



City of Greenfield

Community Preservation Plan

2023-24



August 24, 2023

Prepared by the Greenfield Community Preservation Committee

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Greenfield Bees at Work

Executive Summary

Plan Purpose

The purpose of the Greenfield Community Preservation Committee Plan is to serve as an informational document, a guideline and instructional document for applicants seeking project funding through the Community Preservation Act (CPA), and a guidance document for the Community Preservation Committee (CPC) in making recommendations to the Mayor and City Council for project funding.

Mission

The CPC's mission is to strategically deploy CPA funds to enhance Greenfield's unique identity as the sole City and County Seat in the most rural county of the Commonwealth – specifically, for CPA-eligible projects that:

- Promote community spirit, diversity, and vitality
- Support continued vibrancy of downtown Greenfield
- Create additional housing in the City
- Protect at-risk natural resources
- Further climate resilience
- Enhance public enjoyment of recreation, natural and historic resources

Planning Process

The CPC created its first plan in 2022. The CPC consulted with the appropriate municipal boards and commissions through its CPC member liaisons to the various committees in accordance with the CPA Statute. The CPC worked with the Franklin Regional Council of Governments to prepare the initial plan. To encourage public participation in the Plan's creation, the CPC held a public hearing on July 28, 2022. The Greenfield CPC planning process included the review of several plans developed by the City of Greenfield and its departments and committees over the last 10 years to identify Greenfield's community preservation resources, needs and priorities in the four CPA funding categories: community housing, historic preservation, open space conservation, and outdoor recreation. This information was combined with other documentation of community needs that was derived from information provided by the Franklin Regional Council of Governments and the UMass Donahue Institute.

The CPC continues to update its plan annually. The CPC held a public hearing on July 27, 2023, provided an opportunity for written feedback from July 13 to August 10, and conducted outreach to city departments, boards, and city council to gather feedback for 2024. The CPC finalized its FY2024 plan on August 24, 2023.

Our Approach

The CPC has identified the following guiding principles that will be used in the evaluation and selection of projects to recommend to the Greenfield City Council for funding. The CPC hopes these guiding principles will be useful to project proponents as they develop their CPA project ideas and applications. These guiding principles apply to all eligible CPA project categories – open space, outdoor recreation, community housing and historic preservation - and are listed here in no order of importance.

- **Advance projects with high/multiple community benefits**
Select projects that have importance to the City and demonstrate multiple/substantial community benefits, such as projects that address more than one CPA priority area.
- **Prioritize urgent projects**
Analyze projects to determine the relative level of urgency of the work and possible phasing of project work.
- **Maximize fund leveraging**
Favor projects that expand the impact of CPA funds through maximum leveraging with other public or private sources of funds, volunteer efforts, and/or donated materials, supplies, or property.
- **Ensure maintenance of CPA-funded investments**
Favor projects that demonstrate an adequate plan and financial capacity for ongoing maintenance required to protect any CPA-funded investment.

For fiscal years 2024-2029, the CPC has identified several priorities for CPA-funded projects that reflect the City's goals and needs as expressed in recent planning documents and through the planning process undertaken to develop this CPC Plan. The articulation of these priorities in no way excludes from consideration other projects that are eligible for CPA funding and may address other needs identified by Greenfield residents and the City's Boards and Committees.

- **Creation of further housing opportunities in the City**
The highest CPA priority between FY24 and FY29 is to create greater housing choice and foster a diversity of housing options throughout the City.
- **Further climate resilience and/or improve physical access to or quality of, the City's current open space**
The second CPA priority in this five-year timeframe is to protect and improve the City's climate resiliency and access to/enjoyment of the City's open space.
- **Actively preserve and enhance the cultural, architectural, and environmental heritage of our community**

The third CPA priority in this five-year timeframe is to foster projects that will enhance knowledge and understanding of the history of Greenfield through partnerships that offer engagement with our building and landscape assets.

- **Increase access to outdoor public recreation opportunities**

The fourth CPA priority in this five-year timeframe is to improve access to, and enjoyment of, the City's outdoor recreation opportunities.

Eligible projects that address other needs and interests will also be given full consideration for possible funding.

Summary of Identified Goals for CPA Projects

Open Space Goals

- Preserve, protect, and enhance Greenfield's open spaces
- Provide and improve connections and maximize access to open spaces for all residents
- Prioritize climate resiliency to support the health of the City's people, natural resources, and infrastructure

Historic Preservation Goals

- Update the inventory of history properties and sites in Greenfield
- Develop a Historic Preservation Plan
- Support the creative reuse of historic buildings
- Preserve historic landscapes and view corridors
- Preserve historic facades
- Support acquisition of Heritage Landscapes as they become threatened by development
- Preserve historic artifacts and historic documents and archive in a user-friendly and accessible format

Outdoor Recreation Goals

- Enhance, maintain, and expand recreation facilities, urban green spaces, and open spaces
- Improve and increase access for Greenfield residents to public open space and recreational facilities

Housing Goals

- Promote affordable, safe, and energy efficient rental opportunities
- Increase options for first-time and first-generation homebuyers
- Support upgrades, renovations, and preservation of the existing affordable housing stock, including work to make more units accessible pursuant to the Americans with Disabilities Act (ADA)
- Improve and increase access for Greenfield residents to public open space and recreational facilities near new and existing residential areas

Chapter 1: Overview of CPA

CPA in Greenfield

The Community Preservation Act (CPA), MGL Chapter 44B, was signed into law in 2000. The CPA Statute allows Massachusetts municipalities to adopt a property tax surcharge of up to 3%, the revenues from which are matched by state funds, with higher matches eligible to communities that adopt the CPA at the highest level (3%). The purpose of CPA is to fund community preservation projects and initiatives in the areas of community housing, historic preservation, open space conservation, and outdoor recreation. Greenfield citizens adopted the CPA in 2020 with a local surcharge of 1.0%.

CPA Eligibility

CPA funds can be allocated to projects in the following categories: community housing; historic preservation; open space; and outdoor recreation. As described below, the CPA Statute requires that at least 10% of CPA funds be spent or reserved in three categories. Open space and outdoor recreation are combined into one category for the purposes of the 10% spending/reserve requirement. Project eligibility for each CPA category is summarized below and more details are provided in later chapters of this Plan.

Community Housing

A minimum of 10% of the annual CPA revenue must be spent or reserved for the acquisition, creation, preservation, and support of community housing. Housing, under CPA, must be affordable to households with incomes at or below 100% of the area median income.

Historic Resources

A minimum of 10% of the annual CPA revenue must be spent or reserved for the acquisition, preservation, rehabilitation, and restoration of historic resources. Historic resources include a building, structure, vessel, real property, landscapes, document, or artifact that is listed on the State Register of Historic Places or has been determined by the local Historical Commission to be significant in the history, archaeology, architecture, or culture of a city or town. (As defined by MGL Ch. 44B, Section 2).

Open Space & Outdoor Recreation

A minimum of 10% of the annual CPA revenue must be spent or reserved for the acquisition, creation, and preservation of open space and/or the acquisition, creation, preservation, and rehabilitation of land for recreational use. The rehabilitation of existing recreation lands, including parks and playgrounds, is also an allowable use for CPA funds.

Open space includes land to protect future well fields, aquifers, watershed land, grassland, fields, forests, marshland, wetlands, land to protect scenic vistas, and land for wildlife preservation.

Recreational use includes active and passive outdoor recreation such as parks, playgrounds, and athletic fields. It does not include stadiums, bleachers, gymnasiums, or artificial turf for athletic fields.

	Open Space	Historic	Recreation	Housing
Acquire	Yes	Yes	Yes	Yes
Create	Yes	No	Yes	Yes
Preserve	Yes	Yes	Yes	Yes
Support	No	No	No	Yes
Rehabilitate and/or Restore	No (unless acquired or created with CPA \$\$)	Yes	Yes	No (unless acquired or created with CPA \$\$)

Source: <https://www.communitypreservation.org/allowable-uses> (see Attachment A for a more detailed chart)

Greenfield Community Preservation Committee

The CPA Statute requires that the City establish a Community Preservation Committee (CPC). In Greenfield, the CPC includes nine members. By statute, the CPC must include one representative of each of the following City entities, if they exist, or a representative of a committee whose mission is similar. This list includes: Housing Authority, Historic Commission, Conservation Commission, Recreation Commission, and Planning Board. In addition, Greenfield's CPC has two at large members appointed by the Mayor and two at large members appointed by the City Council President.

Responsibilities of the CPC

The CPC has three primary responsibilities: 1) to study the community preservation needs, possibilities, and resources and develop a Community Preservation Plan; 2) to review and

recommend CPA projects; and 3) to keep records and report on the CPA budget. These responsibilities are discussed in more detail below.

Develop a Community Preservation Plan

The first responsibility is to study the needs, possibilities and resources of the community with regards to community preservation. In performing this research function, the CPC must meet and consult with other municipal boards and committees to get their input, and must hold at least one public hearing annually to get input from the general public. The public hearing must be posted publicly and advertised for two weeks preceding the public hearing in a local newspaper of general circulation. Following its research, the CPC is responsible for developing a local CPA plan to guide its decision-making on CPA project proposals. The CPA plan should be updated each year, as needed, to reflect the feedback received from the public, showcase CPA accomplishments and projects and reaffirm or update the plan goals and data for each CPA project category. The members of the CPC can also participate in other City planning projects and use the outcomes of those efforts to inform and update the Community Preservation Plan.

Review and Recommend CPA Projects

The second responsibility of the Greenfield CPC is to accept project proposals from the community and conduct a thorough review of them, with the aim of selecting the most compelling projects for recommendation to the Greenfield City Council. Once the CPC has voted on a slate of projects to recommend, along with the specific dollar amounts and CPA funding sources it recommends to complete them, it forwards these to the Greenfield City Council for action. Typically, the CPC will make a presentation to the City Council to describe its project recommendations and the reasoning behind its choice of that particular group of projects. The CPC hopes to work collaboratively with City officials and others to cultivate projects that meet CPA goals and eligibility requirements.

Keep Records and Report on the CPA Budget

The third responsibility of the CPC is a record keeping and budgetary responsibility. It is required to keep records of all CPC meetings, proposals, and recommendations, and to submit a CPA budget annually to the Mayor and City Council.

Greenfield's CPA Actual & Estimated Revenue

The City generates CPA fund revenue through a local 1% property tax surcharge. Greenfield adopted the local surcharge with two exemptions: 1) low income households and 2) the first \$100,000 of residential and commercial property value. The local CPA revenue is partially matched by a variable statewide Community Preservation Trust Fund (CP Trust Fund) distribution.

The revenue collected for Community Preservation Act purposes is displayed in the chart below. Each year, this revenue information will be updated.

	Local Surcharge Revenue	State Match Revenue	Total Revenue	Total Expenses	Total
FY22 (7/1/21-6/30/22) Revenue	\$206,483.26	No Match Year 1	\$206,483.26		
FY23 (7/1/22-6/30/23) Revenue	\$234,414.19	\$82,803.00	\$317,217.19		
FY23 Projects (RESERVED)				-\$335,000.00	
FY23 Administrative Expenses (ACTUAL)				-\$1,617.60	
June 30, 2023 Balance	\$440,897.45	\$82,803.00	\$523,700.45	-\$336,617.60	\$187,082.85

CPA Appropriations

The CPC received over \$900,000 in requested funding during its first year in FY23. The requests came from ten recreation projects, three historic preservation projects, and one housing project. The CPC recommended seven projects to be fully funded and three projects to be partially funded for a total of \$335,000.00. All ten of the projects were approved by the Greenfield City Council on May 17, 2023. The list of requests and appropriations can be viewed below.

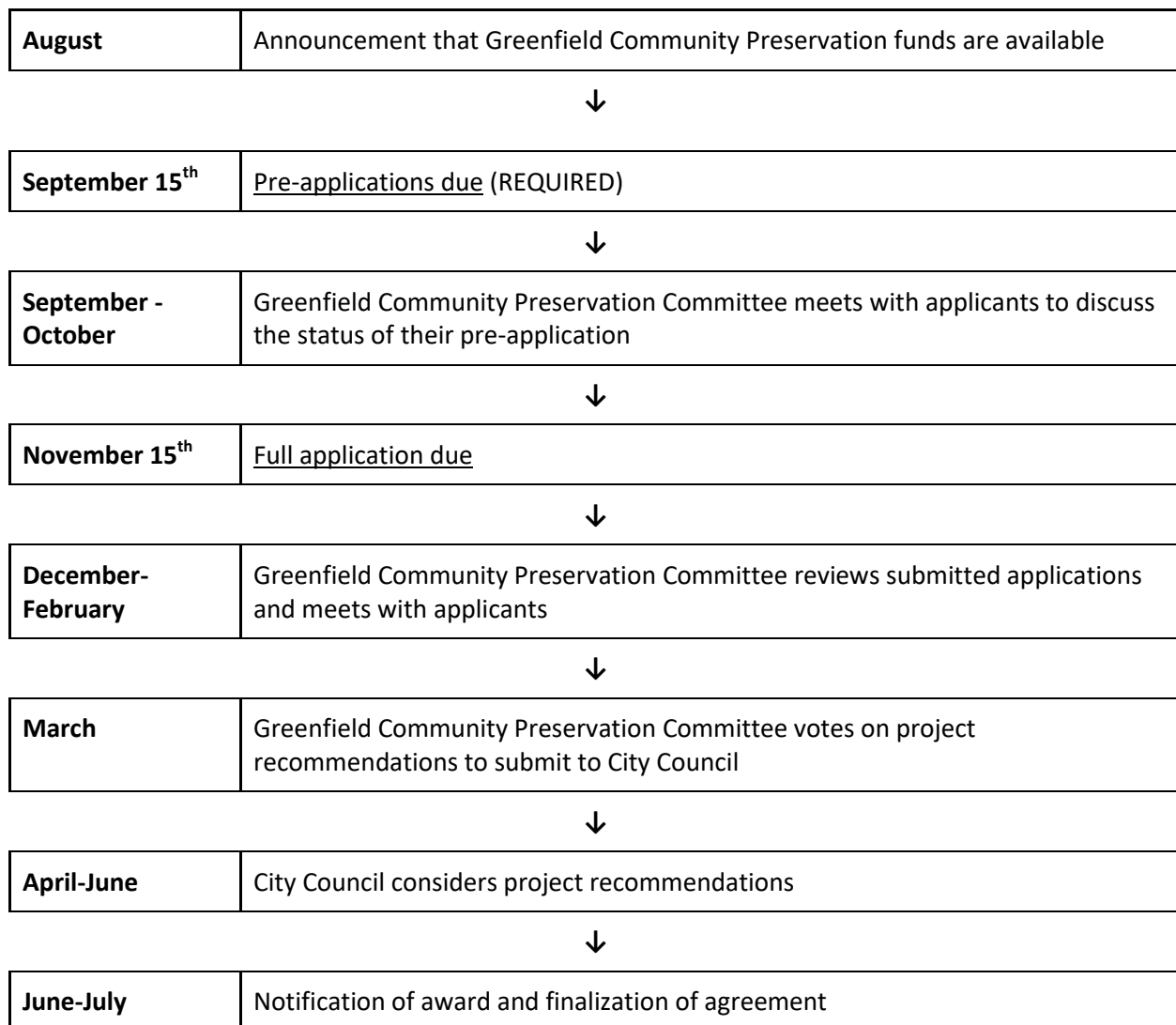
		Request	Historic	Housing	Recreation	Flexible	Total
Historic	FCAS - Barn Rehabilitation	\$75,000.00	\$31,023.69				\$31,023.69
	Historical Society - Document Preservation	\$15,500.00	\$15,500.00				\$15,500.00
	MOIH - Shop Equipment Restoration	\$1,000.00	\$1,000.00				\$1,000.00
Housing	CSO - Wells Street Shelter Expansion	\$100,000.00		\$47,523.69		\$52,476.31	\$100,000.00
Recreation	Boas - Trail Restoration	\$15,000.00			\$15,000.00		\$15,000.00
	Greenfield Pickleball - Court Expansion	\$300,000.00			\$7,773.69	\$42,226.31	\$50,000.00
	Recreation - ADA Track	\$750.00			\$750.00		\$750.00
	Recreation - Beacon Park	\$75,500.00				\$75,500.00	\$75,500.00
	Recreation - Shattuck Fitness Cluster	\$24,000.00			\$24,000.00		\$24,000.00
	Recreation - Site Amenities	\$109,000.00				\$22,226.31	\$22,226.31
	Elmer Highland Pond Aerator	\$8,000.00					\$0.00
	Lamore - Drinking Fountain Highland Park Tennis Courts	\$28,876.20					\$0.00
	Touloumtzis - Bike Route Feasibility Study	\$20,000.00					\$0.00

	Whitbeck - Highland Park Signage	\$184,750.00					\$0.00
	Total	\$957,376.20	\$47,523.69	\$47,523.69	\$47,523.69	\$192,428.93	\$335,000.00

Application & Funding Process

The CPC accepts applications from project proponents according to the following schedule. Please note that pre-applications are required and must be submitted by September 15th. The CPC reviews all pre-applications and applications during regularly scheduled CPC meetings that are open to the public. Residents are invited to attend these meetings and provide input to the CPC on applications. The application process is summarized below. More specific information is provided in the Application. The CPA application and guidelines for project submission are available on the City's website www.greenfield-ma.gov/cpcfunding.

CPC Funding Cycle



CHAPTER 2: Open Space

This chapter provides information on Greenfield’s open space resources, identified needs and the open space goals and strategies for the CPC Plan. Much of the information in this section was taken from the 2021 Greenfield Open Space and Recreation Plan. Please note: the Greenfield Community Preservation Committee is required to combine the Open Space and Outdoor Recreation categories by the CPA law’s spending/reserve requirement. The two categories are separate in this CPC Plan for clarity on the City’s needs, goals and project eligibility for Open Space and Outdoor Recreation.



Rocky Mountain Park

CPA Eligibility for Open Space Projects

Section 2 of the CPA legislation defines open space. It includes, but is not limited to, the following:

- Land to protect existing and future well fields
- Aquifers, recharge areas, and watershed land
- Agricultural land
- Grasslands, fields and forest land
- Fresh water marshes and other wetlands
- River, stream, lake and pond frontage
- Lands to protect scenic vistas
- Land for wildlife or nature preserve
- (Optionally) may allow passive recreation (see separate category information in the next section for active and passive recreation projects)

CPA funds may be spent on the acquisition, creation, and preservation of open space, and for the rehabilitation or restoration of any open space that has been acquired or created using CPA funds. It is important to note that a permanent deed restriction is required for all real property interests acquired under CPA. This restriction must be filed as a separate instrument, such as a Conservation Restriction (CR) or Agricultural Preservation Restriction (APR).

Open Space Context in Greenfield

The City of Greenfield has a wealth of water resources, with four rivers running through its borders. Runoff and nonpoint source pollution from developed areas, roads, and farmland affect the quality of the City's rivers. Warming temperatures and changes in precipitation due to climate change, including heavier precipitation events and more rain in the winter, pose threats to Greenfield's water resources. Conserving, and in some cases restoring, natural areas is key to maintaining the quantity and quality of Greenfield's water into the future.

Approximately 60 percent of Greenfield is forested.¹ The publicly owned forestlands are enjoyed for walking, snowshoeing, and nature study along with being an important habitat for wildlife. Greenfield is fortunate to have forested open space and conservation lands located throughout the City. Heavily forested publicly owned areas in Greenfield include Highland Park, Rocky Mountain Park, Temple Woods, Griswold Conservation Land, and Leyden Woods.

There are approximately 6,566 acres of prime farmland soils in the City of Greenfield. This constitutes 31% of the land area in the City. The larger parcels of prime agricultural land can be found in the northwest portion of Greenfield in the areas known as the Upper and Lower Meadows. These areas are home to many of the city's farms, including the approximately 60-

¹ 2016 MassGIS Land Use Land Cover Data

acre Greenfield Community Farm, a project of Just Roots. Agriculture is important to Greenfield's community and character; efforts to preserve remaining farmland to ensure local food production are a priority to the City and are detailed in the City's [Sustainable Master Plan](#), [Open Space and Recreation Plan](#), and [Municipal Vulnerability Preparedness Plan](#).

Approximately 17%, or 2,364 acres, of land in Greenfield is permanently protected from development. In addition, about 16%, or 2,302 acres, of privately owned land is considered temporarily protected through the Chapter 61 current use programs, where land is assessed and taxed for its current open space value (working farmland and forestland or open space). If an owner seeks to take a parcel out of the Chapter 61 program, the City has the right of first refusal to purchase the property, providing an opportunity to protect the parcel.²

Local and statewide conservation organizations, such as the Franklin Land Trust (FLT) and Mount Grace Land Conservation Trust (MGLCT), exist to conserve and steward land in partnership with municipalities and landowners. The City could partner with a land trust, for example, to exercise its first right of refusal for a priority property.

Open Space Needs and Goals

Greenfield's open space needs and goals were recently articulated in the 2021 Greenfield Open Space and Recreation Plan, 2021 Municipal Vulnerability Preparedness Plan and the 2014 Sustainable Greenfield Master Plan. The needs and goals from these recent planning efforts are reaffirmed and articulated in the CPC Plan as follows:

- Increase the City's resilience to climate change through thoughtful conservation and stewardship of open spaces, wildlife habitat and migration corridors, watersheds, wetlands, woodlands, farms, agricultural lands, and river corridors;
- Protect heritage landscapes and significant view corridors;
- Reduce flooding and erosion along the Green River through open space preservation and floodplain/wetland restoration;
- Increase passive recreation opportunities in properties acquired or preserved as open space.

² What is a right of first refusal when discussing real estate? The term right of first refusal, also called the first right of refusal, refers to the contractual right given to an interested party that allows them to be the first buyer to submit an offer on a specified property. If the right of first refusal holder no longer wants to submit a bid, then the seller can then accept other offers and someone else can buy the property.

Passive recreation refers to recreational activities that do not require prepared facilities like sports fields or pavilions. Passive recreational activities typically place minimal stress on a site's resources and can be combined with projects that provide climate resiliency and natural resource benefits.

Examples of Passive Recreational Activities:

- Hiking
- Wildlife viewing
- Observing and photographing nature
- Picnicking
- Walking
- Bird watching
- Cross-country skiing
- Bicycling
- Running/jogging



Photo credit: Franklin County Chamber of Commerce

Open Space Priorities for CPA Project Evaluation

The Community Preservation Committee has identified the following evaluation criteria for Open Space proposals. These criteria were developed with the needs and goals in mind from recent City plans, outreach to City departments and boards, and public input during the development of this Community Preservation Plan. These criteria, along with the guiding principles identified by the CPC and the CPA statute's general criteria for CPA projects, will be used by the CPC to evaluate projects.

The CPC will seek to support Open Space proposals that meet one or more of the following objectives:

✓ **Preserve, protect, and enhance Greenfield's open spaces**

Examples:

- ☐ Protect and preserve agricultural lands
- ☐ Acquire or protect threatened environmentally sensitive areas, such as wetlands, habitat of rare or endangered species, and river corridors.
- ☐ Acquire land in environmental justice areas to increase accessibility to open space opportunities within the City.
- ☐ Remove invasive trees and plant species

✓ **Provide and improve connections and maximize access to open spaces for all residents**

Examples:

- ☐ Acquire open space properties with passive recreation opportunities in environmental justice neighborhoods
- Improve ADA accessibility to open spaces, such as accessible trails and parking.

✓ **Prioritize climate resiliency to support the health of the City's people, natural resources, and infrastructure**

Examples:

- ☐ Re-establish wildlife migration corridors
- ☐ Promote the creation of pollinator corridors
- ☐ Reduce flooding and erosion along the Green River
- ☐ Increase forest resiliency and carbon storage

Environmental Justice (EJ) is based on the principle that all people have a right to be protected from environmental hazards and to live in and enjoy a clean and healthful environment. EJ is the equal protection and meaningful involvement of all people with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies and the equitable distribution of environmental benefits.

CHAPTER 3: Outdoor Recreation

This chapter describes Greenfield's CPA outdoor recreation goals and strategies, identified needs, and broader outdoor recreation context. Much of the information in this section was taken from the 2021 Greenfield Open Space and Recreation Plan.



Greenfield Triathlon at the Green River Swimming & Recreation Area

CPA Eligibility for Recreation Projects

The focus for CPA recreational projects is on *outdoor* passive or active recreation, such as (but not limited to) the use of land for:

- Community gardens
- Trails
- Noncommercial youth and adult sports
- Parks, playgrounds or athletic fields

CPA funds may not be spent on ordinary maintenance or annual operating expenses; only capital improvements are allowed. In addition, CPA funds may not be used for horse or dog racing facilities, or for a stadium, gymnasium, or similar structure. This prohibition has generally been interpreted to mean that CPA funds may be used only for outdoor, land-based recreational uses and facilities.

CPA funds may be used for the acquisition of land to be used for recreation, or for the creation of new permanent recreational facilities on land a community already owns. A 2012 amendment to CPA broadened the law to also allow for the rehabilitation of existing, outdoor recreational facilities. The amendment made it clear that with respect to land for recreational use, "rehabilitation" could include the replacement of playground equipment and other capital improvements to the land or the facilities thereon to make them more functional for their intended recreational use.

Another change ushered in by the 2012 amendment was a prohibition on the use of CPA funds for the acquisition of artificial turf for athletic fields. Communities may still use their CPA funds for other aspects of a field project, but must appropriate non-CPA funds to acquire the artificial turf surface.³

Outdoor Recreation Context in Greenfield

State conservation agencies and the City of Greenfield own and manage approximately 10% of Greenfield's land for open space and recreation purposes. As Greenfield is located in the center of the County, many residents from the surrounding towns travel to enjoy the City's open spaces and recreational opportunities. The Greenfield Swimming and Recreation Area is the only designated area for recreational swimming in the City. Greenfield's Hillside Park provides an alternative to swimming with its Splash Pad that operates from Memorial Day through Labor Day and attracts many users throughout the region. Green River Park also creates a regional appeal with a Paws Park for area dogs. Greenfield's Energy Park is a destination for summer entertainment. The park provides a small, intimate entertainment venue, set just off of Main

³ Community Preservation Coalition, <https://www.communitypreservation.org/allowable-uses>

Street in the heart of downtown. The park includes sustainable energy exhibits, interpretive signage, and herb, native plant, and pollinator gardens.

The Highland Park/ Temple Woods/ Rocky Mountain Park trail network remains a favorite of area hikers with varying trail terrain and scenic vistas including Sachem's Head and Poet's Seat Tower that overlook the valley. The trail network also connects to the regional Pocumtuck Trail, which links Greenfield to the Sugarloaf Mountains in South Deerfield.

The Franklin County Bikeway is a comprehensive network of off-road and shared roadway linkages to destinations throughout Franklin County. The goal is to provide alternative transportation that provides access to employment, educational, cultural and recreational sites. The Franklin County Bikeway currently consists of about 240 miles. Many of the identified loops for Central County run through Greenfield.

The Greenfield Recreation Department maintains an extensive inventory of parks, playgrounds, and trails on its website.⁴ In the past few years, many improvements have been made to recreation facilities in Greenfield. Green River Park off Petty Plain Road was renovated to include a new dog park, playground, pickle ball court, and pavilion. Several water fountains and refill stations were installed at various parks and fields. Throughout the City, a number of park and school playgrounds have been updated and park identification signs were installed throughout the park system as well.

Outdoor Recreation Needs and Goals

The overarching recreation goals expressed in the 2020 Greenfield Open Space and Recreation survey are: improvements at existing recreation facilities and open space; pedestrian, cyclist, and accessibility improvements to roads and sidewalks; expanded trail systems within and across the City; expanded recreational programs for teens; and increased community outreach informing resident of existing recreational resources. These goals reiterate the goals from the 2014 Sustainable Master Plan, which include maintaining and improving existing public parks, and creating new parks to meet specific needs and demographics.⁵

New recreation facilities most needed in the City according to 2020 survey respondents are:

- Hiking trails (47%)
- Public restrooms (38%)
- Natural Areas (38%)
- Skate Parks (33%)
- Public Art (33%)

⁴ <https://www.greenfieldrecreation.com/parks.html>

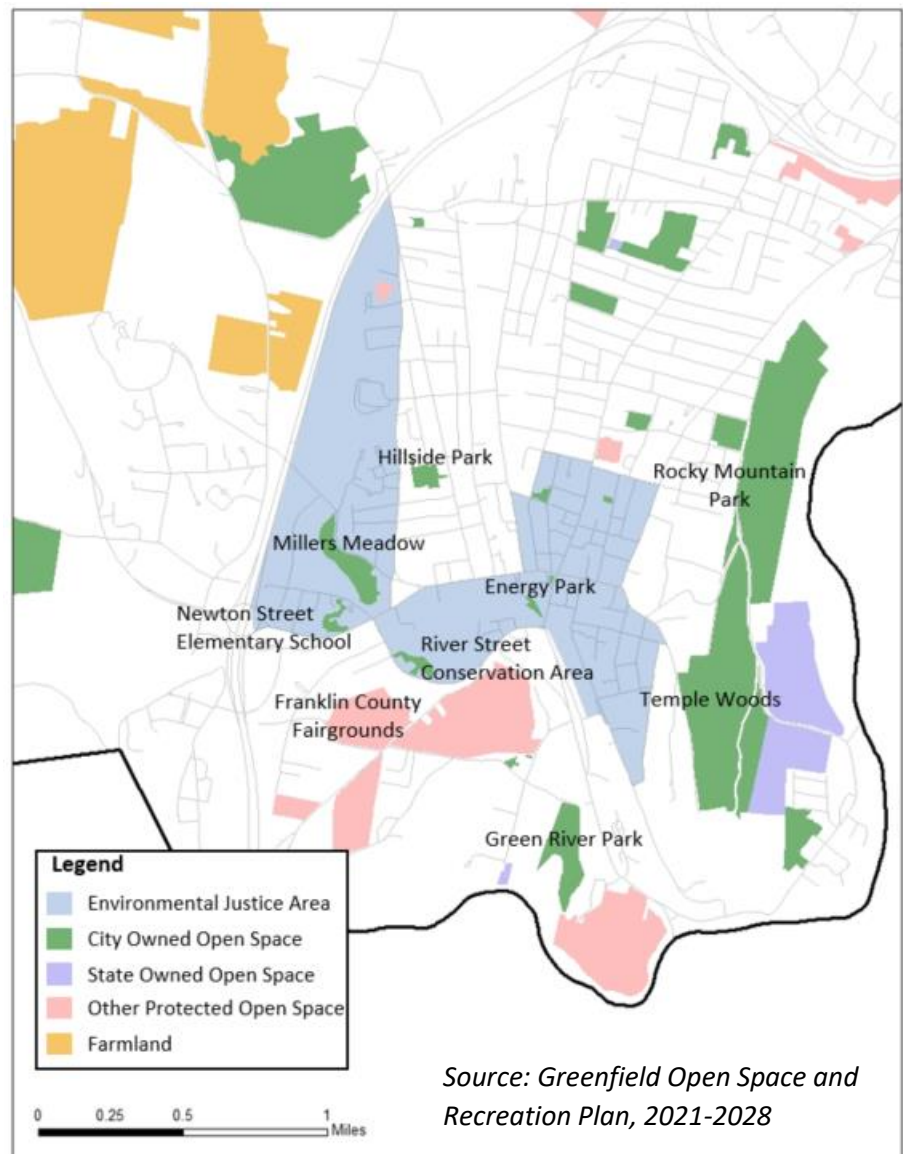
⁵ "Sustainable Greenfield"; Land Use, Goal 1, Strategy 1, action d; page 40

In the “other” category, the greatest calls were for the addition of bike paths, bike trails that are separate from hiking trails, accessible trails, more legal swimming areas, and boat launches.

An analysis conducted using GIS data found that all of the Environmental justice areas in Greenfield are within a half-mile of a park or open space. However, the FRTA bus routes do not run between the downtown area and any of the City parks. Therefore, off-road trails, sidewalks, and on-road bicycle improvements could all be explored as options to improve access

between recreation opportunities and neighborhoods. There is also a need to improve public transportation and access to recreational opportunities such as hiking trails throughout the City.

Environmental Justice Areas, Parks, and Open Spaces in Greenfield



Source: Greenfield Open Space and Recreation Plan, 2021-2028

The OSRP Action Plan calls for improving sidewalks and adding universal access trails, improving ADA accessibility at many parks, adding more pocket parks or community gardens in Environmental justice areas near the downtown, and increasing biking opportunities throughout the City so residents can depend less on traveling by car. Community gardens and additional swimming and river access points are also identified actions in Greenfield’s 2021 Municipal Vulnerability Preparedness Plan (MVP). The plan recommends identifying viable locations for community gardens and providing municipal land for them, especially in Environmental justice neighborhoods and places with rental housing, where tenants may not

have access to land.⁶ In addition, the Plan notes Greenfield has access to four rivers within the City, but there are not many legal opportunities for swimming access. Creating more safe swimming spaces is a priority for the Recreation Department to ensure residents can cool off during heat waves in the summer.⁷

Outdoor Recreation Priorities for CPA Project Evaluation

The Community Preservation Committee has identified the following evaluation criteria for Outdoor Recreation proposals. These criteria were developed with the needs and goals in mind from recent City plans, outreach to City departments and boards, and public input during the development of this Community Preservation Plan. These criteria, along with the guiding principles identified by the CPC and the CPA statute's general criteria for CPA projects, will be used by the CPC to evaluate projects.

The CPC will seek to support Recreation proposals that meet one or more of the following objectives:

✓ Enhance, maintain, and expand recreation facilities, urban green spaces, and open spaces

Examples:

- ☐ Expand community gardens, especially in environmental justice neighborhoods or areas with a high concentration of rental housing
- ☐ Create more river access and safe swimming areas
- ☐ Expand and improve trail systems
- ☐ Develop the riverside Bikeway to extend from the Greenfield Bike Path to Green River Park
- ☐ Remove invasive species and plant native trees, shrubs and plants to provide pollinator habitat, shade and beauty at public parks and playgrounds

✓ Improve and increase access for Greenfield residents to public open space and recreational facilities

Examples:

- ✓ Work to acquire land in environmental justice areas to increase accessibility to open space opportunities within the City
- ✓ Add wayfinding signage to trail heads and trail intersections
- ✓ Develop a public access point on the Green River for boaters
- ✓ Implement ADA accessibility improvements at public parks and playgrounds

⁶ Greenfield 2021 Municipal Vulnerability Preparedness Plan; Risk Matrix Recommendations, page 21

⁷ Greenfield 2021 Municipal Vulnerability Preparedness Plan; High Priority Recommendations, page 32

- ✓ Increase the number of shade trees planted along primary walking and biking routes to schools and to downtown
- ✓ Add public restrooms to outdoor recreation areas
- ✓ Increase off-street walking and bicycling connections to recreation areas

CHAPTER 4: Historic Preservation

This chapter describes Greenfield's CPA historic preservation goals and strategies, identified needs, and broader historic preservation context.



Spanish-American War Memorial in front of the Leavitt-Hovey House

CPA Eligibility for Historic Preservation Projects

Section 2 of the CPA legislation defines historic resources, preservation, and rehabilitation. Under CPA, a historic resource is defined as a building, structure, vessel, real property, document or artifact that is either:

- listed on the State Register of Historic Places; or
- determined by the local Historic Commission to be significant in the history, archeology, architecture, or culture of the city or town.

In other words, if a resource is not listed on the state register, the local historic commission must determine local significance to be eligible for CPA funds.

CPA funds may be spent on the acquisition, preservation, rehabilitation and restoration of historic resources. In addition, CPA funds may be appropriated to pay a nonprofit organization to hold, monitor, and enforce a deed restriction as described in Section 12 of the CPA Act (amended Summer 2012). Furthermore, within the definition of “rehabilitation,” CPA is allowed to fund improvements to make historic resources functional for their intended use, including improvements to comply with the Americans with Disabilities Act and other building or access codes.

All rehabilitation work, with respect to historic resources, is required to comply with the Standards for Rehabilitation stated in the US Secretary of the Interior’s Standards for the Treatment of Historic Properties (codified in 36 C.F.R. Part 68).

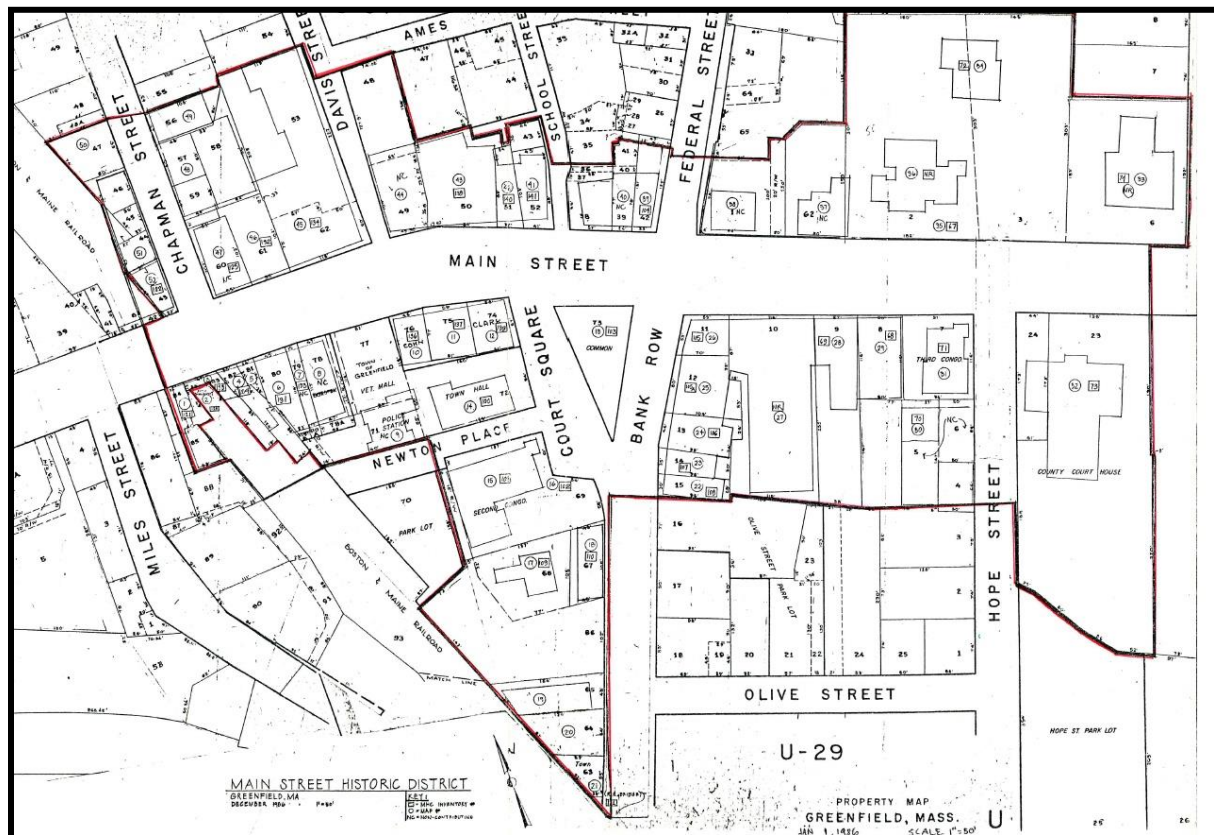
Historic Preservation Context in Greenfield

Greenfield has two historic districts recognized in the State Register of Historic Places, and 13 other areas that are documented in the historic inventory as important groupings of buildings and structures.

The Main Street Historic District (GRE.A) is composed of 56 properties, monuments, and structures on Main Street and Bank Row between Chapman Street and Franklin Street. This district defines the historic and architectural character of the city and includes the city common and important commemorative statues. It includes two nationally significant Asher Benjamin buildings: the Leavitt-Hovey House (1797) and Coleman-Hollister House (1797). Other fine examples of Early Republic, Federal, Queen Anne, Victorian, and Art Deco architecture are also found, including the Garden Theater Block (1928), the Second Congregational Church (1868), and the Arms Block (1876).

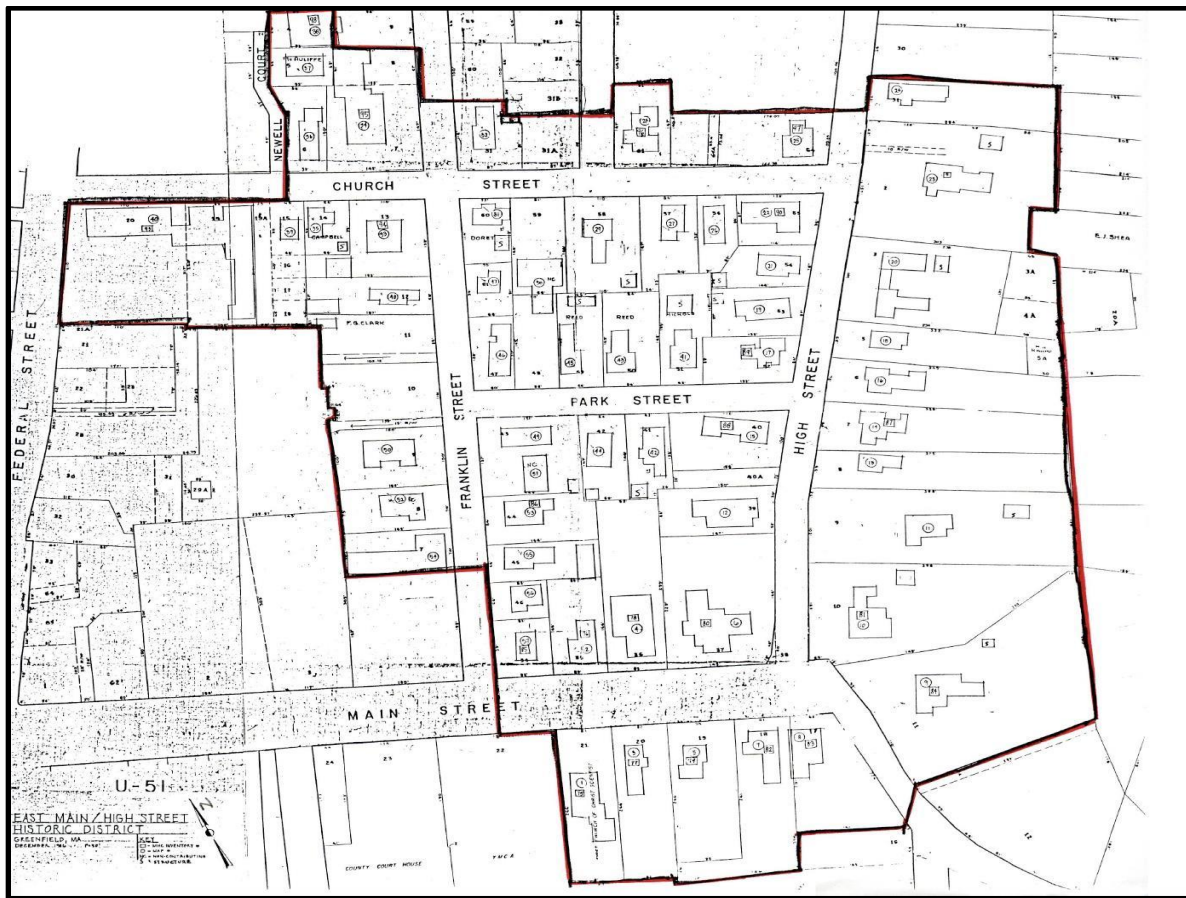
The history of the city is reflected in the concentrated settlement at the intersection of Main and Federal Streets, two primary north-south and east-west roads. Its establishment at the

county seat explains the greater urban density that is unusual for its rural Franklin County location.



The Main Street Historic District (GRE.A)

The East Main - High Street Historic District (GRE.B) is composed of 58 significant properties located in the eastern portion of Main Street, the southern portion of High Street, and the residential neighborhood of Church St., Park St., and Franklin St. Representative of a prosperous period in Greenfield history, the northern edge is defined by the Weldon Hotel (1905), to the west by St. James Episcopal Church, and along Main Street by many prominent and stately residences.



The East Main - High Street Historic District (GRE.B)

The 13 other defined areas include many state recognized properties outside of downtown Greenfield such as the Franklin County Fairgrounds (various dates), Newton Street School (1915), and Poet's Seat Tower (1912), the visible cultural monument seen throughout the city. A full list of properties recognized in the State Register of Historic Places can be found in the Massachusetts Cultural Resource Information System.⁸

A number of public and private entities are involved in the preservation of Greenfield's history. The Greenfield Historical Commission acts as the preservation planning arm of Greenfield's local government to identify, preserve and develop Greenfield's historic assets. Greenfield is home to the Historical Society of Greenfield, "a non-profit historical and educational resource institution maintaining and communicating the diverse history of Greenfield by promoting its archival collections, exhibitions of cultural artifacts, documents, publications, educational resources and programs accessible and targeted to area residents, the wider public and students of all ages." The Museum of Our Industrial Heritage, located on Mead St on the Green River, focuses on technology, transportation and trade in and around Greenfield, "through preserving, collecting, and educating the public, with emphasis on our own neighborhood to tell a national story."

⁸ <https://www.mass.gov/info-details/massgis-data-mhc-historic-inventory>

Historic Preservation Needs and Goals

As stated earlier, the primary goals for historic preservation in Greenfield are:

- Update the inventory of history properties and sites in Greenfield
- Develop a Historic Preservation Plan
- Support the creative reuse of historic buildings
- Preserve historic landscapes and view corridors
- Preserve historic facades
- Support acquisition of Heritage Landscapes as they become threatened by development
- Preserve historic artifacts and historic documents and archive in a user-friendly and accessible format

Historic Preservation Priorities for CPA Project Evaluation

The Community Preservation Committee has identified the following evaluation criteria for Historic Preservation proposals. These criteria were developed with the needs and goals in mind from recent City plans, outreach to City departments and boards, and public input during the development of this Community Preservation Plan. These criteria, along with the guiding principles identified by the CPC and the CPA statute's general criteria for CPA projects, will be used by the CPC to evaluate projects.

The CPC will seek to support Historic Preservation proposals that meet one or more of the following objectives:

✓ **Update the historic inventory and develop a Preservation Plan**

✓ **Preserve and protect Greenfield's historic buildings, facades, and landscapes**

Examples:

- Help preserve the Leavitt Hovey House.
- Work to preserve and revitalize the First National Bank building.

✓ **Support historic preservation projects that serve multiple public purposes such as:**

- Enhancing town meeting/gathering space
- Improving the use of income-generating town function space
- Supporting downtown improvements

✓ **Partner with outdoor recreation interests to extend the existing bike path along the Green River, including memorializing the Wiley Russell dam and adjacent parkland.**

✓ **Foster renewal of existing industrial buildings for new uses**

Examples:

- Wells Tool Company and factory buildings on Hope Street; one on Arch St., and others

CHAPTER 5: Community Housing

This chapter describes Greenfield's CPA community housing goals and strategies, identified needs, and broader housing context. Information in this section comes from the 2014 Greenfield Housing Needs Study and 2014 Sustainable Master Plan. Data was updated with the most current U.S. Census figures and housing market information available.



Upper Story Apartments on Miles Street

CPA Eligibility for Housing Projects

The United States Department of Housing and Urban Development (HUD) income guidelines are used to determine who is eligible to live in the community housing units developed by communities with their CPA funds. Housing developed with CPA funds may be offered to those persons and families whose annual income is less than 100 percent of the area-wide median income (AMI), as determined by HUD.

Communities may choose to limit certain housing units created with CPA funds to those persons and families earning less than 80 percent of the area-wide median income annually, as determined by HUD. This allows communities to include these units on the Massachusetts Department of Housing and Community Development's (DHCD) Subsidized Housing Inventory (SHI).

2023 CPA Income Limits for Greenfield

	Household Size							
	1	2	3	4	5	6	7	8
Moderate Income Limits (100% AMI)	\$69,020	\$78,880	\$88,740	\$98,600	\$106,488	\$114,376	\$122,264	\$130,152
Low Income Limits (80% AMI)	\$55,216	\$63,104	\$70,992	\$78,880	\$85,190	\$91,501	\$97,811	\$104,122

Source: https://www.communitypreservation.org/allowable-uses#anchor_housing

CPA funds may be spent on the acquisition, creation, preservation and support of community housing, and for the rehabilitation or restoration of community housing that has been acquired or created using CPA funds. The CPA requires that whenever possible, preference be given to the adaptive reuse of existing buildings or construction of new buildings on previously developed sites.⁹

Housing Context in Greenfield

Greenfield's Demographics

When considering housing needs, the number of households is more relevant than total population, because one household equals one housing unit. Greenfield experienced a slightly higher increase in households than total population in the last decade. This is due to smaller

⁹ Community Preservation Coalition, <https://www.communitypreservation.org/allowable-uses>

average household sizes over time. The total number of housing units in the city increased at the same rate as households from 2010 to 2020.

Population, Household, and Housing Unit Changes in Greenfield, 2000 to 2020

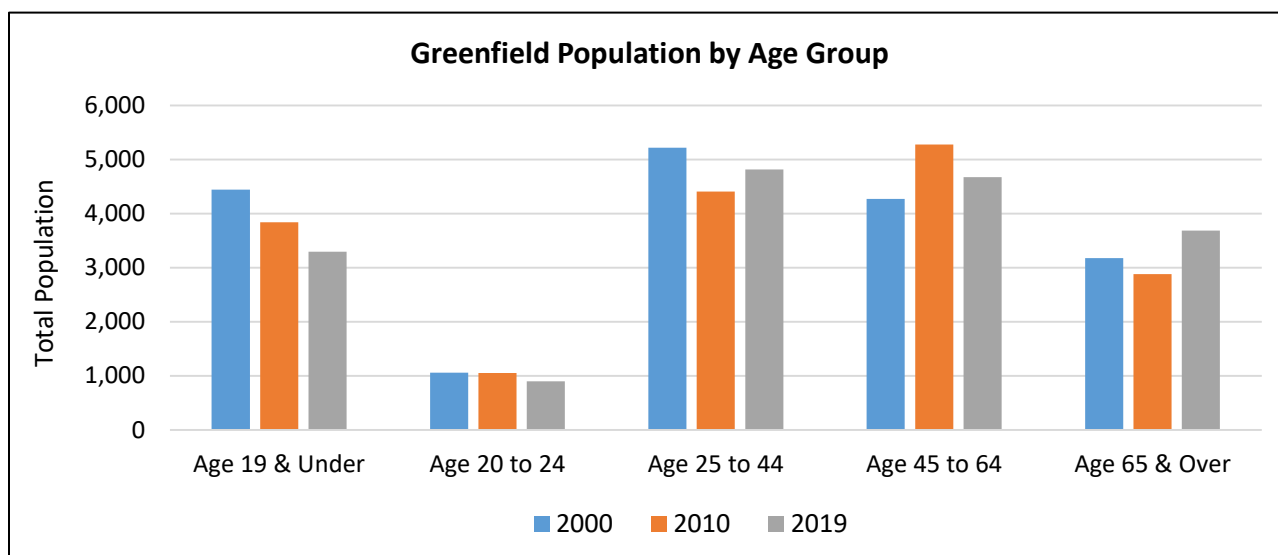
	2000	2010	2020	2000-2010 % Change	2010-2020 % Change
Total Population	18,168	17,450	17,768	-4%	2%
Total Households	7,944	7,852	8,116	-1%	3%
Housing Units	8,301	8,377	8,646	1%	3%

Source: 2000 and 2010 U.S. Decennial Census; 2020 2020 Decennial Census PL-94 Redistricting data.

Greenfield's population is younger than most other Franklin County towns. The estimated median age in 2019 was 43.7. However, Greenfield's population is aging, as demonstrated in the figure on the next page. Overall, the population age 44 and under has declined in the past two decades, while the population age 45 and older has increased. The largest decline has been in the 19 and under age group, which experienced a 26% decrease from 2000 to 2019, while the population age 65 and older experienced the largest increase, at 16%. It is projected that as the baby boomer generation continues to age, the senior population in Greenfield will continue to grow over the next decade. By 2030, Greenfield's senior population is expected to account for 32% of the total population, compared to 21% in 2019.¹⁰

Population projections are based on demographic models and historic trends, and do not incorporate many of the factors that can influence a town's future population growth, such as the availability and affordability of housing. If housing is not affordable or suitable for residents as they age, seniors may need to find housing elsewhere. Likewise, if housing is not affordable for young people looking to buy their first house or rent an apartment, they will have to look to other communities.

¹⁰ UMass Donahue Institute, Long-Term Population Projections for Massachusetts Regions, November 2018.



Source: 2000 and 2010 U.S. Decennial Census; U.S. Census Bureau 2015-2019 American Community Survey Five-Year Estimates.

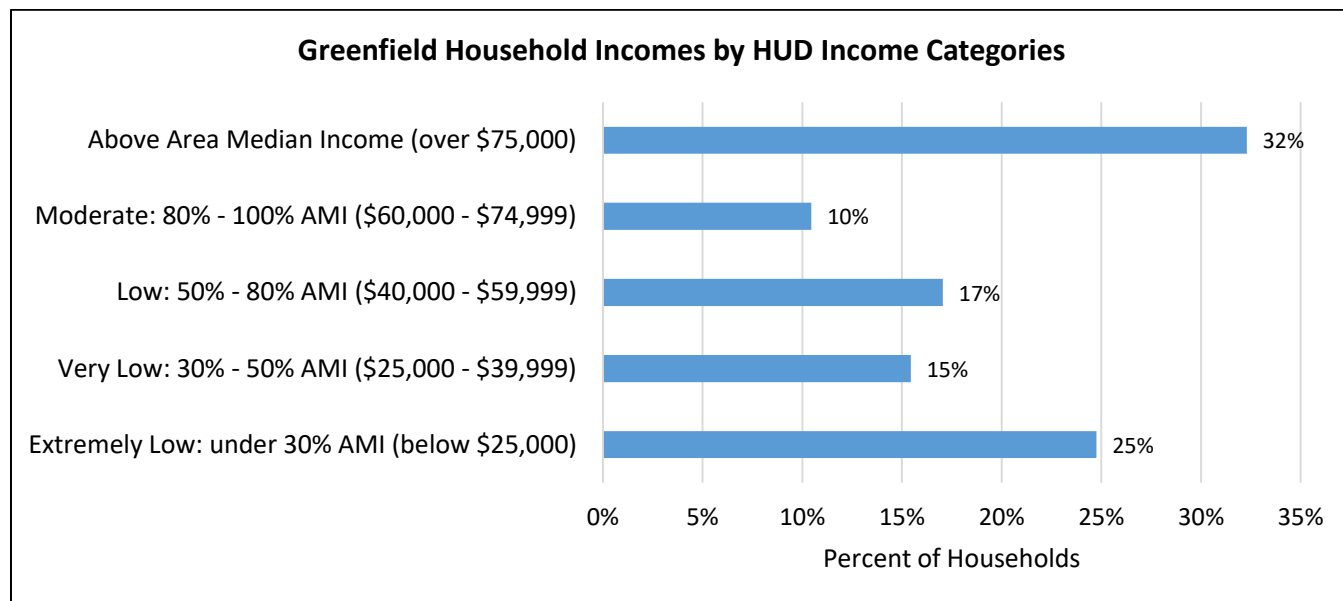
In 2020, the racial and ethnic makeup of Greenfield's population is 83% White, 8% Hispanic or Latino (of any race), 4% two or more races (non-Hispanic or Latino), 2% Black, 2% Asian, and less than 1% American Indian & Alaska Native. Since 2010, Greenfield's population has become more racially and ethnically diverse, a trend seen across the State as well. The largest changes were a decrease in the White, non-Hispanic population (-7.3%), and increases in the Hispanic and Latino population (3.4%) and two or more races (2.5%) population.

The Fair Housing Act, passed in 1968 as part of the Civil Rights Act, and amended in 1988, protects against discrimination based on race, color, religion, sex, disability, familial status, or national origin. The Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Massachusetts fair housing laws, codified in Chapter 151B of the General Laws, provide for broader coverage and prohibit discrimination based on race, color, religion or creed, marital status, disability, genetic information, military status (veteran or member of the armed services), familial status (presence of children in the household), national origin, sex, age, ancestry, sexual orientation, recipient of public assistance (including rental assistance), and gender identity or expression.

Examples of current conditions that perpetuate racial segregation include discrimination or differential treatment in the housing, mortgage and insurance markets; exclusionary zoning, land use, and school policies; government policies affecting the location of, and access to, subsidized housing; limited affordable housing and a lack of housing diversity in many communities; and a lack of, or unequal, private and public investments; and displacement of residents due to economic pressures.¹¹ It is imperative for Greenfield, through the Community Preservation Plan and other City initiatives, to ensure Fair Housing practices are followed, and

¹¹ Massachusetts Department of Housing and Community Development 2019 Analysis of Impediments to Fair Housing Choice." <https://www.mass.gov/service-details/analysis-of-impediments-to-fair-housing-choice-ai>

to proactively plan for and invest in diverse housing options for a variety of households and income levels.



Source: 2021 HUD Area Median Income Limits; U.S. Census Bureau 2015-2019 American Community Survey 5-Year Estimates.

Because Greenfield has lower household incomes than the county, a high percentage of households could potentially benefit from housing or programs created or supported by Community Preservation funds. Approximately 68% of households in the city have incomes below 100% of the Area Median Income. Eligibility for affordable housing and programs is ultimately determined by household size and a number of other factors. However, based on the estimates in the figure on the following page, the largest income category group that could benefit from affordable housing efforts are extremely low income households (approximately 25% of Greenfield households), followed by low income households (17%) and Very Low Income households (15%). Roughly 10% of Greenfield households fall within the 80% - 100% AMI income range.

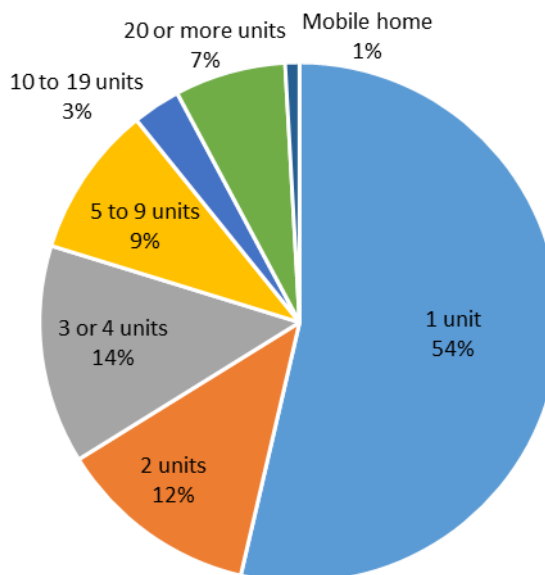
Greenfield's Housing Stock

Greenfield's housing stock is relatively diverse, compared to other communities in Franklin County. The majority of homes, 54%, are single family, while over a quarter of homes in Greenfield are two-family (12%) or small multi-family homes of 3 to 4 units (14%). Apartment homes with anywhere from 5 to over 20 units in a building make up 29% of housing, while mobile homes account for just 1 % of homes in the city. Since 2000, the City has permitted a total of 299 new housing units: 54% were single family homes; 21% were two-family homes; 21% were 5 or more unit homes; and 4% were 3 or 4 unit homes.¹²

Greenfield also has more rental units than the county as a whole, which is not surprising given the diversity of housing types and the more urban characteristics of Greenfield compared to most towns in Franklin County. An estimated 44% of homes are rented in Greenfield, compared to 31% in the County. The other 56% of homes in Greenfield are owner-occupied.

Despite the increase in housing units over the past couple of decades, Greenfield still maintains a relatively old housing stock. Approximately 3,648 homes, or 43% of all housing, were built prior to 1940, compared to 37% of homes in Franklin County, and 33% of homes in the State. While an older housing stock contributes to the historic character of the community, often older homes are not ADA accessible, and deferred maintenance can pose health and safety issues. For example, homes built prior to the Federal ban on lead paint in 1978 (over 80% of Greenfield's homes) may contain lead-based paint. Not only is this a health concern for families with young children, but also makes it difficult for families with Section 8 rental vouchers to find apartments that are certified lead-free. Vacant, distressed housing contributes to blight and is a public safety concern. Of the 458 estimated vacant housing units in Greenfield, 267 units are vacant due to reasons such as health, safety, or building code issues that make the housing uninhabitable.

Greenfield Housing - Units in Structure



Source: U.S. Census Bureau 2015-2019 American Community Survey Five-Year Estimates.

¹² U.S. Census Annual Building Permit Survey (Reported and Imputed). The number of permits for 5 or more unit homes includes the 49 new structures in Leyden Woods Apartments that replaced existing structures in 2015 and 2016 (see <https://www.huduser.gov/portal/pdredge/pdr-edge-inpractice-051319.html> for more on the Leyden Woods renovations). It is possible some of the other permits reported are also replacement structures, but this is not possible to sort out in the data.

Housing Affordability in Greenfield

The general definition of affordable housing is when a household spends no more than 30% of their gross monthly income on housing costs. Households spending more than 30% of income on housing are considered to be “cost-burdened” by housing costs. Affordable housing can be naturally occurring in the marketplace. This housing does not have any restrictions on rent or sale price. Sometimes there are reasons why the housing is affordable; the home may be in poor condition, or located in a less-desirable location. In addition, sometimes there are not enough “naturally-occurring” affordable homes available. Affordable homes with a restriction on the rent or sale price keep the housing affordable over time, and may be built or operated with local (such as CPA), State or Federal funds. Restricted affordable housing could be rental or owner-occupied, single-family or multi-family. Currently, 15.4% of housing in Greenfield, or 1,284 units, are restricted affordable housing.¹³ Not all of these units are restricted in perpetuity. As restrictions expire, units may revert to market rate.

An estimated 69% of Greenfield renters pay over 30% of their income on housing, and are considered cost-burdened. This is a much higher rate of cost-burden among renters than in the State, where an estimated 46% of renters pay too much for housing. Even more striking, an estimated 21% of renters are paying more than 50% of income on housing (considered severely cost-burdened). Greenfield’s percentage of cost-burdened homeowners is much less, at 29%, but is still higher than the State rate of 27%. Housing cost-burden is an important measure because it demonstrates that although Greenfield’s rents and home prices may seem low compared to other communities, lower incomes and wages in our region offset any potential affordability gains.

It’s also important to look at how affordable a community’s housing is for people seeking housing. Anecdotally, rents have increased dramatically during COVID-19, further exacerbating cost-burden among current renters, and pushing rents out of range for low income households seeking an apartment. Sale prices for single family homes are the most accessible data to measure affordability gaps between incomes and prices. Greenfield’s median sale prices have been out of reach for households earning a median income since before the pandemic. Recent real estate trends since the onset of COVID-19 have exacerbated the affordability gap, at a time when household incomes have likely fallen overall.

¹³ MA DHCD Subsidized Housing Inventory, as of December 21, 2020: <https://www.mass.gov/service-details/subsidized-housing-inventory-shi>

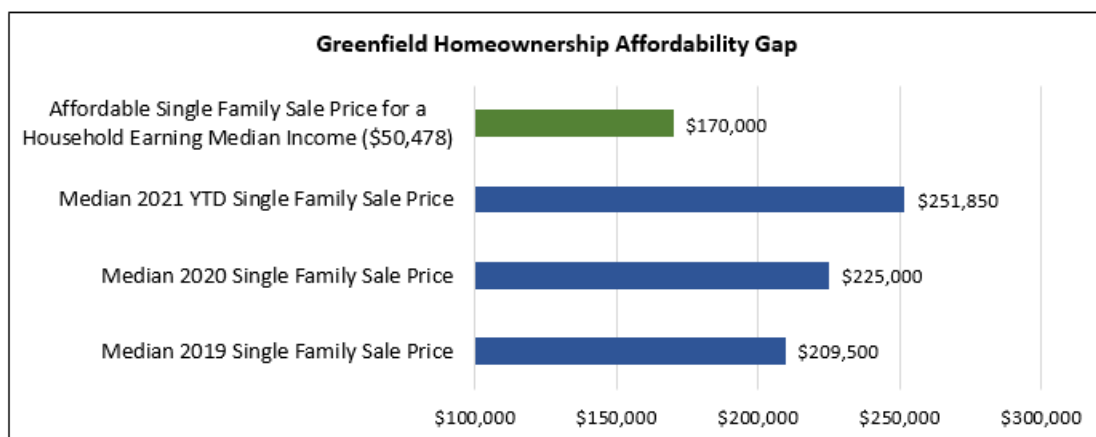
Housing Needs and Goals

The *Sustainable Greenfield's* Housing Chapter articulates a vision in which

“A diverse housing stock with adapted, renovated and newly built units, promotes through both location and design a healthy environment and lifestyle, appealing to people of varied age and income, promoting individual prosperity and the economic vitality of Greenfield as a whole.”

The 2014 Greenfield Housing Study dove deeper into Greenfield’s housing needs. Key findings from the study include the following:

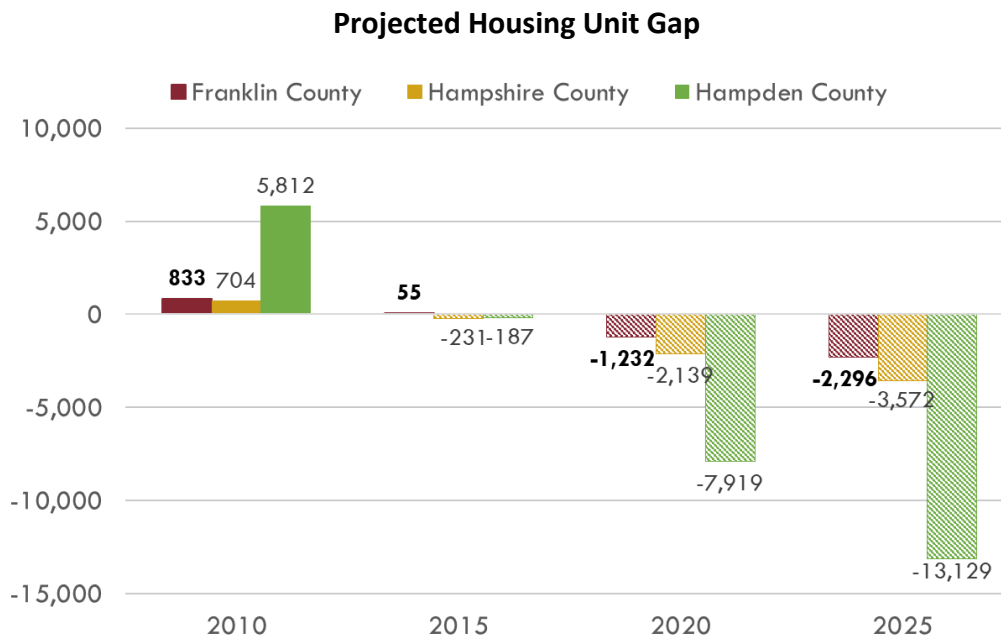
- The Greenfield population is aging and elders from outside the City are expected to move to Greenfield to be near services further increasing the need for housing suitable to elders.
- Working adults will remain the largest age group, so strategies related to their housing needs should be a priority.
- The arrival of passenger rail and broadband will attract young adults priced out of other regions. They typically favor rental housing located near downtowns.
- The study’s affordability analysis shows that there is not enough affordable housing for the Extremely Low Income group. This group is not likely to become homeowners due to financial barriers and will need additional rental housing.



Source: Massachusetts Association of Realtors, MA Department of Housing and Community Development Homeownership Calculator

While the 2014 study specifically calls out the need for housing that is affordable to extremely low income households (which is still a need today), it also notes the need for more housing in general. A recent report on the state of housing in the Pioneer Valley quantifies the current housing shortage in Franklin, Hampshire, and Hamden Counties.¹⁴

¹⁴ *Greater Springfield Regional Housing Analysis*. UMass Donahue Institute, March 4, 2021.



Source: *Greater Springfield Regional Housing Analysis*. UMass Donahue Institute, March 4, 2021.

Housing production since the 2008 Recession has not kept pace with need, leading to a supply shortage and increasing prices across the region. Franklin County has a current gap of roughly 1,232 housing units (4% of current total housing units). In 2025, the gap is projected to grow to 2,296 (7% of current total housing units) if production does not increase from current levels. As a percentage of total housing units, Franklin County has a larger housing shortage than Hampshire County and a comparable housing shortage to Hampden County. Given the current affordability gap in home prices, and the severe cost burden among renters, it is clear that new affordable housing production restricted at levels that are affordable for households earning below the area median income is needed.

Sustainable Greenfield lays out a number of objectives for improving housing in Greenfield, to help guide future development and redevelopment. These include:

- Increase housing choice, expand and update housing stock to reflect changing preferences and population
- Create quality housing – safe, durable, energy-efficient, sustainable, and human-oriented
- Enhance and expand options to live in walkable neighborhoods
- Replace and renew homes to create a more energy efficient housing stock
- Protect historic character of neighborhoods while facilitating improvement of housing stock
- Document, enhance and protect the unique character of Greenfield’s neighborhoods

Housing Priorities for CPA Project Evaluation

The Community Preservation Committee has identified the following evaluation criteria for Community Housing proposals. These criteria were developed with the needs and goals in mind from recent City plans, outreach to City departments and boards, and public input during the development of this Community Preservation Plan. These criteria, along with the guiding principles identified by the CPC and the CPA statute's general criteria for CPA projects, will be used by the CPC to evaluate projects.

The CPC will seek to support Community Housing proposals that meet one or more of the following objectives:

✓ Reduce the number of unhoused and housing insecure people in Greenfield

Examples:

- ☐ Provide supportive housing for unhoused individuals and families
- ☐ Establish a rental assistance program to pay for moving expenses, utilities, or rent

✓ Promote affordable, safe, ADA accessible and energy efficient rental opportunities

Examples:

- ☐ Rehabilitate a vacant multi-family structure into affordable apartments
- ☐ Renovate vacant upper stories in downtown for rental housing
- ☐ Convert a large single family home into two or more units
- ☐ Develop new apartments on vacant land or parcels near downtown
- ☐ Subsidize inclusion of affordable units in rental developments

✓ Increase options for first-time and first-generation homebuyers

Examples:

- ☐ Establish down payment, closing costs, purchase price buy-down, or mortgage subsidy assistance programs
- ☐ Develop affordable homes on vacant lots
- ☐ Rehabilitate and convert vacant single family homes into affordable homes
- ☐ Subsidize inclusion of affordable units in new housing developments

✓ Support upgrades, renovations, and preservation of the existing affordable housing stock

Examples:

- ☐ Support capital improvements of Greenfield's public housing

- ☐ Prevent expiration of affordability in private affordable housing

✓ **Increase universal design and accessibility in housing**

Examples:

- ☐ Incorporate barrier free, universally accessible housing units in developments

Attachment A – CPA Allowable Uses Chart

ATTACHMENT V-2 - COMMUNITY PRESERVATION FUND ALLOWABLE PROJECT SPENDING PURPOSES (G.L. c. 44B, § 5)				
	OPEN SPACE	HISTORIC RESOURCES	RECREATIONAL LAND	COMMUNITY HOUSING
ACQUISITION - Obtain property interest by gift, purchase, devise, grant, rental, rental purchase, lease or otherwise. Only includes eminent domain taking as provided by G.L. c. 44B	Land to protect existing and future well fields, aquifers and recharge areas, watershed land, agricultural land, grasslands, fields, forest land, fresh and salt water marshes and other wetlands, ocean, river, stream, lake and pond frontage, beaches, dunes and other coastal lands, lands to protect scenic vistas, land for wildlife or nature preserve and land for recreational use	Building, structure, vessel, real property, document or artifact listed on the state register of historic places or determined by the local historic preservation commission to be significant in the history, archeology, architecture or culture of the city or town	Land for active or passive recreational use including, but not limited to, the use of land for community gardens, trails, and noncommercial youth and adult sports, and the use of land as a park, playground or athletic field	Housing for low income individuals and families and low or moderate income seniors Moderate income is less than 100%, and low income is less than 80%, of US HUD Area Wide Median Income
CREATION - Bring into being or cause to exist. <i>Seideman v. City of Newton</i> , 452 Mass. 472 (2008)	Yes	Yes	Yes	Yes
PRESERVATION - Protect personal or real property from injury, harm or destruction	Yes	Yes	Yes	Yes
SUPPORT - Programs providing grants, loans, rental assistance, security deposits, interest-rate write downs or other forms of assistance directly to individuals and families who are eligible for community housing, or to entity that owns, operates or manages it, for the purpose of making the housing affordable				Yes, provided the housing asset itself is made affordable by the expenditure
REHABILITATION AND RESTORATION - Capital improvements, or extraordinary repairs to make assets functional for intended use, including improvements to comply with federal, state or local building or access codes or federal standards for rehabilitation of historic properties	Yes, if open space asset acquired or created with CP funds	Yes, provided that rehabilitation complies with Secretary of Interior's Standards for Treatment of Historic Properties	Yes (includes replacement of playground equipment)	Yes, if housing asset acquired or created with CP funds
APPROPRIATIONS TO AFFORDABLE HOUSING TRUST G. L. c. 44, § 55C				Yes, however, trust is required to spend CPA funds for CPA community housing purposes.
Maintenance expenditures are prohibited for all assets even if they could otherwise be considered acquisition, creation, preservation, support, rehabilitation or restoration Maintenance means incidental repairs that do not materially add to value of property or appreciably prolong property's life, but keep property in condition of fitness, efficiency or readiness				