws may be amended.

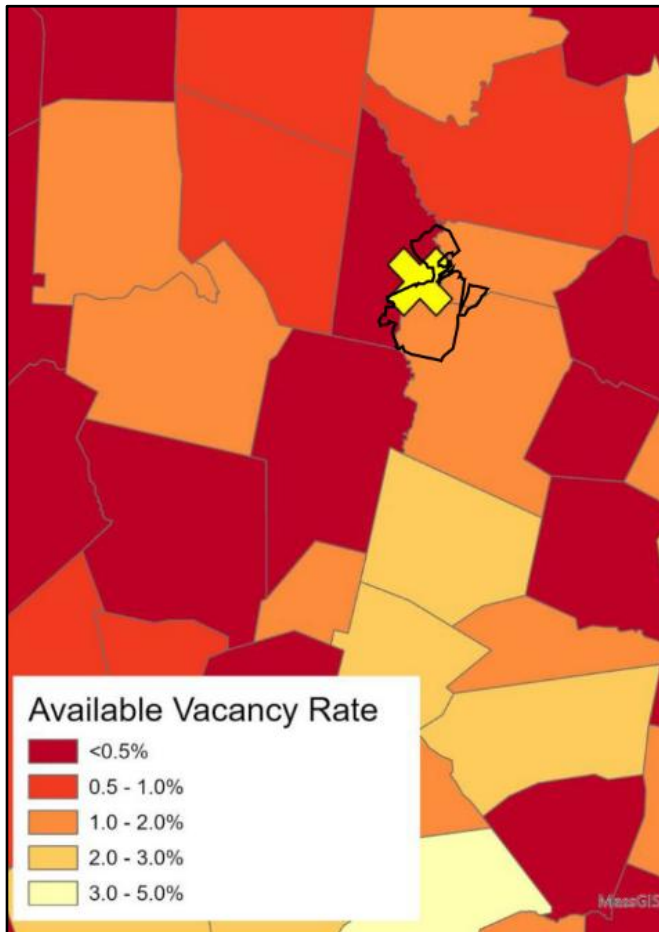
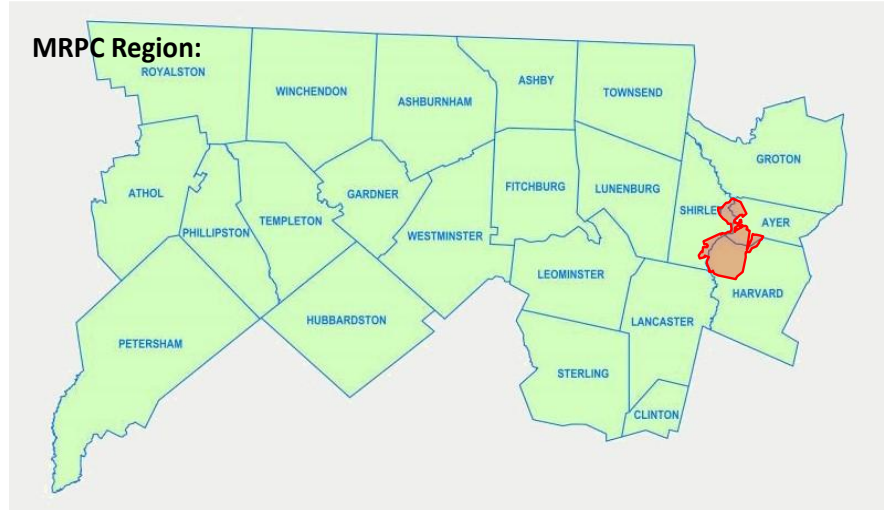
This final report also includes several appendices with supporting information such as public comments and details about the regional housing context, all of which were introduced in a prior draft and presented to the Working Group members on May 8.

2. Regional Context and Background on Devens and the Surrounding Communities

Regional Housing Context

Devens is located in greater north central Massachusetts in the Montachusett Regional Planning Commission (MRPC) region, which has 22 municipalities, ranging from mixed-use urban centers like Fitchburg to small and rural towns such as Ashby. The region's character and community development has been shaped by the historic dominance of the manufacturing industry and

the military. The region has the highest concentration of manufacturing jobs in the state but has a critically low housing vacancy rate: only 1.1% of homes are for sale or rent, lower than the vacancy rate for the state as a whole. This creates intense demand for the homes that are available and pushes prices higher.

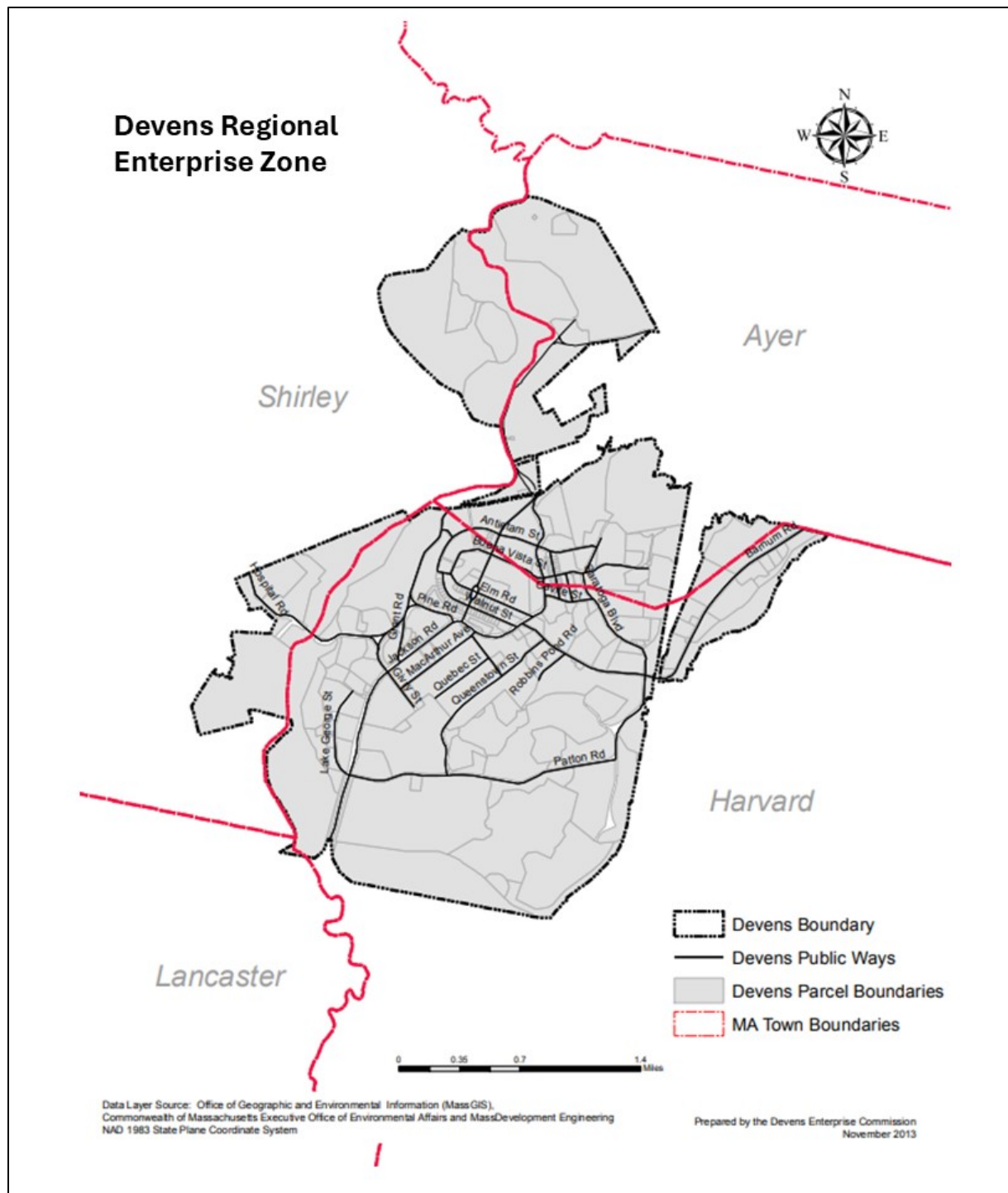


Within the Montachusett region, the median sale price for a single-family home or condo more than doubled from 2012 to 2023, rising from \$158,000 to \$375,000. More than 30% of households in the region are housing cost burdened, paying more than 30% of their income in rent. Roughly one in ten homeowners and one in five renters in the region are paying more than half their income on housing costs. Communities in the Montachusett region, including Devens, reported issuing building permits for just 3,505 new homes between 2013 and 2023. Current EOHLC estimates indicate the region may need 6,300 new homes from 2025 to 2035. This underscores the need and demand for more housing in the entire region, including Devens.

Additional regional context is included in Appendix A of this report.

Devens Background

Devens was created by a special act of the Legislature (Chapter 498 of the Acts of 1993) to help provide an orderly and expeditious conversion and development of approximately 4,400 acres that were a portion of a former federal military base, Fort Devens, into a non-military-use area. Devens comprises land area within the historic boundaries of the Towns of Ayer, Harvard, and Shirley.



Chapter 498 of the Acts of 1993 made the Massachusetts Government Land Bank (later merged into MassDevelopment) exclusively responsible for acquisition, control, maintenance, and redevelopment of Devens. To provide for orderly development, a long-term Reuse Plan and Zoning By-laws were adopted by the Massachusetts Government Land Bank and the Towns of Ayer, Harvard, and Shirley. The Reuse Plan and Zoning By-laws provided broad development goals and planned uses of the property and were passed at town meetings in the three towns. The legislation also established the Devens Enterprise Commission to function as the local regulatory and permit-granting authority for all new development within Devens to ensure development in a manner consistent with the Reuse Plan and Zoning By-laws.

Since the establishment of Devens, approximately 120 units of former military housing have been repurposed and 136 new units of housing have been constructed within its boundaries. Devens currently has 256 units of residential and senior housing and approximately 950 residents. MassDevelopment is obligated to provide the same educational benefits and opportunities other Massachusetts residents enjoy, which MassDevelopment has typically done by contracting with one of the nearby school districts. Since 2012, MassDevelopment has contracted with the Harvard School District to educate students residing in Devens. In the 2023-24 academic year, there were 86 full-time and 10 transitional students attending the Hildreth Elementary and Bromfield (High) Schools and six out-of-district students.

Until recently, housing development in Devens was limited by the Reuse Plan to no more than 282 units. That housing cap was removed by the Legislature last year and the development of new housing on parcels already zoned for residential uses is governed by the Zoning By-laws, as approved by the three towns and MassDevelopment, and regulations promulgated by the Devens Enterprise Commission.

3. The Working Group's Process for Building Consensus

The Working Group has held five meetings to conduct its work and develop this final report. Each meeting was held at a location in Devens or virtually and was open to the public. The Working Group also established an online portal to accept public comments.

At the Working Group's initial meeting on January 22, 2025, each member and legislator in attendance was provided an opportunity to articulate what success would look like at the end of the process. A strong consensus emerged that the Working Group should strive to propose achievable recommendations and establish flexible zoning recommendations that would lead to actual housing production within a reasonable timeframe.

At this initial meeting, Working Group members also were assigned to one of three subgroups:

- Devens Fundamentals: Asked to consider and report on the background of Devens and existing zoning and regulatory framework.
- Community Considerations: Asked to consider and report on community needs and opportunities.
- Innovation in Development and Sustainable Housing: Asked to consider and report on the general framework for residential zoning in the ITC district.

The three subgroups met multiple times and shared their work at the second Working Group meeting on February 25, 2025. At the end of the second meeting, Secretary Hao asked that a "captain" of each subgroup meet subsequently to craft the first draft of a report and plan to

provide for increased housing. The captains met five times to develop the first draft of this report which was presented at the third Working Group meeting on April 1, 2025.

At its first two meetings, the Working Group heard that the following statements reflect the vision for more housing at Devens.

- Adaptive reuse where feasible;
- Historic preservation and compatibility;
- Special attention to existing businesses and residences;
- New housing is compatible with surrounding land uses and densities;
- Connect new housing districts to open space – creating and maintaining the network of recreational trails and green infrastructure;
- Importance of public education about zoning for additional housing types;
- Public education about the unique situation with MassDevelopment as the property owner and DEC regulations is different from other zoning and development processes;
- Green and complete streets;
- Healthy buildings, social and active neighborhood design;
- Build from existing success of Innovative Residential District (IRD) regulations but recognizing the different location and context;
- Careful not to let parking dictate design – design neighborhoods for people first
- Jurisdiction will not be accelerated – can accommodate additional housing if properly planned;
- Ensure the existing levels of service that Devens residents, businesses and organizations have come to expect are maintained.

The following community considerations were presented to the Working Group in the second meeting.

Needs

- Increase senior housing by zoning for a range of housing types and densities. Smaller units work well for seniors and downsizers. Do not need to restrict zoning for seniors.
- Maintain or increase green spaces, walking trails, and wildlife habitat;
- Consider how towns' Councils on Aging work with Devens residents;
- Public education about existing public transportation – shuttles to MBTA Commuter Rail and Montachusett Regional Transit Authority (MART) services that are available;
- Concern about increase in traffic;
- Desire to phase housing over time so that there is no “glut” of new housing units;
- Availability of healthcare system to support additional residents;
- Ability of regional education system to support additional residents;
- Importance of design so that community character reflects Devens historic designs;
- Rogers Field and existing recreational demands considered in design and location of new residential areas;
- Playground within the ITC.

Opportunities

- Existing infrastructure in place to serve new residential development (roads, sewer, water);
- Municipal services provided by MassDevelopment;

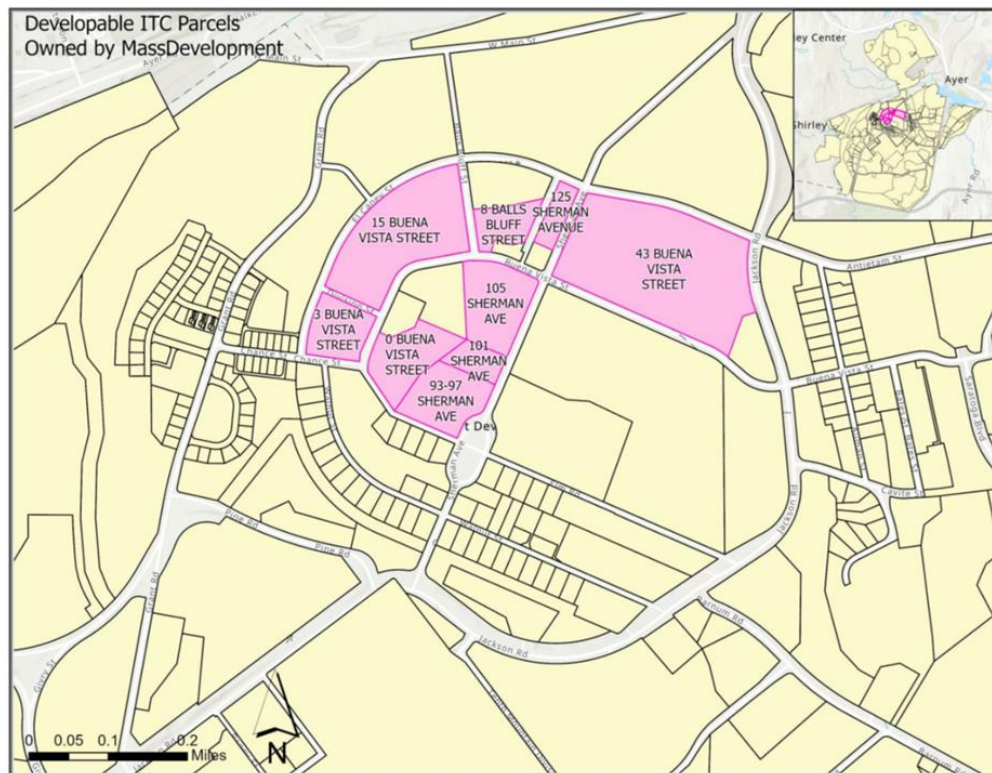
- More customers for local businesses;
- New connections and trails to adjacent municipalities;
- Increase in affordable housing;
- Additional users of new amenities in Devens;
- Economic growth, increased revenue and job opportunities for the region.

The Working Group also solicited and reviewed written public comments as part of its information gathering process. For the most part, the public comments were supportive of additional housing at Devens. Most public commenters expressed a preference for the kinds of housing they would prefer to be built at Devens, or the kinds of amenities that they would wish for when new housing is developed. The Select Boards of Ayer, Harvard and Shirley also submitted identical letters identifying the “two matters of greatest concern” as being “the methods used to enact any changes to town zoning bylaws and the omission of binding prescriptive development criteria, in particular for Vicksburg Square.” All public comments are in Appendix B.

4. Strategies for Increased Housing at Devens

As directed by Legislature, the Working Group focused most of its attention on strategies to promote housing production within the Innovation and Technology Center (ITC) zoning district. The ITC comprises approximately 90 acres in total, including the historic buildings at Vicksburg Square.

The Zoning By-laws currently allow commercial and other uses in the ITC, but no housing.



Preliminary findings support the need for and development of a range of housing types within the ITC District to re-create the classic village/neo-traditional neighborhood design concept that was originally laid out by the military with housing and a mix of uses surrounding Rogers Field.

Additional housing in the ITC is also consistent with the Core patterns in the [Reuse Plan](#) (see page 28). A diversity of housing types that includes primarily “missing-middle housing” (cottage style/small footprint single family, duplex, townhomes, and apartments) in size and scale that is in context with the surrounding development and the historic nature of this district.

The Working Group considered the following strategies and principles for a zoning amendment that would permit housing within the ITC District:

1. Amend the existing zoning to permit a range of housing types within certain areas of the district.
 - Reuse of Vicksburg Square buildings – feasibility to be informed by further study;
 - Allow housing over remaining 40+ developable acres (with a range of densities);
 - The fine-tuning of densities will need to rely on design and compatibility;
 - Densities – mixed – but generally higher near Rogers and reduce as we move away from Rogers, (Devens Utilities can likely accommodate higher densities);
 - Combination of market-rate and deed restricted affordable units – while there is a desire to maintain Devens 25% affordable requirement the financial feasibility of such a requirement needs to be further evaluated to ensure this aspirational target does not make it financially unfeasible to actually build new housing.
2. Frame the ITC District area as a village center to capitalize on the classic neo-traditional neighborhood design, recognizing existing opportunities and constraints within the District.
 - Require innovative, low-carbon neighborhood and building designs in exchange for higher densities that respect location and context (continuing to lead by example);
 - Missing middle housing types – smaller footprint, mix of housing types, universal accessibility, age-in place (life-cycle housing);
 - Consider existing development and vacant parcel development opportunities and constraints when considering density and building typologies;
 - Mix of rental and for-sale units (flexibility to meet market demand);
 - Mixed-use zoning (allowing for a mix of complementary commercial and residential uses).

Following the adopting of a zoning amendment, the Devens Enterprise Commission will have authority to promulgate more detailed regulations to minimize or mitigate any adverse impacts of proposed housing developments, and to facilitate innovative residential development in the ITC District consistent with these strategies and principles.

5. Process for Amending the Zoning By-laws

A zoning amendment consistent with the principles outlined above could be enacted either by a super town meeting held in Ayer, Harvard, and Shirley, with the approval of MassDevelopment, or by a special act of the Legislature. The Working Group has received a number of comments about the process by which the Zoning By-laws can or should be amended, with the Select Boards of Ayer, Harvard, and Shirley all expressing the view that the Zoning By-laws should only be changed by super town meeting votes. Most of the public comment offered at the Working Group’s meeting on May 8 was focused on the two methods of changing the Zoning By-laws, and which process was preferable. Residents of Devens also expressed that they are most directly affected by development in Devens and should have more say in whether and how the Zoning By-laws are amended.

The Working Group does not believe that its charge from the Legislature—to determine a strategy and plan to provide for increased housing production within Devens—includes making a recommendation on the process by which the Zoning By-laws are amended. Accordingly, the Working Group is not making any recommendation as to *how* the Zoning By-laws should be amended, only *that they should be amended*.

If a zoning amendment is proposed to be enacted at super town meeting, MassDevelopment and the Towns would follow the process set forth in Section 10 of Chapter 498 of the Acts of 1993:

- MassDevelopment and the Towns hold two or more public hearings, as they determine appropriate, in the Devens region to receive public comment.
- Within 30 days of the last public hearing held by MassDevelopment and the Towns, submit the proposed revision(s) to the Select Board of each of the Towns.
- Within 90 days of receipt of the proposed revision(s), the Select Board of each of the Towns shall convene a town meeting to be held at the same date and time in each of the Towns for the purpose of adopting or rejecting, by majority vote of each town meeting, the revision(s). Each Town shall vote to adopt or disapprove the revisions as submitted. No amendments to the revisions shall be made by the Towns.
- Each Town shall, within 30 days of an adoption or rejection of the revision(s) at a town meeting, provide MassDevelopment and the Devens Enterprise Commission with a written notification stating whether town meeting adopted or rejected the revision(s).

To promote local understanding of the benefits of new housing production at Devens, and to ensure that MassDevelopment, the DEC and the Towns take appropriate action to prepare for new housing development, the Working Group recommends that the MassDevelopment and the Towns engage a planning consultant to undertake the following studies prior to any super town meeting:

1. School needs assessment – for the region to include analysis of recent zoning amendments in each community. The study should include a review of existing enrollment levels in the region and capacity of each district at primary and secondary levels. The study will use professional enrollment study models to predict enrollment and determine if land should be set aside for a school within Devens.
2. Update assessments of existing buildings to determine adaptive reuse feasibility.
3. Traffic and parking study, including transit and Transportation Demand Management initiatives.
4. Engage the community. Consider approaches such as design charrettes to identify opportunities and constraints (e.g., utilities, topography). Identify effects of additional residential units within the ITC District and create a plan to address through design and permitting.

The Working Group has been informed that state funding is available for these kinds of planning studies, through a grant from the Executive Office of Housing and Livable Communities to the Town of Ayer acting as fiscal agent for the other towns.

6. Framework and Guiding Principles for a Zoning Amendment

At its April 1 meeting, the Working Group developed a general consensus that its report and recommendations would be most impactful if they include the text of a zoning amendment that can be brought for approval at super town meeting, following the process noted above. The initial draft report noted that such a zoning amendment would need to, at minimum:

- Add Residential Uses (Single or Two Family Dwelling, Multi Family Dwelling, Senior Housing) as Permitted Uses in the Innovation Technology Center District in the Table of Permitted Uses under Exhibit D of the Devens Zoning By-laws. (Note: small-scale retail is already permitted as an accessory use so mixed use would be feasible.)
- Add new Multi-Family/Apartment category in Article VI.A1.k. General Land Use Categories: Residential, of the Devens By-Laws to allow for multi-family apartment buildings with more than 3-8 units.
- Set forth the applicable density limitations and height and other dimensional limitations or requirements.

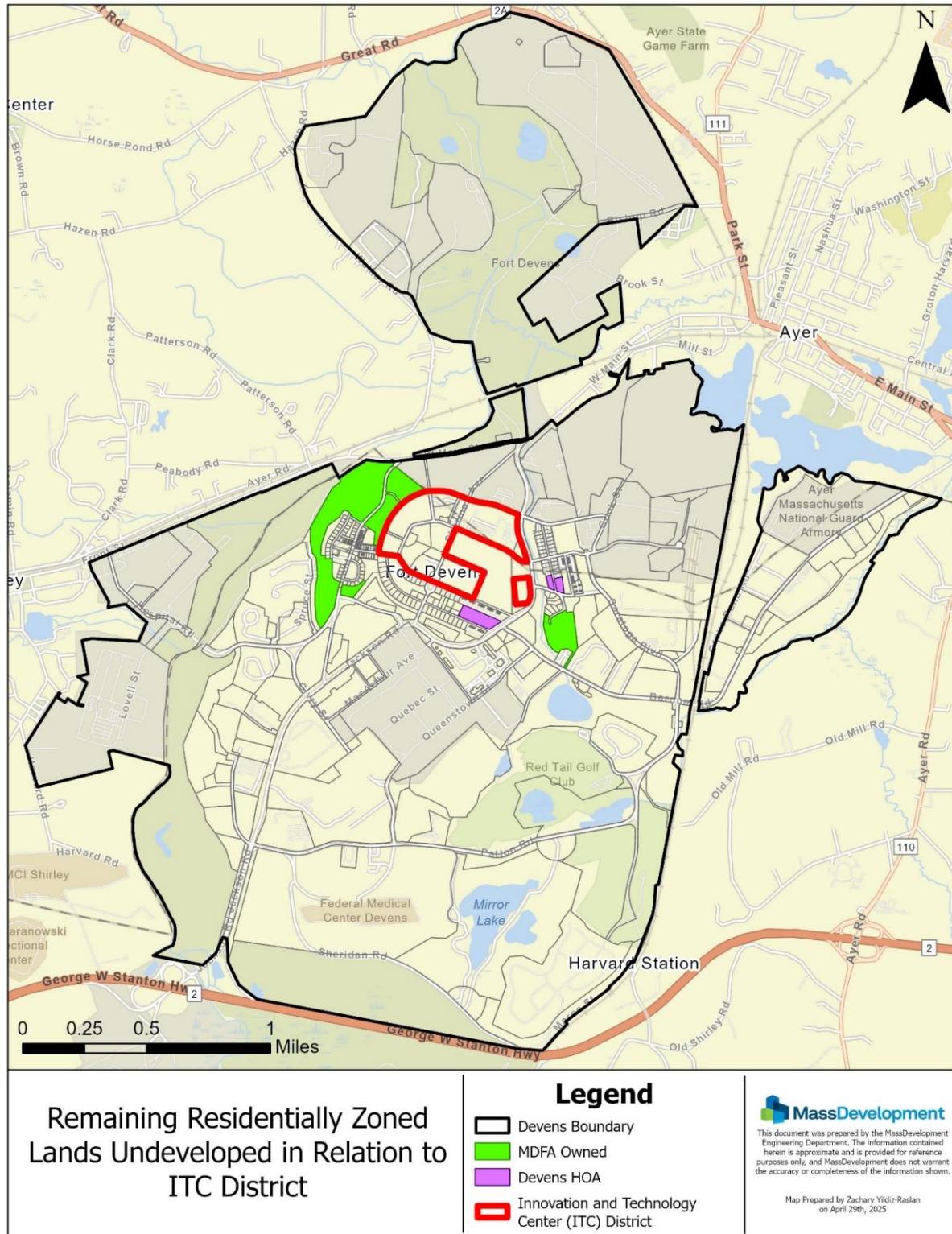
For clarity, the zoning amendment might also modify Article IX. E.1. of the Devens Zoning By-laws to strike the reference to the 282-unit housing cap, making the by-law consistent with the special act that eliminated the housing cap.

Consistent with the Working Group's consensus to achieve an outcome that is practical and feasible, the initial draft report recommended that a zoning amendment not be overly prescriptive or detailed. For example, the zoning amendment should permit but not require specific housing types. Affordability requirements should likewise be reasonable, *i.e.*, not make actual development financially unfeasible. Preliminary zoning amendments are included as Appendix C.

This potential zoning amendment is consistent with the current By-laws and regulatory framework governing development in Devens. Specifically, the amendment would allow residential uses in the ITC District and allow the DEC to develop regulations through its statutory processes to permit appropriate developments. Appendix D provides an overview of the DEC's process to promulgate new regulations, which is a public process that enables interested individuals, communities, and organizations the opportunity to continue to be involved and provide input throughout this process, before any housing is permitted or developed in the ITC District.

Additional Considerations:

Planning for any additional housing within the ITC District must consider the existing undeveloped residentially zoned lands within Devens as many of these areas abut or are near the ITC District (context-sensitive planning and design). See the map of Devens on the following page. The existing Innovative Residential Development (IRD) regulations at 974 CMR 5.02 and Green and Complete Streets regulations at 974 CMR 2.07 are consistent with many of the principles envisioned in this report and would complement the proposed residential development patterns within the ITC District. However, it will be important to consider the surrounding context existing undeveloped residentially zoned lands within Devens as part of the drafting of any regulations that would facilitate residential development in the ITC District.



APPENDIX A: Regional Context

Located in greater north central Massachusetts the Montachusett region has 22 municipalities, ranging from mixed-use urban centers like Fitchburg to small and rural towns such as Ashby.^[1] The region also includes the Devens Regional Enterprise Zone (Devens), a 4,400 acre former military base encompassing portions of the towns of Ayer, Harvard, and Shirley.

Key Considerations:

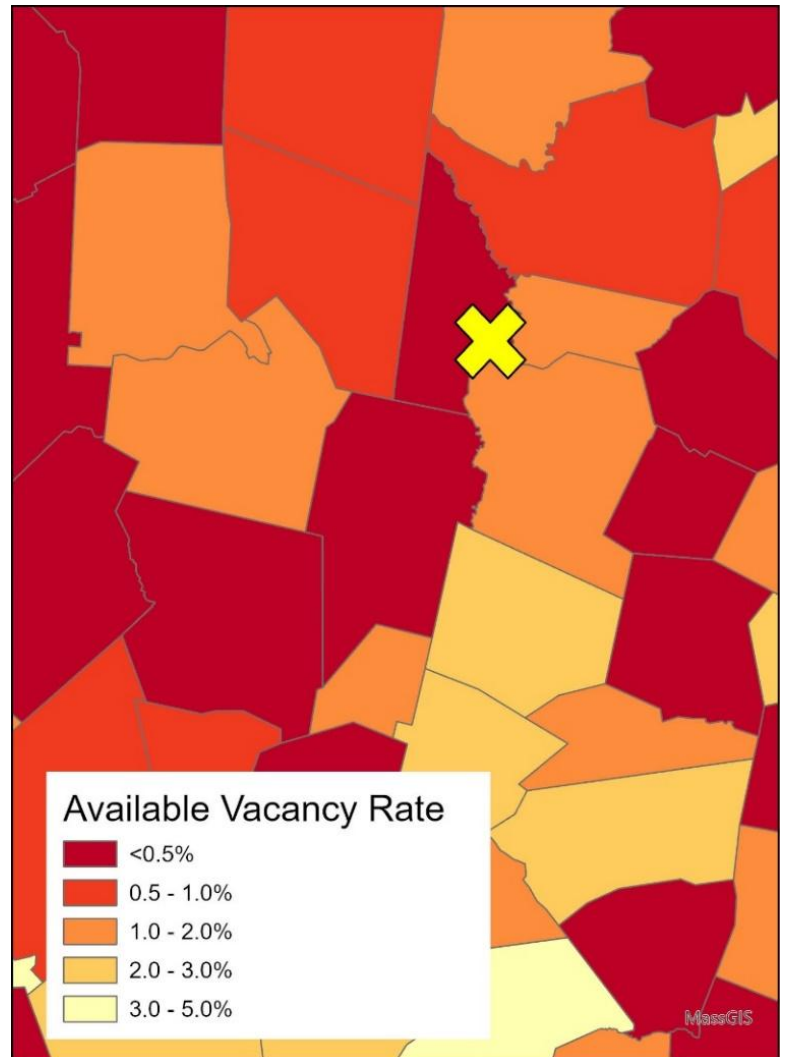
The Montachusett Region has a critically low vacancy rate: only 1.1% of homes are for sale or rent, lower than the state's vacancy rate. This creates intense demand for the homes that are available and pushes prices higher.

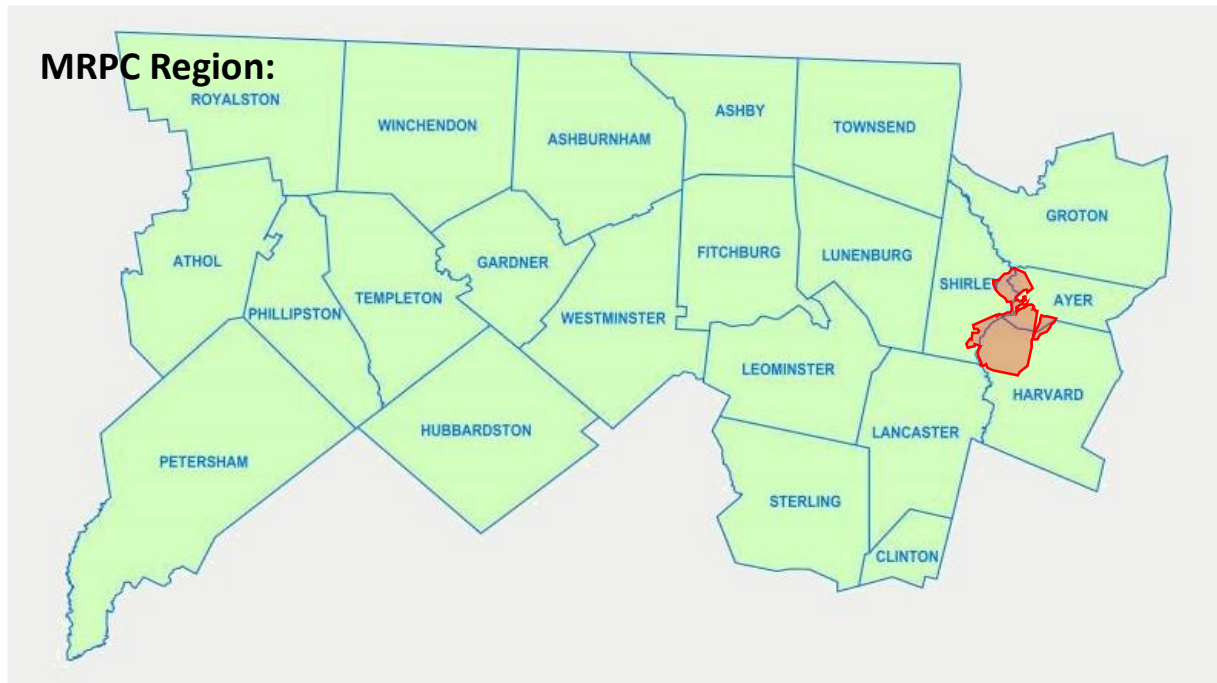
The median sale price for a single-family home or condo more than doubled from 2012–2023, rising from \$158,000 to \$375,000.

More than 30% of households in the region are housing cost burdened, paying more than 30% of their income in rent. Roughly one in ten homeowners and one in five renters in the region are paying more than half of their income on housing costs.

Montachusett region municipalities reported issuing building permits for just 3,505 new homes from 2013–2023.

Current EOHLC estimates indicate **the region may need 6,300 new homes from 2025 to 2035.**





The region's character and community development has been shaped by the historic dominance of the manufacturing industry and the military. The region has the highest concentration of manufacturing jobs in the state. The decline of the manufacturing sector has opened new economic opportunities, such as expanding the region's tourism sector; however, the industrial character has left a lasting impact on the region's community and housing development. For instance, the region has a number of Environmental Justice Populations and is faced with environmental challenges; 19 communities have brownfield sites^[2] and Devens is a Superfund site on the Environmental Protection Agency's (EPA) National Priorities List (NPL). The amount of cleanup necessary varies by site, but the presence of hazardous substances or pollutants present additional challenges to housing development or adaptive reuse. Through MRPC's Brownfields Program, the regional planning agency has made progress on brownfield remediation by leveraging EPA funds. Redevelopment projects vary but include building affordable single-family housing units in Fitchburg and Gardner.^[3] The coordinated clean-up effort by the EPA, the Massachusetts Department of Environmental Protection, the U.S. Army, and MassDevelopment has facilitated the redevelopment of this former military base into a thriving mixed-use community with nearly 100 employers and more than 6,000 employees, creating substantial economic growth in the region but further contributing to the unique housing challenges.

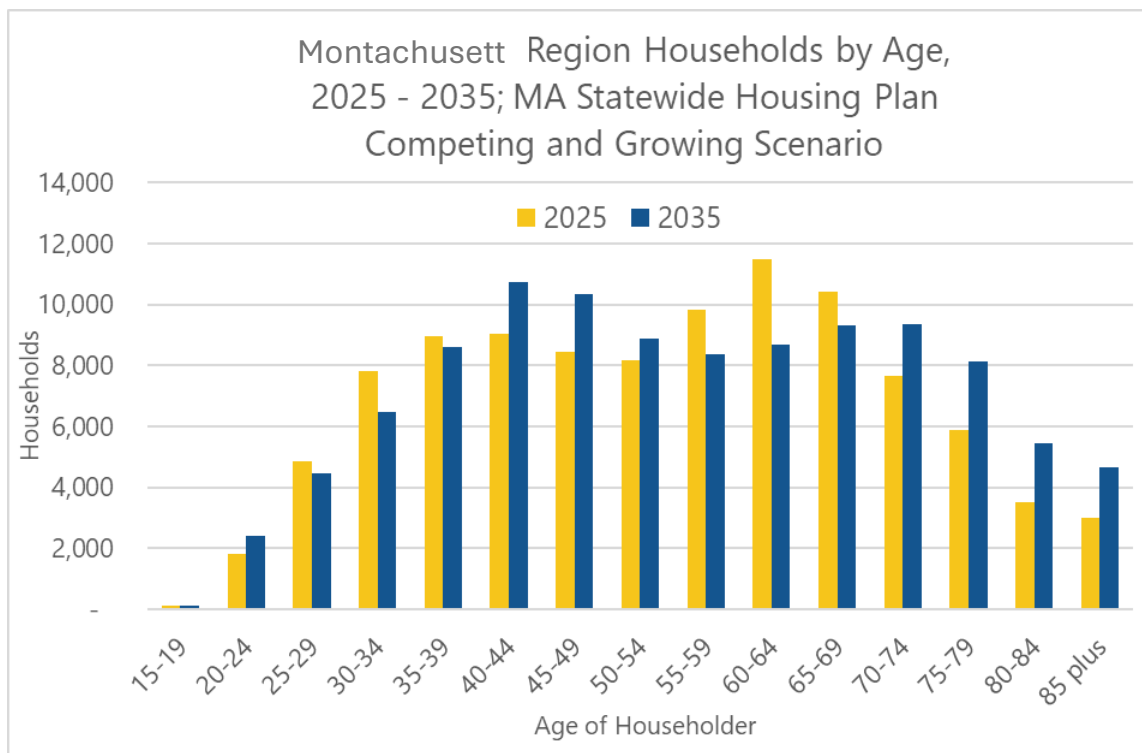
The dominance and decline of industry are also reflected in the Gateway City designations of two cities within the region: Fitchburg and Leominster. Both cities are economic hubs for the region, with proximity to transportation hubs, but face unique housing challenges. Although both cities are among the least expensive rental housing markets, the data also show a growing gap in household income compared to the rest of the state.^[4] As a result, housing costs in the region are high for existing residents who live and work in the region. However, the region's relative affordability, connection to regional transit, and proximity to major economic centers such as Boston and Worcester, has attracted an influx of new residents, creating tensions in the region's inventory supply.^[5] One way in which MRPC prioritizes the preservation and production of affordable housing is through the Montachusett Enterprise Center, Inc. (MEC), a nonprofit

subsidiary focused on affordable housing production and job creation in the region.^[6] A reason for the organization’s success is due to MEC’s receivership designation and authority to “take temporary possession of abandoned/foreclosed properties which pose a threat to public health and safety.”^[7] A regional receivership program allows MEC to rehabilitate unused properties to meet health and building code standards and resell more quickly than a property owner might be able to do on their own.

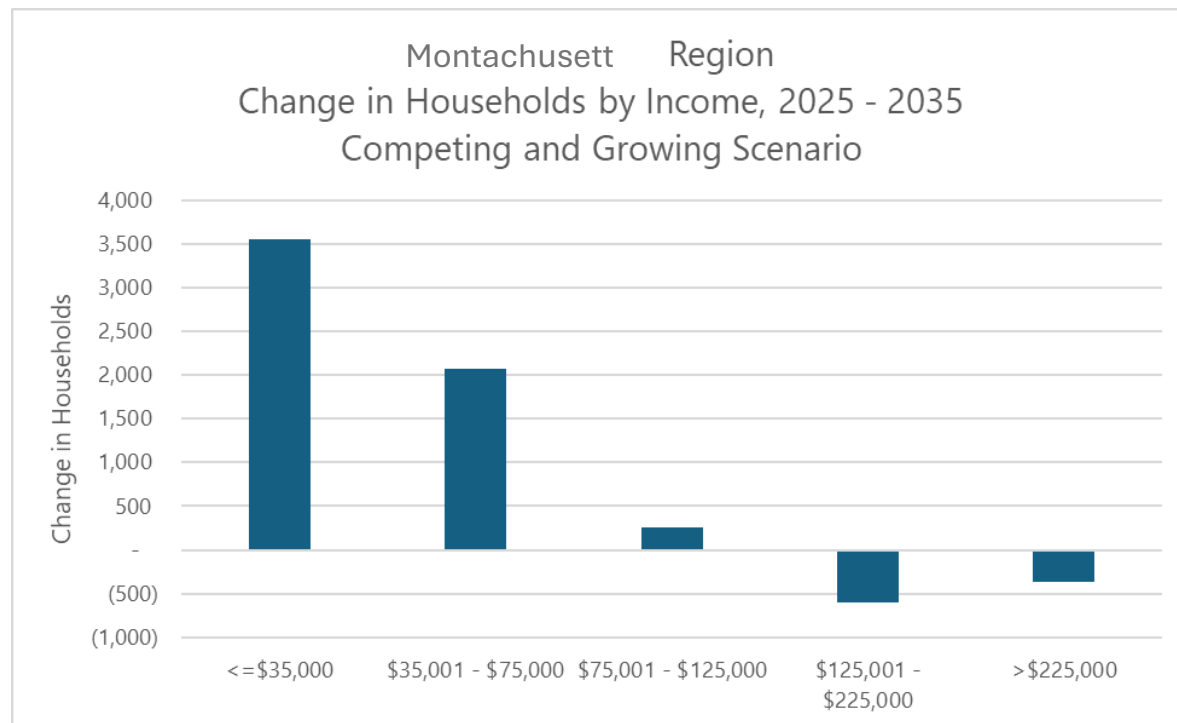
With the military as a major employer in the eastern portion of the Montachusett Region, after the base closure was announced in 1993, the redevelopment efforts in Devens focused more on economic development. Up until November 2024, Devens was restricted to a limit of 282 housing units. While this artificial limitation was restrictive, Devens did require 25% to be affordable to low- and moderate-income individuals and households.

The incidence of cost burden in the Montachusett region is slightly lower than statewide rates, notably for severe cost burden. For example, only 21.1% (+/- 1.8%) of MRPC renters are severely cost burdened, as compared to 25.2% (+/- 0.4%) of renters statewide.

EOHLC's Competing and Growing scenario forecasts that the number of households in the region is projected to grow by 4,900 from 2025 - 2035 under the Competing and Growing scenario used for the Statewide housing plan targets. With vacancy rates of just 1.0% for homeownership units and 4.7% for rentals, EOHLC also estimates the region needs 1,400 additional homes for sale or rent to achieve a healthy vacancy rate. All told, EOHLC estimates that MRPC region needs to add 6,400 homes to the year-round supply over ten years to meet the forecasted need, an increase of 6.1% over the 2020 housing stock. The number of projected households by age of householder (below) shows that the region is likely to see a decline in households under the age of 40, an increase of those 40-54 (likely drawn to the region for its lower housing costs), and an increase of 7,500 households headed by someone 70 or older.



Driven largely by the increase in the Oldest Adult households, all of the net growth is in households earning less than \$75,000 per year (growth of 5,600 households). The total number of households earning \$125,000 or more is projected to decline by nearly 1,000. This is due in part to the large decline in households 55-69 (age groups that tend to have higher incomes than older and younger groups) as the youngest Boomers age into retirement or leave the region.



[1] Montachusett Regional Planning Commission. (2013, February 28). The Region.

<https://www.mrpc.org/home/pages/the-region>

[2] Montachusett Regional Planning Commission. (2014). *Building a Better Montachusett* [Comprehensive Economic Development Strategy - Five Year Annual Report, Evaluation and Work Plan].

https://www.mrpc.org/sites/g/files/vyhlif3491/f/file/file/building_a_better_montachusett_-_ced_strategy.pdf

[3] Ibid.

[4] MassINC Policy Center. (2024). 2024 Gateway Cities Housing Monitor [Inaugural Edition with a Special Analysis of the Gateway City Housing Shortage]. <https://massinc.org/research/2024-gateway-cities-housing-monitor/>

[5] Montachusett Regional Planning Commission. (2014). *Building a Better Montachusett* [Comprehensive Economic Development Strategy - Five Year Annual Report, Evaluation and Work Plan].

https://www.mrpc.org/sites/g/files/vyhlif3491/f/file/file/building_a_better_montachusett_-_ced_strategy.pdf

[6] Montachusett Regional Planning Commission. (2013, March 10). *Montachusett Enterprise Center, Inc. (MEC)*.

<https://www.mrpc.org/montachusett-enterprise-center-inc-mec>

[7] Montachusett Regional Planning Commission. (2014). *Building a Better Montachusett* [Comprehensive Economic Development Strategy - Five Year Annual Report, Evaluation and Work Plan].

https://www.mrpc.org/sites/g/files/vyhlif3491/f/file/file/building_a_better_montachusett_-_ced_strategy.pdf

APPENDIX B: Proposed/Draft Zoning Amendments

To facilitate the development of housing in the Innovation and Technology Center Zoning District, there would be four (4) text edits required, as shown below. Deletions are shown as ~~struck through text~~ and new text is underlined.

1. Article IX. E. Residential Density, Section 1.:
There is ~~no limit on the~~ total number of residential units ~~to be~~ allowed within the existing residential zoning districts in Devens (as authorized under Section 272 of the 2024 Mass Leads Act). ~~shall not exceed two hundred and eighty-two (282) units, not including , with the exception of the~~ Senior Residential units within the Shirley Village Growth I Zoning District, which shall not exceed one hundred twenty (120) units.
2. Article V.A. Development Goals, Section 13.b.:
The primary goal of this zoning district is to provide an urban center for the Devens Regional Enterprise Zone in which residential, incubator ventures, and a broad range of businesses are encouraged. Its combination of historic buildings and traditional open space provides an environment unique to the former base and allows for an intensity ~~and of both a mix of residential, business, and public uses~~ that is singular to Devens. Development of design, siting, and retrofitting criteria should be flexible in order to accommodate a wide range of users and their special needs, and any ancillary support services. A major theme for this zone is to encourage and promote the development of a range of housing types, as well as academic and educational support links for the entire Devens Regional Enterprise Zone, as set forth in the Reuse Plan.
3. Article VI.A. General Land Use Categories, Section 3.k.:
The residential use type refers to the following activities: single and two family dwellings; multi-family dwellings [containing three or more units]; nursing homes and congregate or life care facilities with a permanent health care component; housing for the elderly, including retirement communities and shared living developments; active and passive recreation facilities; and professional offices and service businesses as accessory uses or home occupations where allowed in particular districts.
4. Exhibit D: Table of Permitted Uses: *(additions highlighted for ease of reference)*

EXHIBIT D: TABLE OF PERMITTED USES continued...

USES	ZONING DISTRICTS													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Environ. Business (EB)	Gateway I (G1)	Gateway II (G2)	Special Use I (SU1)	Special Use II (SU2)	Residential I (R1)	Residential II (R2)	Business/ Commercial Services (BCS)	Village Growth I (VG1)	Village Growth II (VG2)	Innovation Technology Business (ITB)	Rail, Industrial, & Trade- Related (RIT)	Innovation Technology Center (ITC)	Open Space & Recreation (OSR)
Cultural	-	P	P	P	-	-	-	P	P	P	-	-	P	P
Conference	-	P	P	P	-	-	-	P	P	P	-	-	P	-
Health Care	-	-	-	P	-	-	-	-	P ⁴	-	P	-	-	-
Academic/Institutional/Civic	-	P	P	P	-	-	-	P	P	P	P	-	P	-
Municipal Uses	P	P	P	P	P	P	P	P	P	P	P	P	P	AC
Lodging Services	-	-	-	-	-	-	-	P	P	P	-	-	-	-
Commercial														
Retail Center	-	-	-	-	-	-	-	-	P	-	-	-	-	-
Free Standing Retail	-	-	-	-	-	-	-	P	P	-	-	-	-	-
Convenience Retail	-	-	-	-	-	-	-	P	P	-	-	-	-	-
Small-Scale Retail: Accessory Use	AC	AC	AC	AC	AC	-	-	AC	AC	AC	AC	AC	AC	-
Residential														
Single or Two Family Dwelling	-	-	AC	-	-	P	P	-	-	-	-	-	P	-
Multi-family (MF) Dwelling	-	-	-	-	-	P	P	-	-	-	-	-	P	-
Elderly Housing	-	-	-	-	-	P	P	-	-	-	-	-	P	-
Senior Residential	-	-	-	-	-	-	-	-	P	-	-	-		
Nursing Home	-	-	-	-	-	P	P	-	-	-	-	-	-	-
Dormitories (Group Residence)	-	-	P	AC	AC	-	-	-	-	-	AC	-	AC	-
Home occupation/Accessory Uses	-	-	-	-	-	-	AC	-	-	-	-	-	-	-
Incubator	P	-	-	P	P	-	-	-	-	-	P	P	P	-

P = Permitted Use
 AC = Accessory Use
 - = Not Allowed

⁴ Within the Shirley Village Growth I District, healthcare uses including hospitals, immediate-care facilities, and clinics are not allowed.

APPENDIX C:

Devens Enterprise Commission Regulation Revision/Adoption Process

Once any Zoning By-Law amendments have been adopted, the Devens Enterprise Commission (DEC) can craft and promulgate regulations to guide the development of housing within the ITC District that is consistent with the findings of the Devens Housing Working Group Report and subsequent supporting studies. Such a process would include:

Drafting of Innovative Housing Regulations specific to the ITC District to accommodate the following:

- Missing Middle housing types (range of housing types and densities to meet market demand and provide a wider range of price points for smaller homes and smaller lots).
- Maintaining an appropriate affordability requirement (both low- and moderate-income levels)
- Green and Complete Streets (safe streets designed for all users and low-impact development techniques that incorporate more natural elements for both environmental and social benefits)
- Context sensitive design (compatibility with surrounding land uses and the Devens Historic District)
- Interconnected network of parks and open spaces.
- Adaptive reuse potential (condition of existing buildings and realistic potential for reuse)
- Phased approach to any housing development in the ITC.
- Any additional factors that may be raised in the recommended supporting studies to address traffic, schooling, utilities, etc.

The Devens Rules and Regulations are Code of Massachusetts Regulations (CMRs). To modify or change these regulations, the DEC would take the following steps:

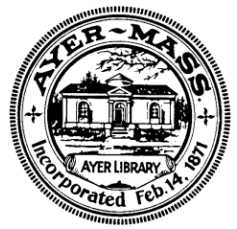
1. Prepare a draft of the proposed regulation amendments in a format acceptable to the Code of Massachusetts Register;
2. Send notice to the Local Government Advisory Committee (LGAC) 14 days before giving notice of a public hearing (indicating any potential impact of proposed regulation changes on local governments);
3. Schedule and advertise a public hearing;
4. Circulate copies of the proposed amendments to the Towns of Ayer, Harvard, and Shirley, and the Register (and make available to the general public);
5. Include a 30-day comment period prior to the hearing date;
6. File a small business impact statement with the Register (noting how the regulations will/will not impact small business in MA);
7. Hold a public hearing in Devens, allow for public input, and continue or close the hearing;
8. File final draft amendments with the Register, including any changes made during the hearing or public comment process.
9. Register publishes final regulations and they become effective (CMRs are published every two weeks).
10. DEC updates Rules and Regulations locally and enforces them.

APPENDIX D: Public Comments

All comments were sent to Working Group members and made available on the Devens Working Group web page. List of Public Comments received:

1. Letter from the Select Board of Ayer (pp. 9-10)
2. Letter from the Select Board of Harvard (p.11)
3. Letter from the Select Board of Shirley (pp. 12-13)
4. Proposed edits to the report – Harvard (pp. 14-15)
5. Michael Alves comments / wish list (pp. 16 -17)
6. Bill Dustin comments (p.18)
7. Richard and Alison Enright comments (p.19)
8. Phil Fama comments (p. 20)
9. James Geller comments (p. 21)
10. Patrick Hughes comments (pp. 22-53)
11. Bonnie Petrovich comments (p. 54)
12. Regina Todd comments (p. 55)

Office of the Select Board
Office of the Town Manager



Town of Ayer| Ayer Town Hall| 1 Main Street| Ayer, MA 01432|978-772-8220| www.ayer.ma.us

May 7, 2025

Interim Secretary Ashley Stolba
Department of Economic Development
1 Ashburton Place – Room 2101
Boston, MA 02108

Subject: Devens Housing Production Working Group – Public Comment

Dear Secretary Stolba:

The Ayer Select Board voted at its meeting on May 6, 2025 the following be included as Public Comment to the Plan/Report of the Devens Housing Production Working Group that you chair.

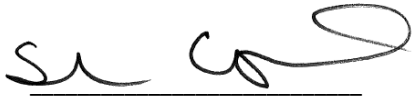
The two matters of greatest concern to us are the method used to enact any changes to town zoning bylaws, and the omission of binding prescriptive development criteria for Vicksburg Square.

The draft plan seems to give equal weight to using either a super town meeting or special legislation to change town zoning bylaws. **We strongly object to equating these two methods.** Any legislative changes to the bylaws of the Devens Regional Enterprise Zone would violate both the detailed, specific language and the spirit of informed self-governance enacted by Massachusetts General Law, Part I, Title VII, Chapter 40A, Section 5. Further, Section 10 of Chapter 498 of the Acts of 1993, the enabling legislation for the Devens Regional Enterprise Zone, specifically states that changes to the Devens Reuse Plan and Bylaws must use the same process as when they were originally adopted, which is a super town meeting, with prior approval by MassDevelopment.

We know of no case where the Legislature has overridden local zoning bylaws. Such legislation would set a precedent for every city and town in the Commonwealth. The fact that the Legislature has the authority to enact such measures does not imply that it is appropriate or justified to do so. Every zoning bylaw change enacted at Devens over the past 32 years has been accomplished by a super town meeting, and this method has been overwhelmingly successful.

The draft plan calls for up to 400 units of housing to be added to the Innovation and Technology Center (ITC) district, split between adaptive reuse of the Vicksburg Square quadrangle and the remainder of the ITC zone. Given the size and location of the Vicksburg Square quadrangle and the anticipated density of units created in them, **we strongly recommend that MassDevelopment submit a detailed and enforceable redevelopment plan for any proposed zoning changes.**

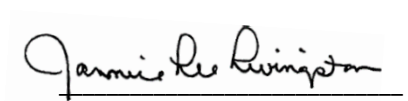
Sincerely,



Shaun C. Copeland, Chair



Christopher E. Tavares, Vice Chair



Jannice L. Livingston, Clerk

The Ayer Select Board

Cc: SusanMary Redinger, Chair, Havard Select Board
Debra Flagg, Chair, Shirley Select Board
State Senator James Eldridge
State Senator John Cronin
State Representative Danillo Sena

Town of Harvard

April 16, 2025

Yvone Hao, Secretary
Department of Economic Development
1 Ashburton Place, Room 2101
Boston, MA 02108

Subject: Devens Housing Production Working Group – Public Comment

Dear Secretary Hao:

The Harvard Select Board voted Unanimously at its meeting of April 15, 2025 that the following be included as public Comment to the Plan/Report of the Devens Housing Production Working Group that you chair.

The two matters of greatest concern to us are the method used to enact any changes to town zoning bylaws, and the omission of binding prescriptive development criteria for Vicksburg Square.

The draft plan seems to give equal weight to using either a super town meeting or special legislation to change town zoning bylaws. **We strongly object to equating these two methods.** Any legislative changes to the bylaws of the Devens Regional Enterprise Zone would violate both the detailed, specific language and the spirit of informed self-governance enacted by Massachusetts General Law, Part I, Title VII, Chapter 40A, Section 5. Further, Section 10 of Chapter 498 of the Acts of 1993, the enabling legislation for the Devens Regional Enterprise Zone, specifically states that changes to the Devens Reuse Plan and Bylaws must use the same process as when they were originally adopted, which is a super town meeting, with prior approval by MassDevelopment.

We know of no case where the Legislature has overridden local zoning bylaws. Such legislation would set a precedent for every city and town in the Commonwealth. The fact that the Legislature has the authority to enact such measures does not imply that it is appropriate or justified to do so. Every zoning bylaw change enacted at Devens over the past 32 years has been accomplished by a super town meeting, and this method has been overwhelmingly successful.

The draft plan calls for up to 400 units of housing to be added to the Innovation and Technology Center (ITC) district, split between adaptive reuse of the Vicksburg Square quadrangle and the remainder of the ITC zone. Given the size and location of the Vicksburg Square quadrangle and the anticipated density of units created in them, **we strongly recommend that MassDevelopment submit a detailed and enforceable redevelopment plan for any proposed zoning changes.**

Sincerely,

SusanMary Redinger, Chair
Harvard Select Board

Cc:

Shaun Copeland, Chair, Ayer Select Board
Debra Flagg, Chair, Shirley Select Board
Senator James Eldridge
Senator John Cronin
Representative Danillo Sena

Town of Shirley

SELECT BOARD



7 KEADY WAY – SHIRLEY, MASSACHUSETTS - 01464-2812

Debra Flagg—Chair, Brian Hildebrant—Vice Chair, Andree Jean Jacques —Clerk

Tel: (978) 425-2600, x200

Fax: (978) 425-2602

selectboard@shirley-ma.gov

April 28, 2025

Yvone Hao, Secretary
Department of Economic Development
1 Ashburton Place, Room 2101
Boston, MA 02108

Subject: Devens Housing Production Working Group – Public Comment

Dear Secretary Hao,

The Shirley Select Board voted unanimously at its meeting of April 28, 2025 that the following be included as public Comment to the Plan/Report of the Devens Housing Production Working Group that you chair.

The two matters of greatest concern to us are the method used to enact any changes to town zoning bylaws, and the omission of binding prescriptive development criteria for Vicksburg Square.

The draft plan seems to give equal weight to using either a super town meeting or special legislation to change town zoning bylaws. **We strongly object to equating these two methods.** Any legislative changes to the bylaws of the Devens Regional Enterprise Zone would violate both the detailed, specific language and the spirit of informed self-governance enacted by Massachusetts General Law, Part I, Title VII, Chapter 40A, Section 5. Further, Section 10 of Chapter 498 of the Acts of 1993, the enabling legislation for the Devens Regional Enterprise Zone, specifically states that changes to the Devens Reuse Plan and Bylaws must use the same process as when they were originally adopted, which is a super town meeting, with prior approval by MassDevelopment.

We know of no case where the Legislature has overridden local zoning bylaws. Such legislation would set a precedent for every city and town in the Commonwealth. The fact that the Legislature has the authority to enact such measures does not imply that it is appropriate or justified to do so. Every zoning bylaw change enacted at Devens over the past 32 years has been accomplished by a super town meeting, and this method has been overwhelmingly successful.

The draft plan calls for up to 400 units of housing to be added to the Innovation and Technology Center (ITC) district, split between adaptive reuse of the Vicksburg Square quadrangle and the remainder of the ITC zone. Given the size and location of the Vicksburg Square quadrangle and the anticipated density of units created in them, **we strongly recommend that MassDevelopment submit a detailed and enforceable redevelopment plan for any proposed zoning changes.**

Respectfully,


Debra Flagg


Brian Hildebrant


Andree Jean Jacques

Cc:

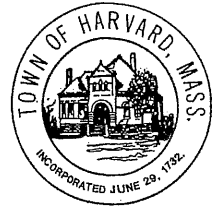
Shaun Copeland, Chair, Ayer Select Board

Susan Mary Redinger, Chair, Harvard Select Board

Senator James Eldridge

Senator John Cronin

Representative Danillo Sena



**OFFICES OF THE
SELECT BOARD AND
TOWN ADMINISTRATOR**

13 Ayer Road, Harvard, Massachusetts 01451
(978) 456-4100

www.harvard-ma.gov

April 28, 2025

Yvone Hao, Secretary
Department of Economic Development
1 Ashburton Place, Room 2101
Boston, MA 02108

Subject: Devens Housing Production Working Group – Public Comment

Dear Secretary Hao,

On behalf of the Harvard Select Board I present the following to be included as public comment to the plan/report of the Devens Housing Production Working Group that you chair.

The two matters of greatest concern are the methods used to enact any changes to town zoning bylaws and the omission of binding prescriptive development criteria, in particular for Vicksburg Square.

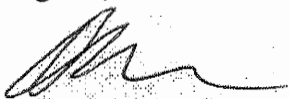
The draft plan seems to give equal weight to using either a super town meeting or special legislation to change town zoning bylaws. **We strongly object to equating these two methods.** Any legislative changes to the bylaws of the Devens Regional Enterprise Zone would violate both the detailed, specific language and the spirit of informed self-governance enacted by Massachusetts General Law, Part I, Title VII, Chapter 40A, Section 5. Further, Section 10 of Chapter 498 of the Acts of 1993, the enabling legislation for the Devens Regional Enterprise Zone, specifically states that changes to the Devens Reuse Plan and Bylaws must use the same process as when they were originally adopted, which is a super town meeting, with prior approval by MassDevelopment.

We know of no case where the Legislature has overridden local zoning bylaws. Such legislation would set a precedent for every city and town in the Commonwealth. The fact that the

Legislature has the authority to enact such measures does not imply that it is appropriate or justified to do so. Every zoning bylaw change enacted at Devens over the past 32 years has been accomplished by a super town meeting, and this method has been overwhelmingly successful.

The draft plan calls for up to 400 units of housing to be added to the Innovation and Technology Center (ITC) district, split between adaptive reuse of the Vicksburg Square quadrangle and the remainder of the ITC zone. To ensure that town meeting has sufficient information to make an informed decision about the proposed zoning changes, given the size and prominence of the Vicksburg Square quadrangle and the anticipated density of units created in them, **we strongly recommend that MassDevelopment submit a detailed and enforceable redevelopment plan for at least the Vicksburg Square quadrangle simultaneously with any proposed zoning changes.**

Regards,



Daniel F. Nason
Town Administrator
Town of Harvard Massachusetts

cc: Harvard Select Board
Shaun Copeland, Chair, Ayer Select Board
Debra Flagg, Chair, Shirley Select Board
Senator James Eldridge
Representative Danillo Sena

Dear Devens Working Group,

Thank you for your efforts and collaboration to make for both Increased Economic Development and More Thoughtful Housing for Devens and the surrounding communities.

My Wishes:

- Live Work Play
- Human Performance Lab
- Devens as a Blue Zone
- Public, Private and Educational Partnerships for Longitudinal Cohort Studies
- Devens is like Assembly Row and Arsenal Yards
- Keep idea of Village Center District and piggyback on it.
- Amenities & Revenue Generating Ideas Like Summer Weekend Tournaments
 - Human Performance Lab (Destination for Testing & Research Cohort Studies)
 - Health Club: YMCA, Lifetime, Equinox and/or invite Orchard Hills to switch locations and build out a new gym.
 - Indoor Olympic Size Pool w/ Kiddie Area, Splash Pad,
 - Swim Tournaments
 - Indoor Full Sized Basketball Courts
 - Basketball Tournaments
 - Indoor Tennis
 - Indoor Pickleball
 - Outdoor Olympic Size Pool w/ Kiddie Area, Splash Pad,
 - Outdoor Full Sized Basketball Courts
 - Tournaments
 - Adult Leagues
 - Outdoor Pickleball
 - Outdoor Tennis
 - Sledding Hill (regroom the back of Vicksburg Square and the Hill Opposite Clear Path for Sledding Like Benjamin Hill in Shirley)
 - Outdoor Ice-Skating Rink
 - Trader Joe's
 - Ace Hardware
 - Parking Garage for Weekend Tournaments
 - New 3 Story Playground like Franklin Park Zoo, Martin Richard Playground near Boston Children's Museum, Sand Playground near Harvard Square and Charlestown Playground near Spaulding Hospital.
 - Allston Car Wash
 - Dicks Sporting Goods to serve tournament attendees and weekly sports & fitness enthusiasts.
 - (3) Off Leash, Residential Dog Parks w/ Doggie Bags and Trash Barrels
 - Fenced In and Canopied by Trees (like old tennis court)
 - Canopied Trail
 - Fenced in Open Space Park

- Residents Only Signs (no commercial and truck traffic) on Grant, Bradley, Chance, Powell, Marshall, Goddard, Elm, Walnut, Sherman, Adams, Cavite, Malvern Hill, Balls Bluff and residential parts of Antietam, Buena Vista and residential service roads.
 - Raised Cross Walks
 - Traffic Beacons
- Tree Replacement: every tree that is taken down, gets replacement trees planted equal to the number tree rings on the tree.
- Re: Housing:
 - Missing Middle
 - Live Up & Live Down Options (ability to move up as income and family grows and move down as kids move out, income shrinks / becomes fixed and less space is needed, so you can stay in the community).

Thank you for considering my wish list.

Warmly,

Michael Alves
 Devens Resident
 Devens Committee

A Vision of Housing Development at Devens.

Bill Duston, Chance Street

I believe that the Devens residential community should remain intact and not be separated into two towns. Currently Devens residents are separated politically by the old boundary lines of Ayer and Harvard, but are physically located in a small compact area and share all the qualities of a small town community of around 600 people. Whatever happens to the jurisdiction of Devens, I feel that the residential community should remain together and be either part of Ayer, Shirley, Harvard or Devens as a single entity. With that in mind, I would like to describe the future residential development of Devens as I see it.

As residents, we experience Devens as a wonderful, vibrant, and very livable community with open space, neighborhoods, excellent infrastructure and services that are close by. The existing housing and residentially zoned area in Devens is no more than 1-1.5 square miles and is bounded by Adams Circle, the Parker School, the end of Grant Road, and Bradley Circle. Our residential area is conveniently adjacent to the commercial area of Devens Commons and near to all the other recreational offerings of Devens, including Mirror Lake, Red Tail Golf, playing fields, disc golf and walking paths. The Innovation and Technology Center District (ITC) including Vicksburg Square is in the center of our residential area. Because the ITC is the center of the residential community of Devens, it should be the cornerstone of the community and be the link that brings all of our neighborhoods together. Any new development in Vicksburg Square should draw our community together both physically and socially.

How should the ITC be rezoned and developed? Here are some of the criteria that I feel are important and essential to this development. Many of these were mentioned at the first Working Group Meeting.

1. Reuse existing buildings or tear them down and build on the same site. (i.e. BOQ)
2. Develop brown areas before green, if possible.
3. The density of the residential zone should incorporate cluster zoning with maximum open space and walkability
4. Vicksburg Square should contain no more than 150-200 units of owned and rental housing in 1-2 of the existing buildings with the remaining buildings torn down. Four large buildings with 400 units of housing in Vicksburg Square is too massive for the residential area and for the region.
5. Live/Work/Play should be the guideline for the ITC residential area which should include recreation and mixed use zoning.
6. Development should use the DEC zoning guidelines and include 25% affordable with an emphasis on work force housing and affordability. The template used by NOW Communities at Emerson Green should be the starting point and include a combination of single, multiple and rental units. Construction should emphasize sustainability and a small carbon footprint.
7. The ITC should incorporate mixed use zoning to allow for ancillary commercial space that is compatible with the current Devens Commons businesses and existing ITC businesses.
8. Pedestrian traffic should be encouraged and auto traffic should be restricted from certain areas such as Buena Vista.
9. Zoning for future municipal use should be located outside of the residential zone.
10. Rogers Field should be used for recreation and open space, but large scale recreation events should not be allowed due to the proximity to residential development.
11. New areas within the ITC should be rezoned for open space to include buffer zones between Vicksburg Square and the surrounding residential neighborhoods. Jackson Road and Elm Street provide a buffer for the Auman/Bates and lower Elm/Walnut neighborhoods, however new green space should be considered. A green buffer zone should be developed between the ITC and the Emerson Green/upper Walnut and Elm neighborhoods.
12. If possible, historical buildings should be reused with the exception of the four Vicksburg Square buildings which could be reduced to 1-2 as described above in #4.
13. Utilities should be placed underground.
14. Construction should be done to the highest quality and aesthetics.

Richard & Alison Enright
19 Chance Street
Devens, MA 01434

Devens New Housing should favor affordability (more than 25%). It is an economic development issue for MA. Home ownership across the US is declining. Wealth gap is growing.

Devens New Housing should prefer home ownership over landlord/tenant housing.

Devens New Housing should prefer modular building practices over stick building housing to improve quality, cost and time to market.

Devens New Housing should discriminate in favor of first time home buyers.

Devens New Housing should favor smaller cottage style housing that would improve affordability and limit impact on local schools (fewer people in smaller homes means fewer students that might lead to school system impacts).

Devens New Housing should avoid rezoning Vicksburg Square. It is too dense for the area. The state of the building as it relates to hazardous materials, sheer volume and size of the building, and the cost of rehabilitating the structures would not meet the immediate need for housing relief. Time to market will interfere with affordability and will have a negative impact on other Devens residents due to the number of people expected in these large buildings and the number of cars without easy access to highways.

Devens New Housing should consider rezoning the ITC area ONLY as it relates to the apartment buildings across from 100 Sherman Road (The Community Center). The apartment buildings are in far better shape than the buildings at Vicksburg Square, and thus have a shorter time to market. The number of units would be considerably smaller in scope and have a lesser impact to current residents.

Devens New Housing should consider traffic impacts of any new development to minimize impacts to existing residents. Devens is a benefit to surrounding residents who come to Devens to walk themselves and pets in a place with lots of sidewalks and open space. Keeping that intact as much of possible will benefit Devens residents but also residents of surrounding communities.

My comments are an overview of Devens' immediate needs in housing, although thoughtful and intelligent planning of details should take precedence over speed.

I believe the primary concern should be to build for young adults so they can live near their jobs in or around Devens. They need affordable apartments which would include studio, one and two bedroom apartments. Many of these residents will be able to fill the jobs needed by local businesses here. It will help stop the flight of productive people who are moving out of Massachusetts in droves. These apartments should be built in quantity also to accommodate seniors who are downsizing and veterans who have unique housing needs.

As those young adults increase their skills and move into higher paying jobs, building affordable condos and small one family houses could then become the dominant focus. As time goes on and job income increases, many will start families with small children and will need larger apartments, condos and single family houses to accommodate them.

Housing in Devens is essential to the growth of the businesses in and around Devens, and the success of the businesses will ensure a continuation of the quality of our lives here.

~ Phil Fama

I do not understand the rush to change the zoning of the Innovation and Technology Center District to include residential uses when there remains land already zoned for residential use that has not been developed and absent any specific proposal for the redevelopment of Vicksburg Square. Is there a role for the Commonwealth to play in facilitating the completion of the Emerson Green project on Grant Road, and in developing housing for Adams Circle, rather than simply adding to the overall land zoned for residential purposes?

I would like to see the redevelopment and reuse of Vicksburg Square and the Bachelor Office Quarters. Those buildings are anchor points for the ITC District and knowing what will happen with those structures is important to any integrated planning of the ITC District. My concern is that the rest of the ITC District gets built out while those buildings continue to sit empty and to deteriorate.

~ James Geller

**Maximizing Affordable Residential
Development in Devens using Passive House
Standards for Net Zero Residential
Construction with low impact land use
and Smart Growth techniques.**

**Thoughts on how to provide an accurate
assessment for the total number of developable
residential units in Devens to these standards.**

**Without considering a total number of potential
additional housing units it would be difficult to
determine local impacts on Governance, Schools
and Services if additional residential
buildout is facilitated**

***Could Devens become a living example of how
these building principles could be used all over
the Commonwealth***

Submitted by Innovation in Development and Sustainable Housing subcommittee
member

Patrick Hughes Net Zero Building Consultant Ayer MA

All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

Table of Contents

Page 1 Cover

Page 2 Table of Contents

Page 3 Overview

Page 4 Title page for Recommended home types, Building Specifications and land development considerations (following Pages)

Page 5 Cottage Courtyard Style Homes

Pages 6-7 Starter Home with denser impacts on clustered looped road

Page 8 Single Family Homes in Devens

Page 9 Style potential for Multi Family with Modular Example

Pages 10-11 Typical Construction Specs for all housing types

Page 12 All site conditions, existing utilities, excavation considerations Lot locations, % of Preserved Land Vs Impacted land

Page 13 Title page Areas in Devens to consider adding housing with challengers noted (following Pages)

Page 14 Proposed housing The Innovation and Technology Rodgers Field and Vicksburg Square area

Page 15 Special Challenges the Old Batchelor's Quarters

Page 16 Special Challenges Vicksburg Square Buildings

Page 17 Additional housing on Pine Road

Page 18 Additional housing on Grant Road

Page 19 Adams Circle and Cavite Street Area Residential Potential

Pages 20 Auman Street, Walnut Street, Salerno Circle Challenges

Page 21 Title page Methodology for Parcel assessment How the attached Excel spread sheets were conceived, programmed and used (following Pages)

Pages 22- 25 Methodology for Parcel assessment criteria per lot and in general

Page 26 Patrick Hughes Qualification

All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

Overview

Any discussion regarding trying to add to and achieve more affordable housing at Devens (or for that matter anywhere in the Commonwealth) centers around what type of home to encourage developers to build. The general consensus is the “Missing Middle”. Small Cottage with walkable Courtyards. Starter homes clustered on smaller lots with deed restrictions on allowable expansion. Multi Family buildings. Potentially these become “Affordable” by Smart Net Zero building techniques. Very adaptable to Modular or Panelized production. Hence reduce the cost to construct that then reduces the purchase price so that not all affordable units have to be subsidized in a 40 B type use. Perhaps held to size by zoning to perpetuate affordability.

Many of the lots reviewed in this proposal are currently owned by Mass Development whether they are zoned residential or other zoning. A few are in control of the Estates of Harvard Hills HOA.

In considering how much of a parcel to impact a basic standard of 50% Preserved and 50% Impacted was used with adjustment to preserve more if the sites natural features or historic preservation dictated. Or less preserved if more has been impacted or abutting dense residential neighborhoods. This to maintain the existing rural land use and feel of the Devens campus.

The choices of housing being considered as the Missing Middle also reflect a smaller lot foot print with more shared greenways of forested or natural features, while acknowledging the need for all impervious surfaces, roads and driveways in these calculations.

Recommended home types, Building Specifications and land development criteria with infrastructure considerations.



Cottage Courtyard Style Homes 144 Proposed

Typically, a 5-600 SF Single story Slab on grade 1 Bedroom home on individual 3,500 SF Lots inclusive of a common walking courtyard and shared parking. Potential for a shared Solar Car port roof.

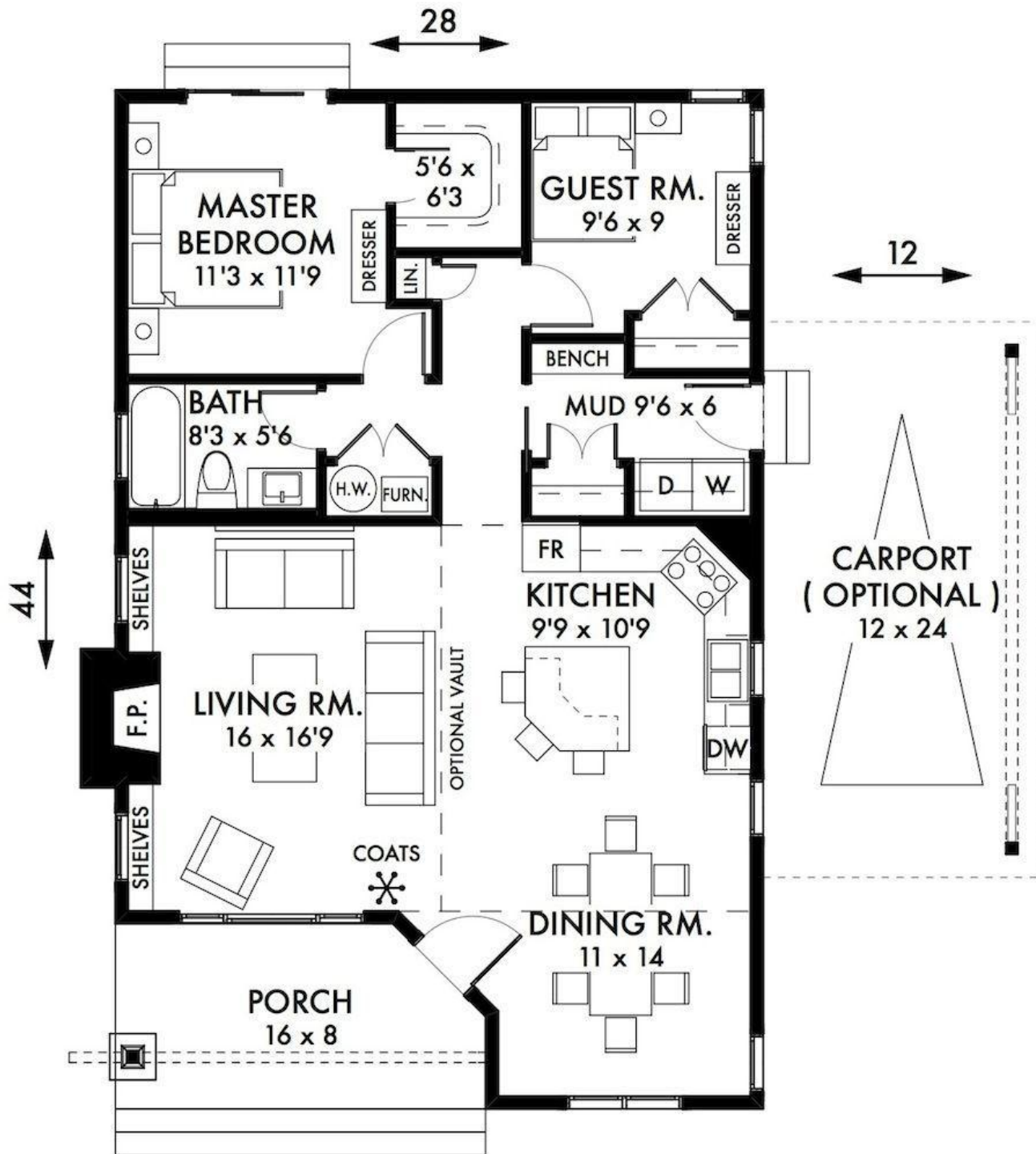


 HOUSEPLANS

All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

Starter Home with denser impacts on clustered looped road 171 Proposed

1,000 to 1,200 SF Single story slab on Grade. Deed restriction on a 5,000 SF Lot with Single car Garage with parking spot. Basement optional. Consider optimal orientation to maximize solar efficiency.



Looped road type Neighborhoods with shared preserved forested scope



Single Family Homes existing in Devens

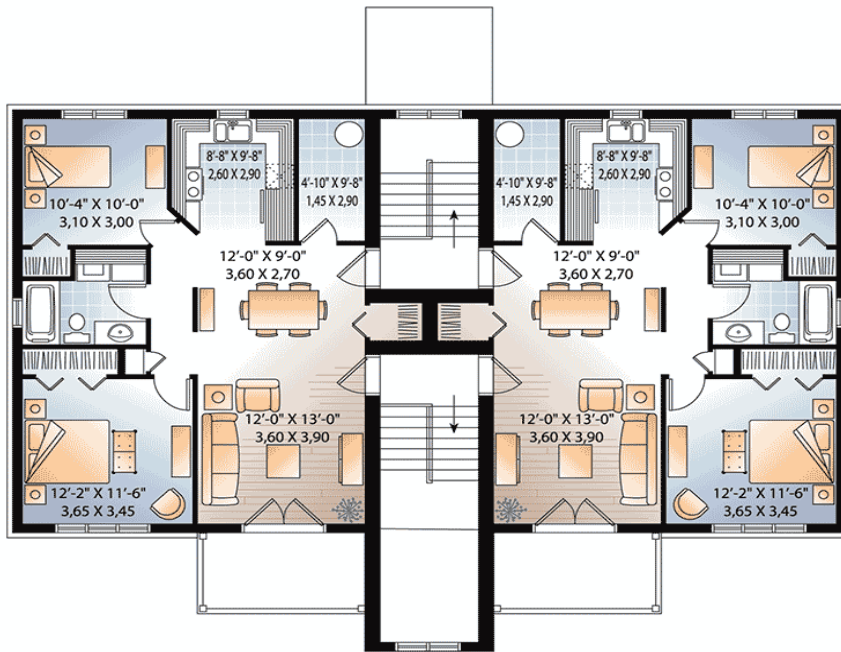
2,400 SF homes on a 7,000 SF lot

30 Proposed but potentially up to 49 more if allowed in Salerno Circle



All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

The Different Style potentials for Modular Multifamily homes 1,500 to 2,200 SF Units on 10,000 SF Lots 192 Units Proposed



All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

Typical Construction of all housing types
Specifications for all housing from foundation to frame and finish. Simplify
where possible to keep it affordable but adhere to Passive House Standards.

Review building using Panelized or Modular to reduce cost and waste

- 1) Carpentry Exterior
 - a. Framing Shell
 - i. All Engineered lumber exterior walls with 1 ½” nail base sheathing and engineered interior partitions.
 1. KD Lumber is almost useless with high waste factors. Engineered can be ordered to lengths needed
 - a. All walls are straight and true reducing labor costs for all following trades
 2. Skip sheathing vs. Blue Skin Wrap
 - a. Cautionary note about skip sheathing and nail penetration moisture issues
 - ii. AGS 25 Floor systems with ¾ Advantix sheathing
 1. This allows maximum penetration of the Web for MEP and could use 9” instead of 12” floor systems due to great strength
 - iii. KD Roof rafters okay with nail base sheathing and full ice and water
 - iv. How to translate this into Modular or panelized construction
 - b. Doors and windows
 - i. Tripple Pane
 - ii. Thermally broken rough buck, unit frames and jambs for exterior
 - iii. Taped to Air moisture barrier and foamed at interior
 - c. Finish Trim
 - i. Azak or other synthetics typical
 - ii. Box Soffits Applied to assist in thermal envelope creation
 - d. Siding Choices
 - i. Vinyl
 - ii. Simulated
 - iii. Stucco
 - iv. Panelized
 - v. Cedar upgrades
 - vi. Brick Venner upgrades
 - e. Roofing over High Heat full Ice and Water
 - i. Asphalt type
 - ii. Metal Panel
 - iii. Solar Roofing types
 - iv. Potential for Green Garden roofs where feasible in Multifamily, Vicksburg Square Old Bachelors Quarters and Sylvia’s Haven buildings .
 - f. Painting
 - i. All low and No VOC
- 2) Insulation Values
 - a. Creating insulation enclosures
 - i. Continuous from Below Slab thru roof or Attic
 - b. Nailbase sheathing

All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

- i. ½ Ply /t 1 ½ HD Foam at walls. Roof ¾ Ply. Same HD foam as walls
 - c. Thermally broken rough Buck mounting frame
 - d. Triple Pane glass windows and doors
 - e. Building wraps (Blue Skin or Equivalent No Tyvek) Or Taped Skip sheathing
 - i. Higher “R” and Air Penetrations ratings reduce HVAC load hence reduced equipment costs
 - f. Spray foam vs Rock wool vs Cellulose
- 3) MEP Systems
- a. Air Source heat pumps
 - i. Geo thermal (At Vicksburg Square, Bachelors quarters and cottage courtyards)
 - b. All Electric Kitchen and water heating
 - c. LED Lighting
 - d. Pecs tube Supply with hot water insulated
 - i. Efficient hot water runs
 - ii. Copper Exposed
 - e. PVC waste
 - f. Low Flow Fixtures
- 4) Interior Finishes
- a. Plaster or Drywall
 - b. Brosco typical doors with Trustile up grade
 - c. Plastic, Finger joint or real wood trim
 - d. Flooring
 - i. Engineered wood floor with Real wood upgrades
 - ii. Carpet
 - iii. Synthetic flooring
 - iv. Tile
 - e. Modular type Cabinets and counters
 - i. Stone counter tops upgrade
 - f. Shower and tub Inserts
 - i. Tile upgrades
 - g. Low or no VOC paints
 - h. Insulated Shades

All site considerations, existing conditions, existing utilities, excavation, Lot locations, % of Preserved Land Vs Impacted land. Needed to review as to how housing types and quantities could/would work in that lot location and abutting Neighborhoods with the densities proposed.

1. Utilities
 - a. Water and sewer capacity
 - i. Sets Limits and/or defines how many homes or apartments can be built without adding more capacity thru underground utilities
 - ii. It is confirmed the treatment plant and wells have enough volume/capacity to support significant increases in population
 - iii. Just needs the infrastructure as noted.
 - b. New water and sewer Branch lines to support Denser development in currently zoned or new areas
 - c. All new underground electrical and communications supply likely.
 - i. Should gas be excluded?
 - d. Solar
 - i. Support Solar oriented housing layouts
 - ii. Solar fields for neighborhoods
 - iii. Moore Air Field for Solar
 - iv. Vicksburg Sqr Roofs
 - e. Geo thermal per Neighborhood or apartment building
 - i. Vicksburg Sqr Buildings
 - ii. Batchelor Officer Quarters Buildings
2. Road layout and land usage per Lot of developable area
 - a. Reuse existing to the greatest extent possible but repave with impervious asphalt and Low impact storm water collection.
 - i. Impervious Asphalt Already a DEC Standard
 - b. Repave all as impact of new Underground Utilities will significantly degrade existing asphalt.
 - i. Minimize revisions
 - c. Preserve important natural features
3. Road work and drainage
 - a. If adding new roads Minimal Road width with enhancements to reduce speeds
 - i. Visitor parking????
 - b. Sidewalks or none
 - i. Impedes using low impact storm water collections swales
 - ii. If so adds considerably to infrastructure cost to build Sidewalks and Drainage catch basins, underground piping and retention ponds
4. Excavation and site work
 - a. Existing Tree and Historical features protections
 - b. Preserve interesting ledge out cropping's if relevant
 - c. Deeded access Utility right of ways on lots if it reduces underground utility cost for new lines if needed
 - d. Slab vs Basement
 - e. Soil conditions for ease of excavation Reported Generally Sandy

Lots in Devens to consider adding housing with challengers noted

Summary of all 5 Tabs												
Location	Total Acres Available per lot	Acres Preserved	Acres Impacted	Cottage (Affordable to Construct)	Starter (Affordable to Construct)	Singel Family	Apt Units	Mixed use retail Rodgers field	Multi Family units	Multi family buildings with 4 units	Total Units per lot	Total Unit per page
3 and 15 Buena Vista Street	13.92	6.96	6.96	16	16				24	6	56	VKSBG SQ RF Area
308 and 309 0 Buena Vista St. 93 & 101 Sherman 105 Sherman Ave to remain	13.24	6.62	6.62	12	12		85	21			130	
Vicksburg Square	19.75		19.75				256		0		256	442
1 Pine Road	2.15	1.08	1.08						16	4	16	Pine St
15 Pine Road	3.12	1.56	1.56						16	4	16	32
59 Grant Road	45.70	22.85	22.85	30	45	30			40	10	145	Grant Road Area
140 Grant Road	7.00	3.50	3.50	8	8				12	3	28	
160 Grant Road	12.83	8.21	4.49	12	10				28	7	50	223
100 Adams Circle	11.60	5.80	5.80	12	10				28	7	50	Adams Circle Cavite Street Area
1 Bates Street	1.50	0.38	1.13		8						8	
95 Buena Vista Antietam Fields	7.31	1.83	5.48	12	8				12	3	32	147
24 Cavite Street	9.22	4.61	4.61	12	15				4	1	31	
99 Cavite Street	5.14	1.29	3.86	6	8				12	3	26	Est Harvard Hills Salerno Circle
4 Auman Street	1.14	0.57	0.57		4						4	
5 Auman Street	0.84	0.42	0.42		3						3	
0 Walnut Street	4.85	2.43	2.43	12							12	
50 Walnut Street	6.20	3.10	3.10	16							16	108
40 Salerno Circle	87.14	65.36	21.79		24	49					73	
Total of each type	252.65	136.54	115.98	148	171	79	341	21	192	48	952	952
319	# of cottage and starter homes that become affordable by less expensive to construct											
0.34	% of total that potentially do not need to be subsidized (40B type) to achieve affordability											

The Innovation and Technology Rodgers Field and Vicksburg Square area the Secretaries Focus 442 Proposed

3 and 15 Buena Vista Street

- 13.92 Acres
- 50% Preserved
- 50 % Impacted
- 2 Cottage style 8-unit Courtyards
- 16 Starter Homes on clustered looped road.
- Multi Family 6 4-unit buildings

93 and 101 Sherman Ave, 308 and 309 0 Buena Vista St.

- 13.24 Acres
- 50% Preserved
- 50 % Impacted
- 2 Cottage style 6-unit Courtyards
- 12 Starter Homes on clustered looped road.
- **21 Unit Walkable single floor retail mall**
- **85 Apartments in Rehabbed Old Officers Quarters and former Sylvia's Haven**

Vicksburg Square

- 19.74 Acres Existing
- **256 Apartments in Rehabbed Old Command Buildings**

Currently Zoned Innovation and technology, this area is the focus of the Innovation in Development and Sustainable Housing subcommittee work as to how to maximizes housing. These lots abut the existing original officers' quarters at the Estates at Harvard Hills, have many important monuments and historical areas of note to be preserved and all border the Rogers Field area. Widely used for sports by many towns in the commonwealth. As this area already has many single family homes the suggestion is to build Cottage Courtyard, smaller starter homes on Looped roads, new Multifamily and rehab existing buildings into Apartments or Condos .

Further given the existing and new neighborhoods proposed with wide public use and support of Rodgers field, having an abutting walkable retail Mall area of shops, restaurants, bistro's etc., could prove a valuable addition to the local land use for housing and recreational as well as regional sports events .

It is noted added parking will be required if rezoned residential to facilitate the wide use of Rodgers Field suggesting the value of a parking deck at 205 Jackson Road with amenities like large public bath rooms to support the larger use of those fields.

Special Challenges the Old Batchelor's Quarters and former Sylvia's Haven Apartment units 85 Proposed



Per the Batchelor's Adaptive Reuse Study 2010 these buildings present a reasonable conversion to a similar breakdown as the Vicksburg square apartments or condos noted but an existing building structure more amenable to revamping the interiors to the new usage and specifications for passive house required.

Note no need for added parking

The 101 Sherman Building (Red) is also part of this assessment

Special Challenges Vicksburg Square Buildings

Apartment units: 256 Proposed



Preservation and repurposing of the Vicksburg Square Buildings present many unique and expensive challenges. The first of which is the Guting of the buildings back to the concrete structures of foundations, walls, floors and the framed roofs. As outlined in the Vicksburg Square Site Assessment and Hazard Identification 2017 report. It is nothing less than a hazmat level full gut just to begin.

A full Structural site/building assessment is needed to determine the ability to convert extensively these existing buildings into useable small, medium and larger apartments with some of the larger apartments hopefully set aside for Affordable but would need to be subsidized. Given the historical designation of these buildings preservation of the exteriors is essential to any plan. This would include upgrade to thermally efficient doors and windows maintaining the historical look. Gable ends being restored but likely roof areas could facilitate Solar panels or a solar typical roof sheathing available now by many companies. Achieving the goal of a passive house level of Net zero does represent challenges, given the potential of thermal transfer of the existing masonry walls and concrete floor design into the interior of any new configuration affecting room HVAC conditioning, even with new spray foam interior walls

The Center courtyard may also need a 2nd deck to facilitate the resident parking along with guest parking. Suggested to make a garden surround at the street and 2nd deck level.

All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

Proposed Additional Housing on Pine Road
Currently Zoned Residential abutting other existing residential
Multi Family Condos 32 Proposed

1 Pine Road

- 2.15 Acres
- 50% Preserved
- 50% Impacted
- 4 4-unit Multi Family buildings

15 Pine Road

- 3.12 Acres
- 50% Preserved
- 50% Impacted
- 4 4-unit Multi Family buildings

To keep the character of the neighboring and existing buildings while minimizing the impact on the rural, wooded, open space feel, it is recommended to just do the multi-family units as noted. Ideal location for flat garden roof type units.

Additional housing on Grant Road Potential Currently Residential abutting other existing residential 223 Proposed

59 Grant Road

- 45.70 Acres
- 35% Preserved
- 65% Impacted
- 2 Cottage style 8-unit Courtyards
- 2 Cottage style 7-unit Courtyards
- 45 Starter Homes on clustered looped road.
- 30 Single Family Homes
- 10 4-unit Multi Family buildings

140 Grant Road

- 7.00 Acres
- 35% Preserved
- 65% Impacted
- 1 cottage style 8-unit Courtyard
- 8 Starter Homes on clustered looped road.
- 3 4-unit Multi Family buildings

160 Grant Road

- 12.83 Acres
- 35% Preserved
- 65% Impacted
- 2 Cottage style 6-unit Courtyard
- 10 Starter Homes on clustered looped road.
- 7 4-unit Multi Family buildings

Grant Road has already committed to a more focused residential look while keeping to the best of passive house and low impact site design. All that is proposed respects that but with the “Missing middle” homes proposed to break up the look of the single family home neighborhood while keeping it walkable. Consider maximizing solar orientation of roofs where reasonable.

Note easy access to the Walkable Commercial mall at Rodgers field.

Any additional roads would be of the looped type noted

Adams Circle and Cavite Street Area Residential Potential 147 Proposed

100 Adams Circle

- 11.60
- Acres
- 50% Preserved
- 50% Impacted
- 2 Cottage style 6-unit Courtyards
- 10 Starter Homes on clustered looped road.
- 7 4-unit Multi Family buildings

1 Bates Street

- 1.5 Acres
- 25% Preserved
- 75% Impacted
- 8 starter Homes on clustered looped road.

95 Buena Vista Antietam Fields

- 7.31 Acres
- 25% Preserved
- 75% Impacted
- 2 Cottage style 6-unit Courtyards
- 8 Starter Homes on clustered looped road.
- 3 4-unit Multi Family buildings

24 Cavite Street

- 9.20 Acres
- 50% Preserved
- 50% Impacted
- 2 Cottage style 6-unit Courtyards
- 15 Starter Homes on clustered looped road.
- 1 4-unit Multi Family 1 4-unit building

99 Cavite Street

- 5.14 Acres
- 25% Preserved
- 75% Impacted
- 1 Cottage style 6-unit Courtyards
- 8 Starter Homes on clustered looped road.
- 3 4-unit Multi Family buildings

This is similar to the Grant Road area lots, that abut existing residential housing. It is the same thought to add the missing middle to add more diversity of housing type choices to an already single family home residential area.

Auman Street, Walnut Street residential Challenges per Estates of Harvard Hills approval and Salerno Circle Potential if rezoned Residential 108 Total

4 Auman Street

- 1.14 Acres
- 50% Preserved
- 50% Impacted
- 4 Starter Homes on clustered looped road.

5 Auman Street

- .84 Acres
- 50% Preserved
- 50% Impacted
- 3 Starter Homes on clustered looped road

0 Walnut Street

- 4.85 Acres
- 50% Preserved
- 50% Impacted
- 2 Cottage style 6-unit Courtyards

50 Walnut Street

- 6.20 Acres
- 50% Preserved
- 50% Impacted
- 2 Cottage style 8-unit Courtyards

40 Salerno Circle

- 87.14 Acres
- 75% Preserved
- 25% Impacted
- 24 Starter Homes on Existing Roads
- 49 Single Family Homes on Existing Roads

Any approval for changes on lots and properties under the rules of the HOA for the Estates at Harvard Hills has to have a 100% approval of the members.

For the Auman Street properties the suggestion would be Starter homes to match the density of the existing homes on those lots but lean toward that affordable goal.

For the Walnut Street properties, the suggestions would be the Courtyard cluster type. They could represent retirement homes as families downsized and those in the old officers' quartets could now retire in the neighborhood they have lived in for years. Or could be used as an ADU or in-law apartments for the abutting homes.

4 Salerno Circle presents the challenge of being a view shed that had been impacted. So, the suggestion is no new roads and single family homes on already disturbed lots as much as possible. All to preserve this view shed. Total Acreage available 87 but only 22 acres impacted with new housing on existing roads. Solar orient layouts and Design style to maximize potential

All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

**Methodology for Parcel assessment based on the
criteria noted on the previous pages
per lot and in general.**

**How the attached Excel spread sheets were
conceived, programed and used**

An Important consideration is the Certification of any lot to build on that the toxic cleanup of each area and lot is complete if relevant to currently or future zoned residential sites given the history of remediation in Devens

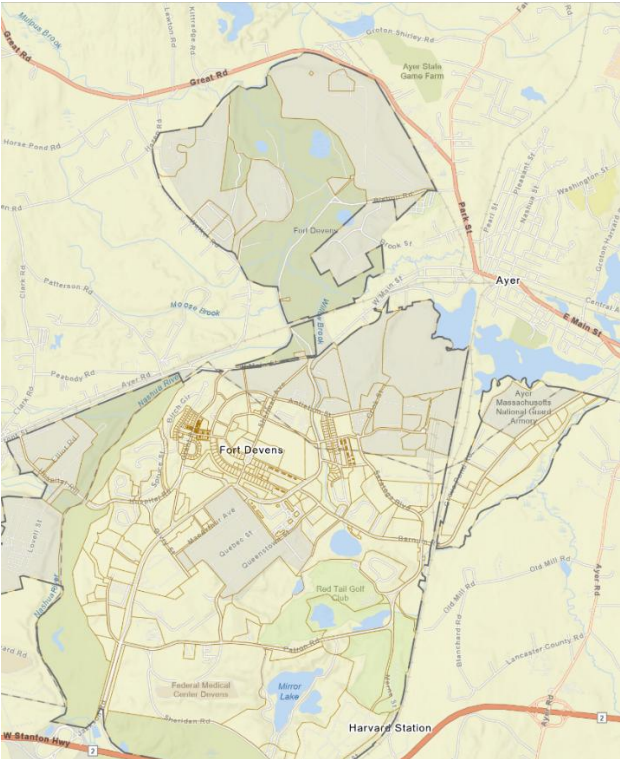
What follows is how the number of Unit types were chosen and how to evaluate each lot to determine appropriate usage of a parcel with its relationship to the existing area it is located in as well as its own characteristics.

Noting additional infrastructure costs can affect density and ultimately housing costs



Google Earth Satellite view

Take any given Lot in Devens noted on the interactive AxisGIS map shown below to find ownership, zoning and Data to calculate potential preservation and impacts in Acres and SF.
<https://www.axisgis.com/devensMA/#>



Take DATA from the IAS Property Card file (From Map website page Menu top at the left) as to who Owns, what is the Zoning, Acreage and Square Feet for that lot

PARID: 3520260001001000
MDFA / BV HSG
Property Information

MUNICIPALITY: DEVENS
100 ADAMS CIRCLE

LUC: 930
PARCEL YEAR: 2025

Property Location:

100 ADAMS CIRCLE

Class:

E-EXEMPT

Use Code (LUC):

930-VACANT - SELECTMAN/CITY COUNCIL

District:

MA352 - DEVENS

Deeded Acres:

11.6000

Square Feet:

505,296

Owner

Owner	Co-Owner	City	Address	State	Zip	Deed Book/Page
MDFA / BV HSG	CORNER OF JACKSON & CAVITE	BOSTON	99 HIGH STREET 11TH FLOOR	MA	02110	17907/1

All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

Add it in where noted on the Excell spread sheets (Attached 6 Tabs one per each area and summary of all impacts)

Parcel address	Zoned	Who owns	Acreage from GIS data
100 Adams Circle	Residential	Ma Dev	Acres Available
			11.60
			Square Feet Available
Total Square Feet Per GIS Data			505269

Which then calculates at generally 50% Preserved and 50% impacted unless otherwise noted to include preserved space or Historical features.

You then note how many of **each type of unit you want** and that calculates the total impact of allowable lot SF to be impacted.

50% - 70% Acreage preserved as walkable forested or existing to be reused	50%-30% Acreage Developable using cluster loop road Impervious roads, drives and lot foot print combined	LF and SF of Impervious Road, driveway, guest parking and Emergency Access	Total Proposed Building/ Lot Foot print	Cottages 5-600 sf Unit 3500 sf lots inclusive of courtyard and shared parking	Starter 1000 to 1200 sf unit 5000 sf lot Deed restricted as to allowable added sf	Single Family home to 2400 sf 7000 sf Lot	Multi family 1500 - 2200 sf 2 story 3-4 units per bldg. 10000 sf lot with parking at lower level	Total units per site
Acres Available		LF	Quantity of each housing type					
5.80	5.80	1650		12	20		3	44
Square Feet Available			Totals in Square Feet					
252300	252300	36300	216000	56000	100000	0	60000	

- You then have **available square feet** to be **preserved** or **impacted** as a usable measure for the calculation of the total of individual units any site potentially can develop.
- In the Unit type columns, you can **add how many** of each type, which will then calculate the impact of those decisions in **total square feet** for that type.
 - This is an estimation of the noted housing types which then uses the lot size to calculate the total SF impacted per lot while considering the Google Satellite map of Devens as to how that could work out gracefully in the lot provided for the estimated unit numbers abutting properties, preserved areas and/or usage.
 - (A professional experienced judgment call)
- The **Total Proposed building lot footprints SF** column is then subtracted from the **Acreage Developable SF** that will be impacted, that will then set up the calculation of how much is left for **roads/impervious surfaces**.
 - Road LF is calculated at 22' wide
- It is helpful to have Google Earth Satellite view on an adjacent screen (Viewed above) in assessing lots along with local knowledge of the sites

Patrick Hughes Qualifications

My experience comes from a 47-year career in the custom residential building industry. Overseeing construction of Architecturally designed homes in many towns and communities in the Commonwealth. I also note 20 plus years of involvement with the town of Ayer and other regional advocacy. Including 6 Years on the board of the Nashua River Watershed Association. 8 years ACEC Implementation then Stewardship committees. 3 Town of Ayer master plans. Restoration of Ayer town hall and down town Historical District restoration advocacies. Ayer Greenway Committee to touch on a few of them.

My interest in Devens goes back to the work of PACE (People of Ayer Concerned about the Environment) in the late 90's when the enormous cleanup effort of the former base was needed and its potentially negative impact on Ayer. An important issue for the town to be involved with. As I was advocating to protect Ayer's Forested legacy from a Planning Board, more interested in the profits of big developers than protecting that legacy, I used my experience as a builder to learn subdivision design and planning so as to try and encourage a smaller foot print than just chewing up land to build subdivisions. That along with my land preservation advocacy, I was invited to join the Devens Open Space and Recreation Committee back in the early 2000's which I served on for 6 years.

20 years ago, there was a push to go beyond the original reuse plan and craft how Devens could be developed. This was known as the Disposition of Devens Stakeholder MOU referred to as the 2B proposal that notes other possibilities or outcomes were considered. But the consensus was to create a template to form a Town of Devens. At that time, I was recruited to be on the Land use and Zoning committee, which I served on for close to 3 years. In 2006 I was a member of a consortium known as the Sustainable Design Working group. Our advocacy was how to achieve Net zero building and low impact land usage in roads and neighborhoods layouts at the subdivision level while remaining profitable. With my connections to Mass Development, I was able to present the Groups findings to them. A result was influencing the RFP that created the Transformation Net Zero Subdivision and evolved to the recently completed Emerson Green project that is getting so much attention for adhering to those principles. As a side note a few years later I worked for Transformations and 6 years back was in discussions with the Emerson Green Developer to be the Field Project manager when another opportunity arose that I recently retired from. Working as a full-time residential construction estimator. I further note that in my retirement I am setting up a Net Zero Building Consulting advocacy. Not to teach Architects or Planners what that is. But for builders as how to do it simply and effectively so it does not become an expensive option.

All Rights Reserved by Patrick Hughes Net Zero Building Consultant Ayer MA 4/28/2025

Summary of all 5 Tabs 4/28/2025

Location	Total Acres Available per lot	Acres Preserved	Acres Impacted	Cottage (Affordable to Construct)	Starter (Affordable to Construct)	Singel Family	Apt Units	Mixed use retail Rodgers field	Multi Family units	Multi family buildings with 4 units	Total Units per lot	Total Unit per page
3 and 15 Buena Vista Street	13.92	6.96	6.96	16	16				24	6	56	
308 and 309 0 Buena Vista St. 93 & 101 Sherman Sherman Ave to remain 105	13.24	6.62	6.62	12	12		85	21			130	VKSDBG SQ RF Area
Vicksburg Square	19.75		19.75				256		0		256	442
1 Pine Road	2.15	1.08	1.08						16	4	16	Pine St
15 Pine Road	3.12	1.56	1.56						16	4	16	32
59 Grant Road	45.70	22.85	22.85	30	45	30			40	10	145	Grant Road
140 Grant Road	7.00	3.50	3.50	8	8				12	3	28	
160 Grant Road	12.83	8.21	4.49	12	10				28	7	50	223
100 Adams Circle	11.60	5.80	5.80	12	10				28	7	50	Adams Circle
1 Bates Street	1.50	0.38	1.13		8						8	
95 Buena Vista Antietam Fields	7.31	1.83	5.48	12	8				12	3	32	Cavite Street
24 Cavite Street	9.22	4.61	4.61	12	15				4	1	31	
99 Cavite Street	5.14	1.29	3.86	6	8				12	3	26	147
4 Auman Street	1.14	0.57	0.57		4						4	Est
5 Auman Street	0.84	0.42	0.42		3						3	Harvard
0 Walnut Street	4.85	2.43	2.43	12							12	Hills
50 Walnut Street	6.20	3.10	3.10	16							16	Salerno Circle
40 Salerno Circle	87.14	65.36	21.79		24	49					73	108
Total of each type	252.65	136.54	115.98	148	171	79	341	21	192	48	952	952
319	# of cottage and starter homes that become affordable by less expensive to construct											
0.34	% of total that potentially do not need to be subsidized (40B type) to achieve affordability											

Auman Street, Walnut Street residential per Estates of Harvard Hills approval and Salerno Circle Potential if rezoned Residential													4/28/2025	
Parcel address	Zoned	Who owns	Acreage from GIS data	50%-75% Acreage preserved as walkable forested or existing to be reused	50%-25% Acreage Developable with impact of cluster loop road, driveways parking and lot foot print.	LF and SF of Impervious road, driveway, guest parking and Emergency Access	Total Proposed Building/Lot Foot print	Cottages 5-600 sf Unit inclusive of courtyard and shared parking	Starter 1000 to 1200 sf unit 5000 sf lot Deed restricted as to allowable added sf	Single Family home to 2400 sf 7000 sf Lot	Multi family 1500 -2200 sf 2 story 4 units per bldg. 10000 sf lot with parking at lower level	Total units per site	Notes	
4 Auman Street	Residential	Estates of Harvard Hills	Acres Available			LF	Quantity of each housing type							
			1.14	0.57	0.57	218			4			4		
			Square Feet Available			Totals in Square Feet								
			49658	24795	24795	4795	20000	0	20000	0	0			
Total Square Feet Per GIS Data			49658	24795	24795	4795	20000	0	20000	0	0			
5 Auman Street	Residential	Estates of Harvard Hills	Acres Available			LF	Quantity of each housing type							
			0.84	0.42	0.42	149			3			3		
			Square Feet Available			Totals in Square Feet								
			36590	18270	18270	3270	15000	0	15000	0	0			
Total Square Feet Per GIS Data			36590	18270	18270	3270	15000	0	15000	0	0			
0 Walnut Street	Residential	Estates of Harvard Hills	Acres Available			LF	Quantity of each housing type							
			4.85	2.43	2.43	2886		12				12		
			Square Feet Available			Totals in Square Feet								
			211266	105488	105488	63488	42000	42000	0	0	0			
Total Square Feet Per GIS Data			211266	105488	105488	63488	42000	42000	0	0	0			
50 Walnut Street	Residential	Estates of Harvard Hills	Acres Available			LF	Quantity of each housing type							
			6.20	3.10	3.10	3584		16				16		
			Square Feet Available			Totals in Square Feet								
			270072	134850	134850	78850	56000	56000	0	0	0			
Total Square Feet Per GIS Data			270072	134850	134850	78850	56000	56000	0	0	0			
40 Salerno Circle	Special Use I	Ma Dev	Acres Available			LF	Quantity of each housing type							
			87.14	65.36	21.79	19802			24	49		73		
			Square Feet Available			Totals in Square Feet								
			3795818	2842943	947648	435648	512000	0	120000	392000	0			
Total Square Feet Per GIS Data			3795818	2842943	947648	435648	512000	0	120000	392000	0			
Total unit Potential as Residential												108		
Color Code Legend of Definitions														
Where can we build and acres available to do so		Explains it self in the headings												
How much to preserve		% of Acreage to be preserved as walkable forested or existing Parking, Fields/Open Space, Monuments to be Repurposed or Restored												
How much to develop		% of Acreage Developable using cluster loop road Impervious roads, drives and lot foot print combined												
How much impervious Surface		Totals of LF and SF of potential Impervious road, driveway, guest parking and Emergency Access												
How much impacted with housing plots		Total Proposed Building/Lot Foot print												
Housing type and Plot sizes		Explains it self in the headings as to type of housing and lot with yard foot prints in SF												
Impact in Square Feet		Useful in formulas to calculate impact to a more refined degree than % of acres												
Notes		As noted												
Total units per site		Total unit Potential as Residential												

Adams Circle and Cavite Street Area Residential Potential													4/28/2025	
Parcel address	Zoned	Who owns	Acreage from GIS data	50%-25% Acreage preserved as walkable forested or existing to be reused	50%-75% Acreage Developable impact of cluster loop road, driveways parking and lot foot print.	LF and SF of Impervious road, driveway, guest parking and Emergency Access	Total Proposed Building/ Lot Foot print	Cottages 5-600 sf Unit 3500 sf lots inclusive of courtyard and shared parking	Starter 1000 to 1200 sf unit 5000 sf lot Deed restricted as to allowable added sf	Single Family home to 2400 sf 7000 sf Lot	Multi family 1500 -2200 sf 2 story 4 units per bldg. 10000 sf lot with parking at lower level	Total units per site	Notes	
100 Adams Circle	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type						44	50% Preserved 50% Impacted
			11.60	5.80	5.80	3650		12	20		3			
			Square Feet Available			Totals in Square Feet								
Total Square Feet Per GIS Data			505269	252300	252300	80300	172000	42000	100000	0	30000			
1 Bates Street	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type							More impacted 75% so less to preserve 25%
			1.50	0.38	1.13	406			8			8		
			Square Feet Available			Totals in Square Feet								
Total Square Feet Per GIS Data			64340	16313	48938	8938	40000	0	40000	0	0			
95 Buena Vista Street	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type							More impacted 75% so less to preserve 25%
			7.31	1.83	5.48	5749		12	8		3	32		
			Square Feet Available			Totals in Square Feet								
Total Square Feet Per GIS Data			318424	79496	238489	126489	112000	42000	40000	0	30000			
24 Cavite Street	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type							50% Preserved 50% Impacted
			9.22	4.61	4.61	3343		12	15		1	31		
			Square Feet Available			Totals in Square Feet								
Total Square Feet Per GIS Data			401623	200535	200535	73535	127000	42000	75000	0	10000			
99 Cavite Street	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type							More impacted 75% so less to preserve 25%
			5.14	1.29	3.86	3486		6	8		3	26		
			Square Feet Available			Totals in Square Feet								
Total Square Feet Per GIS Data			223898	55898	167693	76693	91000	21000	40000	0	30000			
Total unit Potential as Residential												141		
Color Code Legend of Definitions														
Where can we build and acres available to do so		Explains it self in the headings												
How much to preserve		% of Acreage to be preserved as walkable forested or existing Parking, Fields/Open Space, Monuments to be Repurposed or Restored												
How much to develop		% of Acreage Developable using cluster loop road Impervious roads, drives and lot foot print combined												
How much impervious Surface		Totals of LF and SF of potential Impervious road, driveway, guest parking and Emergency Access												
How much impacted with housing plots		Total Proposed Building/Lot Foot print												
Housing type and Plot sizes		Explains it self in the headings as to type of housing and lot with yard foot prints in SF												
Impact in Square Feet		Useful in formulas to calculate impact to a more refined degree than % of acres												
Notes		As noted												
Total units per site		Total unit Potential as Residential												

Additional housing on Grant Road Potential Currently Residential abutting other existing residential													4/28/2025	
Parcel address	Zoned	Who owns	Acreage from GIS data	35% Acreage preserved as walkable forested or existing to be reused	65% Acreage Developable impact of cluster loop road, driveways parking and lot foot print.	LF and SF of Impervious road, driveway, guest parking and Emergency Access	Total Proposed Building/ Lot Foot print	Cottages 5-600 sf Unit inclusive of courtyard and shared parking	Starter 1000 to 1200 sf unit 5000 sf lot Deed restricted as to allowable added sf	Single Family home to 2400 sf 7000 sf Lot	Multi family 1500 -2200 sf 2 story 4 units per bldg. 10000 sf lot with parking at lower level	Total units per site	Notes	
59 Grant	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type							145
			45.70	16.00	29.71	10869		30	45	30	10			
			Square Feet Available			Totals in Square Feet								
Total Square Feet Per GIS Data			1990692	695783	1292168	652168	640000	105000	225000	210000	100000			
140 Grant road	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type					28	50% Preserved 50% Impacted	
			7.00	2.45	4.55	4542		8	8		3			
			Square Feet Available			Totals in Square Feet								
Total Square Feet Per GIS Data			304920	106575	197925	99925	98000	28000	40000	0	30000			
160 Grant Road	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type					50	Half the property is not in the Devens footprint as to why less proposed units per acre	
			12.83	4.49	8.34	9126		12	10		7			
			Square Feet Available			Totals in Square Feet								
Total Square Feet Per GIS Data			558875	195337	362768	200768	162000	42000	50000	0	70000			
Total unit Potential as Residential													223	
Color Code Legend of Definitions														
Where can we build and acres available to do so		Explains it self in the headings												
How much to preserve		% of Acreage to be preserved as walkable forested or existing Parking, Fields/Open Space, Monuments to be Repurposed or Restored												
How much to develop		% of Acreage Developable using cluster loop road Impervious roads, drives and lot foot print combined												
How much impervious Surface		Totals of LF and SF of potential Impervious road, driveway, guest parking and Emergency Access												
How much impacted with housing plots		Total Proposed Building/Lot Foot print												
Housing type and Plot sizes		Explains it self in the headings as to type of housing and lot with yard foot prints in SF												
Impact in Square Feet		Useful in formulas to calculate impact to a more refined degree than % of acres												
Notes		As noted												
Total units per site		Total unit Potential as Residential												

Additional housing on Pine Road Potential Currently Residential abutting other existing residential												4/28/2025	
Parcel address	Zoned	Who owns	Acreage from GIS data	50% Acreage preserved as walkable forested or existing to be reused	50% Acreage Developable impact of cluster loop road, driveways parking and lot foot print.	LF and SF of Impervious road, driveway, guest parking and Emergency Access	Total Proposed Building/ Lot Foot print	Cottages 5-600 sf Unit inclusive of courtyard and shared parking	Starter 1000 to 1200 sf unit 5000 sf lot Deed restricted as to allowable added sf	Single Family home to 2400 sf 7000 sf Lot	Multi family 1500 -2200 sf 2 story 4 units per bldg. 10000 sf lot with parking at lower level	Total units per site	Notes
1 Pine	Residential	Ma Dev	Acres Available			LF	Quantity of each housing type					16	50% Preserved 50% Impacted
			2.15	1.08	1.08	307					4		
			Square Feet Available			Totals in Square Feet							
			Total Square Feet Per GIS Data			93654	46763	46763	6763	40000	0		
15 Pine	Available Acreage	Ma Dev	Acres Available			LF	Quantity of each housing type					16	50% Preserved 50% Impacted
			3.12	1.56	1.56	1266					4		
			Square Feet Available			Totals in Square Feet							
			Total Square Feet Per GIS Data			135907	67860	67860	27860	40000	0		
Total unit Potential as Residential												32	
Color Code Legend of Definitions													
Where can we build and acres available to do so		Explains it self in the headings											
How much to preserve		% of Acreage to be preserved as walkable forested or existing Parking, Fields/Open Space, Monuments to be Repurposed or Restored											
How much to develop		% of Acreage Developable using cluster loop road Impervious roads, drives and lot foot print combined											
How much impervious Surface		Totals of LF and SF of potential Impervious road, driveway, guest parking and Emergency Access											
How much impacted with housing plots		Total Proposed Building/Lot Foot print											
Housing type and Plot sizes		Explains it self in the headings as to type of housing and lot with yard foot prints in SF											
Impact in Square Feet		Useful in formulas to calculate impact to a more refined degree than % of acres											
Notes		As noted											
Total units per site		Total unit Potential as Residential											

Secretaries focus on Vicksburg Square-Rodgers Field Housing Potential if rezoned to Residential															4/28/2025	
To Remain as is 8 Balls Bluff, 84 Antietum, 125 Sherman and 23 Buena Vista																
Parcel address	Zoned	Who owns	Acreage from GIS data	50% Acreage preserved as walkable forested or existing to be reused	50% Acreage Developable impact of cluster loop road, driveways parking and lot foot print.	LF and SF of Impervious road, driveway, guest parking and Emergency Access	Total Proposed Building/ Lot Foot print	Cottages 5-600 sf Unit 3500 sf lots inclusive of courtyard and shared parking	Starter 1000 to 1200 sf unit 5000 sf lot Deed restricted as to allowable added sf	Potential Mixed Use Residential retail 700 to 1000 sf Store on 4000 sf Lots	Vicksburg Square, Old Batchelor's quarters 101 Sherman potential apartments	Single Family home to 2400 sf 7000 sf Lot	Multi family 1500 -2200 sf 2 story 4 units per bldg. 10000 sf lot with parking at lower level	Total units per site	Notes	
3 Buena Vista Street 15 Buena Vista Street	Innovation and Tech	Ma Dev	Acres Available			LF	Quantity of each housing type								Protect / Preserve Forman Garden Preserve tree boarder at Antitum	
			13.92	6.96	6.96	4853		16	16				6	56		
			Square Feet Available			Totals in Square Feet										
Total Square Feet Per GIS Data			606355	302760	302760	106760	196000	56000	80000			0	60000			
308 and 309 0 Buena Vista St. 93 & 101 Sherman 105 Sherman Ave to remain	Innovation and Tech	Ma Dev	Acres Available			LF	Quantity of each housing or unit type								Mixed use retail Walking Mall. Bachelor Officers qtrs. Rehab to 65 apartments new with all up grades to net zero standards where possible	
			13.24	6.62	6.62	4635		12	12	21	85			130		
			Square Feet Available			Totals in Square Feet										
Total Square Feet Per GIS Data			631434	287970	287970	101970	186000	42000	60000	84000		0	0			
Vicksburg Square Restoration and Reuse	Innovation and Tech	Ma Dev	Acres Available			SF Floors Apx.	Quantity of each Unit type								Rehab Existing as noted in Bach Qtrs. Add Parking deck in courtyard with garden permitter	
			19.74	0.00	19.74	Existing Bldgs.						256				256
			Square Feet Available													
Total Square Feet Per GIS Data			859874	0	859874	280000	280000	0	0		280000	0	0			
Total unit Potential as Residential															442	Secretaries Target 400
Color Code Legend of Definitions																
Where can we build and acres available to do so		Explains it self in the headings														
How much to preserve		% of Acreage to be preserved as walkable forested or existing Parking, Fields/Open Space, Monuments to be Repurposed or Restored														
How much to develop		% of Acreage Developable using cluster loop road Impervious roads, drives and lot foot print combined														
How much impervious Surface		Totals of LF and SF of potential Impervious road, driveway, guest parking and Emergency Access														
How much impacted with housing plots		Total Proposed Building/Lot Foot print														
Housing type and Plot sizes		Explains it self in the headings as to type of housing and lot with yard foot prints in SF														
Mixed Use Retail Walking Mall		Access to Rodgers field crowds and walkable from many neighborhoods														
Impact in Square Feet		Useful in formulas to calculate impact to a more refined degree than % of acres														
Notes		As noted														
Total units per site		Total unit Potential as Residential														

5 March 2025

My comments for the discussion on housing and community development at Devens:

- I would like to see truly affordable and high-quality housing developed: duplexes, triplexes, 1-floor cottage-style houses, clustered small-ish houses with common land/nature around. I am an active senior and would like to downsize and stay in the area.
- I'd like to see the natural beauty be preserved and nurtured:
 - o areas of wild, natural land (not manicured and landscaped) with walking trails that connect throughout Devens
 - o quiet and safe streets to walk on
 - o quiet and dark-sky – as much as possible – be preserved and protected (restrict / reduce light pollution)
 - o continue to add and nurture trees and natural beauty at Devens (it lifts spirits, makes people feel prouder of where they live, increases property values, and positively contributes the benefits of nature: oxygen into the air, soil conservation and support of other plant and animal life)
- I would also love to see a space for a community garden! :)

Thanks for providing a place to contribute my / our comments into the process. I am in favor of some additional, thoughtful, and affordable housing added to Devens with an eye out for not only economic development but developing community among residents.

Kindly,
~ Bonnie Petrovich
Walnut St., Devens

The Devens Housing Working Group (HWG) has been an efficient and effective mechanism to engage a variety of critical stakeholders, resulting in the initial Draft Strategy and Plan for adding housing to the Devens Innovation and Technology Center Zoning District. It has been one of the least demanding, focused, and most effective quick-turn committees to provide a tangible path forward for meaningful increased housing on Devens.

The report reflects the inputs from many varied participants and offers a solid, workable plan to meet the objectives.

I fully support and encourage the adaptive reuse of existing buildings for housing or other appropriate purposes and strongly encourage the engineering evaluation of those buildings as soon as possible, and in advance of the Zoning Amendment if possible. Due to the significant questions and persistent town concerns over many years, particularly about the Vicksburg Square quadrangle, having a factual assessment may make a huge difference to educate residents in all of the Towns, to hopefully provide the necessary level of support to pass a Super Town Meeting.

Any demands for a more comprehensive development proposal before merely voting to amend the Zoning should be quickly dismissed.

The Legislature should be prepared to pass legislation if the Super Town Meeting process fails.

~ Regina Todd