

**TOWN OF DENNIS PLANNING BOARD'S  
EXECUTIVE SUMMARY - 1 LOVE LANE**

**ON-SITE EDUCATION MUST BE THE “PRIMARY OR DOMINANT” PURPOSE OF THE FACILITY.** The Dover Amendment approved projects that have withstood judicial review are generally facilities with a highly structured curriculum for the residents and almost always include a vocational component and/or an academic component in addition to the teaching of “life skills”. Resident participation in these programs is required. Residents attend class, often five days a week, undergo regular testing and graduate from the programs. These facilities are also staffed with a number of teachers and counselors sufficient to support the educational purposes of the facility. The 1 Love Lane facility is not consistent with these projects.

**HAC IS ATTEMPTING TO CIRCUMVENT TOWN BYLAWS & THE REVIEW PROCESS BY FALSELY CLAIMING THAT THE 1 LOVE LANE SHELTER IS AN EDUCATIONAL FACILITY.** Courts have been keen to recognize when an educational use was “subordinate” to or mere “window dressing” for residential developments. “The primary or dominant purpose requirement helps ensure that a party invoking the Dover Amendment protection does so without engrafting an educational component onto a project in order to obtain favorable treatment under the statute.”<sup>1</sup>

**THE PRIMARY PURPOSE OF HAC’S SHELTER AT 1 LOVE LANE IS CLEARLY HOUSING AND NOT EDUCATION.** According to HAC’s own submissions:

- Only 79 out of a possible 158-237 residents will receive any “education” on-site;
- Average stay: 9-12 months or up to 3 years;
- Education Staff: 3 educational *case managers* & 1 Housing search coordinator;
- No designated classrooms;
- There is no 9-12 month syllabus outlining when and where education will take place or when work is to be completed;
- No information about how many days per week education will be offered;
- The library is a converted closet;
- Limited information on how computer lab will be utilized and no number of computers;
- HAC included educational materials consisting of two courses: 1) Ending Homelessness, “designed to be self-paced and reflect your needs and wants” with handouts & 2) Money Matters, a two-session workshop;
- At most, all work from materials can be completed in weeks, certainly not months; and
- HAC’s Participation and License Agreement for Residents is completely silent as to any requirement to participate in on-site education.

---

<sup>1</sup> Regis College vs. Town of Weston, 462 Mass. 280, 290 (2012)