

Town of Easton, Massachusetts

Affordable Housing Plan

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I. Introduction

BACKGROUND

The Easton Housing Plan builds upon and updates the Affordable Housing Production Plan that was prepared for the Town of Easton in 2005. This new plan, like its predecessor, promotes ways to address local and regional housing needs by increasing Easton's affordable housing inventory. By providing its regional "fair share" of housing affordable for low- or moderate-income people, Easton will have more flexibility in the future to decide when, where, and how much affordable housing should be built and if necessary, to deny unwanted Chapter 40B comprehensive permits. In addition, this plan documents and reinforces Easton's efforts to implement the previous plan and outlines a policy framework to guide such efforts over the next five years. Toward these ends, this plan is intended to help Easton create more affordable housing on a gradual but steady basis, consistent with the state's housing plan regulations at 760 CMR 56.03(4).

Easton has benefited from decades of local efforts to preserve the town's history and natural resources despite the amount of growth that occurred during the last half of the twentieth century. Though Easton no longer has many large tracts of vacant developable land, it has well-preserved elements of its historic villages and many outstanding structures from the mid- to late-nineteenth century, including a renowned collection of H. H. Richardson buildings. Public agencies and private tax-exempt organizations also own a considerable amount of land in Easton - about 7,400 acres, or 49 percent of the town's total area - and most of this is protected open space. From the look and feel of many parts of Easton, it is hard to imagine how close the town is to two cities and three regional highways. In fact, Easton's neighbors include the City of Brockton and the City of Taunton, and the town is located inside a triangle formed by three freeways: State Route 24, Interstate Route 495, and Interstate Route 95.

Unlike so many of Boston's homogenous suburbs, Easton has several "faces" that create visual interest and provide a glimpse at the variety of people who live in the town: vestiges of historic estates, modest post-war neighborhoods, Stonehill College, and several multi-family developments along Route 138. Its housing stock is dominated by traditional single-family homes, but Easton has many other types of housing, too. Still, most of the housing diversity that exists in Easton today would be very difficult, if not impossible, to replicate under the town's present zoning. Easton adopted zoning in 1973, and over time its development regulations became more limiting. Through large-lot, low-density zoning requirements, Easton hoped to control housing growth. This strategy has helped to curb development, yet it also contributes to the high cost of housing in Easton.

What has Easton done since 2005?

Easton's last housing plan was completed at the height of the housing bubble. With assistance from the Community Preservation Committee (CPC) in 2004, Easton embarked on a year-long planning process to examine its housing needs, identify strategies to increase the supply of low- or moderate-income housing, and take advantage of the potential benefits offered by the Commonwealth's then-new "planned production" regulation. At the time, the town expected to receive two comprehensive permit applications, including a rental development that would have added more than one hundred units to Easton's Chapter 40B Subsidized Housing Inventory. In an effort to promote affordable housing and build Easton's capacity to work with prospective comprehensive permit developers, the Board of Selectmen appointed a new Housing Partnership (now known as the Fair and Affordable Housing Partnership) at the outset of the housing plan process. By the end of 2006 - about one year

after the Department of Housing and Community Development (DCHD) approved Easton's housing plan - the housing bubble had begun to burst and new residential building permits fell dramatically. More than any other factor, the collapse of the housing market thwarted Easton's efforts to implement its new housing plan. Instead of adding 363 new low- or moderate-income units to the Subsidized Housing Inventory between 2005 and 2010, Easton added sixteen.

Despite the obstacles Easton faced, the town continued to work on creating more affordable housing opportunities. In fact, Easton has taken *many* steps to implement the 2005 housing plan. But for the condition of the housing market, there is no question that Easton would have succeeded. Some highlights from the past five years:

- **Chapter 40R.** In 2008, Easton Town Meeting approved a mixed-use overlay district under Chapter 40R, a housing development law with objectives similar to those of Chapter 40B. The Queset Chapter 40R district is designed to facilitate construction of up to 280 new housing units, including apartments, assisted living units, and multi-family condominiums, as well as commercial space.
- **Inclusionary Zoning.** In 2010, Town Meeting amended the Zoning Bylaw by establishing affordable housing requirements for Open Space Residential Developments, Residential Compounds, and Adult Retirement Developments.
- **Ames Shovel Works.** The Ames Shovel Works project, a comprehensive permit development, has been reconceived as a historic preservation endeavor that will save the Ames Shovel Works compound by redeveloping the property for 119 mixed-income apartments. Through close collaboration with the developer, Beacon Communities, Easton has committed financial support to the project by agreeing to acquire a historic preservation easement, establishing a Sewer Enterprise Fund, and approving an Urban Center Housing Tax Increment Financing District (UCH-TIF).
- **Comprehensive Permits.** The Zoning Board of Appeals has issued comprehensive permits for a combined total of approximately 400 housing units.
- **Municipal Affordable Housing Trust.** Easton adopted the provisions of M.G.L. c. 44, § 55C and created an Affordable Housing Trust. The Trust's Board has since commissioned and adopted a Five-Year Action Plan.
- **Habitat for Humanity.** After completing an inventory of all town-owned land, Easton identified a lot suitable for affordable housing and is in the process of conveying the site to Habitat for Humanity.
- **Community Housing Planner.** The Town has hired a part-time Community Housing Planner in the Department of Planning and Community Development.

What is Easton doing today?

As a direct result of the initiatives outlined above, Easton is currently working on new housing programs, some of which focus on needs created by the recession and the fall in housing values:

- A buydown program to assist eligible homebuyers by subsidizing all or a portion of the difference between market sale prices and the price affordable to moderate-income purchasers;
- Grants for home maintenance and repairs;

- Proposals to allow accessory dwellings and housing in mixed-use buildings;
- Outreach, referrals, and resources for renters, first-time homebuyers, homeowners, and households facing foreclosure; and
- Partnerships with housing developers.

NOTES ON SOURCES OF DATA

Data for this plan comes from a variety of sources, including local offices, previous plans, and the U.S. Department of Commerce, Bureau of the Census. Since “the Census” in fact encompasses many different surveys and datasets, we have combined information from the following:

- **The 2000 Decennial Census of Population.** The 2005 Plan drew heavily on the results of the 2000 census, which still represents the last complete count of population (a “100- percent sample”). The decennial census is also the official source for determining a community’s year-round housing stock.
- **Annual Population Estimates.** Each month the Census Bureau releases new population estimates for states, counties, and cities and towns. Since no complete enumeration of the population occurs in non-Census years, these estimates form the basis for translating all relative sample data (for example, the ACS) into estimate counts. For this update, we present the most recent (July 2009) population estimates.
- **The American Community Survey (ACS).** Since 2005 the Census Bureau has developed a new sample of the population similar to the “SF-3” data produced in previous years. Although this data is drawn from a very small sample, a new survey is collected each month, and the results are aggregated to provide a similar, “rolling” dataset on a wide variety of topics. For geographies with 65,000 people or more, such as counties, states, and large metro areas, this data is released every year; for smaller towns (generally anything above 20,000), the ACS can average the surveys from a three year period. In most cases, data labeled as “ACS” in this plan area taken from the most recent three-year tabulation, or 2006-2008 inclusive.
- **HUD Consolidated Planning/ Comprehensive Housing Affordability Strategy (CHAS) Data.** Created through a combined effort of the U.S. Department of Housing and Urban Development (HUD) and the U.S. Census Bureau, this dataset represents a “special tabulation” of the American Community Survey (ACS) data to provide information on HUD-specific income categories and housing data used for Consolidated Planning at the local level. According to the HUD guidance, “these special tabulation data provide counts of the numbers of households that fit certain combinations of HUD-specified criteria such as housing needs, HUD-defined income limits (primarily 30, 50, and 80 percent of median income) and household types of particular interest to planners and policy-makers.” The most recent CHAS Data was released in 2009 (and is referred to as “2009 CHAS” data), although this actually represents a tabulation of the three-year American Community Survey Data from 2005-2007. (Note: in previous years, this data was made available through the “State of the Cities Data System”, known as SOCDs, but after the 2000 census this format was discontinued.)

Geographic Units

To allow for comparison and to understand the town in a regional context, the tables in this report present data for Easton along with data from neighboring towns, Bristol County, and the state as a whole. Other regional geographic units are provided as well, as shown in Map 1.1:

- **Boston-Cambridge-Quincy Metropolitan New England Town Consolidated Area (NECTA):** The largest of the New England Metropolitan Areas, this region includes what is traditionally thought of as “the Greater Boston area,” encompassing over 4.5 million people from Southern Massachusetts into New Hampshire. This metro area, called “Boston-Cambridge-Quincy” or simply “Boston Metro” in this plan, is the largest census metropolitan region that includes Easton.
- **Brockton-Bridgewater-Easton NECTA Division:** The Boston-Cambridge-Quincy can be broken down into smaller divisions, including “Brockton-Bridgewater-Easton” or simply “Brockton Metro,” which includes Easton and eleven other towns.
- **Easton-Raynham HUD Metro Fair Market Rent Area (HMFA):** A subset of the Providence-New Bedford-Fall River Metropolitan Statistical Area (MSA), used to establish the maximum allowable rents under the HUD Section 8 Existing Housing Program and the income limits for most housing assistance programs.

All maps referred to in this plan appear at the end of the report.

II. Housing Needs Assessment

OVERVIEW

Located thirty miles south of Boston, Easton is an attractive suburb with visual qualities and natural features that appeal both to its own residents and those who visit the town. Its villages, historic architecture, open and forested landscapes, and winding back roads define Easton's small-town image and almost make one forget that two of the region's cities lie next door. Easton's physical evolution and economic history were indelibly influenced by the Ames family and their renowned shovel manufacturing company, which in turn drew spin-off industries to town. In the late 1800s, the Ames family gave Easton a notable collection of H.H. Richardson buildings that form the heart of the National Register Landmark District in North Easton. These and other historically significant structures - churches, estates, worker housing, former schools, commercial and industrial buildings, and barns - make Easton a recognizable, distinctive community.

Wetlands, poorly drained soils, and bedrock outcrops characterize much of Easton's gently sloped terrain. While Easton does not have many large water bodies, it is crossed by numerous tributary rivers and streams to the Taunton River. These waterways and their attendant wetlands and floodplains largely dictate the location of the old roads that run through Easton. They also make much of the town's land difficult to develop. Like Easton's fine historic buildings, most of its ponds are man-made creations that served the needs of nineteenth-century industries. Over time, state agencies have worked hand-in-hand with town government to protect the unique natural resources found in Easton, for nearly half the town is located within two Areas of Critical Environmental Concern (ACEC).¹ Furthermore, some 30 percent of Easton's land provides priority habitat for rare plant and animal species.²

Easton has the angular boundaries of so many towns that were carved from colonial precincts. Due to Easton's shape and size (29.2 square miles), its borders touch an unusually large number of communities: the cities of Brockton and Taunton, and the towns of West Bridgewater, Raynham, Norton, Mansfield, Sharon, and Stoughton. Situated at the edge of three counties and three regional planning agencies, and tucked within a triangle formed by three major highways, Easton falls just outside the Greater Boston core statistical area and just inside a slightly larger region that captures the outer limits of Boston metropolitan area (Map 1.1). Not surprisingly, Easton's housing market is affected by conditions both in Boston and Southeastern Massachusetts.

Easton's development pattern consists of old and new forms, with historic villages organized around a frame of colonial roads, postwar neighborhoods with curvilinear streets and small homes, and modern subdivisions with cul-de-sac streets and spacious homes on large lots. While much of Easton's development remains concentrated around the villages, growth that occurred during the last quarter of the twentieth century extended outward, mainly to the west and southwest, consuming an average of 90 acres per year. About 88 percent of all land use change that has taken place in Easton

¹ Massachusetts Department of Conservation and Recreation (DCR), Areas of Critical Environmental Concern (ACEC) Program, www.mass.gov/dcr/stewardship/acec/index.htm.

² Natural Heritage and Endangered Species Program (NHESP), *Massachusetts Natural Heritage Atlas*, 13th ed. (2008).

from 1970 to 2000 involved the conversion of vacant land to residential development.³ In the same period, the town's population increased by 89 percent. Among Bristol County communities, Easton has consistently placed in the top 20 percent for decennial rate of population growth since 1950.⁴

POPULATION CHARACTERISTICS

Easton's Census 2000 population of 22,299 represented a 12.6 percent increase from 1990 to 2000: a growth rate slightly higher than the suburban average for the state as a whole but lower than that of neighboring communities such as Mansfield and Norton. Today, the Bureau of the Census places Easton's 2009 population estimate at 22,987, or an additional 3 percent increase since 2000. Table 2.1 presents basic population data for Easton, neighboring communities, and the Commonwealth. It shows that of the communities around Easton, Raynham has experienced the highest rate of population growth since 2000.

Geography	2000 Census	2009 Estimate	% Change
Massachusetts	6,349,097	6,593,587	3.9%
Boston-Cambridge-Quincy Metro NECTA ("Boston Metro")	4,540,941	4,741,890	4.4%
Bristol County	534,678	547,433	2.4%
Brockton-Bridgewater-Easton NECTA Division ("Brockton Metro")	233,899	242,026	3.5%
EASTON	22,299	22,987	3.1%
Mansfield	22,414	23,850	6.4%
Norton	18,036	19,300	7.0%
Raynham	11,739	13,552	15.4%
Taunton	55,976	55,778	-0.4%
Foxborough	16,246	17,116	5.4%
Sharon	17,408	18,033	3.6%
Stoughton	27,149	27,154	0.0%
Brockton	94,304	93,527	-0.8%
West Bridgewater	6,634	6,687	0.8%

Source: U.S. Census Population Estimates (2009); U.S. Census SF-1 (2000).

³ Commonwealth of Massachusetts, Executive Office of Administration and Finance, Massachusetts Geographic Information System (MassGIS), "Land Use (1951-1999)" and "Land Use (2005)," www.mass.gov/mgis/.

⁴ University of Massachusetts, Donohue Institute, State Data Center, "Population of Massachusetts Cities, Towns & Counties: Census Counts, 1930-2000, and Census Estimates, 2000-2009" (September 2010), <http://www.massbenchmarks.org/statedata/data.htm>.

Population Age and Household Composition

Over 21 percent of Easton's 7,813 households include at least one elderly person (over 65), yet the elderly constitute only 10.8 percent of Easton's total population. Table 2.2 presents the estimated population by age for Easton and the region as of 2008.

Geography	Total	Under 5		Under 18		Over 65		Over 75	
		Total	Percent	Total	Percent	Total	Percent	Total	Percent
Massachusetts	6,469,770	382,036	5.9%	1,437,173	22.2%	862,493	13.3%	444,076	6.9%
Boston Metro	4,649,838	282,422	6.1%	1,050,187	22.6%	579,849	12.5%	288,224	6.2%
Bristol County	545,225	31,985	5.9%	124,386	22.8%	73,907	13.6%	38,929	7.1%
Brockton Metro	244,151	14,742	6.0%	58,607	24.0%	27,061	11.1%	12,726	5.2%
EASTON	22,868	835	3.7%	4,575	20.0%	2,477	10.8%	1,194	5.2%
Mansfield	23,139	1,778	7.7%	7,054	30.5%	1,524	6.6%	629	2.7%
Taunton	56,970	4,020	7.1%	13,632	23.9%	6,836	12.0%	3,261	5.7%
Stoughton	27,824	1,947	7.0%	6,293	22.6%	4,269	15.3%	2,314	8.3%
Brockton	91,956	7,115	7.7%	23,724	25.8%	9,639	10.5%	4,906	5.3%

Source: ACS 2006-2008.
 Note: The total population figures in Tables 2.1 and 2.2 do not match because they are based on different sources. In most cases, however, the estimates are very similar.

New growth, housing turnover, and general demographic trends have caused changes in the age make-up of Easton's population. From 2000 to 2008, the population percent of seniors dropped slightly in Massachusetts, from 13.5 percent to 13.3 percent, but in Easton, elders made up 9.4 percent of the population in 2000 and 10.8 percent in 2008. In absolute terms, Easton has seen a net increase of 392 seniors since 2000 and 851 since 1990, mainly among persons 65-74.

Geography	Population 65+	% of Total Population	Households with Elderly Member(s)	% of Total Households	One-Person Households/ Headed by Elderly	% of Total Households
Massachusetts	862,493	13.3%	596,843	24.3%	254,804	10.4%
Boston Metro	579,849	12.5%	401,264	23.0%	167,221	9.6%
Bristol County	73,907	13.6%	50,692	24.5%	21,158	10.2%
Brockton Metro	27,061	11.1%	18,506	22.2%	7,175	8.6%
EASTON	2,477	10.8%	1,653	21.2%	708	9.1%
Mansfield	1,524	6.6%	1,232	15.1%	631	7.7%
Taunton	6,836	12.0%	4,945	22.7%	1,977	9.1%
Stoughton	4,269	15.3%	2,944	28.3%	1,106	10.6%
Brockton	9,639	10.5%	6,910	21.1%	2,784	8.5%

Source: ACS 2006-2008.

The 2005 Housing Plan noted that Easton has a comparatively young population, attributable in part to the presence of Stonehill College. Although the town gained more children than seniors during the 1990s, the rate of under-18 population was much higher in neighboring communities such as Mansfield. Today, there seems to be more evidence of a trend toward smaller families and a change in the overall demographic profile of the town. Table 2.4 presents the most recent data on families and the presence of children in Easton. While the town has the *highest* percentage of married families with children of any of the locations compared, the final column makes it clear that there are also *fewer* children on average per family in Easton than in surrounding towns or the regional or state average. The current picture of Easton is one with more—but smaller—families than the region, with parents in the middle of the age spectrum.

Geography	Total Families	% Married	% Married w/ own children <18	% Single Parent w/ own children <18	Average Children <18
Massachusetts	1,567,246	74.8%	41.7%	13.8%	0.92
Boston Metro	1,118,551	76.1%	40.9%	12.5%	0.94
Bristol County	140,002	71.7%	41.4%	17.5%	0.89
Brockton Metro	58,754	70.7%	38.1%	17.2%	1.00
EASTON	5,793	81.0%	44.8%	11.7%	0.79
Mansfield	5,867	80.5%	31.6%	13.5%	1.20
Taunton	14,540	70.7%	38.7%	20.1%	0.94
Stoughton	7,191	76.7%	43.7%	13.4%	0.88
Brockton	22,053	55.9%	28.3%	28.5%	1.08

Source: ACS 2006-2008

Compared with the state as a whole, Easton has somewhat older householders. This was true ten years ago, too, but Easton has experienced more rapid growth among householders between 55 and 64 years than the state, Bristol County, or any of the surrounding communities. Moreover, Easton is one of the only communities in the region that witnessed a net increase in householders 65 years and over, and its rate of over-65 household growth has been dramatic: 22 percent. While the town also gained some younger households over the past decade, there has been a significant decrease in householders under 25 years and between 35 and 54 years since Census 2000. Easton's net increase of 867 over-55 households was partially offset by a net loss of -558 households headed by people under 55 years, for a total increase of 309 households between 2000 and 2008. Table 2.5 compares Easton with surrounding communities, Bristol County, and the state for distribution of householders by age.

Geography	Total	Households by Age of Householder					
		Under 25	25 to 34	35 to 44	45 to 54	55 to 64	Over 65
Massachusetts	2,457,167	3.2%	14.8%	20.9%	22.5%	17.3%	21.3%
Boston Metro	1,742,847	3.0%	14.8%	21.9%	23.0%	17.3%	20.0%
Bristol County	207,035	2.7%	15.6%	20.9%	22.2%	17.4%	21.2%
Brockton Metro	83,296	2.4%	15.8%	21.2%	24.6%	17.6%	18.5%
EASTON	7,813	0.9%	13.1%	20.7%	23.0%	23.3%	19.0%

Households by Age of Householder							
Mansfield	8,163	0.7%	11.7%	29.6%	32.8%	12.9%	12.4%
Taunton	21,752	4.1%	19.1%	20.6%	22.5%	14.3%	19.3%
Stoughton	10,393	1.6%	11.0%	19.4%	24.5%	19.5%	24.1%
Brockton	32,773	2.7%	21.4%	19.7%	23.8%	15.6%	16.8%

Source: ACS 2006-2008.

Table 2.6 provides a breakdown of owner- and renter-occupied housing units, which is to say a division of total households into homeowner and renter categories. In all communities, the total number of *households* is the same as the total number of *occupied housing units*. Easton's 84 percent homeownership rate is the highest of all towns in the comparison area and much higher than both the statewide rate of 65 percent and Brockton Metro rate of 71 percent.

Geography	Total Occupied Housing Units	Total Owner Occupied Households	% Owner Occupied	Total Renter Occupied Households	% Renter Occupied	Median Gross Rent
Massachusetts	2,457,167	1,594,928	64.9%	862,239	35.1%	\$987
Boston Metro	1,742,847	1,130,084	64.8%	612,763	35.2%	\$1,115
Bristol County	207,035	132,185	63.9%	74,850	36.2%	\$777
Brockton Metro	83,296	59,311	71.2%	23,985	28.8%	\$1,014
EASTON	7,813	6,604	84.5%	1,209	15.5%	\$1,106
Mansfield	8,163	5,931	72.7%	2,232	27.3%	\$1,101
Taunton	21,752	13,489	62.0%	8,263	38.0%	\$903
Stoughton	10,393	8,076	77.7%	2,317	22.3%	\$1,066
Brockton	32,773	18,908	57.7%	13,865	42.3%	\$979

Source: ACS 2006-2008.

Tables 2.7 and 2.8 present a comprehensive look at household types in owner- and renter-occupied units in Easton and the surrounding area. As one would expect, married-couple families account for a significant majority of all homeowners in the comparison area with the exception of Brockton, where homeownership is more inclusive. By contrast, married couples make up a larger percentage of the homeowners in Easton and Mansfield than in any of the other towns nearby. "Other family" typically refers to single-parent families and "non-family" households include single people and households with two or more unrelated people, such as roommates and unmarried partners.

Geography	Total	Married Family		Other Family		Nonfamily	
		Total	Pct.	Total	Pct.	Total	Pct.
Massachusetts	1,594,928	983,952	61.7%	198,541	12.5%	412,435	25.9%
Boston Metro	1,130,084	712,407	63.0%	136,991	12.1%	280,686	24.8%
Bristol County	132,185	84,030	63.6%	18,101	13.7%	30,054	22.7%

Table 2.7. Owner-Occupied Housing Units by Household Type

	Total	Married Family		Other Family		Nonfamily	
Brockton Metro	59,311	36,202	61.0%	9,828	16.6%	13,281	22.4%
EASTON	6,604	4,433	67.1%	671	10.2%	1,500	22.7%
Mansfield	5,931	4,171	70.3%	615	10.4%	1,145	19.3%
Taunton	13,489	8,354	61.9%	2,133	15.8%	3,002	22.3%
Stoughton	8,076	5,199	64.4%	1,027	12.7%	1,850	22.9%
Brockton	18,908	9,492	50.2%	4,560	24.1%	4,856	25.7%

Source: ACS 2006-2008

Many non-family households are single people living alone, and often they constitute a majority of all renters. In small towns, non-family renters tend to be seniors occupying units in age-restricted housing. Table 2.8 shows that while non-family households make up a plurality of Easton's renter population, the town also has a regionally large percentage of unmarried family renters.

Table 2.8. Renter-Occupied Housing Units by Household Type

	Total	Married Family		Other Family		Nonfamily	
Geography		Total	Pct.	Total	Pct.	Total	Pct.
Massachusetts	862,239	188,428	21.9%	196,325	22.8%	477,486	55.4%
Boston Metro	612,763	138,936	22.7%	130,217	21.3%	343,610	56.1%
Bristol County	74,850	16,298	21.8%	21,573	28.8%	36,979	49.4%
Brockton Metro	23,985	5,335	22.2%	7,389	30.8%	11,261	47.0%
EASTON	1,209	259	21.4%	430	35.6%	520	43.0%
Mansfield	2,232	551	24.7%	530	23.8%	1,151	51.6%
Taunton	8,263	1,928	23.3%	2,125	25.7%	4,210	51.0%
Stoughton	2,317	318	13.7%	647	27.9%	1,352	58.4%
Brockton	13,865	2,841	20.5%	5,160	37.2%	5,864	42.3%

Source: ACS 2006-2008

Race and Ethnicity

About 92 percent of Easton's population is white and of English, Irish, Italian, or German descent. African Americans and Asians comprise most of Easton's minority population. Hispanic or Latino persons make up less than 2 percent of the total. Brockton has the region's largest minority population, with 16,811 African Americans, followed by Stoughton (1,548) and Taunton (1,534). Although Brockton is also home to the largest Asian population, Sharon leads the region for largest population percent of Asian persons (4.9 percent).⁵

⁵ Census 2000, Summary File 1, Tables P5, P6. Note: These figures are from Census 2000. The more recent American Community Survey (ACS) does not provide detailed information about race due to the relatively small numbers involved.

Labor Force, Education, and Employment

About 12,800 Easton residents make up the local labor force.⁶ Most commute alone by car to management, professional, or technical jobs in Brockton, Boston, Stoughton, Canton, or in town. However, a fairly small percentage of residents work locally, 20 percent, compared with 31 percent for the state as a whole. The earnings gap between men and women in Easton slightly exceeds that of the state overall, yet it is lower than the earnings gap found in some nearby towns.⁷ In general, Easton's labor force is well educated and well represented in private business, science and technology, engineering and architecture, law, education, health care and allied professions, and finance. Table 2.9 illustrates the education levels and median incomes of Easton's population. The competitiveness of Easton's labor force is evident in the town's comparatively low unemployment rate. As of September 2010, 8.0 percent of the labor force statewide was unemployed while in Easton, unemployment hovered at a regionally low 7.2 percent.⁸

Table 2.9. Median Income by Educational Attainment

Geography	Population 25+ Years (Total)	Less Than High School Education	High School Graduate	College Graduate	Graduate or Professional Degree
Massachusetts	\$42,028	\$23,423	\$32,395	\$52,784	\$67,014
Boston Metro	\$44,321	\$23,451	\$33,353	\$54,562	\$70,268
Bristol County	\$37,994	\$25,636	\$31,751	\$52,072	\$63,613
Brockton Metro	\$39,129	\$25,211	\$34,880	\$50,693	\$62,628
EASTON	\$51,290	\$24,508	\$37,229	\$61,220	\$71,932
Mansfield	\$51,067	\$12,016	\$41,539	\$70,292	\$76,632
Taunton	\$37,082	\$25,903	\$33,338	\$48,255	\$62,165
Stoughton	\$43,250	\$32,848	\$34,985	\$57,857	\$64,167
Brockton	\$33,814	\$22,750	\$32,043	\$41,344	\$54,491

Source: ACS 2006-2008

According to the Massachusetts Department of Labor and Workforce Development (DLWD), Easton's 785 public and private employers provide jobs to more than 9,300 people. The town's economy is somewhat less service-based than the regional or state economy, for about 80 percent of all local jobs are generated by service establishments. The remaining jobs are with goods-producing establishments, and goods-producing employment is equally distributed between the construction trades and manufacturing. Regionally and statewide, the distribution of goods-producing employment is different, which helps to explain the higher average wages paid for goods-producing work close to Boston and across the Commonwealth. In many industries, the average weekly wages paid by Easton establishments exceed wages paid elsewhere in the Brockton labor market area (LMA)

⁶ The Massachusetts Division of Career Services reports that Easton's labor force currently consists of 13,306 people. For consistency with the rest of this report, Census 2000 data have been used unless otherwise noted.

⁷ U.S. Census Bureau, American Community Survey 3-Year Estimates 2006-2008, Table B24092. Sex By Class Of Worker And Median Earnings In The Past 12 Months (In 2008 Inflation-Adjusted Dollars) For The Full-Time," <www.census.gov>.

⁸ Massachusetts Department of Labor and Workforce Development, "Labor Force and Unemployment Rates," <<http://lmi2.detma.org>>.

but fall below wages throughout the Boston LMA. These conditions contribute to Easton's small share of locally employed people and large percentages of commuters and self-employed workers.

Table 2.10 reports economic statistics for Easton, the two LMAs in which most Easton residents work, and the state as a whole. Today, the jobs-to-labor-force ratio in Easton is only 0.69, measured by Easton's 2009 labor force and 2009 total employment, which includes a loss of 345 jobs since 2007. Under 2007 conditions, however, the jobs-to-labor force ratio was only slightly higher (0.73). Easton's economic statistics are not surprising given the make-up of its commercial and industrial base. Compared with the LMAs and the state, however, Easton's economy is more dependent on some industries than others, and often its largest industries are those that offer lower-paying jobs. Table 2.11 characterizes Easton's economy in a series of *location quotients*, which express the relationship between the percentage of local employment in each major industry and the percentage of employment in the same industries in the labor market areas and the state. A location quotient of >1.10 indicates an industry with a disproportionately large number of jobs in the local economy, and a quotient of <0.90 indicates an industry with a disproportionately small number of local jobs.

Economic Measure	Easton	Brockton-Bridgewater-Easton Metropolitan NECTA Division	Boston-Cambridge-Quincy MA, NH Metropolitan NECTA	Massachusetts (Statewide)
Annual 2009				
Total Establishments	785	6,052	131,635	213,962
Average Monthly Employment	9,324	85,438	2,209,643	3,136,539
Average Weekly Wage	\$785	\$829	\$1,188	\$1,082
Annual 2008				
Total Establishments	784	5,990	131,965	213,882
Average Monthly Employment	8,498	87,960	2,285,004	3,245,755
Average Weekly Wage	\$823	\$836	\$1,201	\$1,092
Annual 2007				
Total Establishments	811	6,190	130,688	211,843
Average Monthly Employment	9,669	88,950	2,271,277	3,236,118
Average Weekly Wage	\$784	\$805	\$1,174	\$1,063
Annual 2006				
Total Establishments	792	6,181	128,909	208,860
Average Monthly Employment	9,428	89,966	2,236,667	3,197,325
Average Weekly Wage	\$765	\$781	\$1,112	\$1,008
Gains-Loss 2006-2009				
Total Establishments	-7	-129	2,726	5,102
Average Monthly Employment	-104	-4,528	-27,024	-60,786
Average Weekly Wage	(\$60)	\$8	\$47	\$47

Source: MA Department of Labor and Workforce Development, ES-202.

Very high or low location quotients do not always signify a problem. Sometimes they reflect unique characteristics of an area, such as the high location quotients for agriculture found in many North-

Central Massachusetts towns, for hospitality and tourism on Cape Cod or the Berkshires, and for shipping and warehousing in Central Massachusetts communities along interstate highways or major commercial rail routes. Similarly, towns with a college or university campus always have high location quotients for educational services, and this can be seen in Easton. From a community development perspective, the issue is whether a local economy offers enough livable-wage employment to give its own residents meaningful choices about where they can find work. A significant difference between the cost of housing and the wages paid by local establishments reduces the choice to work in town and contributes to suburban sprawl. In addition, it often indicates housing needs unmet by existing residential development, particularly in towns with a small percentage of locally employed residents.

	Easton	Location Quotients		
		Labor Market Areas		
		Brockton	Boston	State
	Avg. Weekly Wage			
Total, All Industries	\$785			
Goods-Producing Domain	\$1,122			
Agriculture, Forestry, Fishing & Hunting		0.37	0.01	0.22
Construction	\$1,267	1.55	0.49	0.71
Manufacturing	\$925	1.02	0.19	0.83
Service-Providing Domain	\$705			
Trade, Transportation and Utilities	\$681	1.39	0.55	0.87
Utilities			1.23	0.73
Wholesale Trade	\$1,382	1.42	0.38	0.92
Retail Trade	\$441	1.38	0.46	0.90
Transportation and Warehousing	\$571	1.53	1.23	0.67
Information	\$917	0.39	0.97	1.19
Financial Activities	\$1,034	0.52	2.22	1.10
Finance and Insurance	\$1,093	0.44	2.39	1.20
Real Estate and Rental and Leasing	\$762	0.88	1.52	0.79
Professional and Business Services	\$670	0.68	1.19	1.10
Professional and Technical Services	\$1,019	0.42	1.28	1.36
Management of Companies & Enterprises		0.86	0.63	1.35
Administrative and Waste Services	\$511	1.01	1.27	0.80
Education and Health Services	\$878	0.98	1.32	1.40
Educational Services	\$871	0.45	1.42	2.22
Health Care and Social Assistance	\$895	1.12	1.30	1.27
Leisure and Hospitality	\$296	0.94	1.03	0.92
Arts, Entertainment, and Recreation	\$324	0.57	0.92	1.02
Accommodation and Food Services	\$291	1.01	1.05	0.91
Other Services, Ex. Public Admin	\$427	1.39	0.95	1.17

Source: Massachusetts Department of Labor and Workforce Development, "Employment Shares and Location Quotients by Major Industry Sector."

Household Income

The 2006-2008 ACS places Easton's median household income at \$86,204, second highest of the towns included in the survey and almost \$22,000 more than the statewide median. Across the Commonwealth, 6.6 percent of households have incomes over \$200,000 per year, but in Easton, this figure is over 10 percent. Concentrated wealth is conspicuous in Mansfield, too. (In Sharon, 14 percent of all households earned more than \$200,000 in 2000, but current household income statistics for Sharon were not available when this plan was prepared.)

As suggested by the data in Table 2.12, family incomes generally run much higher than household incomes. Moreover, in suburbs and small towns, families with children under 18 tend to have the highest incomes of all household types. This is not true in most cities, however, and the effects of urban conditions on statewide data are evident in the nearly identical statewide median incomes for all families and families with dependent children.

Geography	% Households w/ Income > \$200	Median Household Income (2008)	Median Family Income (2008)	Median Family Income (2008), Families w/children <18
Massachusetts	6.6%	\$64,684	\$81,056	\$81,865
Boston Metro	8.2%	\$71,196	\$88,578	\$91,305
Bristol County	3.0%	\$55,845	\$70,257	\$70,396
Brockton Metro	3.1%	\$65,601	\$76,875	\$73,915
EASTON	10.3%	\$86,204	\$105,235	\$111,521
Mansfield	10.6%	\$95,916	\$113,162	\$117,182
Taunton	1.2%	\$57,096	\$71,115	\$66,483
Stoughton	3.9%	\$66,084	\$81,154	\$89,312
Brockton	1.4%	\$51,835	\$59,440	\$50,841

Source: ACS 2006-2008

Married-couple families usually have higher incomes than families in general, without or without children under 18. As shown in Table 2.13, married-couple families with children under 18 are Easton's wealthiest households, which is consistent with state and national norms for suburban communities. In contrast, single parents without young children usually have higher incomes than single parents with children, and the poorest single parents are generally single women with children under 18. The income statistics for single parents in Easton seems contrary to this general rule. However, for all household categories in the sample, the number of families is quite small, so the errors can be quite large (as high as \$50,000 or more in some cases).

Geography	Without Dependent Children			With Dependent Children		
	Married Couple	Single Male	Single Female	Married Couple	Single Male	Single Female
Massachusetts	\$88,132	\$65,776	\$54,785	\$103,794	\$46,424	\$28,065
Boston Metro	\$95,827	\$68,328	\$58,528	\$111,131	\$50,433	\$31,378
Bristol County	\$75,039	\$66,097	\$48,790	\$95,418	\$45,128	\$24,025
Brockton Metro	\$87,043	\$66,307	\$54,036	\$92,688	\$47,936	\$36,512

Table 2.13. Median Family Income by Family Type

	Without Dependent Children			With Dependent Children		
EASTON	\$105,488	\$61,250	\$46,117	\$129,791	\$39,494	\$60,684
Mansfield	\$109,668	\$91,389	\$66,750	\$130,155	\$47,123	\$45,588
Taunton	\$78,145	\$81,058	\$57,002	\$86,337	\$52,584	\$23,013
Stoughton	\$82,130	\$56,912	\$52,266	\$114,468	\$41,786	\$40,546
Brockton	\$77,547	\$64,888	\$49,109	\$75,705	\$41,648	\$30,205

Source: ACS 2006-2008

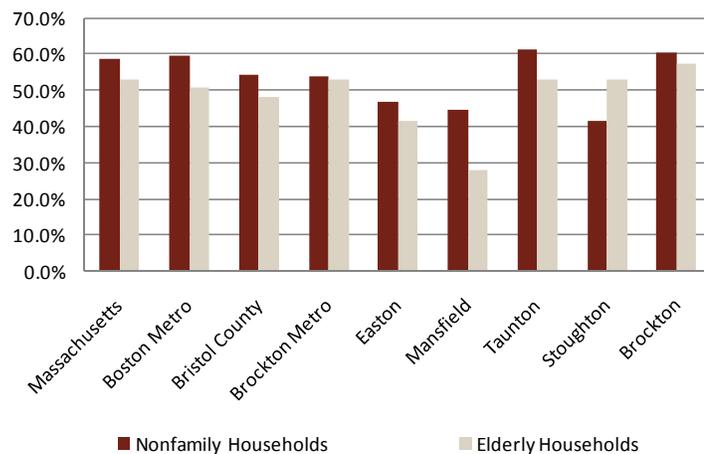
By contrast, non-family households typically have much lower incomes than families, in part because so many non-family households are senior citizens living alone. There are significant differences between the economic position of Easton's families and non-family households and between young adult and senior households, but this is true region-wide. For the state as a whole, the median non-family household income is 59 percent of median household income (all households); in Easton, it is only 47 percent. However, the non-family income difference is more pronounced in some of Easton's neighboring towns, notably Stoughton, where the median income of non-family households is only 41 percent of the median for all households, or Mansfield, 44 percent. To some extent, these differences run parallel to the substantially lower incomes of elderly households. In Mansfield, for example, the median household income for seniors over 65 years of age is 27.8 percent of the median for all households; in Easton this figure is much closer. Table 2.14 compares Easton with the region and the state for non-family household income and the household incomes of young citizens and elderly households.⁹

Median Household Income Comparisons

Nonfamilies and the Elderly:

Percentage of Median Income for All Households

Source: ACS 2006-2008



⁹ Note: This table also includes an anomalous figure of \$8,245 for the median income in Easton for householders <25 years, but again, this may be simply a "small numbers/big errors" problem. It is unlikely that there are many such households in Easton unless the town has a large population of student households - as opposed to students in dormitories, who are not counted as households.

Table 2.14: Median Household Income of Selected Household Types

Geography	All Households	All Nonfamily Households	Households by Age of Householder			
			Householder <25 yrs.	Householder 25-44 yrs.	Householder 45-64 yrs.	Householder >65 yrs.
Massachusetts	\$64,684	\$38,078	\$32,668	\$72,509	\$80,174	\$34,151
Boston Metro	\$71,196	\$42,410	\$36,247	\$79,289	\$86,547	\$36,293
Bristol County	\$55,845	\$30,330	\$32,043	\$64,115	\$71,187	\$26,789
Brockton Metro	\$65,601	\$35,293	\$38,569	\$71,718	\$77,018	\$34,690
EASTON	\$86,204	\$40,398	\$8,245	\$95,945	\$113,828	\$35,750
Mansfield	\$95,916	\$42,833	\$90,444	\$101,192	\$108,367	\$26,667
Taunton	\$57,096	\$35,015	\$39,573	\$62,354	\$76,441	\$30,298
Stoughton	\$66,084	\$27,444	\$26,899	\$84,659	\$79,906	\$34,970
Brockton	\$51,835	\$31,338	\$34,938	\$55,641	\$64,321	\$29,785

Source: ACS 2006-2008

Nearly 43 percent of Bristol County's 208,910 households have *low or moderate incomes*. This refers to the income terms used in a majority of housing assistance programs: incomes equal to or less than 80 percent of the area median income (AMI) of all households throughout the urban or non-urban region in which the household or family resides. In Easton, 38.5 percent of all households have incomes in the low or moderate range – up from only 23.2 percent in 2000 – and a majority live in neighborhoods adjacent to Route 138. Table 2.15 summarizes the number and percentage of low- and moderate-income households in Easton and surrounding communities, using Comprehensive Housing Affordability Strategy (CHAS) data for 2009.

Table 2.15: Low and Moderate Income (LMI) Households

Geography	Total Households	30% AMI or less	30.1-50% AMI	50.1-80% AMI	Total LMI	% LMI
Massachusetts	2,439,001	375,394	272,029	407,596	1,055,019	43.3%
Bristol County	208,910	30,210	25,330	34,130	89,670	42.9%
EASTON	7,835	895	710	1,410	3,015	38.5%
Mansfield	8,160	555	530	1,220	2,305	28.3%
Taunton	22,190	3,505	3,405	4,065	10,975	49.5%
Stoughton	10,535	1,785	1,370	2,090	5,245	49.8%
Brockton	33,325	5,935	4,745	6,970	17,650	53.0%

Source: U.S. Department of Housing and Urban Development, 2009 CHAS.

Especially relevant for the purposes of affordable housing production is the discussion of the types and sizes of owner and renter households that HUD classifies as “cost burdened,” as described later in this section.

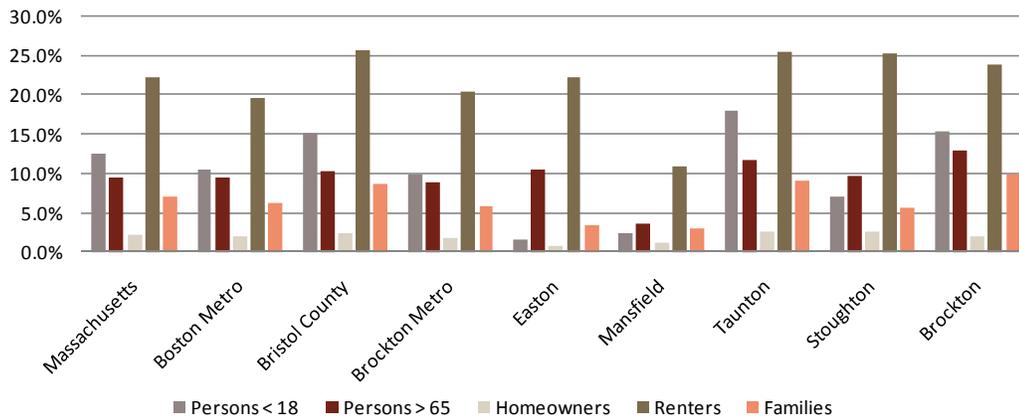
Income and Poverty

Living in poverty is not the same as being a low-income household or family, though people sometimes use these terms interchangeably. The incomes that define very-low, low and moderate

income are based on ratios of median family income for a given area. As a result, they serve as a barometer of household wealth on a regional scale, accounting for differences in wages, the cost of living and indirectly, the cost of housing, in different parts of a state and different sections of the country. Each year, HUD publishes updated low- and moderate-income limits, adjusted for household size, for economic areas defined by the federal Office of Management and Budget (OMB). The income limits are used primarily to determine eligibility for various housing assistance programs. This is important, for “low and moderate income” reflects assumptions about a threshold below which households have too little income to afford the cost of housing where they live.

Incidence of Poverty

Source: ACS 2006-2008.



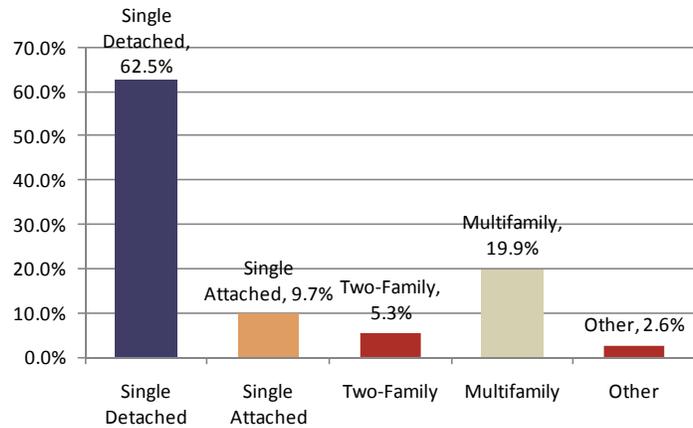
In common-sense terms, poverty means having an extremely low household income, but it is not measured the same way. Poverty thresholds are determined annually by the Census Bureau, not by HUD. In addition, the thresholds are national, not tied to economic regions, and they differ not only by household size but also by household composition. For example, when HUD establishes an income limit for a household of three, the same income limit applies to all three-person households: a married couple with a dependent child, a single parent with two dependent children, an older couple with an adult child living at home, or three unrelated individuals in a household. When the Census Bureau publishes poverty thresholds, however, the threshold for a three-person household with no dependent children differs from the threshold for a household with dependent children. The formula for setting poverty thresholds is based on assumptions about the cost of basic food as a percentage of household income, and the purposes served by federal poverty thresholds are quite different from the purposes served by income limits for subsidized housing. Suffice it to say that households and families living at or below the federal poverty threshold are *very* poor, and their needs extend far beyond housing.

Nationally and in Massachusetts, children under 18 comprise a disproportionately large percentage of the population in poverty, and single-parent families with dependent children are far more likely to be in poverty than married couples, with or without children. Compared to the region as a whole or to any individual community within it, Easton has one of the smallest percentages of families in poverty (3.3 percent) and an *extremely* small percentage of children in poverty (1.5 percent). At the same time, a larger percentage of Easton’s elderly population is in poverty (10.4 percent). Perhaps most telling is that while only 0.8 percent of Easton’s homeowners are in poverty, a striking 22.8 percent of the town’s renters are below the federal poverty threshold.

HOUSING CHARACTERISTICS

Age and Physical Characteristics of Housing Units

About 53 percent of all housing units in Bristol County are detached single-family homes, but the county's statistical profile is heavily influenced by five cities and several small urban centers. While single-family homes are the most common type of housing in Easton (and other nearby suburbs), the exceptions create visual distinction and offer choices to those who cannot afford or do not want a single-family residence. Two-family and multi-family homes, including apartments in mixed-use buildings, account for about 25 percent of all units in Easton. The town also has a large inventory of attached single-family homes and older properties with two or more houses. Table 2.16 compares Easton's housing inventory with that of the region.



Easton's Housing Inventory by Unit Type

Source: ACS 2006-2008

Table 2.16. Structural Characteristics of Housing Units (Units)

Geography	Total Units	Single Detached	Single Attached	Two-Family	Multifamily	Other
Massachusetts	2,724,787	52.8%	4.7%	10.9%	30.8%	0.9%
Boston Metro	1,866,149	48.9%	5.5%	11.4%	33.2%	1.0%
Bristol County	224,554	52.7%	3.5%	9.6%	32.7%	1.5%
Brockton Metro	88,480	60.1%	3.6%	8.4%	26.1%	1.8%
EASTON	8,271	62.5%	9.7%	5.3%	19.9%	2.6%
Mansfield	8,394	67.8%	3.7%	2.9%	25.6%	0.0%
Taunton	23,493	44.9%	4.8%	13.5%	33.0%	3.7%
Stoughton	10,581	61.8%	7.6%	6.4%	23.8%	0.5%
Brockton	35,487	47.8%	1.3%	11.3%	39.6%	0.0%

Source: ACS 2006-2008

The diversity that exists in Easton's single-family home inventory is an important part of the town's character. New and older twentieth century homes differ in size, amenities, value, and lot area. In Easton, single-family homes, townhouses, and units in older, two-to-four-family buildings supply most of renter-occupied housing inventory, i.e., relatively low-density development. Overall, almost

80 percent of all rental units in Easton are in structures with fewer than 10 units, and less than 10 percent are in structures of 20 or more units.¹⁰

Age of Housing Stock

Housing units in Easton are generally newer than homes in most of the surrounding communities, in Bristol County, or throughout the Commonwealth. In 1990, the median year of construction for homes in Easton was 1971 but by 2000, the median year built had advanced to 1974. Based on the latest data, the median is now closer to 1976. This is a significant change in a short time, and it reflects Easton's ongoing housing growth since 1990. Of the cities and towns reported in Table 2.17, only Mansfield has a larger share of relatively new housing. The age of housing in Easton and Mansfield help to explain another difference between these communities and others nearby: the size of the homes, especially among owner-occupied dwellings. This implicitly speaks to the higher market value of land in Easton and Mansfield and the size of the houses that developers build in order to justify their land acquisition costs.

Table 2.17: Median Age of Housing Units and Median Number of Rooms by Occupancy

Geography	Median Year Built	Median Rooms: All Structures	Median Rooms: Owner Occupied	Median Rooms: Renter Occupied
Massachusetts	1957	5.6	6.4	4.0
Boston Metro	1957	5.7	6.6	4.0
Bristol County	1958	5.5	6.3	4.3
Brockton Metro	1962	5.8	6.4	4.0
EASTON	1976	6.6	7.0	3.8
Mansfield	1981	6.5	7.3	3.9
Taunton	1963	5.3	6.1	4.1
Stoughton	1964	5.8	6.4	3.9
Brockton	1952	5.3	6.1	4.2

Source: ACS 2006-2008

HOUSING MARKET

Many of Easton's new homebuyers have been people from Boston seeking a home in a good neighborhood that is relatively affordable and convenient to the city. Homebuyers priced out of towns somewhat closer to Boston often look in Easton because its homes have similar characteristics but they are slightly more affordable. Furthermore, Easton is attractive to many people in the market for a single-family home because the town has a desirable reputation. It is recognized for its historic architecture, conservation land, rural ambience, and good schools. Easton's proximity to Boston and easy access to the regional highway system from Routes 106 and 138 also make it attractive to people who commute into Boston for work. Together, these factors are likely to accelerate interest in Easton when the South Coast Rail Plan materializes.

¹⁰ ACS 3-Year Estimates 2006-2008, Table B25032.

Housing Preferences

Most households in Easton are homeowners. Of the 7,813 occupied housing units in town, 85 percent are owner-occupied, and 77 percent of all homeowners live in detached single-family homes. In most suburbs, the owners of single-family homes tend to be married couples and it no surprise to find that in Easton, they account for 90 percent. About 10 percent of all owner-occupied units are townhouses, and 15 percent are two-family and multi-family buildings.¹¹ During the past decade, the number of renter households in Easton declined by 3 percent, a statistic that suggests no new rental housing was built and units previously used for rental housing were converted to homeownership units.

Easton residents seem to prefer large, single-family homes and the housing market has catered to these preferences. In 2000, the average household size of owner-occupied homes was 2.90 persons per unit and the average size of families in Easton was 3.21.¹² Today, these figures have dropped to 2.66 persons per owner-occupied unit and an average family size of 2.98.¹³ Despite shrinking household and family sizes, a large percentage of households have chosen to live in four-bedroom homes. Today, 38 percent of the owner-occupied units have eight or more rooms and 33 percent of the units have four or more bedrooms.¹⁴ By contrast, most renters in Easton occupy smaller units. It is unclear whether renters want smaller units or simply accept whatever they can find in the market. In 2009, 81 percent of renters lived in one and two-bedroom units, which is similar to 2000. Although very few renter households lived in studio units in 2000, 113 renter households reportedly occupied studio units as of 2009. In total, about 15 percent of the town's occupied housing units are leased to tenants. As in most communities, the average size of Easton's renter households is smaller than owner-occupant households – 2.15 compared to 2.87 persons – but the typical renter in Easton has a slightly larger household than renters across the state (2.13 persons) or within Bristol County (2.10 persons). The difference appears to be influenced by two factors: Easton's small base of elderly rental housing, and the type and density of housing units occupied by most renters.

Another component of the Easton market is housing restricted to over-55 households: generally one-story, somewhat smaller homes than new residences built for families. While the over-55 homes built today do not meet affordability needs, they provide housing that meets the physical needs (and in some cases, the social service needs) of senior citizens. Over-55 units in Easton's market area have sold in the mid \$300K to high \$400K range. At Queset on the Pond, an "active adult" apartment development in South Easton, monthly rents range from \$1,450 to \$2,100.¹⁵

Housing Sale Prices

Like the region and much of the nation, housing prices in Easton have declined significantly after climbing for several years in a row. Table 2.18 shows that between 2000 and 2005, the median single-family home price in Easton rose more than 50 percent. By contrast, the median sale price declined by almost 20 percent between 2005 and 2009.¹⁶

¹¹ ACS 3-Year Estimates 2006-2008, Table S2504.

¹² Census 2000, Summary File 1, Tables P33 and H12; 1990 Census, Summary File 1, Tables P017A, H018A.

¹³ ACS 3-Year Estimates 2006-2008, Tables B25010 and S1101.

¹⁴ ACS 3-Year Estimates 2006-2008, Table S2504.

¹⁵ Queset on the Pond, www.queset.com/onthepond/index.html.

¹⁶ The Warren Group, "Town Stats," October 2010.

Community	Median Sale Price			% Change	
	2000	2005	2009	2000-2005	2005-2009
Sharon	\$320,000	\$455,000	\$370,000	42.2%	-18.7%
EASTON	\$275,000	\$415,125	\$336,000	51.0%	-19.1%
Foxborough	\$257,500	\$399,900	\$350,000	55.3%	-12.5%
Mansfield	\$275,000	\$427,450	\$345,000	55.4%	-19.3%
Stoughton	\$215,000	\$353,750	\$260,000	64.5%	-26.5%
Raynham	\$219,500	\$359,900	\$317,250	64.0%	-11.9%
Norton	\$207,000	\$346,500	\$272,500	67.4%	-21.4%
West Bridgewater	\$200,500	\$350,000	\$255,000	74.6%	-27.1%
Taunton	\$172,400	\$305,450	\$225,000	77.2%	-26.3%
Brockton	\$142,900	\$275,000	\$165,000	92.4%	-40.0%

Source: The Warren Group, October 2010.

For the cities and towns in Easton's region, sale prices did not accelerate and fall to the same degree. All of the communities experienced sale price increases of 50 percent or more, with the exception of Sharon, where home prices were already at the top of the regional market. Brockton led the region for sale price growth with a near doubling of single-family home prices between 2000 and 2005. In Taunton, sale prices rose by 77 percent. Since 2005, both cities have experienced a dramatic fall in sale prices, especially Brockton, where the median price has dropped 40 percent. A similar pattern exists throughout the Commonwealth: as housing sale prices accelerated during the first half of the decade, the traditionally affordable communities witnessed a disproportionately high rate of sale price growth, and when prices fell, the same communities suffered disproportionate losses. In many cases, they also absorbed the highest rates of foreclosure activity once the housing market toppled in 2007.

Table 2.19 shows that condominium values in the region also rose dramatically after 2000, indicating a high demand for more affordably priced housing. Condominiums in Raynham sold for almost three times the amount in 2005 than in 2000, and for the most part, they have retained their value, declining only 20 percent as of 2009. Condominiums in many communities did not experience the same decline in values as those of single-family homes. Sharon and Brockton are exceptions, for condominium values declined markedly in both communities between 2005 and 2009.¹⁷

Community	Median Sale Price			% Change	
	2000	2005	2009	2000-2005	2005-2009
Sharon	\$244,500	\$389,900	\$200,000	59.5%	-48.7%
EASTON	\$135,900	\$244,000	\$206,750	79.5%	-15.3%
Foxborough	\$125,000	\$185,000	\$195,000	48.0%	5.4%
Mansfield	\$97,500	\$212,000	\$200,000	117.4%	-5.7%

¹⁷ Ibid. Note: the drop in Sharon's median condominium sale price is partially attributable to the sale of affordable units created under a comprehensive permit.

	Median Sale Price			% Change	
Stoughton	\$138,000	\$250,500	\$204,000	81.5%	-18.6%
Raynham	\$88,950	\$262,500	\$207,000	195.1%	-21.1%
Norton	\$152,900	\$293,450	\$222,900	91.9%	-24.0%
West Bridgewater	n/a	\$307,675	\$266,725	n/a	-13.3%
Taunton	\$112,750	\$235,000	\$159,900	108.4%	-32.0%
Brockton	\$76,000	\$196,500	\$75,750	158.6%	-61.5%

Source: The Warren Group, October 2010.

Foreclosures

In the past year, the foreclosure crisis in Massachusetts has migrated from inner cities to suburbs and small towns. While defaults on sub-prime mortgages precipitated the rise in foreclosures and the state's cities felt the greatest impacts, the Massachusetts Housing Partnership (MHP) reports that foreclosures have increased in non-urban areas primarily because of prolonged unemployment and a stagnant economy.¹⁸ Table 2.20 shows the number of foreclosure deeds in Easton's region in the last five years. Lenders have initiated foreclosure proceedings on far more properties; Table 2.20 lists only those properties for which the lender has actually foreclosed and assumed the deed.

Community	2007		2008		2009		Total
	Single Family	Condo	Single Family	Condo	Single Family	Condo	All Units
Sharon	20	1	16	0	9	0	46
EASTON	14	6	15	17	8	9	69
Foxborough	6	0	16	3	3	5	33
Mansfield	12	3	11	10	11	1	48
Stoughton	25	5	36	7	28	10	111
Raynham	13	0	10	1	15	5	44
Norton	14	6	23	9	22	4	78
W. Bridgewater	4	0	6	1	7	0	18
Taunton	39	17	79	16	64	23	238
Brockton	192	17	299	28	195	19	750

Source: The Warren Group, November 2010.

Market Rents

Easton's 1,209 renters tend to be one- or two-person households, which makes sense because most renter-occupied housing units are small, one- or two-bedroom units. It is difficult to find apartments

¹⁸ Tim Davis, "Percentage of distressed homes shifts to 'burbs," *Foreclosure Monitor* (November 9, 2010).

suitable for families with children in Easton and nearby towns. Although new rental developments have been built in several towns around Easton since 2000, in most cases the apartments are size-restricted and most were built under comprehensive permits. In Easton, however, most units occupied by renters are actually condominiums or townhouses: units developed for homebuyers and intended for owner occupancy. More than 70 percent of the renter-occupied units in Easton today are in buildings with less than ten units per structure.¹⁹

Table 2.21. Survey of Suburban Market Rents in Easton's Region

Community	Development	Low	High	Number of Bedrooms		
				One	Two	Three+
Bridgewater	Waterford Village	\$702	\$1,347	X	X	X
Canton	Windsor Woods	\$1,140	\$2,190	X	X	
Canton	Waterfall Hills	\$1,395	\$1,725	X	X	
EASTON	262 Washington St.	\$1,100	N/A	X		
EASTON	12 Park Street	\$895	N/A	X		
EASTON	Quset on the Pond	\$1,450	\$2,100	X	X	
Foxborough	Lodge at Foxborough	\$1,020	\$2,470	X	X	
Mansfield	Cedar Heights	\$1,320	\$1,620	X	X	
Mansfield	Twin Oaks Village	\$695	\$1,099	X	X	
Mansfield	Village at Mansfield Depot	\$1,200	\$1,500	X	X	X
Mansfield	West Village	\$1,515	\$2,374	X	X	X
Randolph	Woodview	\$900	\$1,450	X	X	
Randolph	Avalon Blue Hills	\$1,225	\$1,415	X	X	
Stoughton	Alta at Indian Woods	\$1,550	\$1,905	X	X	

Source: Community Opportunities Group, Inc. (November 2010).

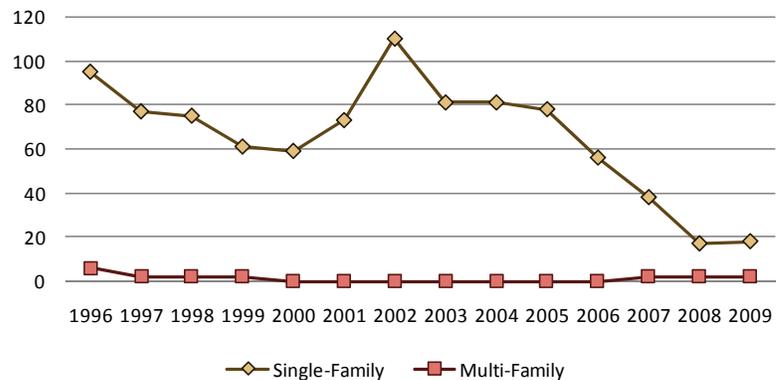
Housing Production

There has been very little new housing construction in Easton since 2005. The national foreclosure crisis has permeated the banking industry and all but frozen new housing development, leaving homebuyers with few options for obtaining a mortgage and developers and homebuilders unable to finance new projects. For the first time since 1995 - after the market recovered from the recession of the early 1990s -

New Housing Units in Easton

1996-2009

Source: U.S. Bureau of the Census



¹⁹ ACS 3-Year Estimates 2006-2008, Table S2504.

housing production in Easton exceeded ninety units per year when the Building Inspector issued building permits for 110 new units in 2002. However, residential building permits have steadily declined since then. Consistent with the Town's zoning, single-family homes have consistently dominated new housing development in Easton for many years. Over the past few decades, Easton has not witnessed major housing growth. From 1990 to 2000, the housing inventory increased by a total of 923 new units, and according to the Bureau of the Census, 617 new units were built in Easton from 2000 to 2009.²⁰

HOUSING AFFORDABILITY

Most communities have some modestly priced housing: small, older single-family homes that are less valuable than new homes, multi-family condominiums, or apartments that can be leased for relatively low monthly rents. This type of affordable housing often stays affordable as long as the market will allow. Under a Massachusetts law that went into effect in 1969, however, all communities are supposed to have housing that is affordable to low-income households and remains affordable to them even when home values appreciate under robust market conditions. These units remain affordable because their resale prices and rents are governed by a deed restriction that lasts for many years, if not in perpetuity. Both types of affordable housing meet a variety of housing needs and both are important. The crucial difference is that the market determines the price of unrestricted affordable units while a recorded legal instrument determines the price of deed restricted units. There are other differences, too. For example, any household - regardless of income - may purchase or rent an unrestricted affordable unit, but only a low- or moderate-income household is eligible to purchase or rent a deed restricted unit. (See also, "Affordability Mismatch" later in this section.)

When less than 10 percent of a community's housing consists of deed restricted affordable units, M.G.L. c. 40B, Sections 20-23 ("Chapter 40B") authorizes the Zoning Board of Appeals to grant a *comprehensive permit* to qualified affordable housing developers. The 10 percent minimum is based on the total number of year-round housing units reported in the most recent decennial census; for Easton, this currently means that 760 units out of a total of 7,596 must be affordable (Census 2000). A comprehensive permit is a type of *unified permit*: a single permit that replaces the approvals otherwise required from separate city or town permitting authorities. Chapter 40B supersedes zoning and other local regulations that make it too expensive to build low- and moderate-income housing. By consolidating the approval powers of multiple town boards, the state legislature hoped to provide more low-income housing options in suburbs and small towns. Under Chapter 40B, the Zoning Board of Appeals may approve, conditionally approve, or deny a comprehensive permit, but in communities that do not meet the 10 percent minimum, developers may appeal to the state Housing Appeals Committee (HAC). Although comprehensive permits may still be granted after a town achieves the 10 percent minimum, the HAC no longer has authority to overturn a local board's decision. Despite many years of controversy about Chapter 40B, Massachusetts voters recently defeated a ballot question to repeal the law.

The Massachusetts Department of Housing and Community Development (DHCD) maintains a list of the deed restricted affordable units in each city and town. Known as the Chapter 40B Subsidized Housing Inventory,²¹ the list determines whether a community meets the 10 percent minimum. It also

²⁰ U.S. Bureau of the Census, Building Permits by County or Place (Database), October 2010.

²¹ "Subsidized" does not always mean the project receives direct financial assistance, such as a low-interest loan or grants from public agencies. A mixed-income development may be "privately" subsidized by a density bonus

is used to track expiring use restrictions, i.e., when non-perpetual affordable housing deed restrictions will lapse. Table 2.22 (next page) reports Easton's Subsidized Housing Inventory as of September 2010.

When the 2005 Housing Plan was written, Easton hoped to make rapid progress toward increasing its supply of Chapter 40B units. At the time, local officials expected to receive two comprehensive permit applications with a combined total of 192 low- and moderate-income units that would have increased Easton's Chapter 40B Subsidized Housing Inventory from 3.1 percent to 5.6 percent. The Housing Plan called for 363 new low- and moderate-income units over a five-year period. This included the 192 units Easton anticipated in 2005 and 2006 and 57 units per year from 2007 to 2009.²² Despite the town's efforts, however, only sixteen low- or moderate-income units have been added to Easton's Subsidized Housing Inventory since 2005. More recently, the town expected that two projects, Queset Commons and the Ames Shovel Works, would provide a combined total of 280 affordable units, but the recession has stalled both developments.²³

- **Queset Commons.** In 2007, Town Meeting voted to create a special overlay district for Queset Commons under Chapter 40R, a housing production law enacted by the legislature as a voluntary alternative to Chapter 40B. Local developer Douglas A. King proposed a mixed-use project at the intersection of Route 123 and Route 138, adjacent to an over-55 rental development that he had constructed only a few years earlier, Queset on the Pond. The new mixed-use project would include sixty multi-family condominiums, eighty assisted living units, 140 apartments, and 101,000 sq. ft. of retail/commercial space. Due to the number of deed restricted affordable units that King proposed for the three residential components of Queset Commons, the project would add 161 units to Easton's Subsidized Housing Inventory, including fifty-six units affordable to low- or moderate-income households.²⁴
- **Ames Shovel Works.** In 2010, Town Meeting authorized \$7.5 million in Community Preservation Act (CPA) funds to support the Ames Shovel Works project. If this project moves forward, the town plans to give three million dollars to the developer, Beacon Communities, as a grant and \$4.5 million as a construction loan. In total, the development would provide 119 apartments, with 20 percent of the units affordable to low-income renters.²⁵ Easton also plans to contribute other funds to the project through tax incentives.

because the additional income from market-rate sales or rents helps to offset the cost of the affordable units. Regardless of whether the subsidy is public or private, affordable units eligible for the Subsidized Housing Inventory must be protected by a long-term deed restriction and be offered for sale or rent through a fair and open process that complies with the federal Fair Housing Act of 1968, as amended.

²² Note: In 2005, the state's housing plan regulations would have required Easton to produce a minimum of 57 new units per year if the town wanted to qualify for housing plan certification.

²³ Colleen Corona (Board of Selectmen, Town of Easton, MA), meeting with Community Opportunities Group, Inc., October 5, 2010.

²⁴ The affordable units include thirty-five apartments, twelve assisted living units, and nine multi-family condominiums.

²⁵ BC Shovel Works LLC (Beacon Communities), Application to the Easton Board of Appeals for Amended Comprehensive Permit: Ames Shovel Works Apartments, Exhibit 1 (May 19, 2010).

Table 2.22. Easton Subsidized Housing Inventory

Name	Address	Type	SHI units	Affordability Expires
(Unnamed)	Elise Circle	Rental	64	Perpetuity
(Unnamed)	Parker Terrace	Rental	80	Perpetuity
Parker Terrace & Elise Circle	Baldwin	Rental	40	Perpetuity
Chandler Way	Foundry St.	Rental	7	Perpetuity
(Unnamed)	Poquanticut Ave./ Barrows St./ Day St.	Rental	3	Perpetuity
Easton Country Estates	Route 106	Ownership	17	2034
Easton Community Residence	Rollins Rd.	Rental	4	2025
Toward Independent Living & Learning	William St.	Rental	7	2020
DMR Group Homes	Confidential	Rental	26	N/A
Winterberry Hills ²⁶	Union St.	Ownership	0	Perpetuity
		Total Units	248	3.3%

Source: DHCD, September 14, 2010.
⁽¹⁾ Winterberry Hills is an approved 44-unit comprehensive permit development in North Easton. However, no affordable units have been added to the Subsidized Housing Inventory.

Easton has a local housing authority that manages approximately 200 units of elderly and family housing. The vast majority of these units (187) are located in two developments, Elise Circle and Parker Terrace, both targeted to the elderly and people with disabilities. The Easton Housing Authority (EHA) gives preference to applicants who already live or work in Easton, but the demand for affordable units is very high. Currently, an elderly Easton resident would need to wait four to six months for a unit and an Easton family would wait two to five years. Non-residents would wait far longer. The EHA also gives preference to people facing an emergency, such as a house fire or urgent medical need. In addition to the units it owns and manages, the EHA administers 101 Section 8 mobile vouchers. The wait list for vouchers has been closed since 2005 and it is purged every two years.²⁶ Anecdotally, the EHA has observed an increased need for housing among persons receiving Transitional Aid to Families with Dependent Children (TAFDC) and disability payments. Elderly households living on fixed Social Security payments are also struggling to pay for housing and other living expenses and they, too, are seeking assistance.²⁷

Measuring Affordability

The intent of Chapter 40B is to provide a fair-share distribution of low-income housing throughout the state. However, the number of Chapter 40B units in a city or town does not measure local housing needs or the degree to which a community is affordable to its residents. To a housing policy analyst, a home is unaffordable to low- and moderate-income people if their monthly payments for housing – a mortgage payment, property taxes, and house insurance for homeowners, or rent and utilities for tenants – exceeds 30 percent of their monthly gross income. By definition, they are *housing-cost burdened*. According to federal census data, almost 43,000 homeowners in Bristol County and nearly

²⁶ Dawn Doyle (Administrative Assistant, Easton Housing Authority, Easton, MA), interview by Community Opportunities Group, Inc., November 17, 2010.

²⁷ Ibid.

2,000 in Easton spend more than 30 percent of their income on housing. However, the condition is more pronounced among renters: high housing costs in relation to income affect over 32,000 renters in Bristol County and 710 in Easton. Tables 2.23 and 2.24 reports the number of cost-burdened renters and homeowners in Easton and the surrounding communities, by householder age and household type.

Housing Cost Burdens in Easton (2009)

Source: HUD, CHAS 2009.

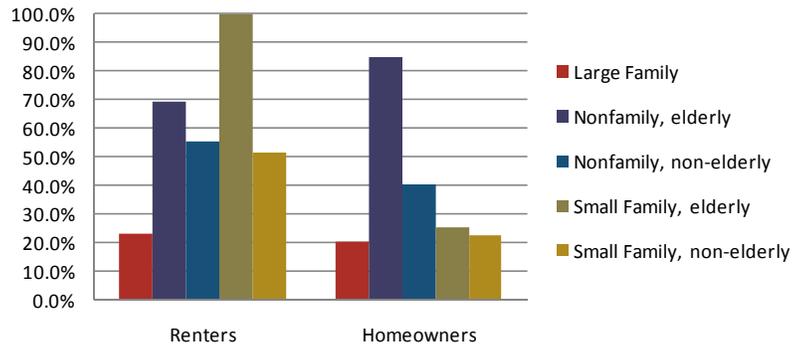


Table 2.23. Renter Households with Housing Cost Burdens

Geography	Families			Nonfamily Households	
	Large Family	Small Family - Non-elderly	Small Family - Elderly	Non-elderly	Elderly
Massachusetts	17,764	134,945	17,840	144,375	69,220
Bristol County	1,195	12,895	1,580	10,940	5,930
EASTON	30	255	60	205	160
Mansfield	0	405	20	465	110
Taunton	140	1,330	110	1,510	595
Stoughton	145	685	0	385	410
Brockton	630	3,280	185	2,220	895

Source: HUD, 2009 CHAS.

Note:

(1) "Large family" means a household with five or more people.

(2) "Small family" means a household of two to four people.

Table 2.24. Homeowner Households with Housing Cost Burdens

Geography	Families			Nonfamily Households	
	Large Family	Small Family, Non- elderly	Small Family, elderly	Non-elderly	Elderly
Massachusetts	49,970	223,805	60,295	101,725	86,175
Bristol County	3,515	19,120	5,570	7,850	6,845
EASTON	100	865	240	340	400
Mansfield	300	690	140	435	215
Taunton	460	1,930	400	1,350	540
Stoughton	415	1,225	435	550	470
Brockton	1,185	4,265	615	1,790	1,050

Source: HUD, 2009 CHAS.

Availability of Affordable Housing

Communities sometimes find Chapter 40B frustrating because they already have quite a bit of low-cost housing, yet the units do not qualify for the Subsidized Housing Inventory. However, housing units that are affordable due to their age, condition, or location are not the same as units with a deed restriction that keeps units affordable and available for low- and moderate-income people. In Easton and other towns, homeownership and rental units offered at below-market prices do not always house families with lower incomes. Units listed on the Chapter 40B Subsidized Housing Inventory have to comply with numerous requirements, including price controls and income eligibility rules, but this is not the case for unrestricted, privately owned housing.

The U.S. Department of Housing and Urban Development tracks and reports an affordable housing barrier known as *affordability mismatch*, which means housing units that are affordable but unavailable to lower-income households because the units are already occupied by higher-income households. In Easton and all of the surrounding cities and towns, the total number of units affordable to very-low, low-, and moderate-income households significantly exceeds the number of units on the Chapter 40B Subsidized Housing Inventory, yet the households in these income ranges remain housing cost burdened. This is partially because an affordability mismatch prevents them from accessing existing units they could otherwise afford to purchase or rent. Table 2.25 reports the extent of affordability mismatch in Easton's region. (Comparable data sets are not available for the smaller towns.) It shows that in almost every community, the number of low- or moderate-income households is more than twice the number of low- or moderate-income households living in units they can afford. Since 2000, the total number of affordable units - with or without deed restrictions - in Easton has declined from 2,185 in 2000 to 1,760 in 2009.²⁸ This is because the value of once-affordable units increased due to renovations, additions, or demolition and reconstruction.

Table 2.25. Affordability Mismatch in Easton's Region

City/Town	Affordably Priced Units		# Occupied by Lower-Income Households		# Affordability Mismatch Units	
	Owner	Rent	Owner	Rent	Own	Rent
Easton	750	1,280	190	380	560	900
Brockton	1,700	12,735	480	5,330	1,220	7,405
Mansfield	295	1,770	105	735	190	1,035
Stoughton	915	2,085	305	625	610	1,460
Taunton	<u>3,170</u>	<u>8,155</u>	<u>545</u>	<u>2,490</u>	<u>2,625</u>	<u>5,665</u>
Total Units	6,830	26,025	1,625	9,560	5,205	16,465
			<i>Mismatch Percent by Tenure</i>		76.2%	63.3%

Source: CHAS 2009.

The problem of affordability mismatch is more complicated than may be apparent in a simple comparison of affordable units with low- or moderate-income households. When a very-low-income tenant rents an apartment priced for moderate-income occupancy, the tenant will be housing cost burdened due to an affordability mismatch that occurs *within* the affordable housing inventory. This condition exists in Easton and all of the surrounding towns, especially Mansfield, where the vast

²⁸ U.S. Department of Housing and Urban Development (HUD), CHAS 2000, 2009; Affordability Mismatch Series, www.huduser.org/portal/datasets/pdrdatas.html.

majority of the affordable rental inventory consists of moderate-income apartments (many of which are new), yet most of the town's tenants have very-low or low incomes.²⁹

Affordability Gaps in Market-Rate Housing

Despite falling home prices in the past few years, the cost of housing in Easton remains a barrier for low- and moderate-income people. While the town offers some relatively affordable condominiums and older single-family homes, they make up a small part of Easton's housing inventory. Further, the number of modest houses that once offered an affordable avenue to homeownership is declining due to alterations, expansions, and mansionization, which lead to higher home values and resale prices. In addition, the absence of deed restrictions means that low- or moderate-income people may not have access to units they could afford. This contributes to the problem of cost burdened households. In fact, in Easton there are fewer "affordable" units, by almost half, than there are households with incomes below 80 percent of the area median income.

The difference between a community's median housing sale price and the price affordable to a moderate-or middle-income homebuyer is known as an *affordability gap*. In the tables below, the gap is represented by a negative value, i.e. the amount the median income falls short of the amount needed to purchase a property at the median sales price. From a fair housing perspective, the issue is whether homebuyers have choices within a given market area. Table 2.26 shows that single-family home prices in Sharon, Mansfield, Foxboro, Raynham, and Easton significantly exceed the maximum purchase price affordable to households at the *median income* for a family of four in the Easton-Raynham HUD Metro Fair Market Rent Area (HFMA). For moderate-income homebuyers, the gap is much larger. While Easton's condominium inventory offers some affordability (Table 2.27), more affordably priced units are needed to meet demand.

	Median	Affordable Purchase Price: 4-Person Family	
		At Median Income	At Moderate Income
	Single-Family Home	\$275,486	\$220,389
Community	Sale Price	Affordability Gap	
Sharon	\$370,000	(\$94,514)	(\$149,611)
EASTON	\$336,000	(\$60,514)	(\$115,611)
Foxborough	\$350,000	(\$74,514)	(\$129,611)
Mansfield	\$345,000	(\$69,514)	(\$124,611)
Stoughton	\$260,000	\$15,486	(\$39,611)
Raynham	\$317,250	(\$41,764)	(\$96,861)
Norton	\$272,500	\$2,986	(\$52,111)
W. Bridgewater	\$255,000	\$20,486	(\$34,611)
Taunton	\$225,000	\$50,486	(\$4,611)
Brockton	\$165,000	\$110,486	\$55,389

Sources: HUD, The Warren Group; affordability calculations by author.
Notes: The affordable purchase price assumes a 30-year, fixed-rate mortgage at 4.4% plus 0.8% for points and fees and PMI equal to 0.78% of the mortgage amount, a 5% downpayment, and 30% of monthly gross income for principal, interest, taxes, and insurance. Source for mortgage interest rate: Freddie Mac Primary Mortgage Market Survey (2010).

²⁹ HUD, CHAS 2009, MA_Table 15C_06.

		Affordable Purchase Price: 4-Person Family	
		At Median Income	At Moderate Income
Median Condo		\$252,316	\$201,853
Community	Sale Price	Affordability Gap	
Sharon	\$200,000	\$52,316	\$1,853
EASTON	\$206,750	\$45,566	(\$4,897)
Foxborough	\$195,000	\$57,316	\$6,853
Mansfield	\$200,000	\$52,316	\$1,853
Stoughton	\$204,000	\$48,316	(\$2,147)
Raynham	\$207,000	\$45,316	(\$5,147)
Norton	\$222,900	\$29,416	(\$21,047)
W. Bridgewater	\$266,725	(\$14,409)	(\$64,872)
Taunton	\$159,900	\$92,416	\$41,953
Brockton	\$75,750	\$176,566	\$126,103

Sources: HUD, The Warren Group; affordability calculations by author.
Notes: The affordable purchase price includes the same assumptions as in Table 2.25, plus condominium fees.

Housing for People with Disabilities

Easton's Subsidized Housing Inventory currently includes thirty-seven units in group residences that serve adults with major life-long impairments. In addition, the Easton Housing Authority is required to make some of the units in its senior housing developments available to people with disabilities. According to the most recent data available for Easton, there are approximately 520 working-age adults with a disability and without employment. They are a high-risk population both for poverty and for housing problems that stem from some type of architectural barrier. The Mass Access Registry, a statewide service that lists accessible and access-retrofit units that are available in each community, does not identify any available barrier-free units in Easton. Although the town has several group residences for people with severe disabilities, it appears that Easton has no accessible units for those who can live independently in barrier-free housing and whose incomes may be too high to qualify for the Easton Housing Authority's senior developments.

Chapter 40B in Easton's Region

In all but one case, the eight cities and towns around Easton have fairly large percentages of subsidized housing, and four currently exceed the 10 percent statutory minimum: Brockton, Mansfield, Raynham, and Stoughton. Table 2.28 compares the Subsidized Housing Inventory in Easton with that of neighboring communities. It is important to remember that not all of the 10,113 units listed as Chapter 40B units are actually affordable for low- or moderate-income households. The list includes some mixed-income apartment developments with 20 or 25 percent affordable units and the rest, market-rate units. It also includes more than 300 affordable homeownership units in developments with a combined total of about 1,250 market-rate units.

Community	Total Year-Round Housing Units	Total Development Units	Total Subsidized Housing Units	Percent Subsidized
EASTON	7,596	351	248	3.3%
Brockton	34,794	4,486	4,486	12.9%
Mansfield	8,083	980	934	11.6%
Norton	5,942	723	413	7.0%
Raynham	4,197	602	487	11.6%
Sharon	6,006	462	462	7.7%
Stoughton	10,429	1,746	1,249	12.0%
Taunton	22,874	1,883	1,771	7.7%
West Bridgewater	<u>2,507</u>	<u>125</u>	<u>63</u>	2.5%
	102,428	11,358	10,113	9.9%

Source: DHCD, 2010. Note: the total housing inventory and percentage of Chapter 40B units are based on Census 2000 housing data. These numbers will change when the Bureau of the Census releases Census 2010 housing information.

DEVELOPMENT CONSTRAINTS

Natural Features

One of Easton's most striking natural features is the presence of wetlands all over town (Map 2-1). At least 24 percent of its total area is composed of wetlands, many of which coincide with floodplains along the streams and brooks that eventually feed the Taunton River. The 16,800-acre Hockomock Swamp, designated by the state as an Area of Critical Environmental Concern (ACEC), extends across roughly 5,000 acres in Easton's southeast corner. In general, the town's extensive wetlands, poorly drained soils, and high water table present challenges for on-site wastewater disposal and reduce the development suitability of a portion of Easton's land.³⁰

Both state government and the Town have taken steps to protect Easton's natural resources. Over time, the Commonwealth has acquired and protected a considerable amount of open space, including Borderland State Park and hundreds of acres of land for wildlife management. In addition, portions of Easton lie within two state-designated ACECs: the Hockomock Swamp (as noted above) and the Canoe River Aquifer ACEC, which runs along the western side of town. Easton also has purchased some 3,000 acres of open space, most of it protected in perpetuity as conservation land (Map 2-2). The prevalence of natural constraints and conservation land leave Easton with very little developable upland. In many cases, future housing development will involve reuse and redevelopment of existing built assets, as evidenced by the proposed Ames Shovel Works project, more than new construction on vacant land.

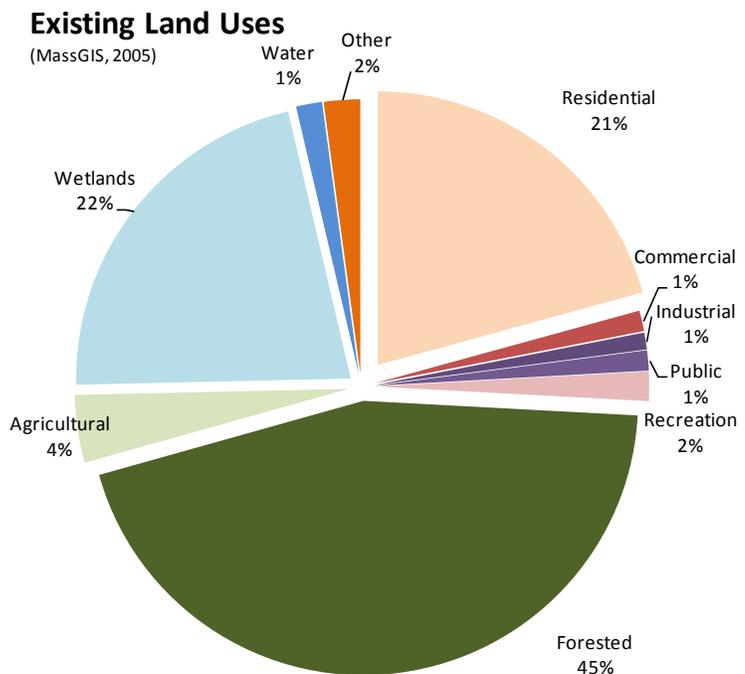
³⁰ Taintor and Associates, *Easton Growth Management Study* (1998), 53-54.

Physical Characteristics

Easton's development pattern is framed by a collection of old roads that connect the town to adjacent communities and nearby urban centers. The three state-numbered routes that run through Easton - Routes 138, 123, and 106 - provide relatively easy access to the region's major highways, I-495 and Route 24, at interchanges located in neighboring towns. All three routes are heavily traveled arterials, with Belmont Street (Route 123) carrying the highest volume of traffic, approximately 19,000 vehicles per day (vpd), and Turnpike Street (Route 138), approximately 17,000 vpd.³¹ Two roads run the full length of Easton from north to south: Bay Road, and Washington Street/Turnpike Street (Route 138). There is only one road that runs continuously from east to west, Foundry Street/Eastman Street (Route 106), with Route 123 crossing the town from Brockton to Norton in a northeast-southwest direction, changing names three times (Belmont Street, Depot Street, and Foundry Street). In most cases, the minor roads between these streets are neighborhood-level streets that serve residential traffic. The historic villages of North Easton, Easton Center, and Furnace Village are nestled around the convergence of the major roads.

The absence of public sewer service means that Easton residents and businesses rely on private on-site septic systems. The town provides public drinking water from six gravel-packed wells and one well field, withdrawing a total of 629 million gallons per year.³² Like other Massachusetts communities, Easton was recently reviewed by the Department of Environmental Protection (DEP) as part of a statewide effort to improve water conservation. The Town's Water Management Act permit has been modified to include a residential water restriction of 65 gallons per person per day (gpd) and a more demanding standard for "unaccounted for" water: a maximum of 10 percent of all water withdrawn in any given year, measured at the pumping stations. Complying with DEP's order requires the Town to impose mandatory water restrictions during the summer. In addition, the Town has an ongoing program to replace old water mains and thereby improve service while also reducing the potential for leaks.³³

Easton's existing development pattern is predominantly residential, but due to the natural features described above, substantial portions of the town are forested and wet. Measured by *land coverage* - that is, the amount of land actually occupied



³¹ Old Colony Planning Council (OCPC), 2008 Traffic Counting Program, Automatic Traffic Recorder Counts, <http://www.eastondpw.org/dpw/documents/2008trafficOCPC.pdf>.

³² Town of Easton Water Division, *Annual Water Quality Report* (2009), 2; *Annual Town Report* (2009).

³³ Ibid.

by principal and accessory uses and necessary for those uses to comply with zoning requirements - just over 20 percent of the land in Easton is used for some type of housing.³⁴ Single-family homes are clearly the dominant form of housing development, but Easton also has a large inventory of multi-family structures. (Measured by acreage in parcels as shown on an assessor's map, the amount of land in residential use in Easton is 38 percent.) Less than 5 percent of the town's land is used for commercial or industrial purposes.

The assessor's records show that while Easton still has quite a bit of undeveloped residential land - about 1,800 acres - most of the vacant land is subject to some type of development constraint, whether natural (such as wetlands) or legal (such as a conservation restriction). The amount of land assessed as developable or potentially developable includes 1,200 acres for residential use and about seventy-three acres for commercial use.³⁵ Public land owned by the state, county, or town, plus land controlled by non-profit charitable organizations, makes up nearly half of Easton's total area. Excluding government buildings and schools, most of the land owned by the Town of Easton is conservation land or otherwise protected under Article 97 of the state constitution.

Land Use and Zoning

Residential development in Easton is constrained by two sources of regulatory control: state laws governing wetland resources (M.G.L. c. 131, s. 40) and on-site wastewater disposal systems (Title V), and local bylaws governing land use. Easton's zoning encourages single-family homes on lots with at least 40,000 sq. ft. of land and 150 feet of frontage on a public way. By contrast, multi-family development is limited to the Business District, where an existing structure may be converted and new attached dwellings may be constructed in buildings with a maximum of ten bedrooms at an average density of 20,000 square feet per bedroom. The town's density restrictions make it difficult to develop multi-family housing, for a two-bedroom multi-family unit essentially requires the same amount of land as a detached single-family home and twice the amount of land that Title V requires for wastewater discharge in a nitrogen-sensitive area. In addition, the town's design standards call for townhouse-style units with separate entrances. Conventional multi-family flats would not meet Easton's minimum specifications for "multiple or attached dwellings."

The Zoning Bylaw includes some provisions for modest density increases and affordable housing. For example, Easton's Open Space Residential Development (OSRD) bylaw includes a 10 percent density bonus and creates opportunities to develop land that would otherwise be difficult to subdivide. In addition, Easton has adopted inclusionary zoning since the last housing plan was prepared (2005). The inclusionary housing bylaw mandates affordable units in new developments that trigger a special permit requirement (OSRD, Adult Retirement Community, and Residential Compound). Still, it does not offer specific development incentives, such as a density bonus or an expedited development review and permitting process.

In 2008, Easton Town Meeting voted to establish an overlay district under M.G.L. c. 40R, known as the Queset Smart Growth Overlay District. The development proposal that led to the overlay district called for a mixed-use development with housing, an assisted living facility, office space, and retail on 37.5 acres west of the Washington Street/Belmont Street intersection and north of Morse Pond. Queset Commons would have generated new economic opportunities for Easton and increased the

³⁴ MassGIS, "Land Use 2005."

³⁵ Easton Assessor's Office, FY 2011 Parcel Database, supplied to Community Opportunities Group, Inc., by the Department of Planning and Community Development (November 2010).

town's Chapter 40B Subsidized Housing Inventory by 161 units. However, Queset Commons has not gone forward due to the dramatic downturn in the housing market.

INFRASTRUCTURE CAPACITY

Easton is maturely developed despite the amount of land that is undevelopable due to natural constraints such as wetlands and legal constraints such as conservation restrictions. As such, it has most of the basic infrastructure one would expect to find in an established suburb, but its existing infrastructure has some limitations. Still, Easton's public facilities and infrastructure are generally in good condition and some have capacity to support new growth. That Easton does not have serious infrastructure constraints attests to the success of its growth management methods and careful stewardship of public resources. These conditions bode well for the town's ability to manage the impacts of future growth that includes affordable housing - provided the town has control over the rate at which that growth occurs and the developments are appropriately sited.

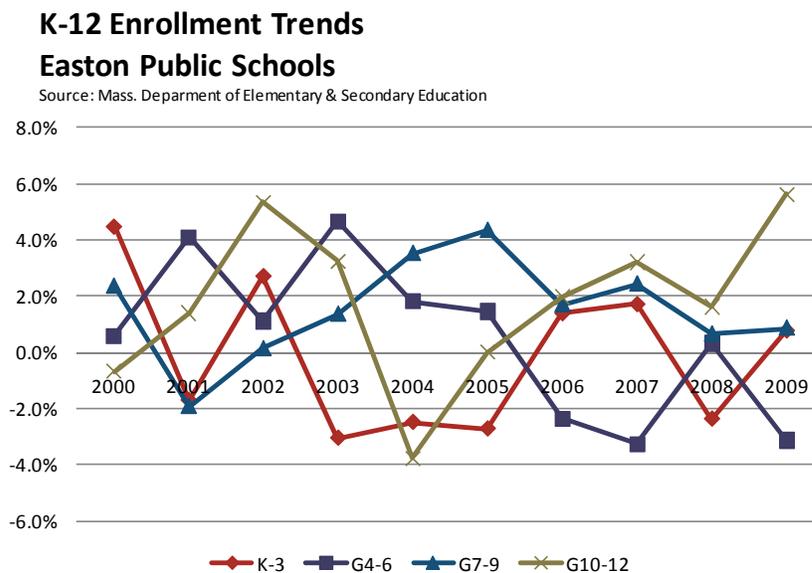
- **Drinking Water.** Public water is available in most of Easton. Although the water supply and distribution systems have been strained by growth, the Easton Department of Public Works (DPW) has a water system capital plan and the town has continued to work toward implementing it. Easton also has an impressive water conservation program. According to the DPW, the town has sufficient water to meet future needs. Easton's authorized withdrawal limit under the Massachusetts Water Management Act is 2.45 million gallons per day (gpd).³⁶
- **Sewer Service.** Easton does not have a municipal wastewater treatment facility and collection system. Stonehill College has its own wastewater treatment facility, but the rest of town depends on septic systems under Title V of the Massachusetts Environmental Code. Higher-density developments have been built in communities without public sewer service, but it is a more difficult and expensive proposition. The Ames Shovel Works development includes provisions for a wastewater treatment facility that may be capable of serving some surrounding municipal and private land uses in North Easton.
- **Roads.** Access through Easton occurs along fairly well-maintained state-numbered routes and local streets. The Town spends approximately \$550,000 per year on roadway maintenance.³⁷ However, according to the town's most recent open space plan, Easton has several local, collector, and minor arterial streets that are very narrow and in poor condition, yet important for the preservation of Easton's historic character. While the condition of these roads will not prevent new growth, they are not appropriate for a substantial increase in housing development. The town does not plan to consider or promote growth policies that would trigger a substantial change in the character of its scenic roads. As a result, Easton will need to guide new housing development toward locations that can absorb household and population growth, e.g., the anticipated MBTA stations in the north part of town and along roadways that are already designed for higher volumes of traffic.
- **Pedestrian Facilities.** While Easton's commercial areas and some of its new neighborhoods have sidewalks, the scenic, narrow roads in outlying parts of town have no facilities for pedestrians or

³⁶ Easton Department of Public Works, to Community Opportunities Group, Inc. (November 4, 2010), through the Department of Planning and Community Development.

³⁷ Ibid.

bicycle traffic. Sidewalks or improved paths that connect neighborhoods to each other, to the schools, or to shopping areas, public parks, and community facilities are limited.

- Schools.** Easton operates its own K-12 school district. The town has seven schools in six buildings, including three schools for early primary students (K-2), two for the older elementary grades (3-5), a middle school, and a high school with a combined total enrollment is 3,860 students (October 1, 2009). Since 2000, Easton's K-12 enrollment has increased at a moderate pace - approximately 6 percent - with average annual growth of just under 1 percent per year. Just as enrollment growth has proceeded slowly over the last nine years, the town anticipates a gradual enrollment decline. According to school enrollment projections prepared by the New England School Development Council (NESDEC), Easton's enrollments will fall to 3,483 students by 2019.³⁸ The capacity of the existing school buildings has been estimated at 3,500 students.³⁹



School officials report that while Easton High School is currently at capacity (as suggested by the enrollment statistics in the chart) and the middle school is close behind, the other schools have modest room for enrollment growth. It is difficult to measure reserve or "surplus" capacity in a school building or group of buildings, first because class size policies vary by grade level and second, the actual impact of an influx of students depends on their ages. The town has individual capital improvement plans for each school facility except the high school, which is a new building.⁴⁰

³⁸ New England School Development Council, Easton School Enrollment Trends and Projections (undated copy), supplied by Town of Easton.

³⁹ Town of Easton, General Obligation Bond Prospectus (April 14, 2010), 15.

⁴⁰ Easton Public Schools, to Community Opportunities Group, Inc. (November 17, 2010), through the Department of Planning and Community Development.

SUMMARY OF EASTON'S AFFORDABLE HOUSING NEEDS

- Easton needs approximately 1,300 affordable units in order to reduce housing cost burdens for its existing low- and moderate-income residents. This need is expected to increase by about 2 percent over the next five years, consistent with Easton's projected household growth rate.
- Easton's affordable housing needs include approximately 400 homeownership units and 900 rental units.
- Assuming Easton's Census 2010 year-round housing inventory includes about 8,200 units, the Chapter 40B statutory minimum over the next ten years will be 820 units. Easton's actual need is 1.5 affordable units for every one unit that qualifies for the Subsidized Housing Inventory.
- There is a regional need for approximately 21,700 safe, decent, and sanitary homeownership and rental units at affordable prices. This is about twice the number of units that would be required in order for Easton and its neighbors to meet the 10 percent statutory minimum under Chapter 40B. Easton's share of the regional need is approximately 6 percent.
- Of the 3,015 low- or moderate-income households in Easton, only 725 are affordably housed.
- Easton has over 1,000 housing units that could be affordable to low- or moderate-income people at market rates. However, the units are not covered by an affordable housing deed restriction, and many of the units are occupied by households at higher income levels.
- Easton currently has 248 deed-restricted affordable units, most of which are further restricted for occupancy by seniors and people with disabilities. These deed restricted units constitute 3.3 percent of the town's Census 2000 year-round housing.
- To reach the 10 percent statutory minimum under Chapter 40B, Easton would need another 512 low- or moderate-income housing units - assuming a Census 2000 year-round housing count of 7,596 units. When the Bureau of the Census releases Census 2010 housing counts for each city and town, the Chapter 40B "gap" will most likely increase to about 570 units.⁴¹
- Among low- or moderate-income renters living in housing they cannot afford, non-elderly households have the highest incidence of housing cost burden. This makes sense because so much of Easton's Subsidized Housing Inventory consists of age-restricted units. Seventy-three percent of the cost-burdened families are small, with two to four family members, and 56 percent of the cost-burdened non-family households are either single people living alone or two unrelated people sharing a housing unit. There is an estimated need for 710 units of affordable apartments with a mix of bedroom sizes, including three-bedroom units. The family housing need alone - meaning two- and three-bedroom units - is estimated at 350 units (rounded).
- Among Easton's low- or moderate-income homeowners living in housing they cannot afford, small families make up 44 percent of the total and 72 percent of all cost-burdened families. Elderly non-family homeowners (typically those living alone) constitute 21 percent of the total

⁴¹ This assumes that all 600± units for which building permits have been issued since 2000 are counted as year-round housing. The number could be higher depending on how the Bureau of the Census classifies Quaset on the Pond: as housing or as institutional quarters.

and 54 percent of the non-family homeowners with housing cost burdens. There is an estimated need for up to 1,950 (rounded) affordable for-sale units with a mix of two-, three- and four-bedroom units. However, rental options would most likely provide a more suitable and affordable choice for very-low-income seniors and single people living alone.

- Easton appears to have few if any accessible housing units for people with disabilities. The town has several group residences, but group residences are designed to meet the needs of severely disabled adults who cannot live independently.
- The existing inventory of townhouses and multi-family condominiums provides affordability for homebuyers at the median income for a four-person family, currently estimated at \$80,000. With basic homebuyer assistance, many of these units would also be affordable to moderate-income first-time homebuyers with relatively small households, i.e., up to four family members. Virtually none of these units have an affordable housing deed restriction.
- Easton *does not have* affordable housing options for larger families.
- When market conditions improve enough for Ames Shovel Works and Queset Commons to proceed, they will add 280 units to the Subsidized Housing Inventory. However, only eighty of these units will be affordable to low- or moderate-income households. In addition, Winterberry Hills, offering forty-four for sale units, is currently in development. Also developed with a Chapter 40B comprehensive permit, Winterberry Hills will provide eleven units of affordable housing. Depending on how the developers price the remaining units, some may also be affordable to first-time homebuyers at or somewhat above the median income for Easton's region.
- By 2015, Easton will have an estimated 3,192 households with incomes at or below \$75,000 (*in inflation-adjusted dollars*) and 1,515 households headed by a person 65 years of age or older.⁴²

⁴² Claritas, Inc., Site Reports, User-Defined Query, Easton, Massachusetts.

III. Affordable Housing Goals

In 2002, the Massachusetts Department of Housing and Community Development (DHCD) created an incentive for cities and towns to take an active role in increasing the supply of affordable housing. By developing a plan that met DHCD requirements, communities could become eligible to deny a comprehensive permit for twelve (or possibly twenty-four) months if they implemented their housing plan by meeting a minimum annual low-income housing production target. Easton prepared a housing plan under the program known as Planned Production. Today, the incentive is known as a Housing Production Plan and it is similar to the concept that DHCD inaugurated eight years ago.

To qualify for the flexibility that a DHCD-approved Housing Production Plan offers, Easton would need to create (through the issuance of permits and approvals) at least thirty-eight new low- or moderate-income housing units (or an amount equal to or greater than the 0.50 percent production goal) in a given calendar year and obtain certification from DHCD that the Housing Production Plan standard had been met.⁴³ Units eligible for the Subsidized Housing Inventory (SHI) will be counted for the purpose of certification in accordance with 760 CMR 56.03(2). Requests for certification may be submitted at any time. DHCD will determine whether Easton complies within 30 days of receipt of the Town's request. If DHCD finds that Easton complies with the Housing Production Plan, the certification will be deemed effective on the date upon which Easton achieved its numerical target for the calendar year, in accordance with the rules for counting units on the SHI under 760 CMR 56.03(2). The certification will remain in effect for one year from its effective date. If DHCD finds that Easton has increased its number of SHI Eligible Housing units in a calendar year by at least 1 percent of its total housing units, the certification will remain in effect for two years from its effective date.

The certification process would allow Easton's Board of Appeals to deny a comprehensive permit for twelve months (or twenty-four months, as applicable), or continue to approve projects based on merit. However, if the Board decides to deny a comprehensive permit or impose conditions during the Housing Plan certification period, it must do so according to the following procedures. Within fifteen days of opening the public hearing on a comprehensive permit application, the Board has to provide written notice to the applicant, with a copy to DHCD, that denying the permit or imposing conditions or requirements would be consistent with local needs, the grounds that it believes has been met (e.g., a Housing Plan certification is in effect), and the factual basis for that position, including supportive documentation. If the Applicant wishes to challenge the Board's assertion, it must do so by providing written notice to DHCD, with a copy to the Board, within fifteen days of receiving the Board's notice, and include supportive documentation. DHCD will review the materials provided by the Board and the applicant and issue a decision within thirty days. The Board has the burden of proving that a denial or approval with conditions would be consistent with local needs, but any failure of DHCD to issue a timely decision constitutes a determination in favor of the Town. While this process is underway, it tolls the requirement to complete the public hearing and final action within 180 days.

It is important to note that the benefits of implementing an affordable housing plan far surpass the ability to deny comprehensive permits. Easton understands the role that planning can play in shaping the future, for the town has commissioned other plans in the past. Although it appears that

⁴³ The thirty-eight unit minimum will increase somewhat after the new decennial census is released. This is because the decennial census housing count determines a community's social housing obligations under Chapter 40B.

Easton's first town-wide master plan (1971) has never been updated, the town has carried out numerous other planning initiatives and for the most part, many have been implemented or are still being implemented today. In 1998, for example, Easton completed a Growth Management Study, and plans for historic preservation and open space protection have been prepared within the past three years. Furthermore, while this housing plan is a sequel to the 2005 affordable housing plan, Easton also commissioned a plan for affordable housing development many years before (1990). That developers showed limited interest in developing mixed-income housing in Easton was driven, at least in part, by the town's lack of public sewer service as well as its zoning.

NUMERICAL GOALS

Easton's target housing production schedule for 2011-2015 is shown on the next page. It is based on the following assumptions:

- Until Calendar Year (CY) 2012, the Census 2000 year-round housing count for Easton, 7,596 units, will continue to be used as the denominator for purposes of calculating (a) the 10 percent statutory minimum and (b) the minimum number of units Easton must create in order to qualify for housing plan certification (38 units in a single calendar year).
- By CY 2012, the town's housing "base" will have been adjusted to reflect Census 2010 figures. For purposes of this plan, the estimated number of year-round housing units will be 8,196 (7,196 + 600) and the new minimum annual production target will be forty-one low- or moderate-income units.⁴⁴
- As a matter of policy, DHCD will continue to encourage apartments by adding all units in a rental development to the Subsidized Housing Inventory as long as at least 25 percent of the units are affordable to moderate-income tenants or 20 percent, to low-income tenants. Under this policy framework, the 119 rental units at Ames Shovel Works and the 140 rental units at Queset Commons will be eligible for the Subsidized Housing Inventory (along with twenty-one units in the assisted living and for-sale components of Queset Commons). By contrast, DHCD will add only the eleven affordable units at Winterberry Hills to the Subsidized Housing Inventory because it is a homeownership development.
- That any affordable units created by Habitat for Humanity will be subject to a deed restriction that is acceptable to DHCD and added to the Subsidized Housing Inventory.

Table 2.28. Goals for Low- or Moderate-Income Housing Production in Easton

CALENDAR YEAR	2010	2011	2012	2013	2014	2015
Total Year-Round Homes (Census 2010)	7,596	7,596	8,196	8,196	8,196	8,196
New Chapter 40B Units	0	38	119	6	140	80
Total Chapter 40B Inventory	248	286	405	411	551	631
10% Requirement	760	760	820	820	820	820

⁴⁴ Note: the ACS 3-Year Estimates 2006-2008 include a current estimate of 8,271 housing units in Easton. Since the ACS estimate is based on a sample of 328 housing units and the margin of error is 208 units, this plan has adopted a more conservative position: adding the number of units permitted since 2000 to the Census 2000 year-round base. Another data source, Claritas, Inc., estimates that Easton currently has 8,094 housing units.

Table 2.28. Goals for Low- or Moderate-Income Housing Production in Easton

CALENDAR YEAR	2010	2011	2012	2013	2014	2015
Gap	512	474	415	409	269	189
Required # for .50 of 1%	38	38	41	41	41	41
Required # for 1.0%	76	76	82	82	82	82

Notes:

(1) "New Chapter 40B Units" assumes that through any combination of affordability strategies, Easton will meet the minimum Planned Production target of 38 units in 2011; that Ames Shovel Works will proceed in 2012; and construction of the apartments at Queset Commons will occur in 2014. Both projects would qualify Easton for a two-year housing plan certification.

(2) The six units shown under 2013 assume that various subsidies administered by the Affordable Housing Trust will result in six low- or moderate-income units, which may be for-sale housing, subsidized rental units, or group home units. The 80 units shown under CY 2015 assumes that Easton will have achieved housing plan certification for two years due to the construction of apartments at Queset Commons.

(3) Depending on actual market conditions, other comprehensive permits approved by the Board of Appeals, inclusionary housing units approved by the Planning and Zoning Board, or subsidized units assisted by the Affordable Housing Trust, may substitute for or augment these assumptions.

IV. Implementation Strategies

As Easton already knows, many strategies can be tapped to create affordable housing. The town's extraordinary measures to support Ames Shovel Works attest to Easton's capacity to work with developers and to use local tools to achieve multiple objectives, including but not limited to low- or moderate-income housing. Further, the town's decision to adopt Chapter 40R and create a special overlay district for Queset Commons demonstrates that residents recognize the benefits of mixed-use development and the use of development agreements to secure mitigation. Indeed, Easton is poised to succeed with housing plan implementation. However, the housing market's persistent weakness and the substantial constraints on access to credit for new housing development will make it difficult for Easton to carry out some aspects of this plan in the coming months.

The Town needs to consider its staff capacity when implementing this plan. While Easton recently hired a community housing planner, the position is dedicated to overseeing activities of the Affordable Housing Trust's Action Plan. As with all plans, assignment of responsibility and staff support is critical to effective implementation.

Housing Production Plan Requirements

This section of Easton's housing plan outlines several strategies that would help Easton address the needs that already exist both locally and in the region. The strategies rely on a combination of local, state, and private resources, and they are designed to address DHCD's current Housing Production Plan requirements (effective February 22, 2008).

Zoning Amendments. Identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating affordable housing developments to meet its housing production goal [760 CMR 56.03(4)(d)(1)]; see Maps 4-1 and 4-2.

- In addition to the Queset Commons overlay district, Easton can revisit its existing use and dimensional regulations in the Business (B) District and consider modifying them on a district-wide basis or on a targeted basis through overlay districts. In particular, the dimensional requirements for apartments in the B district need to be revised if the town wants to facilitate the redevelopment of existing multi-family housing or provide for new multi-family housing. An average density of one bedroom per 20,000 sq. ft. of land is not a realistic standard for multi-family development. By contrast, a standard of four to eight units per acre usually can support semi-attached or townhouse developments, and an average of twelve units per acre is usually workable for multi-family condominiums (i.e., flats). The density needed to make rental apartments feasible is almost always higher, however: at least twenty units per acre.
- The town has undertaken planning to prepare for the South Coast Project and is exploring zoning options for land in the vicinity of the proposed MBTA train stations on the town's northern border and in North Easton Village.
- Easton can adopt a provision for accessory apartments, which meet needs that are not addressed in a conventional apartment development. Accessory apartments offer families a way to provide housing for an elderly relative or a young adult just out of college, but these units serve more purposes, too. Sometimes seniors who cannot afford to stay in their homes find an accessory apartment advantageous because they can occupy the apartment and rent the rest of the house to a family. While it is difficult to qualify accessory apartments for the Subsidized Housing Inventory, they still contribute to the supply of lower-cost housing because accessory units rarely

command the same high rents charged for market-rate apartments in a multi-family rental development.

Comprehensive Permits. Identification of specific sites for which the municipality will encourage the filing of comprehensive permit projects [760 CMR 56.03(4)(d)(2)]; see Map 4-1.

- Easton has already identified areas within which comprehensive permit developments would be deemed appropriate. These areas are discussed in Easton's Comprehensive Permit Policy (2007). Though not a comprehensive permit project, Queset Commons is in one of the areas identified in the policy.
- During a meeting with town boards in October 2010, local officials identified more specific locations that are potentially suitable for comprehensive permits (or other mechanisms, such as special permits or another Chapter 40R district).

Housing Preferences. Characteristics of proposed residential or mixed-use developments that would be preferred by the municipality [760 CMR 56.03(4)(d)(3)]:

- More diversity in the types of housing created in new residential developments. Without a comprehensive permit (or a use variance), it would be difficult for developers to diversify their product. Under Easton's present zoning, single-family and two-family homes are the only residential uses allowed in town - except "apartments," which are permitted in the B district but under dimensional regulations that make it uneconomic to build multi-family housing. Easton needs to consider updating the residential use definitions in the Zoning Bylaw and provide for more housing types.

Recently, some communities have received proposals to build semi-detached homes and detached condominiums, or small single-family units developed in clusters on common land. The Towns of Stow and Medfield have notable examples of this type of housing: in lieu of units attached from foundation to roof along common walls, the units are attached by wood fences at the building line. Some are not attached at all, but located close together. The land is owned in common, and each unit has an exclusive use area (EUA). While the developments are not age-restricted, most of the units have two bedrooms and are designed primarily for childless households. Since the units look like single-family homes, they fit well within their neighborhood locations and they have been well received. It takes a higher density than one dwelling per 40,000 sq. ft. (Easton's present requirement) to make these types of units realistic for developers. The Town of Northborough adopted zoning specifically to encourage this type of home after a local developer built four units under a comprehensive permit. The minimum lot area for detached and semi-detached homes in Northborough is one unit per 5,000 sq. ft.

In addition, Easton could modify its Apartment regulations (Section 7-2 of the Zoning Bylaw) by adopting design standards that would clearly permit multi-family flats. The Bylaw currently requires each unit to have two separate entrances and prohibits any building from having more than ten bedrooms. These kinds of controls effectively produce attached or townhouse-style units, which may have been Easton's intent. However, it is usually possible to provide more affordability in a building with multi-family "garden style" units and more units within a given building footprint.

- Subsidized rental housing to meet the needs of very-low and low-income households. Except for housing owned and managed by the Easton Housing Authority, Easton has no new housing in the pipeline for very-low-income households, yet they are the most acutely affected by housing

cost burdens. Addressing these needs cannot happen without financial subsidies, such as the HUD 202 program for subsidized elderly housing or an equity investment by the Affordable Housing Trust to write down the debt service for a small rental project.

- Intensification of use on existing sites, such as older townhouse or condominium developments that need reinvestment. Easton is not alone in its desire to protect its remaining open space. There is no reason to encourage housing on land that should be protected, but unless the town takes steps to guide development toward other areas, it will be very difficult for Easton to manage its growth pattern and protect the natural resources that residents value. Through an overlay that includes existing multi-family developments, i.e., targeted densification, Easton could encourage reinvestment in established areas.
- Multi-family units in vertical and horizontal mixed-use developments could be more easily achieved in Easton's business districts if the town modified its density and dimensional requirements. The Bylaw also needs updated residential use definitions.
- Infill housing in neighborhoods adjacent to the villages and near the proposed MBTA stations. The town is currently exploring options for these areas of town.
- Open space-residential developments (OSRD) that include both open space and a mix of housing types, including some affordable units. Under Easton's affordable housing bylaw, the town requires affordable units in an OSRD, which in turn requires a special permit from the Planning and Zoning Board. Development incentives such as a realistic density bonus, OSRD as of right, or an expedited permitting process could encourage more development and thereby create more affordable housing. In its present form, the affordable housing bylaw does not provide for any type of cost offsets to the developer. The effects of requiring affordable units in an OSRD and withholding incentives for inclusionary units may have unintended consequences: no affordable housing production and discouraging developers from proposing OSRDs.
- Units that address the housing needs identified in this plan and the town's Comprehensive Permit Policy.

Town-Owned Land. Municipally owned parcels for which the municipality commits to issue requests for proposals to develop affordable housing [760 CMR 56.03(4)(d)(4)]:

- Prior to the development of this plan, Easton inventoried its town-owned land and identified a parcel suitable for affordable housing. The town is negotiating with Habitat for Humanity to convey the lot for an affordable single-family dwelling. There do not appear to be any unrestricted parcels that would be appropriate for a multi-unit development.
- If existing municipal buildings are declared surplus property and made available for purchase in the future, Easton should assess their suitability for residential reuse.

Regional Collaboration. Participation in regional collaborations to address housing development [760 CMR 56.03(4)(d)(5)]:

- Easton has access to federal HOME funds from the Greater Attleboro-Taunton HOME Consortium in Taunton. These resources are ideally suited to address the needs of very-low and low-income renters.

- The regional housing organization that serves Bristol County, South Shore Housing Development Corporation (SSHDC), has a new executive director with *substantial* affordable housing development experience. SSHDC is interested in partnering with local groups that want to create affordable units. The town, ideally through its Affordable Housing Trust, can explore opportunities to work with SSHDC on small multi-family projects with a larger percentage of affordability than is typically provided in comprehensive permit developments.
- Community Housing Development Organizations (CHDOs) are HUD-certified organizations eligible to receive funds through a HOME Program set-aside. The HOME Consortium sets aside 15 percent of its funds for CHDO activities. Pro-Home, Inc., of Taunton is the primary CHDO operating in Easton's area.

Affordable Housing Trust

In 2008, Easton Town Meeting voted to establish a Municipal Affordable Housing Trust, which serves as an informational resource to residents and affordable housing providers. Through its five-year Action Plan, the Trust is pursuing six local housing initiatives:

- Establish a local homebuyer assistance program;
- Connect residents with housing assistance programs;
- Establish an Easton Housing Office;
- Promote adoption of an Inclusionary Zoning Bylaw;
- Establish a Small Grants Program to allow low-income homeowners to stay in their homes; and
- Develop affordable units through reuse of existing buildings and/or new construction.⁴⁵

Units assisted by the AHT should be eligible for the Subsidized Housing Inventory under the Local Initiative Program (LIP), discussed below.

Local Initiative Program

Easton needs to ensure that all low- or moderate-income units created pursuant to this housing plan are eligible for the Subsidized Housing Inventory. Although affordable units in comprehensive permit developments will automatically qualify, units produced under Easton's affordable housing bylaw, with CPA assistance, or with other subsidies that may be administered by the Affordable Housing Trust will need to be submitted to DHCD for approval. The mechanism for doing so is the Local Initiative Program (LIP) "Local Action Units" process. An eligible "local action" may include any of the following:

- Zoning approval, such as units created under an inclusionary housing bylaw;
- Financial assistance from funds raised, appropriated, or administered by the town, such as a "buydown" unit made affordable with assistance from the Affordable Housing Trust; or

⁴⁵ Jennifer Goldson, Beth Rush, *Easton Affordable Housing Trust Action Plan FY 2011-2015* (December 2009), 1.

- Town-owned land or buildings conveyed at a substantial discount from fair market value, i.e., a "public benefit" disposition under M.G.L. c. 30B.

In order to be added to the Subsidized Housing Inventory, Local Action Units must comply with the following requirements:

- They must be produced as a direct result of an action or approval by the town;
- They must be sold or rented based in accordance with a DHCD-approved affirmative fair marketing plan and lottery;
- The sale price of affordable homes must be affordable to households with incomes at or below 80 percent of the area median income (AMI). However, DHCD encourages a pricing strategy that makes units affordable to households at or below 70 percent of AMI. The difference is known as a "window of affordability." Rents must be affordable to households at or below 80 percent of AMI; and
- An affordable housing restriction approved by DHCD must be recorded with the Registry of Deeds in order to guarantee long-term affordability.
- A Subsidized Housing Inventory "New Units Request Form" or "LIP Local Action Units" application must be submitted to and approved by DHCD.

Managing the process for making Local Action Units eligible for the Subsidized Housing Inventory involves more effort than many people realize. Fortunately, Easton has appointed a Community Housing Planner so the town has established internal capacity. The process typically includes the following steps:

- Meet with the developer and explain the requirements for Local Action Units to qualify for the Subsidized Housing Inventory.
- Verify currently acceptable purchase prices and rents with DHCD staff.
- Designate a qualified marketing agent to prepare the Affirmative Marketing Plan, conduct outreach, and coordinate the lottery process.⁴⁶
- Execute and record a regulatory agreement so the town has the power to enforce long-term affordability requirements.
- Submit a LIP/Local Action Units application and the Affirmative Marketing Plan to DHCD, and obtain DHCD's approval before the marketing process begins.
- Establish and publicize the lottery application period and hold information sessions to explain the application requirements to prospective homebuyers or renters.
- Review lottery applications for income eligibility and other requirements that may apply to the specific project, e.g., preferences for larger households to qualify for family-size units.

⁴⁶ DHCD's current Affirmative Marketing Plan requirements may be found in Appendix A.

- Notify lottery applicants of their status.
- Conduct the lottery.
- For homeownership developments:
 - ⊗ Refer lottery winners to local or regional lenders so they can obtain a mortgage loan commitment;
 - ⊗ Obtain the deed rider and a resale price certificate from DHCD;
 - ⊗ Work with lenders as needed through the closing process.
- For apartments, provide technical assistance to lottery winners about the procedures for leasing and occupying their units.
- Submit documentation to DHCD so the units will be added to the Subsidized Housing Inventory.
- For apartments, institute annual procedures for recertifying the income eligibility renters living in the affordable units.
- Prepare a "Ready Buyers" or "Ready Renters" list for resales or upon tenant turnover.

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VI. Appendix

DHCD Affirmative Fair Housing Marketing Plan

(As of June 25, 2008)⁴⁷

The Commonwealth of Massachusetts has a compelling interest in creating fair and open access to affordable housing and promoting compliance with state and federal civil rights obligations. Therefore, all housing with state subsidy or housing for inclusion on the Subsidized Housing Inventory (SHI) shall have an Affirmative Fair Housing Marketing Plan (AFHMP). *The affordable Use Restriction documents of said housing must require that the AFHMP, subject to the approval of the subsidizing or funding agency, shall be implemented for the term of the Use Restriction.* Affirmative Fair Housing requirements apply to the full spectrum of activities that culminate with occupancy, including but not limited to means and methods of outreach and marketing through to the qualification and selection of residents. All AFHMP plans must, at a minimum, meet the standards set forth by the Department of Housing and Community Development (DHCD). In the case of M.G.L. c.40B projects, the AFHMP must be approved by the Subsidizing Agency.

The developer (Developer) is responsible for resident selection, including but not limited to drafting the resident selection plan, marketing, administering the initial lottery process, and determining the qualification of potential buyers and/or tenants. The Developer is responsible for paying for all of the costs of affirmative fair marketing and administering the lottery and may use in-house staff, provided that such staff meets the qualifications described below. The Developer may contract for such services provided that any such contractor must be experienced and qualified under the following standards.

Note: As used in these AFHMP Guidelines, "Developer" refers to the Project Developer and/or the entity with which the Developer has contracted to carry out any or all of the tasks associated with an AFHMP.

(April 8, 2008 change: inserted a new third sentence in the first paragraph).

A. Developer Staff and Contractor Qualifications

The entity as well as the individual with primary responsibility for resident selection, whether in-house staff or a third-party contractor, must have substantial, successful prior experience in each component of the AFHMP for which the party will be responsible, e.g. drafting the plan, marketing and outreach activities, administering the lottery process and/or determining eligibility under applicable subsidy programs and/or qualifying buyers with mortgage lenders.

- Subsidizing Agencies reserve the right to reject the qualifications of any Developer or contractor. However, generally, Developers or contractors that meet the following criteria *for each component*, as applicable, will be considered to be qualified to carry out the component(s) for which they are responsible:
- The entity has successfully carried out similar AFHMP responsibilities for a minimum of three (3) projects in Massachusetts *or* the individual with primary responsibility for the resident selection

⁴⁷ Document has been reformatted for inclusion in this Housing Plan.

process has successfully carried out similar AFHMP responsibilities for a minimum of five (5) projects in Massachusetts.

- The entity has the capacity to address matters relating to English language proficiency.

“Successfully” for the purposes of these Guidelines means that, with respect to both the entity and the relevant staff, (a) the prior experience has not required intervention by a Subsidizing Agency to address fair housing complaints or concerns; and (b) that within the past five (5) years, there has not been a finding or final determination against the entity or staff for violation of any state or federal fair housing law.

Affirmative Fair Housing Marketing Plan

The Developer shall prepare the following materials which shall comprise an AFHMP:

- Informational materials for applicants including a general description of the overall project that provides key information such as the number of market/affordable units, amenities, number of parking/garage spaces per unit, distribution of bedrooms by market and affordable units, accessibility, etc.
- A description of the eligibility requirements.
- Lottery and resident selection procedures.
- A clear description of the preference system being used (if applicable).
- A description of the measures that will be used to ensure affirmative fair marketing will be achieved including a description of the affirmative fair marketing and outreach methods that will be used, sample advertisements to be used, and a list of publications where ads will be placed.
- Application materials including:
 - ◆ The application form.
 - ◆ A statement regarding the housing provider’s obligation not to discriminate in the selection of applicants, and such a statement must also be included in the application materials.
 - ◆ Information indicating that disabled persons are entitled to request a reasonable accommodation of rules, policies, practices, or services, or to request a reasonable modification of the housing, when such accommodations or modifications are necessary to afford the disabled person equal opportunity to use and enjoy the housing.⁴⁸

⁴⁸ It is important to remember that legal obligations with respect to accessibility and modifications in housing extend beyond the Massachusetts Architectural Access Board requirements, including federal requirements imposed by the Fair Housing Act, the Americans with Disabilities Act, and the Rehabilitation Act. Under state law, in the case of publicly assisted housing, multiple dwelling housing consisting of ten or more units, or contiguously located housing consisting of ten or more units (see M.G.L. c. 151B, § 1 for definitions), reasonable modification of existing premises shall be at the expense of the owner or other person having the right of ownership if necessary for the disabled person to fully enjoy the premises. M.G.L. c. 151B, § 4(7A). See also 24 C.F.R. part 8 for Rehabilitation Act requirements of housing providers that receive federal financial assistance.

- ◆ An authorization for consent to release information.
- ◆ For homeownership transactions, a description of the use restriction and/or deed rider.

The Subsidizing Agency must approve the AFHMP before the marketing process commences. In the case of a Local Action Unit (LAU), DHCD and the municipality must approve the AFHMP.

The AFHMP shall be applied to affordable units⁴⁹ upon availability for the term of affordability and must consist of actions that provide information, maximum opportunity, and otherwise attract eligible persons protected under state and federal civil rights laws that are *less likely to apply*.

Outreach and Marketing

Marketing should attract residents outside the community by extending to the regional statistical area as well as the state.

- ◆ Advertisements should be placed in local and regional newspapers, and newspapers that serve minority groups and other groups protected under fair housing laws. Notices should also be sent to local fair housing commissions, area churches, local and regional housing agencies, local housing authorities, civic groups, lending institutions, social service agencies, and other non-profit organizations.
- ◆ Affordable units in the Boston Metro Area (Boston-Cambridge-Quincy MSA) must be reported to the Boston Fair Housing Commission's Metrolist (Metropolitan Housing Opportunity Clearing House). Such units shall be reported whenever they become available (including upon turnover).
- ◆ Affordable and/or accessible⁵⁰ rental units must be listed with the Massachusetts Accessible Housing Registry whenever they become available (including upon turnover). See <http://www.chapa.org>.
- ◆ Available affordable ownership units must also be listed with CHAPA's lottery website (see <http://www.chapa.org>) and with the Massachusetts Affordable Housing Alliance (MAHA) website (see <http://www.mahahome.org>).
- ◆ Marketing should also be included in non-English publications based on the prevalence of particular language groups in the regional area. To determine the prevalence of a particular language by geographical area, see for example: http://www.doleta.gov/reports/CensusData/LWIA_by_State.cfm?state=MA.

⁴⁹ The advertising component of the AFHMP applies to all units.

⁵⁰ Note: The owner or other person having the right of ownership shall, in accordance with M.G.L. c. 151B, §4(7A), give at least fifteen days notice of the vacancy of a wheelchair accessible unit to the Massachusetts Rehabilitation Commission. Said statute also requires the owner or other person having the right of ownership to give timely notice that a wheelchair accessible unit is vacant or will become vacant to a person who has, within the past 12 months, notified the owner or person or person having the right of ownership that such person is in need of a wheelchair accessible unit.

(April 8, 2008 changes: (1) Inserted new first bullet paragraph; (2) modified fourth paragraph to include listing with MAHA website; and (3) modified fifth bullet paragraph which, previously, stated: "...Marketing should also be targeted towards persons with limited English proficiency (LEP), not limited to solely to Spanish speaking persons.")

All marketing should be comparable in terms of the description of the opportunity available, regardless of the marketing type (e.g., local newspaper vs. minority newspaper). The size of the advertisements, including the content of the advertisement, should be comparable across regional, local, and minority newspapers.

Advertisements should run a minimum of two times over a sixty day period and be designed to attract attention. Marketing of ownership units should begin approximately six months before the expected date of project occupancy.

Pursuant to fair housing laws,⁵¹ advertising must not indicate any preference or limitation, or otherwise discriminate based on race, color, disability, religion, sex, familial status, sexual orientation, national origin, genetic information, ancestry, children, marital status, or public assistance reciprocity. Exceptions may apply if the preference or limitation is pursuant to a lawful eligibility requirement. All advertising depicting persons should depict members of classes of persons protected under fair housing laws, including majority and minority groups.

The Fair Housing logo () and slogan ("Equal Housing Opportunity") should be included in all marketing materials. The logo may be obtained at HUD's website at: <http://www.hud.gov/library/bookshelf11/hudgraphics/fheologo.cfm>.

Availability of Applications

Advertising and outreach efforts shall identify locations where the application can be obtained. **Applications shall be available at public locations including one that has some night hours; usually, a public library will meet this need.** The advertisement shall include a telephone number an applicant can call to request an application via mail.

Informational Meeting

In addition, the lottery administrator must offer one or more informational meetings for potential applicants to educate them about the lottery process and the housing development. These meetings may include local officials, developers, and local bankers. The date, time, and location of these meetings shall be published in ads and flyers that publicize the availability of lottery applications. The workshops shall be held in a municipal building, school, library, public meeting room or other accessible space. Meetings shall be held in the evening or on weekend days in order to reach as many potential applicants as possible. However, attendance at a meeting shall not be mandatory for participation in a lottery.

The purpose of the meeting is to answer questions that are commonly asked by lottery applicants. Usually a municipal official will welcome the participants and describe the municipality's role in the affordable housing development. The lottery administrator will then explain the information requested on the application and answer questions about the lottery drawing process. The Developer

⁵¹ 42 U.S.C. § 3604(c); M.G.L. c. 151B, § 4(7B).

should be present to describe the development and to answer specific questions about the affordable units. It is helpful to have representatives of local banks present to answer questions about qualifications for the financing of affordable units. At the meeting, the lottery administrator should provide complete application materials to potential applicants.

Homeownership – Establishing Sales Prices

Sale prices shall be established at the time of the initial marketing of the affordable units. Thereafter, the prices of homes cannot be increased for lottery winners, even if interest rates and HUD income guidelines change.

For large, phased developments maximum sale prices of units sold in subsequent phases will be calculated prior to the start of marketing for each phase, or approximately 6 months prior to expected occupancy of the units. In such cases, each phase will require its own affirmative fair marketing efforts and lottery.

C. Local Preference

If a community wishes to implement a local selection preference, it must:

- Demonstrate in the AFHMP the need for the local preference (e.g., the community may have a disproportionately low rental or ownership affordable housing stock relative to need in comparison to the regional area); and
- Demonstrate that the proposed local preference will not have a disparate impact on protected classes.

In no event may a local preference exceed more than 70% of the (affordable) units in a Project.

The Subsidizing Agency, and in the case of LAUs, DHCD as well as the municipality, must approve a local preference scheme as part of the AFHMP. Therefore, the nature and extent of local preferences should be approved by the Subsidizing Agency (or DHCD in the case of LAUs) prior to including such language in the comprehensive permit or other zoning mechanism.

Allowable Preference Categories

1. Current residents: A household in which one or more members is living in the city or town at the time of application. Documentation of residency should be provided, such as rent receipts, utility bills, street listing or voter registration listing.
2. Municipal Employees: Employees of the municipality, such as teachers, janitors, firefighters, police officers, librarians, or town hall employees.
3. Employees of Local Businesses: Employees of businesses located in the municipality.
4. Households with children attending the locality's schools, such as METCO students.

(June 25, 2008 change: removed formerly listed allowable preference category, "Family of Current Residents.")

When determining the preference categories, the geographic boundaries of the local resident preference area should not be smaller than municipal boundaries.

Durational requirements related to local preferences, that is, how long an applicant has lived in or worked in the residency preference area, are not permitted in any case.

Preferences extended to local residents should also be made available not only to applicants who work in the preference area, but also to applicants who have been hired to work in the preference area, applicants who demonstrate that they expect to live in the preference area because of a bona fide offer of employment, and applicant households with children attending the locality's schools, such as METCO students.

A preference for households that work in the community must not discriminate (including have a disproportionate effect of exclusion) against disabled and elderly households in violation of fair housing laws.

Advertising should not have a discouraging effect on eligible applicants. As such, local residency preferences must not be advertised as they may discourage non-local potential applicants.

(April 9, 2008 changes: (1) Inserted new fifth enumerated paragraph; (2) addition of "and applicant households with children attending the locality's schools in eighth paragraph).

Avoiding Potential Discriminatory Effects

The local selection preferences must not disproportionately delay or otherwise deny admission of non-local residents that are protected under state and federal civil rights laws. The AFHMP should demonstrate what efforts will be taken to prevent a disparate impact or discriminatory effect. For example, the community may move minority applicants into the local selection pool to ensure it reflects the racial/ethnic balance of the HUD defined Metropolitan Statistical Area as described below.⁵² However, such a protective measure may not be sufficient as it is race/ethnicity specific; the AFHMP must address other classes of persons protected under fair housing laws who may be negatively affected by the local preference.

To avoid discriminatory effects in violation of applicable fair housing laws, the following procedure should be followed unless an alternative method for avoiding disparate impact (such as lowering the original percentage for local preference as needed to reflect demographic statistics of the MSA) is approved by the Subsidizing Agency. If the project receives HUD financing, HUD standards must be followed.

A lottery for projects including a local preference should have two applicant pools: a local preference pool and an open pool. After the application deadline has passed, the Developer should determine the number of local resident minority households there are in the municipality and the percentage of minorities in the local preference pool. If the percentage of minority local resident households in the local preference pool is less than the percentage of minorities in the surrounding HUD-defined area, the Developer should make the following adjustments to the local preference pool:

⁵²Note: This protective measure may not be dispositive with respect to discriminatory effects. For example, the non-local applicant pool may contain a disproportionately large percentage of minorities, and therefore adjusting the local preference pool to reflect demographics of the regional area may not sufficiently address the discriminatory effect that the local preference has on minority applicants. Therefore, characteristics of the non-local applicant pool should continually be evaluated.

- The Developer should hold a preliminary lottery comprised of all minority applicants who did not qualify for the local preference pool, and rank the applicants in order of drawing.
- Minority applicants should then be added to the local preference pool in order of their rankings until the percentage of minority applicants in the local preference pool is equal to the percentage of minorities in the surrounding HUD-defined area.
- Applicants should be entered into all pools for which they qualify. For example, a local resident should be included in both pools.
- Minorities should be identified in accordance with the classifications established by HUD and the U.S. Census Bureau, which are the racial classifications: Black or African American; Asian; Native American or Alaska Native; Native Hawaiian or Pacific Islander; or other (not White); and the ethnic classification Hispanic or Latino.

D. Household Size/Larger Households Preference

General

Household size should be appropriate for the number of bedrooms in the home. It is appropriate to set a minimum. A maximum household size for the units may be established provided that:

- Maximum allowable household size may not be more restrictive than the State Sanitary Code or applicable local bylaws, and may not violate state and federal civil rights laws.
- Maximum allowable household size may not be more restrictive than the Large Household Preference established below.

(April 8, 2008 change: deleted first sentence of paragraph which previously stated "...for example, it may be appropriate for two bedroom homes to set a minimum household size of two persons.")

Larger Household Preference

Within an applicant pool first preference shall be given to households requiring the total number of bedrooms in the unit based on the following criteria:

- There is at least one occupant per bedroom.⁵³
- A husband and wife, or those in a similar living arrangement, shall be required to share a bedroom. Other household members may share but shall not be required to share a bedroom.
- A person described in the first sentence of (b) shall not be required to share a bedroom if a consequence of sharing would be a severe adverse impact on his or her mental or physical health and the lottery agent receives reliable medical documentation as to such impact of sharing.

⁵³ Disabled households must not be excluded from a preference for a larger unit based on household size if such larger unit is needed as a reasonable accommodation.

Within an applicant pool second preference shall be given to households requiring the number of bedrooms in the unit minus one, based on the above criteria. Third preference shall be given to households requiring the number of bedrooms in the unit minus two, based on the above criteria.

A “household” shall mean two or more persons who will live regularly in the unit as their principal residence and who are related by blood, marriage, law or who have otherwise evidenced a stable inter-dependent relationship, or an individual.

Lottery drawings shall result in each applicant being given a ranking among other applicants with households receiving preference for units based on the above criteria. Household size shall not exceed State Sanitary Code requirements for occupancy of a unit (See 105 CMR 400).⁵⁴

Lotteries

The Lottery Application

Resident selection must generally be based on a lottery, although in some cases it may be based on another fair and equitable procedure approved by the Subsidizing Agency.⁵⁵ A lottery procedure is preferred over a “first-come, first-serve procedure,” as the latter procedure may disadvantage non-local applicants.

The application period should be at least 60 days. To ensure the fairness of the application process, applicants should not be required to deliver application materials and instead should be permitted to mail them.

The lottery application must address a household’s:

- income
- assets
- size and composition
- minority status (optional disclosure by the household)
- eligibility as a first-time buyer (for ownership units)
- eligibility for local preference

The lottery administrator shall request verification (e.g., three prior year tax returns with the W2 form; 5 most recent pay stubs for all members of the household who are working, three most recent bank statements and other materials necessary to verify income or assets).

Applicants cannot be required to use a specific lender for their pre-approval letter or their mortgage.

⁵⁴ Note, however, that fair housing exceptions may apply: see HUD Fair Housing Enforcement—Occupancy Standard; Notice of Statement of Policy, Docket No. FR-4405-01 (1998).

⁵⁵ In the case of project based Section 8 properties where resident selection is to be performed by the housing authority pursuant to a Section 8 waiting list, a lottery procedure is not required.

Only applicants who meet qualification requirements should be included in the lottery.

Lottery Procedure

Once all required information has been received, qualified applicants should be assigned a registration number. **Only applicants who meet the eligibility requirements shall be entered into a lottery. The lottery shall be conducted after any appeals related to the project have been completed and all permits or approvals related to the project have received final action.**

Ballots with the registration number for applicant households are placed in all lottery pools for which they qualify. The ballots are randomly drawn and listed in the order drawn, by pool. If a project has units with different numbers of bedrooms, units are then awarded (largest units first) by proceeding down the list to the first household on the list that is of appropriate size for the largest unit available according to the appropriate-unit-size criteria established for the lottery. Once all larger units have been assigned to appropriately sized households in this manner, the lottery administrator returns to the top of the list and selects appropriately sized households for smaller units. This process continues until all available units have been assigned to appropriately sized applicant households.

If the project includes units accessible or adaptable for occupancy by disabled persons, first preference (regardless of applicant pool) for those units shall be given to such disabled persons, including single person households, in conformity with state and federal civil rights laws.

The lottery administrator should retain a list of households who are not awarded a unit, in the order that they were drawn. If any of the initial renters/buyers do not rent/purchase a unit, the unit shall be offered to the highest ranked household on that retained list. This list may generally be retained and used to fill units for up to one year. However, other factors such as the number of households remaining on the list, the likelihood of the continuing eligibility of such households, and the demographic diversity of such households may inform the retention time of the list, subject to the approval of the Subsidizing Agency.

After the initial lottery, waiting lists should be analyzed, maintained, and updated (through additional marketing) so that they remain consistent with the objectives of the housing program and are adequately representative of the racial, ethnic, and other characteristics of potential applicants in the housing market region.

(April 8, 2008 change to the third paragraph: addition of “(regardless of applicant pool)”.

Lottery Example

This theoretical lottery has an OPEN pool that includes all applicants and a LOCAL PREFERENCE pool with only applicants from the local area.

- Total applicants in lottery: 100
 - Total minority applicants: 20
 - The community in which the lottery takes place falls within the HUD Boston Metropolitan Statistical Area which has a minority population of 20.7%.
1. Determine the number of applicants who claim a LOCAL preference according to approved criteria.

2. Determine the number of minority applicants in the LOCAL preference pool.
3. Determine the percentage of minority applicants in the LOCAL preference pool.

Total Applicants in Local Preference Pool	Total Minority Applicants in Local Preference Pool	% Minority Applicants in Local Preference Pool
60	10	16.7%

Since the percentage of minority applicants in the LOCAL preference pool is below the percentage of minority residents in the HUD defined statistical area (16.7% as opposed to 20.7%), a preliminary lottery is required.

4. The 10 minority applicants who do not have LOCAL preference are entered into a preliminary drawing and assigned a rank based on the order of their draw. Minority applicants are added to the LOCAL preference pool in order of their rank until the LOCAL preference pool has at least as great a percentage of minority applicants as the larger statistical area. In this example, 4 applicants will be added to the LOCAL preference pool to bring the percentage of minority applicants up to 21.8%.

Total Applicants in Supplemented Local Preference Pool	Total Minority Applicants in Supplemented Local Preference Pool	% Minority Applicants in Supplemented Local Preference Pool
64	14	21.8%

5. Draw all ballots from the adjusted LOCAL pool and assign rankings to each household. Preference for appropriately sized households will still apply and all efforts should be made to match the size of the affordable units to the legitimate need for bedrooms of each household.
6. Once all units for LOCAL residents have been allocated, the OPEN pool should proceed in a similar manner. All LOCAL residents should have ballots in both pools, and all minority applicants that were put in the LOCAL pool should remain in the OPEN pool as well.

F. Homeownership

1. Household Eligibility

A Subsidizing Agency housing program may establish eligibility requirements for homebuyers. In the absence of such provisions, the following requirements shall apply.

In addition to meeting the requirements for qualifying a Project or dwelling unit for the SHI (see Section II.A), the household shall not have owned a home within three years preceding the application, with the exception of:

- displaced homemakers, where the displaced homemaker (an adult who has not worked full-time, full-year in the labor force for a number of years but has, during such years, worked primarily without remuneration to care for the home and family), while a homemaker, owned a home with his or her partner or resided in a home owned by the partner;
- single parents, where the individual owned a home with his or her partner or resided in a home owned by the partner and is a single parent (is unmarried or legally separated from a spouse and either has 1 or more children of whom the individual has custody or joint custody, or is pregnant);
- households where at least one household member is 55 or over;
- households that owned a principal residence not permanently affixed to a permanent foundation in accordance with applicable regulations; and
- households that owned a property that was not in compliance with State, local or model building codes and that cannot be brought into compliance for less than the cost of constructing a permanent structure.

Individuals who have a financial interest in the development and their families shall not be eligible.

2. Final Qualification and Closing

Once the lottery has been completed, applicants selected to purchase units must be given a reasonable pre-specified time period in which they must secure financing. The Developer should invite the lottery winners to a loan application workshop. The Developer should make prior arrangements with local financial institutions with respect to financing qualified purchasers. Often such institutions will give preliminary approvals of loans, which make the remainder of the process more efficient for all parties.

Before a Purchase and Sale Agreement is signed, the lottery agent should submit income and asset documentation of the applicant to the Subsidizing Agency (to DHCD and the municipality in the case of a LAU). Income verification should include tax returns and W-2s from the past three years, five most recent pay stubs, three months recent bank statements and 401 K reports, reliable documentation as to other sources of income and assets. The Subsidizing Agency (to DHCD and the municipality in the case of a LAU) will then verify that the household's annual income does not exceed 80% of the area median income, or such lower income limit as may have been established for the particular project. The Subsidizing Agency (to DHCD and the municipality in the case of a LAU) also will verify that household assets do not exceed the maximum allowed. Closing of the sale will also be contingent on the Subsidizing Agency's (to DHCD and the municipality in the case of a LAU) approval of the buyer's financing.

Non-household members should not be permitted as co-signers of the mortgage.

3. Resales

AFHMP requirements apply to the housing for its duration. The AFHMP must include a plan, satisfactory to the Subsidizing Agency (to DHCD and the municipality in the case of a LAU), to address AFHMP requirements upon resale. The proposal must, at a minimum, require that units for re-sale to eligible purchasers be listed with CHAPA and MAHA's homeownership lottery sites as

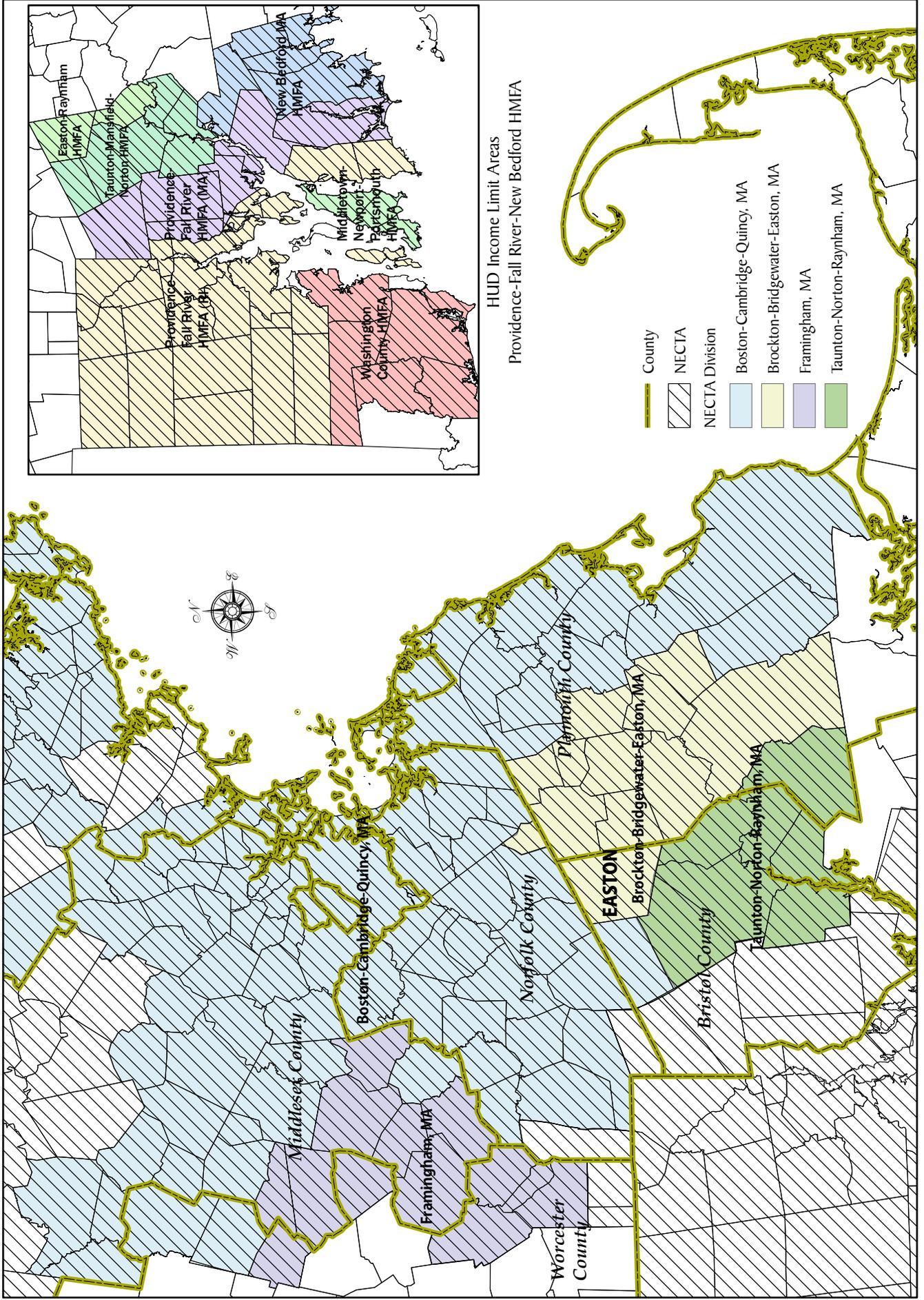
described above and establish minimum public advertising requirements. The proposal cannot impose the AFHMP requirements upon a homeowner other than requiring compliance with requirements of a Use Restriction, reasonable public advertising, and listing with CHAPA and MAHA.

(April 8, 2008 changes: modified second and third sentences to include listing with the MAHA website).

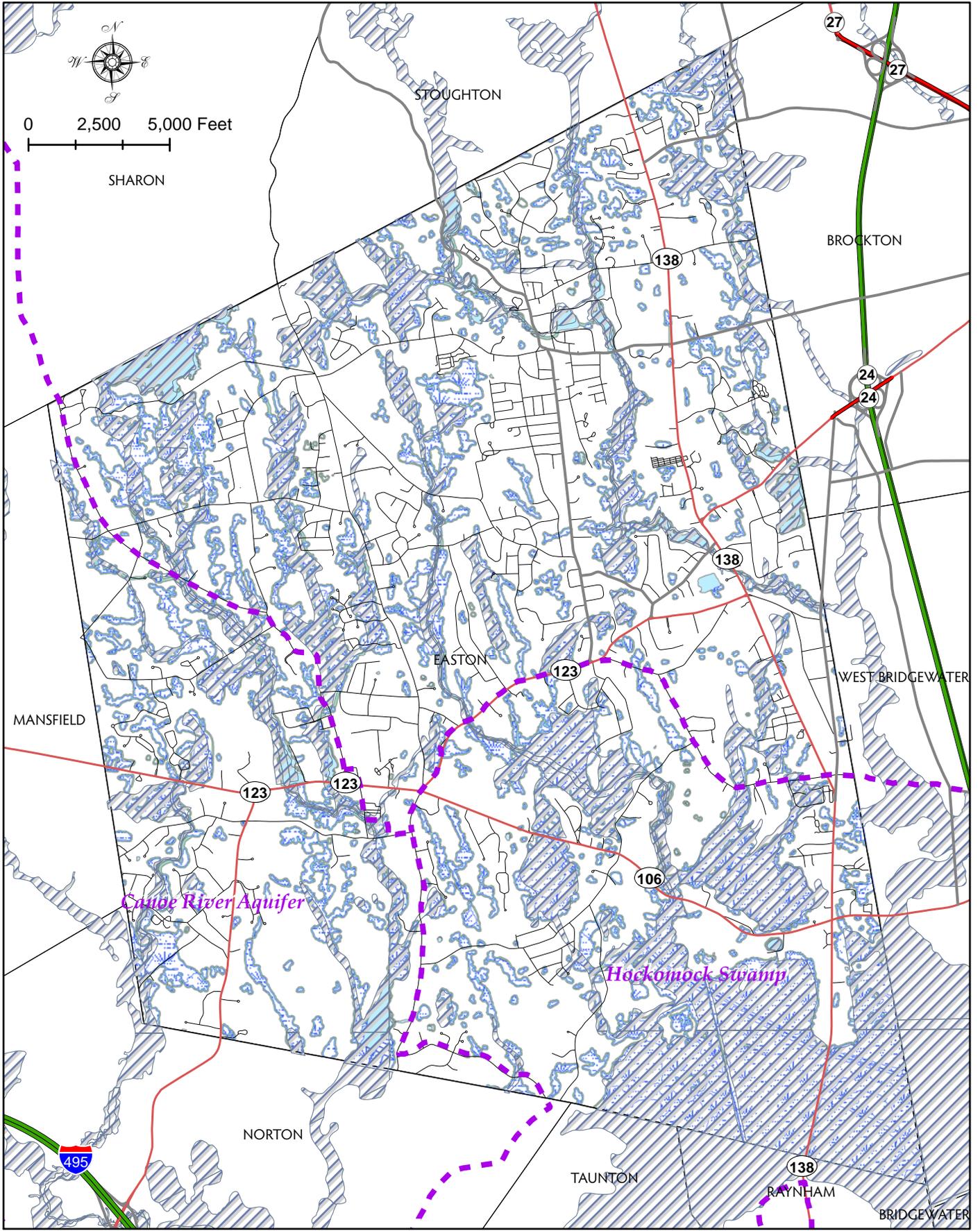
A “ready-buyer” list of eligible buyers maintained by the municipality or other local entity is encouraged. This list may be created through local, regional, and statewide lists and resources. As stated above, the list should continually be analyzed, maintained, and updated (through additional marketing) so that it remains consistent with the objectives of the housing program and is adequately representative of the racial, ethnic, and other characteristics of potential applicants in the housing market region.

VII. Maps

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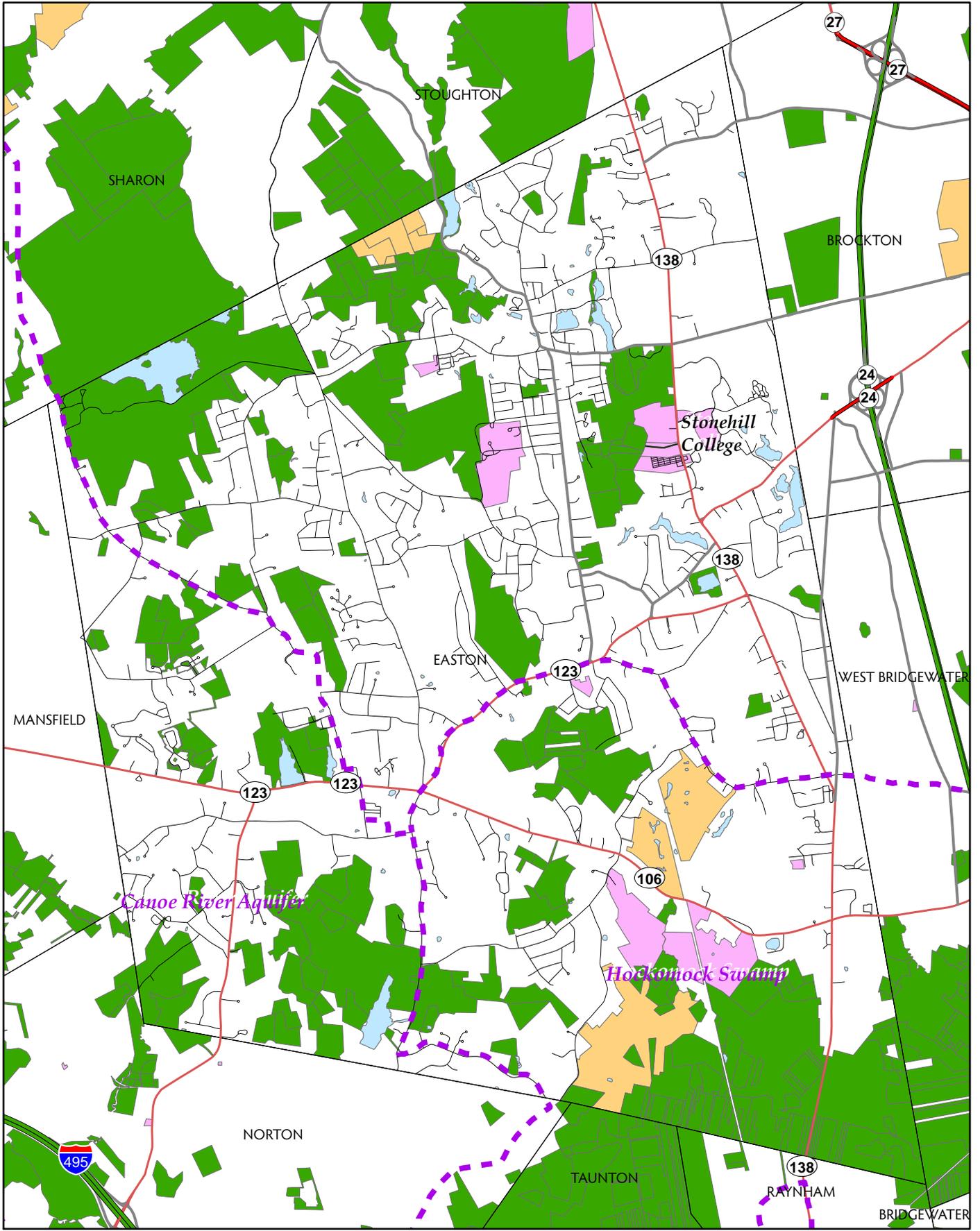


Map 1.1. Geographic Area References



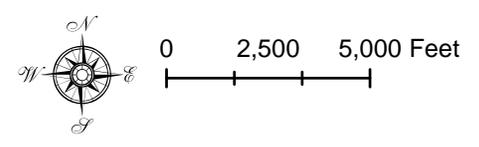
Map 2.1. Natural Constraints

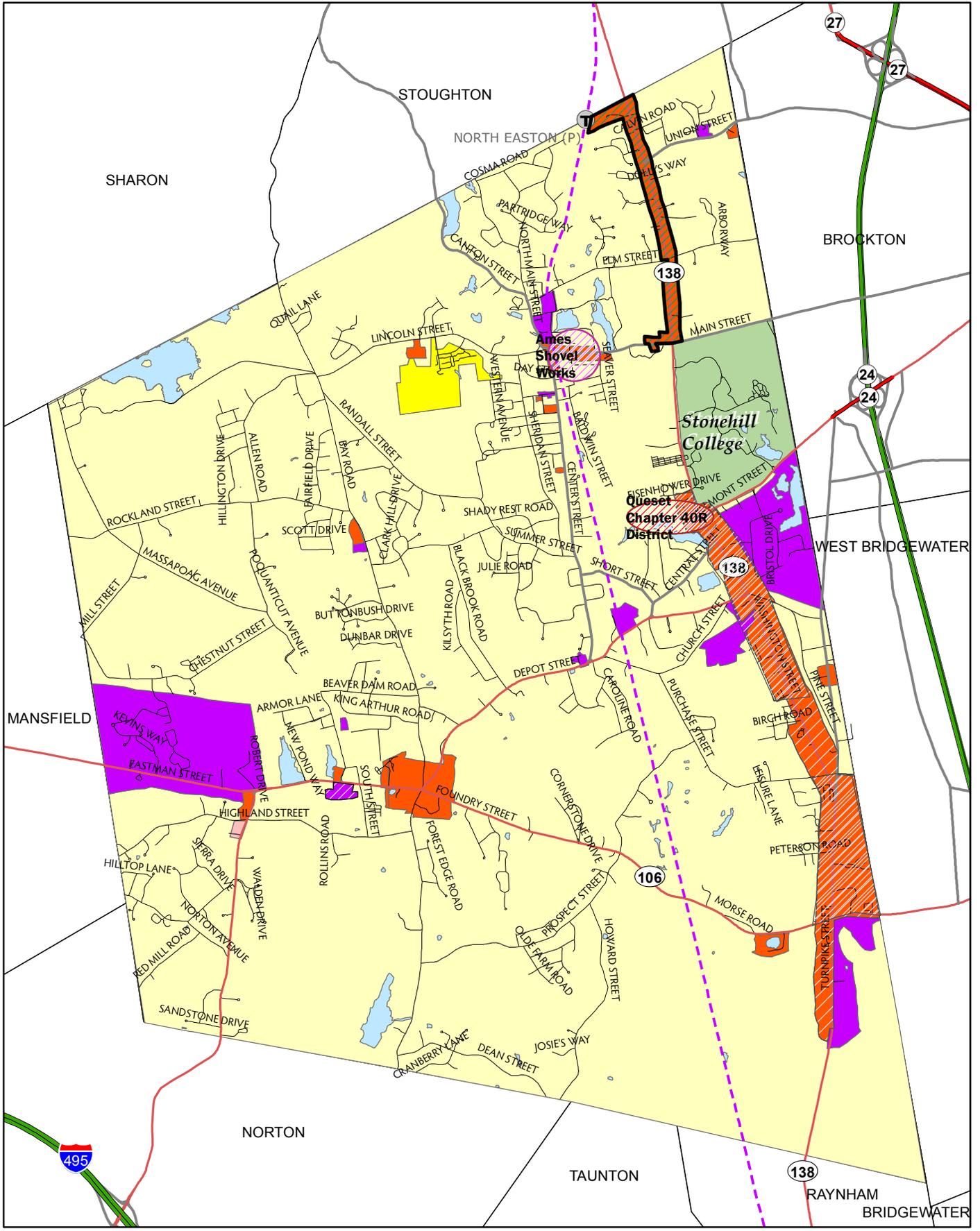




Map 2.2. Open Space

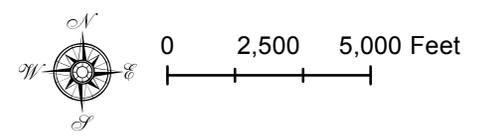
- - - ACEC
- WATER RESOURCES
- OPEN SPACE
Protected
- Limited Protection
- Temporary Protection
- Unprotected

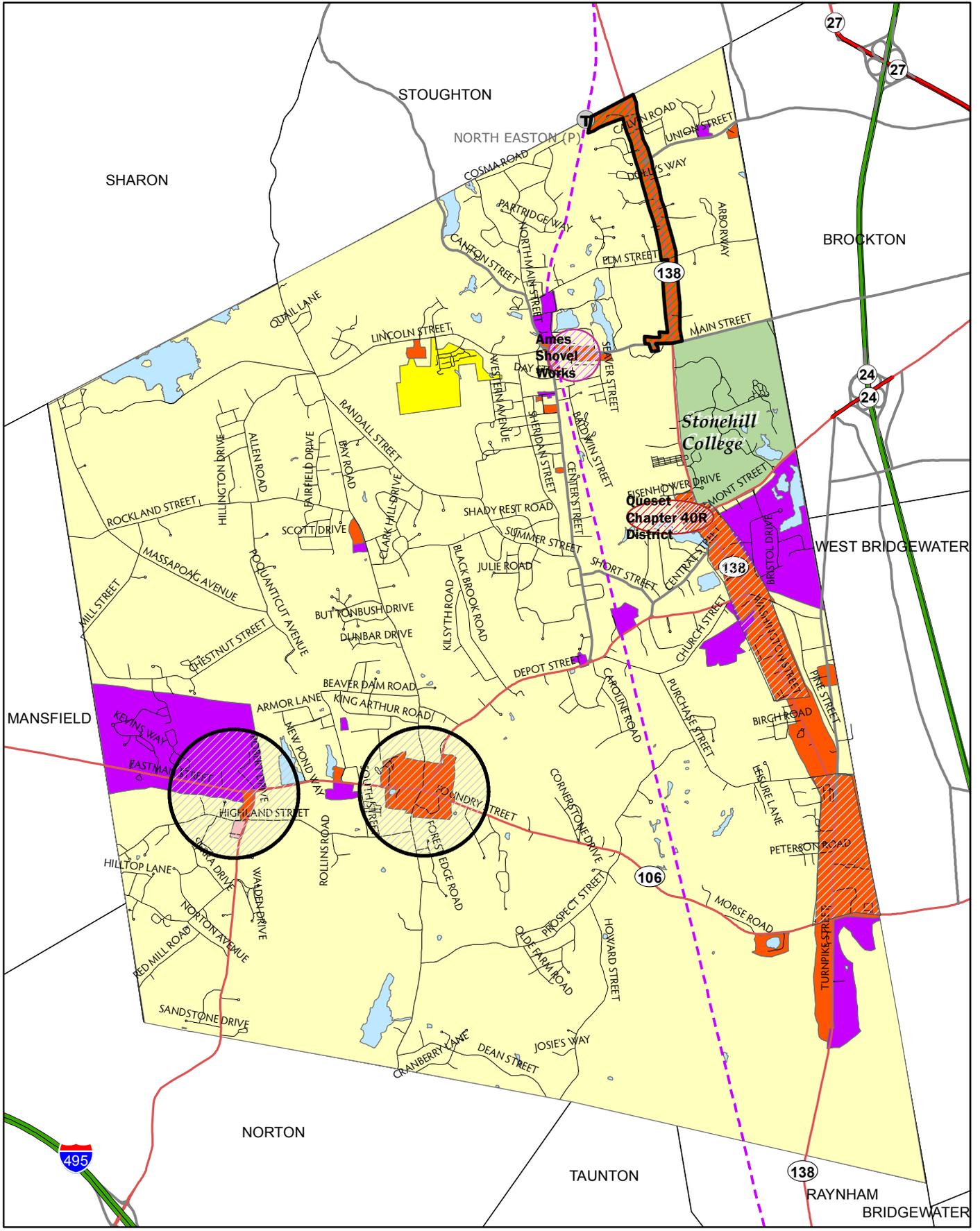




Map 4.1. Potential Housing Development Opportunities

- | | | |
|-----------------------|----------------------------|-----------------------|
| Open Water | Potential Overlay District | Business |
| Proposed MBTA Station | Existing Zoning | Neighborhood Business |
| Proposed Rail Line | Residential | Industrial |
| | Residential I | Eleemosynary |





Map 4.2. Potential Zoning Changes

- | | | |
|-----------------------|----------------------------|-----------------------|
| Open Water | Potential Overlay District | Business |
| Proposed MBTA Station | Existing Zoning | Neighborhood Business |
| Proposed Rail Line | Residential | Industrial |
| | Residential I | Eleemosynary |

