



## Town of Carlisle

66 Westford Street  
Carlisle, MA 01741

**To:** Planning Board  
**From:** MBTA Communities Subcommittee  
**CC:** Select Board  
**Date:** December 9, 2024  
**Re:** Alternative Strategies Considered but Not Pursued

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In connection with the 12/5/2024 Subcommittee Report provided to the Planning Board, the MBTA Communities Subcommittee offers the following summaries of alternative strategies that were discussed. Some were discussed and dismissed, while some could not be considered because of the limited timeframe required for compliance with the MBTA Communities guidelines.

### ALTERNATIVE STRATEGIES CONSIDERED BUT NOT PURSUED

#### A. Town-Owned Land (i.e., Banta Davis, Conant)

What: Zone an area of Banta Davis or Conant land for MBTA Communities compliant residential density unadjusted for nitrogen loading.

Reason(s) Not Pursued: For the purpose of compliance with the MBTA Communities legislation, Town-owned land can be considered if the Town and the State deem the land “developable.” It is not clear what this entails. Moreover, there are many competing uses for the Banta Davis land, and the Conant land is restricted by ledge, wetlands, trails, existing Town buildings/parking, and a monument to a revered Town resident. Both the Banta Davis and Conant lands have been considered for multi-family housing in the past; none of the prior housing proposals on these properties have been successfully permitted. The operational excess capacity at the School wastewater treatment plant is not available for residential or other use.

#### B. Town-Owned Buildings (i.e., Highland, Bog House)

What: Zone for housing at the Highland Building and Bog House.

Reason(s) Not Pursued: While there has been interest expressed in repurposing these structures for housing, there are competing uses for the Highland Building, and though repurposing the Bog House for housing is under discussion, myriad complexities exist and more consideration is needed before zoning is proposed.

**C. Town Center / Mixed-Use**

What: Zone the Town Center for MBTA Communities compliant residential density unadjusted for nitrogen loading and/or zone the Town Center pursuant to the Mixed-Use provisions in the MBTA Communities Guidelines.

Reason(s) Not Pursued: The Town Center is within the Residence A 1-acre zoning district and Historic District. Many of the lots are much smaller than 1 acre and are tight from a septic- and well-siting standpoint, and there are known water issues. There is no municipal infrastructure currently in place to support MBTA Communities compliant residential density in the Town Center, and the operational excess capacity at the School wastewater treatment plant is not available for residential or other use. The Town Center does not meet the criteria outlined for Mixed-Use in the Guidelines and would likely be rejected by the State.

**D. Large Development on Edge of Town**

What: Zone for MBTA Communities compliant residential density unadjusted for nitrogen loading in a large-scale building or buildings on the edge of Town.

Reason(s) Not Pursued: The Subcommittee weighed this option but did not explore it in detail because the survey response does not support zoning for large-scale buildings. However, survey respondents did express interest in zoning on the edges of Town. The Subcommittee is taking the cautious approach that whatever is zoned for may eventually happen, and that it may be possible for a developer to tie into a neighboring town's water or sewer. A strategy that involves zoning for large-scale buildings requires a great deal more consideration.

**E. Churches (i.e., St. Irene's Parish, Congregational Church)**

What: Zone for MBTA Communities compliant residential density unadjusted for nitrogen loading over existing churches in Town.

Reason(s) Not Pursued: This was not considered or discussed in detail by the Subcommittee. The State may view this approach as spot zoning and may not allow this approach. The Subcommittee is taking the cautious approach that whatever is zoned for may eventually happen. A strategy that involves zoning for large-scale buildings requires a great deal more consideration.

**F. Vacant Land**

What: Zone for MBTA Communities compliant residential density unadjusted for nitrogen loading on vacant land.

Reason(s) Not Pursued: The survey response does not support zoning over vacant land. The Subcommittee prefers to pursue a strategy that has as minimal an environmental impact on Carlisle as possible. This approach conflicts with Master Plan goals and Select Board goals of protection of natural resources. However, the Subcommittee did consider

a form of Multi-family Conservation Cluster Subdivision overlay that could be applicable to parcels otherwise able to be developed pursuant to Subdivision Control Law and/or the Approval Not Required process to help enable maximum meaningful habitat preservation and minimized ecological impacts.

**G. Commercial Areas**

What: Zone for MBTA Communities compliant residential density unadjusted for nitrogen loading within the existing commercial areas in Town.

Reason(s) Not Pursued: Most of the existing commercial uses in Carlisle are in the Town Center, which was ruled out for the reasons noted in C above. Aside from the Central Business District, the other commercial zoning districts in Town are along Bedford Road, are not contiguous, and do not contain enough land area to satisfy the mandate.

**H. Existing Development Overlay**

What: Zone the 2-acre multi-family conservation cluster strategy over existing developments such as Kay’s Walk, Garrison Place, Benfield, etc.

Reason(s) Not Pursued: Though popular among some residents, zoning exclusively over areas that were recently developed with higher density developments is not a genuine strategy for the potential creation of housing units. The Subcommittee has not had the opportunity to fully consider this approach.

**I. Low Value Properties**

What: Zone the 2-acre multi-family conservation cluster strategy over parcels valued at \$800,000 or less.

Reason(s) Not Pursued: While there may be some overlap between low-value properties and the areas under consideration, the Subcommittee does not want to rely on re-zoning low-value properties as the sole strategy due to the impact it could have on the current existing lower-case “a” achievable/affordable housing stock in Town. Additionally, this approach raises spot zoning concerns.

**J. Willing Property Owners**

What: Survey the community for property owners willing to be re-zoned for the 2-acre multi-family conservation cluster strategy, and then create zoning over those parcels.

Reason(s) Not Pursued: Simply because a property owner is willing to have their property re-zoned does not mean that it makes sense from a groundwater, ecological, historical, road capacity, etc. perspective. The Subcommittee has taken a holistic look at the Town from a variety of angles and is interested in zoning that is viable for the Town in the long-term. This approach also raises spot zoning concerns.

**K. Do Nothing**

What: Put forward no proposals at Town Meeting.

Reason(s) Not Pursued: Though many residents have expressed opposition to the mandate, the Subcommittee was charged to explore the feasibility of compliance and has identified feasible options. The decision to do nothing should be left to Town Meeting.