



Massachusetts Housing Finance Agency
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January 28, 2026

MP Properties IV, LLC
201 Washington Street, Suite 2100
Boston, MA 02108
Attention: Andrew Mackin

**Re: 27 Kimball Road, Amesbury
Project Eligibility/Site Approval
MassHousing ID No. 1301**

Dear Mr. Mackin:

This letter is in response to your application as “Applicant” for a determination of Project Eligibility (“Site Approval”) pursuant to Massachusetts General Laws Chapter 40B (“Chapter 40B”), 760 CMR 56.00 (the “Regulations”) and the Comprehensive Permit Guidelines issued by the Executive Office of Housing and Livable Communities (“EOHLC”) (the “Guidelines” and, collectively with Chapter 40B and the Regulations, the “Comprehensive Permit Rules”), under the New England Fund (“NEF”) Program (“the Program”) of the Federal Home Loan Bank of Boston (“FHLBank Boston”).

MP Properties IV, LLC submitted an application with MassHousing pursuant to Chapter 40B. You have proposed to build ninety-five (95) units of rental housing (the “Project”) on 9.15 acres of land located at 27 Kimball Road (the “Site”) in Amesbury (the “Municipality”).

In accordance with the Comprehensive Permit Rules, this letter is intended to be a written determination of Project Eligibility by MassHousing acting as Subsidizing Agency under the Guidelines, including Part V thereof, “Housing Programs In Which Funding Is Provided By Other Than A State Agency.”

MassHousing has performed an on-site inspection of the Site, which local boards and officials were invited to attend, and has reviewed the pertinent information for the Project submitted by the Applicant, the Municipality and others in accordance with the Comprehensive Permit Rules.

Municipal Comments

Pursuant to the Regulations, the Municipality was given a thirty (30) day period in which to review the Site Approval application and submit comments to MassHousing. The Municipality submitted a letter on December 17, 2025. The following comments and concerns were identified in their letter:

- The Municipality emphasized that the Project must be designed to ensure the maximum level of emergency access and fire protection, including but not limited to fire lanes, sufficient roadway widths to accommodate public safety vehicles and interior fire suppression systems.

- The Municipality is concerned that the Project would result in increased traffic volume and congestion on and around Kimball Road. In addition, the Municipality noted the need for improved pedestrian access in and out of the Site and a pedestrian connection to existing sidewalk connections.
- The Municipality has noted the lack of any usable open space for residents and has recommended that the site plan includes additional areas left for open space features.
- The Municipality requests a detailed landscaping plan and requests the Applicant create an extensive planning plan to ensure permanent pre-vegetation and impose restrictions on limiting disturbance on vulnerable resources.
- The Municipality is concerned with water and sewer capacity at the Site and requests that the Applicant conduct a detailed study to determine water and sewer capacity needs of the proposed Project and if necessary, make repairs or improvements to the water system to meet the demands of the Project.

Community Comments

In addition to comments from municipal staff and officials, MassHousing received several emails from area residents, expressing various concerns regarding the proposed Project. The emails received are summarized below:

- Area residents are concerned that the size and scale of the proposed Project is not in keeping with the modest nature of surrounding neighborhood residences of mostly single-family homes.
- Area residents are concerned about increased traffic and pedestrian safety, echoing the Municipality's comments regarding the concerns of public safety impacts due to the anticipated increase of traffic congestion on and around Kimball Road.

MassHousing Determination and Recommendation

MassHousing staff has determined that the Project appears generally eligible under the requirements of the Program, subject to final review of eligibility and to Final Approval.¹ As a result of our review, we have made the findings as required pursuant to 760 CMR 56.04(1) and (4). Each such finding, with supporting reasoning, is set forth in further detail on Attachment 1 hereto. It is important to note that Comprehensive Permit Rules limit MassHousing to these specific findings in order to determine Project Eligibility. If, as here, MassHousing issues a determination of Project Eligibility, the Applicant may apply to the Zoning Board of Appeals ("ZBA") for a comprehensive permit. At that time local boards, officials and members of the public are provided the opportunity to further review the Project to ensure compliance with applicable state and local standards and regulations.

Based on MassHousing's site and design review, and considering feedback received from the Municipality, the following issues should be addressed in the application to the ZBA, and the Applicant should be prepared to explore them more fully during the public hearing process:

¹ MassHousing has relied on the Applicant to provide truthful and complete information with respect to this approval. If at any point prior to the issuance of a comprehensive permit MassHousing determines that the Applicant has failed to disclose any information pertinent to the findings set forth in 760 CMR 56.04 or information requested in the Certification and Acknowledgment of the Application, MassHousing retains the right to rescind this Site Approval letter.

- Development of this Site will require compliance with all state and federal environmental laws, regulations and standards applicable to existing conditions and to the proposed use related to building construction, stormwater management, wastewater collection and treatment, and hazardous waste safety. The Applicant should expect that the Municipality will require evidence of such compliance prior to the issuance of a building permit for the Project.
- The Applicant is encouraged to work with its design team to address concerns related to pedestrian circulation, open space elements and providing safe connections to existing streets and walkways.
- The Applicant should be prepared to provide detailed information related to proposed water use and potential impacts on existing capacity and pressure and respond to reasonable requests for mitigation.
- The Applicant should be prepared to respond to community concerns relative to potential off-site traffic impacts on area roadways and intersections and respond to reasonable requests for mitigation.
- The Applicant should provide a detailed landscaping plan. Consideration should be given to enhancing vegetative buffers at the rear of the property and where tree removal will occur. Opportunities to enhance the screening of residents abutting 27 Kimball Road should also be considered.
- The Applicant should engage with the Municipality's Fire and Police Department to review and modify plans as needed and to ensure adequate access is provided for emergency vehicles and responders.
- The Applicant should continue to engage with the Municipality in a good-faith discussion regarding design review matters and other Site-related concerns raised by local boards and officials.

MassHousing has also reviewed the application for compliance within the requirements of 760 CMR 56.04(2) relative to Application requirements and has determined that the material provided by the Applicant is sufficient to show compliance.

This Site Approval is expressly limited to the development of no more than ninety-five (95) rental units under the terms of the Program, of which not less than twenty-four (24) of such units shall be restricted as affordable for low- or moderate-income persons or families as required under the terms of the Guidelines. It is not a commitment or guarantee of financing and does not constitute a site plan or building design approval. Should you consider, prior to obtaining a comprehensive permit, the use of any other housing subsidy program, the construction of additional units or a reduction in the size of the Site, you may be required to submit a new Site Approval application for review by MassHousing. Should you consider a change in tenure type or a change in building type or height, you may be required to submit a new site approval application for review by MassHousing.

For guidance on the comprehensive permit review process, you are advised to consult the Guidelines. Further, we urge you to review carefully with legal counsel the M.G.L. c.40B Comprehensive Permit Regulations at 760 CMR 56.00.

This approval will be effective for a period of two (2) years from the date of this letter. Should the Applicant not apply for a comprehensive permit within this period this letter shall be considered to be expired and no longer in effect unless MassHousing extends the effective period of this letter in writing. In addition, the Applicant is required to notify MassHousing at the following times throughout this two-year period: (1) when the Applicant applies to the local ZBA for a Comprehensive Permit, (2) when the ZBA issues a decision and (3) if applicable, when any appeals are filed.

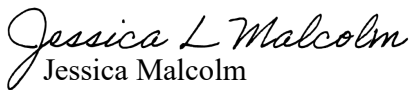
Should a comprehensive permit be issued, please note that prior to (i) commencement of construction of the Project or (ii) issuance of a building permit, the Applicant is required to submit to MassHousing a request for Final Approval of the Project (as it may have been amended) in accordance with the Comprehensive Permit Rules (see especially 760 CMR 56.04(07) and the Guidelines including, without limitation, Part III thereof concerning Affirmative Fair Housing Marketing and Resident Selection). Final Approval will not be issued unless MassHousing is able to make the same findings at the time of issuing Final Approval as required at Site Approval.

Please note that MassHousing may not issue Final Approval if the Comprehensive Permit contains any conditions that are inconsistent with the regulatory requirements of the New England Fund Program of the FHLBank Boston, for which MassHousing serves as Subsidizing Agency, as reflected in the applicable regulatory documents. In the interest of providing for an efficient review process and in order to avoid the potential lapse of certain appeal rights, the Applicant may wish to submit a “final draft” of the Comprehensive Permit to MassHousing for review. Applicants who avail themselves of this opportunity may avoid significant procedural delays that can result from the need to seek modification of the Comprehensive Permit after its initial issuance.

Furthermore, MassHousing takes very seriously our obligation as a Subsidizing Agency to protect the integrity of the 40B Program by working to prevent and detect fraud, waste and abuse. Please be advised that MassHousing may deny future applications for Site or Final Approval should any information materialize affirming fraud, gross negligence, misrepresentation, dishonesty, or breach of fiduciary duty on behalf of the Applicant or any related entities.

If you have any questions concerning this letter, please contact Michael Busby at (617) 854-1219.

Sincerely,

 Jessica L. Malcolm

Senior Manager, Planning & Programs

cc: Ed Augustus, Secretary, EOHLA
The Honorable Kassandra Gove
The Honorable Barry R. Finegold
The Honorable Dawne Shand

Attachment 1

760 CMR 56.04 Project Eligibility: Other Responsibilities of Subsidizing Agency
Section (4) Findings and Determinations

27 Kimball Road, Project #1301

MassHousing hereby makes the following findings, based upon its review of the application, and taking into account information received during the site visit and from written comments:

(a) that the proposed Project appears generally eligible under the requirements of the housing subsidy program, subject to final approval under 760 CMR 56.04(7);

The Project is eligible under the NEF housing subsidy program and at least 25% of the units will be available to households earning at or below 80% of the Area Median Income, adjusted for household size, as published by the U.S. Department of Housing and Urban Development (“HUD”). The most recent HUD income limits indicate that 80% of the current median income for a four-person household in Amesbury is \$132,300.

Proposed average rent levels, net utility allowances for the area, of \$2,075 for a one-bedroom affordable unit, \$2,479 for a two-bedroom affordable unit and \$2,831 for a three-bedroom affordable unit, are within current affordable rent levels for the Boston-Cambridge-Quincy HMFA under the NEF Program.

The Applicant submitted a letter of financial interest from Webster Bank, a member bank of the FHLBank Boston under the NEF Program.

(b) that the site of the proposed Project is generally appropriate for residential development, taking into consideration information provided by the Municipality or other parties regarding municipal actions previously taken to meet affordable housing needs, such as inclusionary zoning, multifamily districts adopted under c.40A, and overlay districts adopted under c.40R, (such finding, with supporting reasoning, to be set forth in reasonable detail);

The City of Amesbury does not have an EOHLC-approved Housing Production Plan. According to EOHLC’s Chapter 40B Subsidized Housing Inventory (SHI), updated through January 22, 2026, Amesbury has 641 Subsidized Housing Inventory (SHI) units (8.21% of its housing inventory), which is 140 units short of the statutory minima of 10%.

(c) that the conceptual project design is generally appropriate for the site on which it is located, taking into consideration factors that may include proposed use, conceptual site plan and building massing, topography, environmental resources, and integration into existing development patterns (such finding, with supporting reasoning, to be set forth in reasonable detail);

Relationship to Adjacent Building Typology (Including building massing, site arrangement, and architectural details):

The proposed development introduces ninety-five (95) residential rental units designed with the aesthetic qualities of traditional New England cottages, ensuring the community reflects the architectural heritage of the region while delivering much-needed housing diversity. The buildings are designed and scaled to resemble traditional single-family homes, employing pitched roofs, gables, dormers, and porches that are common throughout the area.

Five distinct unit types will be provided, including both single-story ranch-style homes and two-story configurations, allowing the neighborhood to appeal to a wide demographic from young professionals and families to empty nesters and seniors. Most of the homes are organized in a “paired home” format, where two units are placed back-to-back. This arrangement provides efficiency in site planning while also offering each resident privacy, natural light, and dedicated exterior access and outdoor space that reinforces the sense of an independent home. Exterior materials have been selected to provide long-lasting durability. Fiber cement clapboard and shingle-style siding in muted natural tones will be accented with painted trim, gable details, and entry porches. The result is a community that conveys the feel of a traditional neighborhood of single-family homes.

Relationship to adjacent streets/Integration into existing development patterns

The Site is located in the West Amesbury section of Amesbury and is primarily residential housing. The neighborhood is bounded by the New Hampshire Border to the north, Route 150 and Lions Mouth Road to the east, Merrimack River to the south, and the Merrimack town line to the west. Travel and commuter routes include Haverhill Road and Route 150 and the Haverhill MBTA station about 10 miles west of the Site and the Newburyport MBTA commuter rail station is about seven miles to the east.

Density

The Applicant proposes to build ninety-five (95) rental units on approximately 9.15 acres of land, of which 8.22 acres are buildable. The resulting density is 11.55 units per buildable acre, which is acceptable given the proposed housing type.

Conceptual Site Plan

The Site is proposed to be organized as a walkable, human-scale neighborhood with tree-lined streets, landscaped buffers, and open spaces integrated throughout the site plan. Units are clustered in small groupings to create smaller communities within the development while offering a central circulation spine providing access to the entire community. Each unit is designed with its own private outdoor space such as a porch, patio, or small yard to foster a sense of ownership and connection to the landscape. Common greens and pocket parks punctuate the layout, providing opportunities for gathering, play, and relaxation. The Applicant intends to respect the surrounding neighborhood context by proposing smaller scaled one- and two-story buildings. The scale of the development creates a soft transition to the adjacent single-family neighborhood. Upon entering the Site, the Applicant proposes sidewalks and landscaping to welcome residents and guests alike. Pedestrian connections are emphasized throughout the development with meandering sidewalks and green spaces.

Environmental Resources

The Site contains 0.93-acres of wetlands located in the southwest corner of the Site. Wetland resources in these areas will be subject to further review by the local Conservation Commission under a Notice of Intent.

Topography

The Site is irregular in shape with the bulk of the Site located behind the residence fronting Kimball Road. The Site has 209 feet of frontage on Kimball Road and about 600-feet of depth with a gradual upward slope. Elevations along Kimball Road are about 142 feet with the house at about 174 feet and the rear of the Site at 180 feet. The topographic features of the Site have been considered in relationship to the proposed development plans and do not constitute an impediment to development of the Site.

(d) that the proposed Project appears financially feasible within the housing market in which it will be situated (based on comparable rentals or sales figures);

According to the appraisal report for the Site, Amesbury's residential market appears stable and strong, with an overall upward trajectory in sales volume and prices in the last decade. MassHousing's Appraisal and Marketing team (A&M) performed a Competitive Market Analysis and found that proposed market rents for each unit type fall within the range of adjusted comparable market rents.

(e) that an initial pro forma has been reviewed, including a land valuation determination consistent with the Department's Guidelines, and the Project appears financially feasible and consistent with the Department's Guidelines for Cost Examination and Limitations on Profits and Distributions (if applicable) on the basis of estimated development costs;

MassHousing has commissioned an as "As-Is" appraisal which indicates a land valuation of \$550,000. Based on a proposed investment of \$37,157,592 in equity and permanent financing, the development pro forma appears to be financially feasible and within the limitations on profits and distributions.

(f) that the Applicant is a public agency, a non-profit organization, or a Limited Dividend Organization, and it meets the general eligibility standards of the housing program; and

MassHousing finds that the Applicant must be organized as a Limited Dividend Organization. MassHousing sees no reason this requirement could not be met given information reviewed to date. The Applicant meets the general eligibility standards of the NEF housing subsidy program and has executed an Acknowledgment of Obligations to restrict their profits in accordance with the applicable limited dividend provisions.

(g) that the Applicant controls the site, based on evidence that the Applicant or a related entity owns the site or holds an option or contract to acquire such interest in the site, or has such other interest in the site as is deemed by the Subsidizing Agency to be sufficient to control the site.

The Applicant controls the Site by virtue of a Purchase and Sale Agreement between Michael Demerjian (Seller) and MP Properties IV, LLC (Purchaser) dated December 2, 2024, with an expiration date of April 16, 2027