



TOWN OF BREWSTER Housing Production Plan

Housing Production Plan 2022-2027

ADOPTED BY THE BREWSTER SELECT BOARD AND PLANNING BOARD ON JULY 11, 2022

In Compliance with 760 CMR 56.03(4)

Prepared for:
The Town of Brewster

by:
Barrett Planning Group LLC





Brewster Housing Production Plan, 2022-2027

BREWSTER HOUSING PARTNERSHIP

Jillian Douglass, Chair
Lisa Forhan
Vanessa Greene
Ralph Marotti
Diane Pansire
Sarah Robinson
Steve Seaver

TOWN STAFF

Jill Scalise, Housing Coordinator
Donna Kalinick, Assistant Town Administrator
Jon Idman, Town Planner
Peter Lombardi, Town Administrator

CONSULTANT TEAM

Barrett Planning Group LLC
Judi Barrett, Principal-in-Charge
Alexis Lanzillotta, Project Manager

BREWSTER SELECT BOARD

David Whitney, Chair
Cynthia Bingham
Mary Chaffee
Ned Chatelain
Kari Hoffmann

BREWSTER PLANNING BOARD

Madalyn Hillis-Dineen, Chair
Amanda Bebrin
Charlotte Degen
Tony Freitas
Rob Michaels
Elizabeth Taylor
Alex Wentworth

Past Members
Paul Wallace, Chair
Mark Koch



TOWN OF BREWSTER Housing Production Plan

Table of Contents

INTRODUCTION	1
Why Prepare This Plan?	2
Defining “Affordable Housing”	3
Components of a Housing Production Plan	4
Community Engagement Process	4
A Note on Data Sources	5
HOUSING NEEDS ASSESSMENT	7
Key Findings.....	7
Demographic Profile	8
Housing Characteristics.....	22
Housing Market.....	30
Housing Affordability.....	34
Barriers to Development.....	41
HOUSING PRODUCTION PLAN GOALS.....	56
Brewster’s Housing Goals	56
Alignment with Regional Goals	58
HOUSING PRODUCTION PLAN STRATEGIES	59
Progress Since 2017	59
Looking Forward: 2022-2027 Strategies.....	60
Approach to Implementation.....	62
Strategies Explained.....	66
APPENDICES	77

This page intentionally left blank.

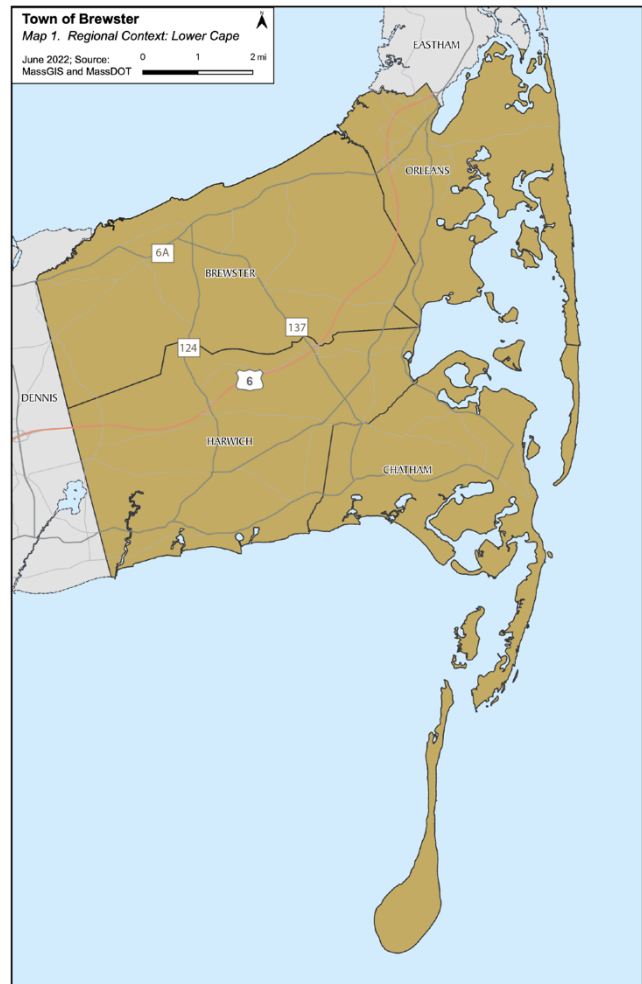


Introduction

The Town of Brewster consists of about 22.5 square miles of land, over 2,000 acres of freshwater ponds, and miles of both coastal and freshwater shorelines. Along with the Towns of Orleans, Chatham, and Harwich, Brewster is part of the Lower Cape region (see Map 1) and is also bordered by the Town of Dennis to the west. Brewster is defined by its identity as a small coastal community, primarily from its northern border along Cape Cod Bay, although the Town also has forty feet of frontage along Pleasant Bay to the south. Both the Town's 2021 Open Space and Recreation Plan and 2018 Vision Plan highlight the Town's rural character and notable assets including its rich scenic and historic heritage, beaches, Cape Cod Bay, ponds, and open space resources.

Many of the conditions that existed when Brewster prepared its last Housing Production Plan (HPP) in 2017 remain true today, particularly in terms of infrastructure capacity, environmental considerations influenced by Brewster's significant marine and freshwater water resources, and the Zoning Bylaw's limitations on the types and density of housing that can be built. Nonetheless, the Town has made significant strides implementing its last HPP, most notably:

- ✓ Hiring a Housing Coordinator in 2017;
- ✓ Establishing the Brewster Affordable Housing Trust in 2018;
- ✓ Adopting the Town's current Accessory Dwelling Unit (ADU) and Accessory Commercial Dwelling Unit (ACDU) bylaws in 2018; and





- ✓ Issuing a Request for Proposals (RFP) for the development of over sixteen acres of Town-owned land off Millstone Road.¹

Other major factors influencing — or influenced by — Brewster’s housing needs include:

The Seasonal Housing Market. As of 2020, an estimated 42 percent of Brewster’s housing stock was used for seasonal, recreational, or occasional use compared to 38 percent for Barnstable County as a whole.² This marks an increase of over 6 percent since 2010 for the Town, which continues to exacerbate the challenge of finding year-round rental housing. Together, year-round residents, seasonal workers, and vacationers compete for the inadequate supply of affordable housing that exists in Brewster.

Older Population. Brewster’s population is older, with a median age of 56.5 years as opposed to 53.7 years for Barnstable County and 39.6 years for the state.³ Accordingly, a larger share of Brewster householders are retired than at county and state levels, and have higher retirement incomes on average, as well.⁴

Growing Income Inequality. Both American Community Survey (ACS) data and Comprehensive Housing Affordability Strategy (CHAS) data indicate an overall *decrease* in households with low and moderate incomes, and a corresponding *increase* in households with higher incomes. Specifically, between 2010 and 2018, the percentage of households earning at or below the Household Area Median Family Income (HAMFI) decreased by 4.5 percent, and households earning above the HAMFI increased by 4.8 percent.⁵ However, this wealth increase is not equally felt across Brewster households, with two census block groups meeting the criteria for 2020 Environmental Justice (EJ) Population designation based upon lower household income levels.⁶

Preserved Open Space. About one third of Brewster’s land is considered protected open space. The achievements of the Town and open space organizations have contributed to Brewster’s beauty and environmental quality, while also influencing where future housing development is likely to occur.

WHY PREPARE THIS PLAN?

This Housing Production Plan has been prepared to meet all the requirements of a Housing Production Plan under state regulations and the guidelines of the Massachusetts Department of Housing and Community Development (DHCD).⁷ The main purpose of a Housing Production Plan is

¹ The “Housing Strategies” section of this plan provides a more complete list of accomplishments since the 2017 HPP.

² American Community Survey (ACS) 5-Year Estimates, 2016-2020, Table 25004.

³ ACS 5-Year Estimates, 2016-2020, Table B01002.

⁴ ACS 5-Year Estimates, 2016-2020, Tables B19059 and B19069.

⁵ Comprehensive Affordability Strategy (CHAS) data, 2010 and 2018. (2018 is the most recent year for which this dataset is available).

⁶ Environmental Justice Population designation criteria are described further in the Needs Assessment of this plan.

⁷ G.L. c. 40B, §§ 20-23 and 760 CMR 56.00.



to help a community make steady progress toward the 10 percent statutory minimum under Chapter 40B, i.e., that 10 percent of total year-round housing units will be deed-restricted to be affordable for low- or moderate-income households. Whether a community has reached the 10 percent minimum is determined by the Chapter 40B Subsidized Housing Inventory (SHI), a periodically updated list of all affordable units recognized by DHCD. To be included on the SHI, a unit must be:

- Affordable to households with incomes at or below 80 percent of the HAMFI, also commonly referred to as the Area Median Income, or AMI. For Brewster, this designated area defining the AMI is the Barnstable County Fair Market Rent (FMR) Area, determined by the U.S. Department of Housing and Urban Development (HUD);
- Approved by a housing subsidy agency as eligible for a comprehensive permit or as “Local Action Units” (i.e., developed *without* a comprehensive permit);
- Protected by a long-term affordable housing restriction; and
- Marketed and sold or rented under a DHCD-compliant Affirmative Fair Housing Marketing Plan (AFHMP).

A completed Housing Production Plan requires approval by DHCD for a town to rely on it as a later basis seeking plan certification. While many types of housing needs may be considered, the *primary* purpose of the Housing Production Plan is to help communities reach the 10 percent statutory minimum under Chapter 40B.

DEFINING “AFFORDABLE HOUSING”

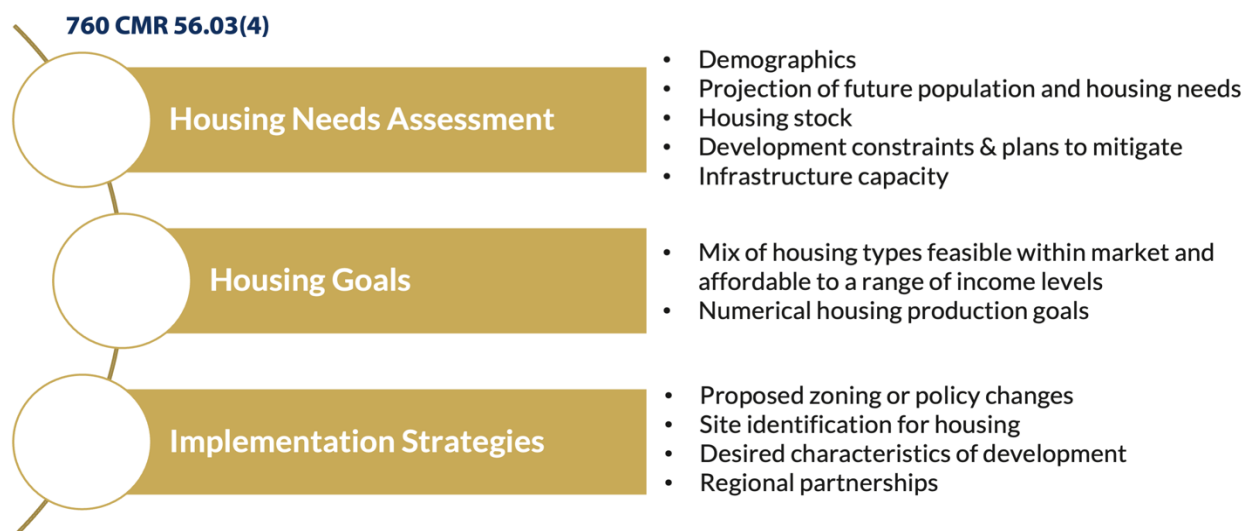
In this Housing Production Plan, the term “affordable housing” means housing that low- or moderate-income individuals and families can afford while also meeting their other basic needs: food, health care, transportation, utilities, and essential goods and services. Of course, households with higher incomes have trouble finding housing in Brewster and elsewhere in the Lower Cape and Barnstable County, too — a strong indicator that the region’s housing supply is out of balance with demand. Housing affordability in a general sense refers to macrolevel relationships between the cost of housing and household incomes. Affordable housing, by contrast, has a specific regulatory meaning and is customarily used in reference to households with low or moderate incomes. For Brewster and all its neighbors, “low- or moderate-income” refers to income limits set annually by HUD. The Commonwealth of Massachusetts uses HUD’s income limits to determine eligibility for income-restricted housing developed under Chapter 40B. As a result, most housing called “affordable housing” in federal, state, or local laws, ordinances, and bylaws is based on this consistent framework. Since Brewster’s Housing Production Plan is required to conform with the Department of Housing and Community Development’s (DHCD) Chapter 40B regulations, the primary (but not exclusive) focus is low- and moderate-income housing.



COMPONENTS OF A HOUSING PRODUCTION PLAN

A Housing Production Plan begins with a **housing needs assessment**, which describes a community's housing needs using data from sources such as the Town, the U.S. Census Bureau, housing market reports, municipal records, and community interviews. In addition, the needs assessment will explore constraints to development and plans to mitigate these constraints where possible. Building upon this analysis of housing needs and potential barriers to further housing development, the Housing Production Plan sets a series of qualitative and quantitative affordable **housing goals**. Based on these goals, the plan lays out **implementation strategies**. State regulations (760 CMR 56.03[4]) and DHCD Comprehensive Permit guidelines describe the specific requirements for each component of an HPP, outlined in Figure 1 below.

Figure 1. Components of a Housing Production Plan



COMMUNITY ENGAGEMENT PROCESS

The Town provided multiple opportunities for participation by local officials and the community at large. The planning process was guided by a Community Engagement Plan that consisted of the following components:

Regular Housing Partnership Meetings. The Housing Partnership met monthly from February 2022 through June 2022 to discuss the development of this plan with Town staff and the consultant team.

Small Group Interviews. During the month of March 2022, the consultant team conducted small group interviews with a total of thirty-five individuals familiar with Brewster's housing needs to get a sense of what has changed since the last HPP and what needs still remain. Participants included Town staff, members of Town bodies, representation from housing advocacy groups and social service providers, members of the business community, realtors, and residents.



Community Survey. A community survey was available online and in paper form from March 10 through April 8, 2022. This survey asked questions about the respondent's own housing needs as well as their perspectives on the needs of the community. A total of 881 individuals participated in this survey, the results of which are included in Appendix E.

Community Meeting. The Housing Partnership hosted a virtual community meeting on April 28, 2022 to share key findings from the Needs Assessment and invite participants to join breakout groups focused on the following topics: housing needs; development constraints; mapping housing solutions; housing goals and strategies; and regional context. A summary of findings from this event is also included in Appendix E.

Focus Groups. Between May 10 and May 19, 2022, the consultant team conducted eight focus groups with Town staff, nonprofit and for-profit developers, representation from regional housing partners, and members from Town bodies. Participants were asked to review and provide comments on draft strategies for the HPP.

Initial Presentation of Needs, Goals, and Strategies to the Select Board and Planning Board. On June 6, 2022, the consultant team presented the Needs Assessment, Goals, and Implementation Strategies to the Select Board and Planning Board for their review. Both boards were invited to provide comments through the Housing Office on the presentation.

Second Community Meeting on Draft Plan. On June 16, 2022, the Housing Partnership hosted a second virtual community meeting, during which the consultant team presented the draft plan. Approximately 30 attendees participated and were given opportunities to ask questions during the presentation.

Public Comment Period. Members of the public were encouraged to provide written comments on the draft plan for two weeks from June 16-June 30, 2022. Three written comments were submitted during this time, in addition to five written comments received previously following the June 6 presentation to the Select Board and Planning Board. Town staff and the consultant team discussed the comments and necessary changes to the plan. These comments are on file with the Brewster Housing Office.

Final Public Hearing and Plan Adoption. On July 11, 2022, the consultant team presented the revised final plan to the Select Board and Planning Board for review. Both boards adopted the plan at this joint meeting.

A NOTE ON DATA SOURCES

Information for the Brewster Housing Production Plan comes from a variety of sources, including the Town, the community engagement process described above, previous plans and studies, the Cape Cod Commission, state agencies, proprietary data, the U.S. Department of Housing and Urban



Development (HUD), and the U.S. Bureau of the Census. The most frequently used sources of data are as follows:

- **The Census of Population and Housing (Decennial Census).** This plan draws from Census 2020 where appropriate, but historical census tables were also used as needed. When this planning process ended, information available from Census 2020 was still limited and only included total housing unit counts, general vacancy information (but not vacancies by type, an important factor for seasonal communities), total population counts, and information about population race and ethnicity for redistricting purposes. The full release of Census 2020 will also include an official year-round housing count, as well as data regarding tenure, household types, population by age, and more.
- **The American Community Survey (ACS).** The ACS provides demographic and housing estimates for large and small geographic areas every year. Although the estimates are based on a small population 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. In most cases, data labeled “ACS” in this plan are taken from the most recent five-year tabulation: 2016-2020 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 Census Bureau, this dataset is a “special tabulation” of ACS. 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 are based on the ACS 2014-2018 estimates.
- **Housing Market Sources.** The consultants tapped the Warren Group’s extensive real estate transaction databases to sample sales volume and sale prices, as well as Rentometer for rental market data.
- **Town Data.** Information provided by the Building Department, Planning Department, and Deputy Assessor supported a review of local development patterns and market trends, and Assessor’s records were used to analyze Brewster’s housing stock.
- **Massachusetts Department of Transportation (MassDOT) Socio-Economic Projections for 2020 Regional Transportation Plans.** This source was relied upon for population projections and trends.

In addition, many local and regional publications were reviewed during the development of this Housing Production Plan and are referenced throughout this document.



Housing Needs Assessment

KEY FINDINGS

- Brewster's population increased by 5 percent between 2010 and 2020 Census, despite recent projections forecasting a potential decline. The number of households also increased by 9 percent.
- The share of older residents and older householders living alone have both increased since the 2010 Census. Conversely, the percentages of residents under 18 and households with children under 18 have declined.
- Brewster's population lacks racial and ethnic diversity, although the percentage of minority residents has slightly increased since the 2010 Census.
- The Town- and county-wide the percentage of older adults with a disability is markedly lower than the state. Nonetheless, older Brewster residents are much more likely to have a disability than residents under age 65.
- Household wealth is increasing, with a significant jump in higher-income households from 2010 and a decrease in lower-income households. Regionally, the HUD area median family income (HAMFI) has also increased sharply since 2021.
- In addition to the percentage of low-to-moderate income (LMI) households decreasing, the percentage of households earning between 80 and 100 percent HAMFI has decreased, likely because they cannot find housing; these households are ineligible for the limited subsidized units currently available in Brewster and are also likely to be priced out of an increasingly competitive housing market.
- This wealth increase is not equally felt across Brewster households, with two census block groups meeting the criteria for 2020 Environmental Justice (EJ) Population designation based upon lower household income levels relative to the statewide household income level.
- Older adults living alone are the most likely household type to be low-to-moderate income (LMI), and female householders living alone are more likely to be living in poverty than any other household type.
- Brewster's housing stock is predominantly detached single family homes, although Brewster has a higher share of attached single-family homes (i.e., condominiums) than the Lower Cape, county, and state. There is very limited multi-unit residential development, and most rental units in multi-unit structures are deed-restricted affordable units.



- Older single-family homes build before 1960 hold more land value than building value and accordingly may be at greater risk of teardown.
- Rental opportunities are limited, particularly for market-rate rental units. Other than the recent ADU/ACDU bylaw amendment, the Town's zoning does not facilitate the production of multi-unit or mixed-use residential development that would provide more rental units.
- The share of housing units for seasonal, recreational, or occasional use has increased while the share of year-round renter households has decreased. Market projections indicate that the gap between year-round and second homes will continue to narrow if housing trends are not altered.
- Housing sale prices have jumped significantly since 2020 and continue to rise, a trend more pronounced in Brewster and the Lower Cape than county- or statewide.
- Households earning the area median income are unlikely to be able to afford a home at Brewster's median sales price, and renters earning the median renter income for Brewster are unlikely to be able to afford market rental units.
- The majority of LMI households (an estimated 58 percent) are unaffordably housed ("housing cost-burdened"), paying more than 30 percent of their income toward housing costs. Seventeen percent of non-LMI households are cost-burdened.
- Among both owners and renters, households earning below 50 percent of the area median income are most likely to be cost-burdened, although there is also significant need at the 80-100 percent level.

DEMOGRAPHIC PROFILE

Population Trends

Brewster experienced tremendous growth between 1970 and 2000, increasing more than five-fold from 1,790 to 10,094 residents. This trend occurred across the Cape and Islands compared to the rest of Massachusetts, which made the population dip most Cape communities experienced by 2010 somewhat striking. While projections by the Massachusetts Department of Transportation (MassDOT) in 2018 anticipated a continued population decline through 2040, the Town's population in fact increased by nearly 500 between 2010 and 2020.⁸ The Cape Cod Commission also published

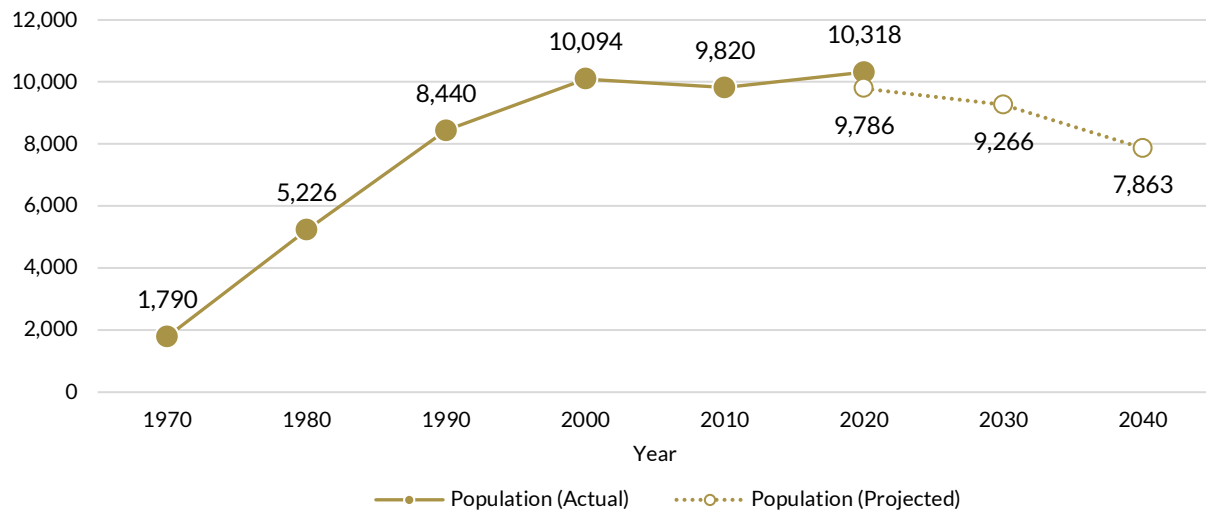
⁸ In 2018, MassDOT — in conjunction with an advisory team of experts from regional and state agencies, the Massachusetts Donohoe Institute (UMDI) and the Metropolitan Area Planning Council (MAPC) — projected population changes and housing demand through the year 2040. This project was intended to inform 2020 Regional Transportation Plans and analyzed demographic trends, labor force participation, commuting patterns, and other data to estimate population and household growth.



population projections through 2025 as part of their 2017 Regional Housing Market Analysis, which anticipated a 2020 population of 9,833.⁹

Figure 2. Total Population: Past Trends and Future Projections

Sources: US Decennial Census, 1970-2020, MassDOT Population Projections, 2018



POPULATION AGE

An estimated 14 percent of Brewster residents are under 18, which is in line with the county (15 percent), but significantly lower than the state (20 percent). Conversely, Brewster has a markedly larger percentage of older adults over age 55 than the state (53 percent and 30 percent, respectively). This trend applies to the Lower Cape and county to different degrees, as shown in Table 1.

Table 1. Percent of Population Under 18 and Over 55

	% Population Under 18	% Population Over 55
Brewster	13.8%	52.9%
Lower Cape	12.5%	56.9%
Barnstable County	15.2%	48.2%
MA	19.9%	30.1%

Source: ACS 5-Year Estimates, 2016-2020, Table B01001

Figure 3 breaks down Brewster's population by age, and Figure 4 highlights changes in different age groups between 2010 and 2020. All benchmark geographies saw a *decrease* in the share of their populations under 55 and an *increase* for the 55+ populations. Both population shifts were more pronounced in Brewster than in the Lower Cape, County, or state to varying degrees.

⁹ Cape Cod Commission, *Regional Housing Market Analysis and 10-Year Forecast of Housing Supply and Demand for Barnstable County, Massachusetts*, 2017. Prepared by Crane Associates, Inc. and Economic Policy Resources.



Figure 3. Population by Age
Source: ACS 5-Year Estimates, 2016-2020,
Table B01001

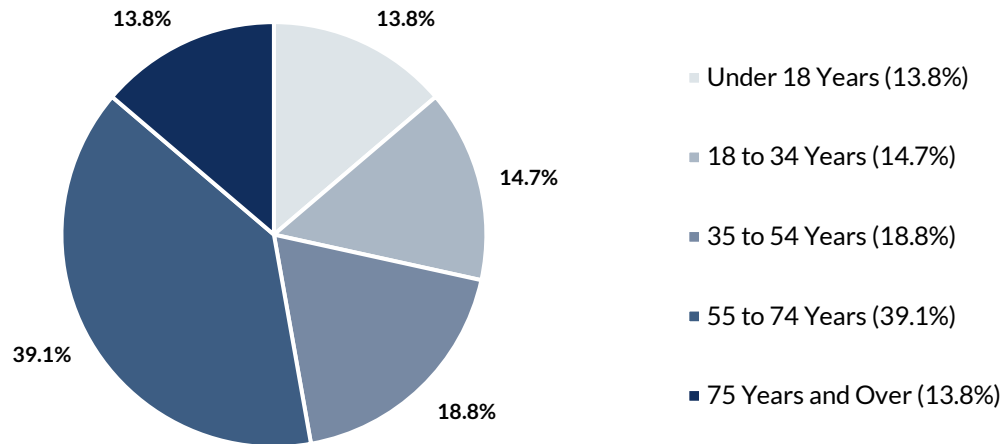
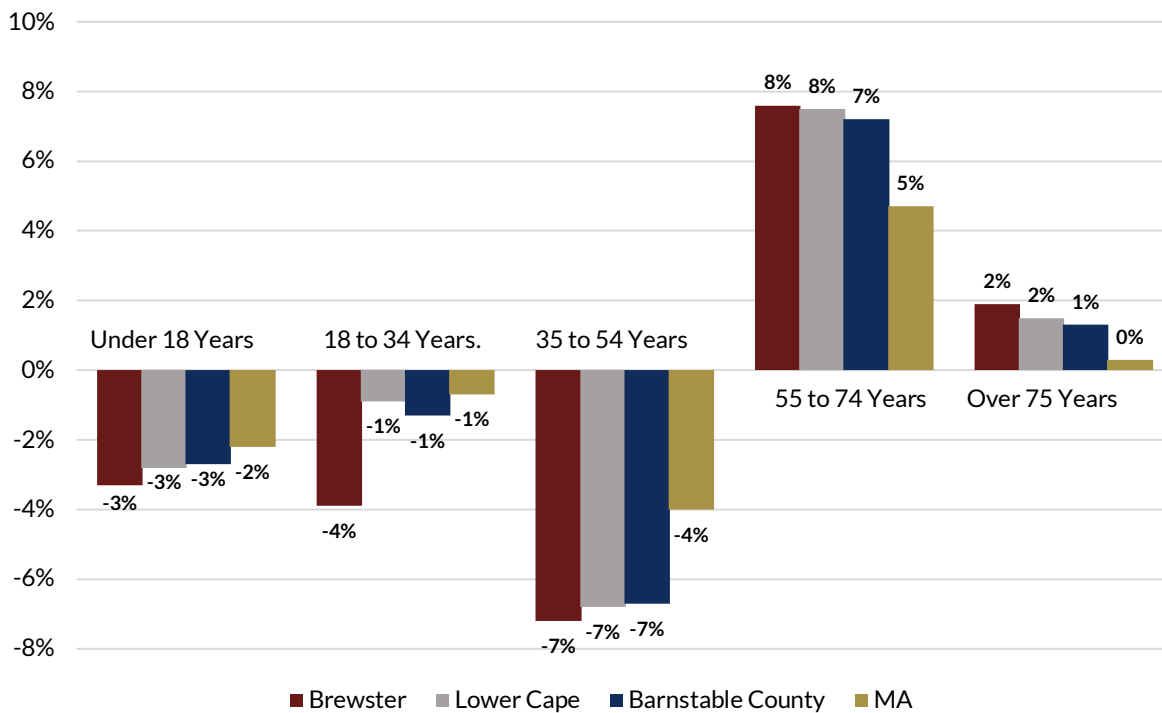


Figure 4. Percent Change in Population by Age, 2010-2020
Source: ACS 5-Year Estimates, 2006-2010 and 2016-2020, Table B01001





RACE, ETHNICITY, AND CULTURE

While the Cape continues to have less racial and ethnic diversity than the state, Brewster's population did see a slight increase in its minority populations between 2010 and 2020, as did the Lower Cape and Barnstable County. In Brewster, the largest increase during this time was among of residents identifying as two or more races (see Table 2). Map 2 displays the minority population across the Lower Cape region by census block group.

Table 2. Brewster Population by Race and Ethnicity, 2010-2020

	2010	2020
White	96.7%	91.4%
Black	0.7%	1.6%
American Indian and Alaska Native	0.2%	0.2%
Asian	0.9%	1.1%
Native Hawaiian and Other Pacific Islander	0.0%	0.1%
Other	0.5%	1.0%
Two or More Races	1.0%	4.7%
Hispanic or Latino (All Races)	1.7%	3.0%

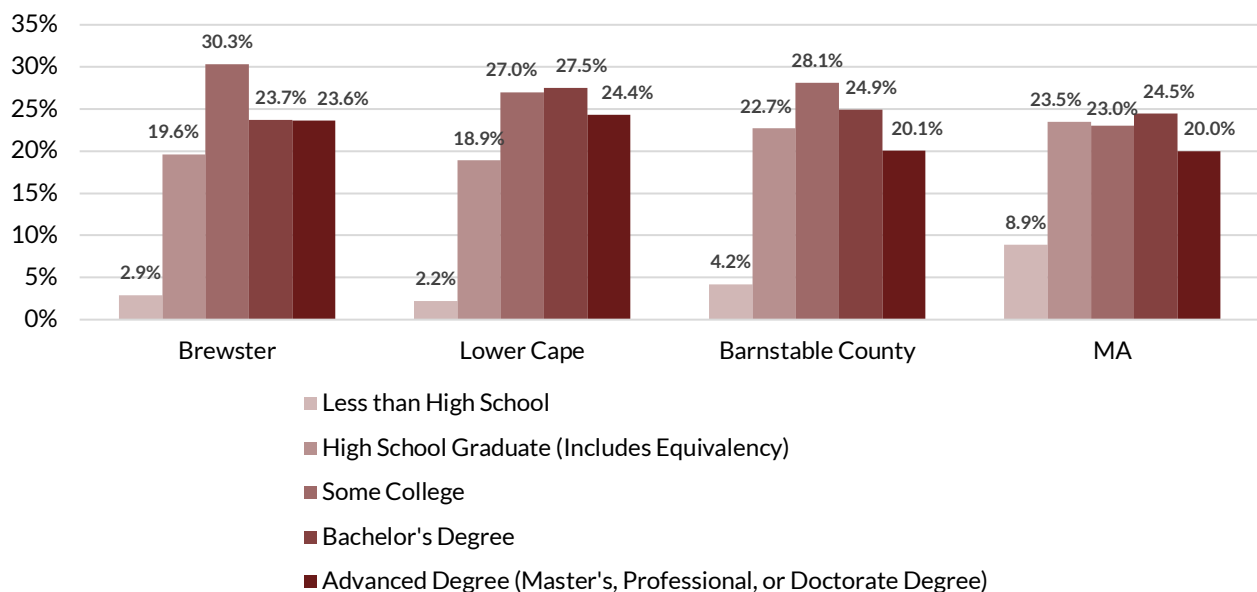
Source: US Decennial Census, 2010 and 2020

EDUCATION

Nearly half (48 percent) of Brewster's population over age 25 holds a bachelor's degree or higher, exceeding Barnstable County and Massachusetts (both an estimated 45 percent), although behind the Lower Cape's estimated 52 percent. Nearly a quarter of the adults over 25 living in Brewster and the Lower Cape have advanced degrees — master's, professional, or doctoral — which sets the region apart from the County as a whole and state.

Figure 5. Educational Attainment for the Population 25 and Over

Source: ACS 5-Year Estimates, 2016-2020, Table B15003



Town of Brewster

Map 2. Minority Population, Lower Cape

May 2022; Source: Town of Brewster, U.S. Census 2020, MassGIS, and MassDOT

012

Miles

Percent Minority

- 4% - 6%
- 6.1% - 8%
- 8.1% - 11%
- 11.1% - 13%
- 13.1% - 17%

MassDOT Major Roads

- U.S. Highway
- State Route
- Non-numbered Road
- Town of Brewster
- Other Lower Cape Towns
- Surrounding Towns



LABOR FORCE

A community's labor force includes all civilian residents over the age of 16 who are either currently employed or are actively seeking employment. Brewster has an estimated civilian labor force of 4,976, with 4,641 employed in a variety of industries.¹⁰ ACS estimates indicate that over one fifth of Brewster's labor force is employed in educational services, health care, or social assistance, as shown in Table 3. Additionally, an estimated 23 percent of working Brewster residents work in Brewster, which is a significantly lower share of individuals working in their municipality of residence than in the Lower Cape (35 percent), County (41 percent), and state (33 percent). The difference is not surprising considering Brewster's small local economic base, although it also reinforces feedback from the community engagement process that people who work in Brewster may struggle to afford to live in the community.

Table 3. Top Five Industries for Brewster's Labor Force

Industry	% Resident Labor Force
Educational Services; Health Care and Social Assistance	22.3%
Professional, Scientific, Management; Administrative and Waste Management Services	16.8%
Arts, Entertainment, and Recreation; Accommodation and Food Services	13.8%
Construction	12.8%
Other Services (Except Public Administration)	8.3%
All Other Industries Combined	26.0%

Source: ACS 5-Year Estimates, 2016-2020, Table C24030

DISABILITY

Twelve percent of Brewster residents live with a disability, a figure in line with the Lower Cape and County (both 13 percent), and state (12 percent).¹¹ Over half of Brewster residents over 65 have some sort of disability, which is relatively low compared to the state. This trend applies county-wide, as the Cape's share of this age cohort with a disability is 52 percent, significantly lower than the state's 67 percent. Table 4 breaks down disabilities by type, both among Brewster residents with a disability and among all non-institutionalized residents. Overall, cognitive difficulties are the most common challenge, closely followed by independent living difficulties.

Table 4. Type of Disability

Type of Disability	% Disabled Pop	% Total Pop
Hearing Difficulty	34.0%	3.9%
Vision Difficulty	5.6%	0.7%
Cognitive Difficulty	49.7%	5.8%
Ambulatory Difficulty	31.3%	3.6%
Self Care Difficulty	13.7%	1.6%
Independent Living Difficulty	47.6%	5.5%

Source: ACS 5-Year Estimates, 2016-2020, Table S1810.
Because some residents may have multiple disabilities, percentages do not equal 100 percent.

¹⁰ ACS 5-Year Estimates, 2016-2020, Table C24030.

¹¹ ACS 5-Year Estimates, 2016-2020, Table B18101. Note that ACS disability status is calculated using the non-institutionalized population, which means those living in institutionalized "group quarters" settings such as nursing homes are not included. ACS estimates indicate that Brewster's non-institutionalized population is 9,530 compared to the total population estimate of 9,811.



Household Type

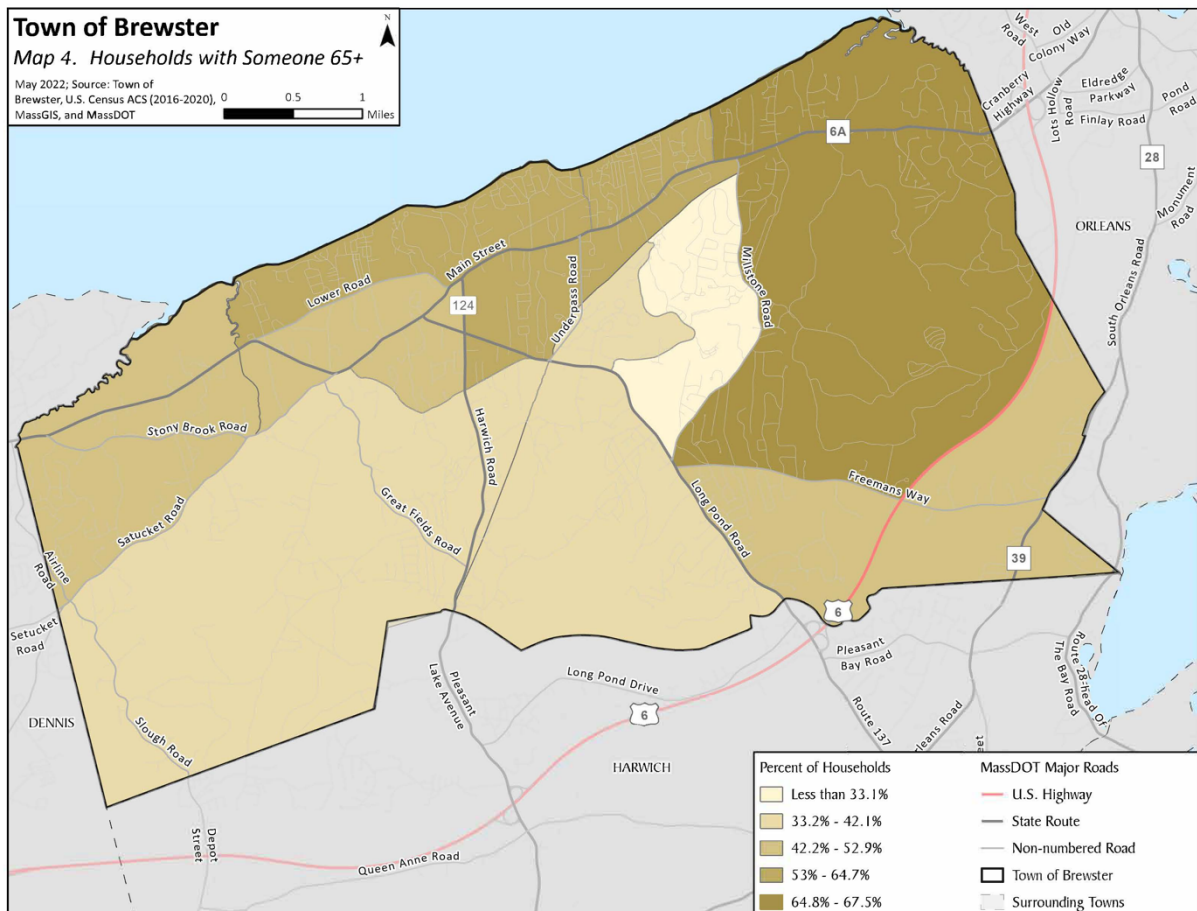
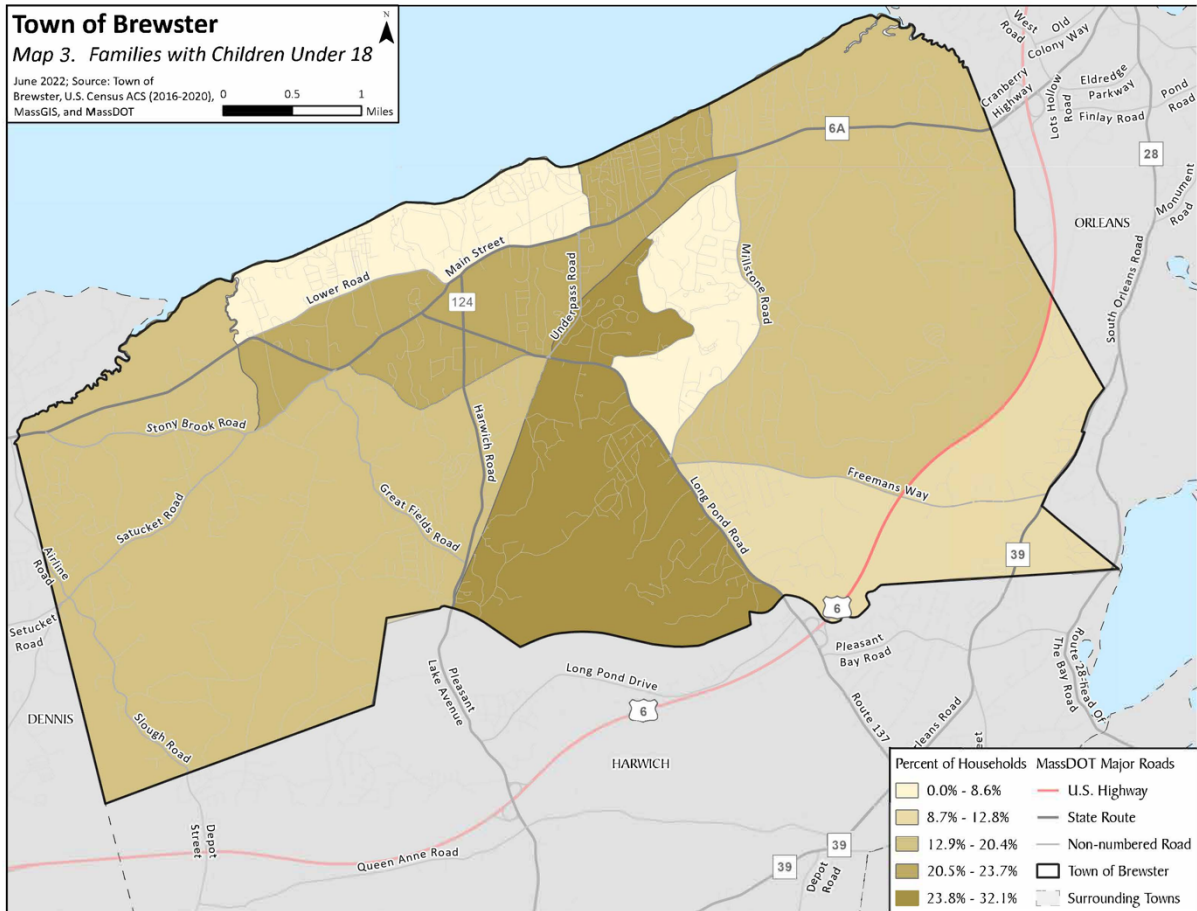
In federal census terms, a family household includes two or more related people living together in the same housing unit, and a non-family household can be a single person living alone or two or more unrelated people living together. Brewster's percentage of family and non-family households is similar to the county and state levels, but the breakdown is significantly different; only 19 percent of Brewster households have children under 18 (a decrease since 2010, as Table 5 shows), compared to the state at 29 percent. This trend is consistent across the Cape, with some Outer Cape communities even falling below 10 percent. For nonfamily households, the percentage of householders living alone increased in Brewster by about 5 percent. Among this household type, the biggest increase was among those 65 or older, representing 41 percent of householders living alone in 2010 versus 63 percent in 2020.¹² Map 3 displays families with children under 18 by census block group and Map 4 shows households with someone over 65.

Table 5. Changes in Household Type, 2010-2020

	2010		2020		Difference
	Number	Percent	Number	Percent	Percent
Family Households	2,851	64.0%	2,812	62.3%	-1.7%
With Children Under 18	938	21.1%	849	18.8%	-2.3%
With No Children Under 18	1,913	43.0%	1,963	43.5%	0.5%
Nonfamily Households	1,602	36.0%	1,703	37.7%	1.7%
Householder Living Alone	1,201	27.0%	1,428	31.6%	4.6%
Householder Not Living Alone	401	9.0%	275	6.1%	-2.9%
Total Households	4,453	100.0%	4,515	100.0%	

Source: ACS 5-Year Estimates, 2006-2010 and 2016-2020, Table B11001

¹² American Community Survey 5-Year Estimates, 2016-2020, Table B25011.





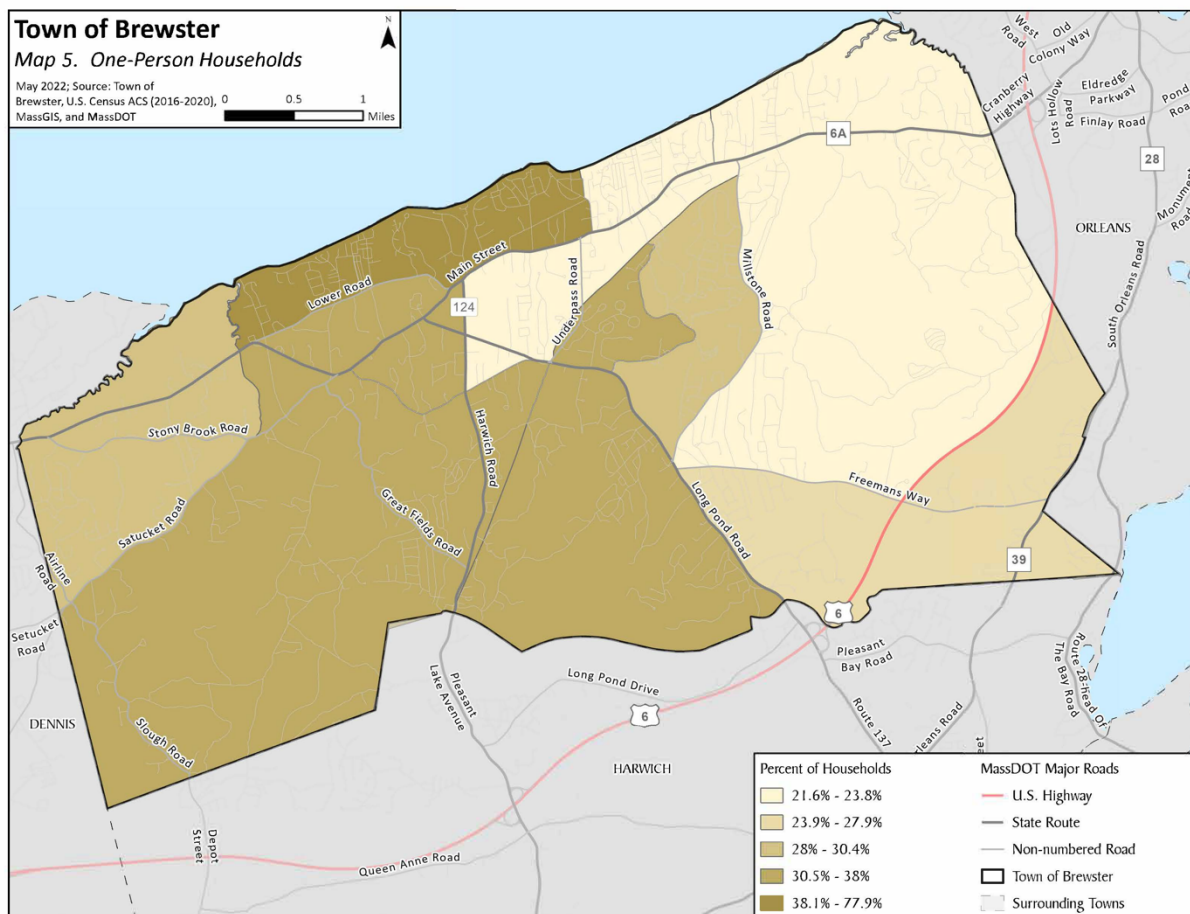
Household Size

The estimated average household size in Brewster is 2.11, below the county at 2.20 and more significantly below the state at 2.50.¹³ This trend toward smaller household sizes in Brewster is also demonstrated by 2010 and 2020 population and household counts; while the 2020 Census average household size is not available at the time of this plan, Table 6 displays the ratio between total population and total households to estimate changes in household size. For additional context, Maps 5 and 6 show the concentration of one-person households and households of four or more persons by census block group.

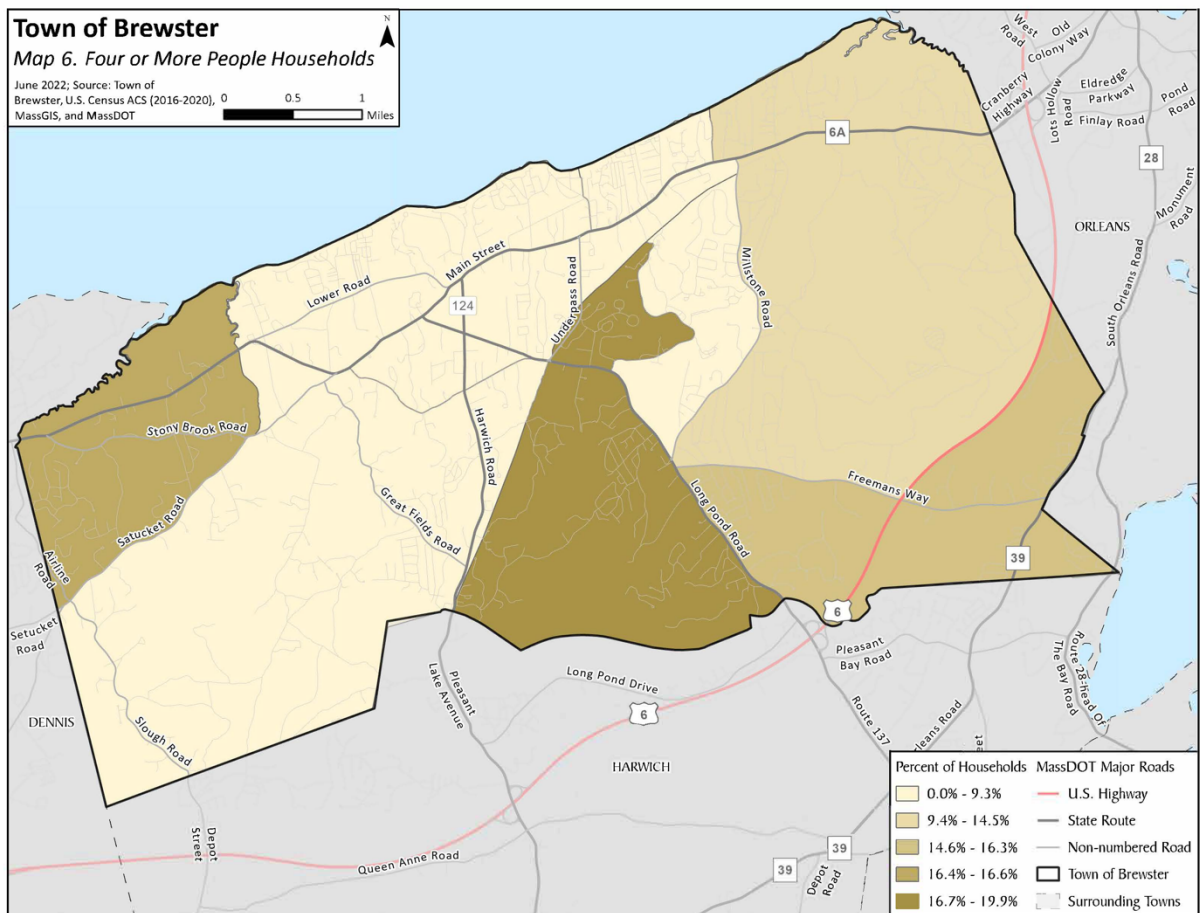
Table 6. Ratio Population and Household Counts, 2010 and 2020

	Brewster		Lower Cape		Barnstable County		MA	
	2010	2020	2010	2020	2010	2020	2010	2020
Ratio of Pop to Household	2.24	2.16	2.12	2.11	2.25	2.22	2.57	2.56

Source: US Decennial Census, 2010 and 2020



¹³ ACS 5-Year Estimates, 2016-2020, Table B25010



Household Income

In 2020 the estimated median household income for Brewster households was \$81,625, slightly over the Lower Cape median of \$78,985 and the County at \$76,863.¹⁴ However, median income is not the only indicator of household wealth in a community, particularly when a significant number of householders are retired; thirty-eight percent of Brewster households had retirement income compared to 36 percent for the Lower Cape and 32 percent for the county, setting the Cape significantly apart from the state's 19 percent of households with retirement income.¹⁵ For this reason, viewing income levels across households provides additional insight regarding distribution of wealth. Between 2010 and 2020, the share of Brewster households earning over \$125,000 increased considerably, while households earning below this level decreased across most income subcategories, as Figure 6 demonstrates. The greatest shift was in households earning over \$200,000, which jumped over 9 percent in a ten-year period. This may indicate that wealthier households have moved into the community over the last decade, a finding also demonstrated by the housing market analysis later in this plan.

¹⁴ ACS 5-Year Estimates, 2016-2020, Table B19013. For regional context, Map 7 displays median household incomes by block group across the Lower Cape.

¹⁵ ACS 5-Year Estimates, 2016-2020, Table B19059



This trend is also confirmed by Comprehensive Housing Affordability Strategy (CHAS) data, which provides estimates of households at 30, 50, 80, and 100 percent or greater of **HUD's Area Median Family Income (HAMFI)**.¹⁶ These income levels are determined by HUD for **Metropolitan Statistical Areas (MSAs)**, which are large geographies designated by the U.S. Office of Management and Budget to represent a larger regional market.¹⁷ Between 2010 and 2018 (the most recent year for which CHAS data is available), the percentage of low-income households earning 80 percent HAMFI or lower slightly decreased while the percentage of households earning over 100 percent HAMFI increased by nearly 5 percent (see Table 7). Also notable is the decrease in households earning over 80 percent and up to 100 percent HAMFI, likely due to these households being priced out of an increasingly competitive housing market yet also being ineligible for an affordable unit.

Table 7. Estimated Households by Income Level, 2010-2018

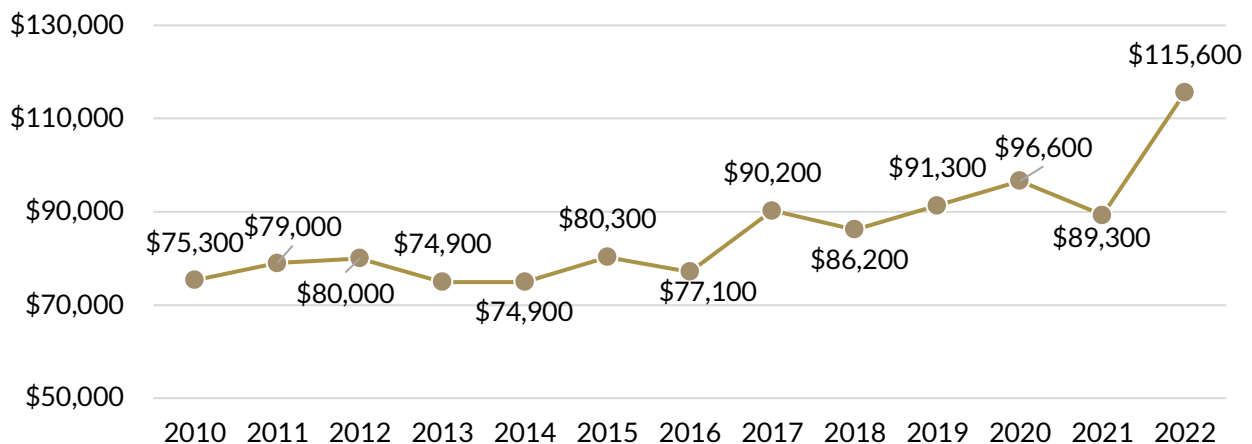
	2010	2014	2018	Difference, 2010-2018
Percent of Households Earning 80% HAMFI or Lower	36.7%	37.8%	34.3%	-2.4%
Percent of Households Earning 81-100% HAMFI	14.9%	11.6%	12.7%	-2.2%
Percent of Households Earning More Than 100 % HAMFI	48.1%	50.6%	52.9%	4.8%

Source: Comprehensive Housing Affordability Strategy (CHAS) data, 2014-2018

AREA MEDIAN INCOME

Regionally, the median family median income as determined by HUD has increased sharply, jumping \$26,300 from FY2021 to FY2022, as shown in Figure 7.

Figure 7. HUD Area Median Family Income (HAMFI) for Barnstable County Metropolitan Statistical Area



¹⁶ The area median income is used by HUD to determine income limits for eligibility for assisted housing programs.

¹⁷ Brewster is part of the "Barnstable Town, MA MSA," which includes all fifteen Cape Cod communities.



AGE AND INCOME

In terms of income and age, Brewster householders 45 to 64 have the highest median household incomes of local and county households, as shown in Table 8. This trend is common for this age group, as they tend to be more advanced in their careers than their peers in younger age brackets. However, Brewster's median income for householders 25 to 44 is nearly \$22,000 lower than the state level, which means that younger Brewster households may have more difficulty with housing and other expenses. Conversely, the median income for householders 65 and over is considerably higher than the state, a trend that makes sense considering the percentage of wealthier households has increased along with the percentage of older adults.

Table 8. Median Household Income by Age of Householder

	Brewster	Barnstable County	Massachusetts
Householder Under 25 Years	No Data	\$54,975	\$44,222
Householder 25 To 44 Years	\$74,597	\$82,045	\$96,311
Householder 45 To 64 Years	\$101,852	\$95,374	\$103,973
Householder 65 Years And Over	\$67,288	\$65,297	\$52,973

Source: ACS 5-Year Estimates, 2016-2020, Table 19049

HOUSEHOLD TYPE AND INCOME

Despite the relatively higher median income for older adults, "elderly non-family" households (adults over age 62 living alone) are nonetheless the most likely to be considered "low to moderate income," or LMI. This refers to households earning at or below 80 percent HAMFI. The "Poverty Level" section below explores this topic further and looks at household types most likely to experience poverty.

Table 9. Low-to-Moderate Income (LMI) Households by Household Type

HUD-Defined Household Types	Total Households	LMI Households	% LMI Households
Elderly family (2 persons, with either or both age 62 and over)	1205	385	32.0%
Elderly non-family	870	530	60.9%
Large family (5 or more persons)	215	30	14.0%
Small family (2 persons, neither person 62 years or over, or 3 or 4 persons)	1425	250	17.5%
Other (non-elderly non-family)	575	280	48.7%

Source: Detailed CHAS Tables, 2014-2018, Table 7



ENVIRONMENTAL JUSTICE POPULATIONS

In 2021, the Massachusetts Executive Office of Energy and Environmental Affairs (EEA) updated its 2002 Environmental Justice (EJ) Policy in accordance with Chapter 8 of the Acts of 2021.¹⁸ This policy defines an EJ population as a neighborhood (i.e., census block group) meeting specific thresholds relating to: median household income; percentage of population belonging to a racial or ethnic minority; or percentage of households with limited English proficiency. As part of this effort, the EEA mapped 2020 EJ designations by census block group based upon American Community Survey data.¹⁹ In Brewster's case, two of the Town's nine census block groups met the policy's income criterion, which states that the median household income of a neighborhood is at or below 65 percent of the statewide median household income.²⁰ An estimated 9.4 percent of Brewster's population lives in these two block groups, both of which are in the northern part of Town along Cape Cod Bay.

Poverty Level

An estimated 6.9 percent of Brewster households live below the poverty level, which is slightly lower than the county (7.1 percent) and significantly lower than the state (10.6 percent). Of those households living in poverty, the highest percentage is among female householders living alone between the ages of 25 and 44 (30.5 percent) and over 65 (30.2 percent). This trend of female householders living alone being more likely to experience poverty is also seen at the county and state levels.²¹

¹⁸ Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs. Updated June 24, 2021. Available at: <https://www.mass.gov/doc/environmental-justice-policy6242021-update/download>

¹⁹ Online EJ mapper available at: <https://mass-eoea.maps.arcgis.com/apps/webappviewer/index.html?id=1d6f63e7762a48e5930de84ed4849212>

²⁰ The newer EEA policy also defines the American Community Survey (ACS) as the source for income data, whereas the previous policy cited federal census data. data is based upon 2019 ACS data.

²¹ ACS 5-Year Estimates, 2016-2020, Table B17017

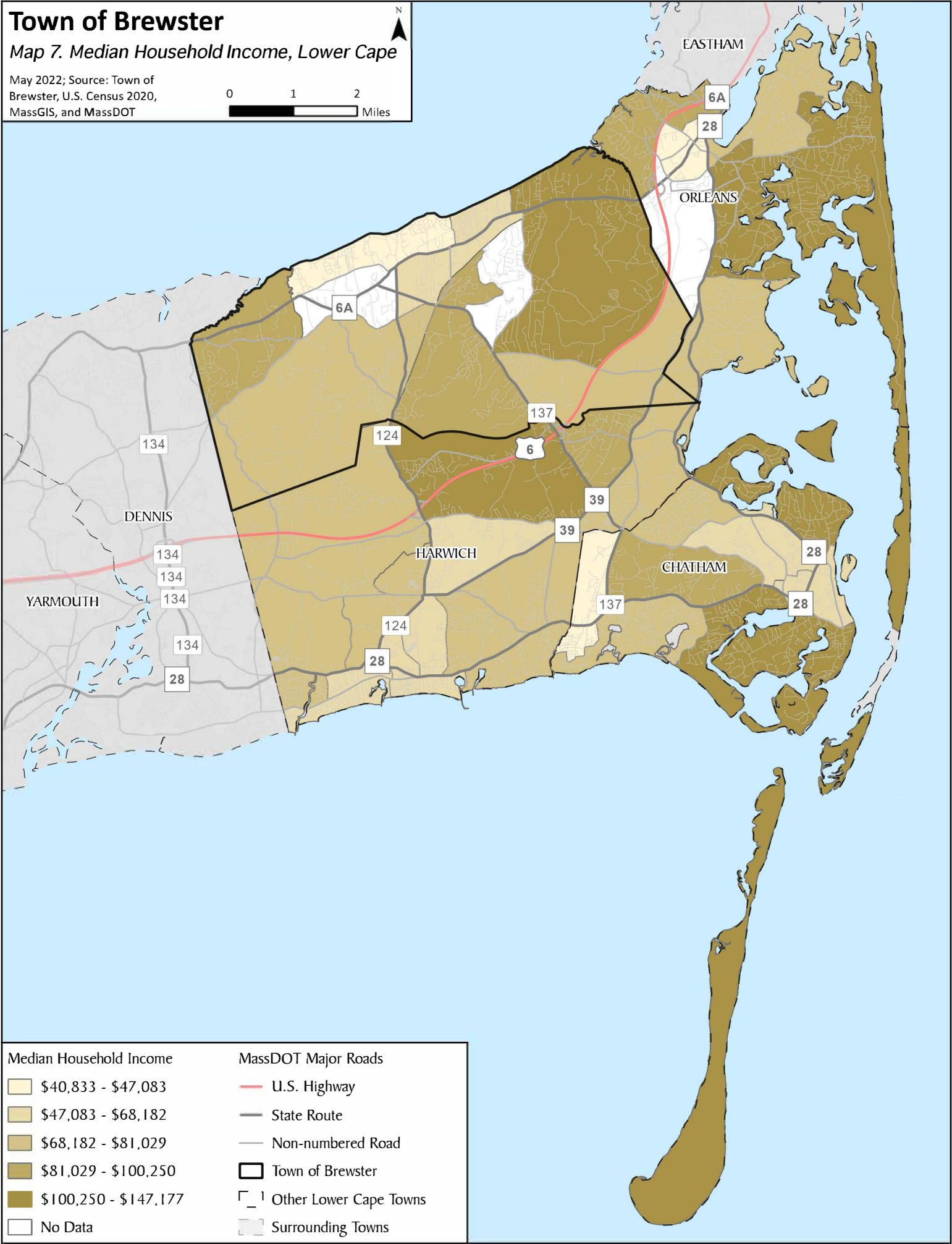
Town of Brewster

Map 7. Median Household Income, Lower Cape

May 2022; Source: Town of Brewster, U.S. Census 2020, MassGIS, and MassDOT

012

Miles

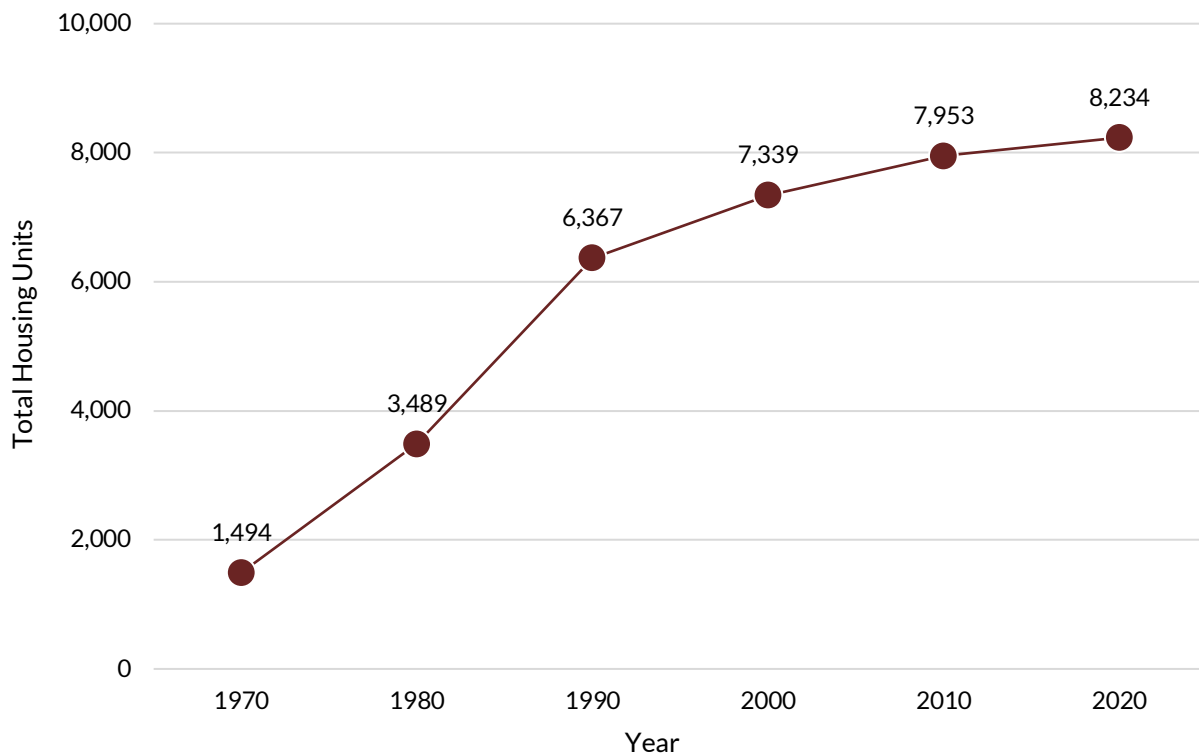




HOUSING CHARACTERISTICS

As of the 2020 U.S. Decennial Census, there were 8,234 housing units located in Brewster, up from 7,953 in 2010. Of the housing units in Brewster, an estimated 75 percent are detached single-family homes compared to 52 percent of the housing across Massachusetts. Because Brewster experienced significant growth between 1970 and 1990, the number of housing units likewise increased, growing more than four-fold.²² Figure 8 highlights this growth pattern, which largely coincides with the age of the Town's housing stock described below.

Figure 8. Brewster Total Housing Units, 1970-2020
Source: U.S. Decennial Census and Minnesota Population Center



Housing Age

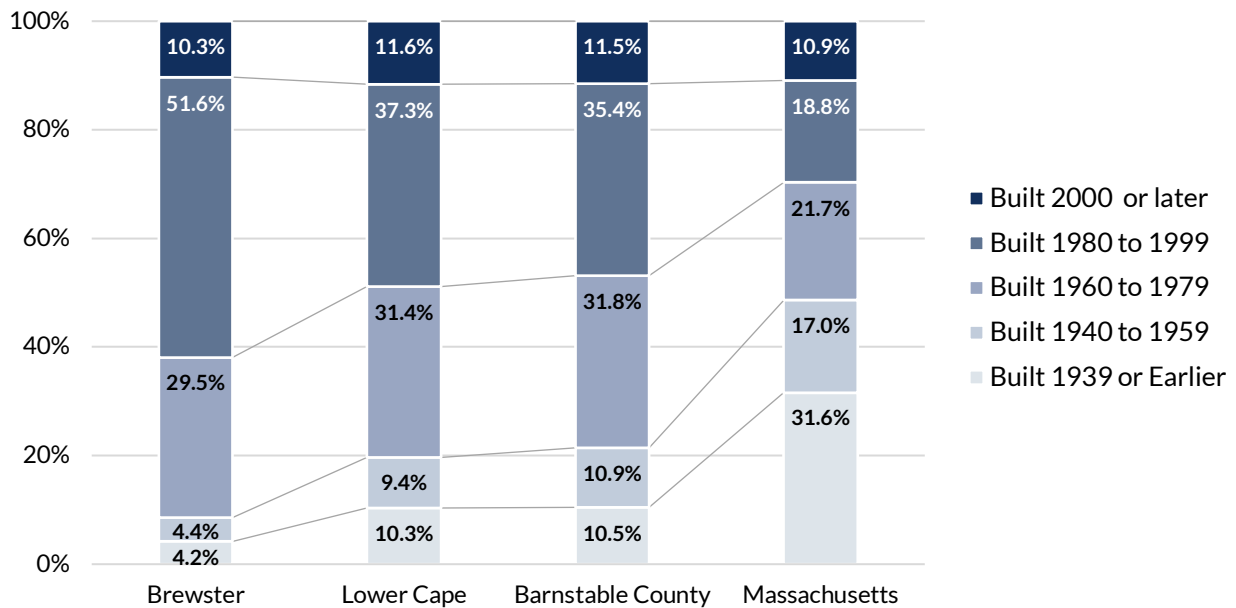
Brewster has a significantly larger share of homes built between 1980 and 1999 than the Lower Cape, county, and state, with an estimated 51 percent of Brewster's housing units built during this time. While Figure 9 displays the age of housing stock by intervals of twenty years, housing units built during the 1980s make up the largest share by decade at an estimated 36 percent (2,878 housing units), the largest jump in five decades. Also of note is the much smaller share of housing units built before 1940 in Brewster compared to the Lower Cape, Barnstable County, and the state.

²² Minnesota Population Center. National Historical Geographic Information System: Version 2.0. Minneapolis, MN: University of Minnesota 2011.



Figure 9. Year Structure Built

Source: ACS 5-Year Estimates, 2016-2020, Table 25034



Housing Types

While Brewster’s estimated share of total share of single-family homes is on par with the County’s share (each 87 percent), Brewster has a significantly higher percentage of “single family attached” homes (such as condominiums), estimated at 11 percent compared to the Lower Cape and county’s 5 percent. The Villages at Ocean Edge is the largest contributor to this category of housing, although there are other smaller attached condominium developments off Snow Road and along Cape Cod Bay.

Table 10. Units in Structure

	Brewster	Lower Cape	Barnstable County	Massachusetts
Single Family, Detached	75.4%	84.9%	81.6%	52.1%
Single Family, Attached	11.1%	5.2%	5.1%	5.5%
2 Units	1.8%	1.7%	2.3%	9.7%
3 or 4 Units	3.4%	2.5%	3.6%	10.7%
5 to 9 Units	4.1%	2.8%	2.8%	5.8%
10 to 19 Units	2.0%	1.0%	1.4%	4.3%
20 to 49 Units	1.4%	1.4%	1.5%	4.4%
50 or More Units	0.8%	0.4%	1.2%	6.9%
Other	0.0%	0.1%	0.5%	0.8%

Source: ACS 5-Year Estimates, 2016-2020, Table B25024



SINGLE-FAMILY (DETACHED) HOMES

Cape-style homes are most common among Brewster's detached single family homes (45 percent), followed by ranches (28 percent) and colonials (14 percent).²³ The remaining 13 percent of detached single-family homes consist of a mix including contemporary, conventional, cottage/bungalow, raised ranch, and other home styles. Table 11 below indicates the most common style for homes built during different periods, as well as other notable features including the average residential floor area, lot sizes, and number of rooms. Homes built since 2000 tend to be larger and hold more building value compared to the land, as shown by the ratio of average land values to average building values. A ratio under 1.0 indicates that the buildings on average are more valuable than the land, in large part due to the trend toward larger homes. Conversely, ratios over 1.0 indicate that the land on average is more valuable than the buildings. This is more common for older homes, potentially putting them at greater risk of teardown, as a new or existing owner of an older home may choose to demolish and rebuild rather than repair, renovate, or maintain a home in poor condition. The Town may wish to monitor teardown activity to see whether this trend increases in Brewster, potentially leading to changes in overall housing affordability.

Table 11. Change in Size and Value in Brewster's Single-Family Home Inventory

Year Built	No. of Records	Most Common Housing Style	Average Residential Floor Area (Sq. Ft.)	Average Lot (Sq. Ft.)	Average No. Rooms	Ratio of Average Land Value to Average Building Value
2000 to Present	760	Cape	2,561	50,809	7	0.583
1980 to 1999	2,343	Cape	1,913	37,529	6	0.688
1960 to 1979	1,930	Cape	1,608	27,844	6	0.950
1940 to 1959	298	Ranch	1,445	36,406	6	2.435
1939 or Earlier	295	Conven/Old	1,773	50,103	7	1.499

Source: Brewster's Assessor's Parcel Database (2022) and Barrett Planning Group LLC

CONDOMINIUMS

Assessor's records indicate that Brewster has 1,518 condominium units, which accounts for the relatively large share of attached single-family homes noted above. However, there are also a number of detached condos (124), such as those in the recently developed Brewster Landing on Sachemus Trail.²⁴ Brewster's condominium stock predominantly consists of townhouses and garden style buildings, although there are also some duplexes and triplexes.

TWO-UNIT HOMES

Assessed differently from a duplex *condominium* where each unit has its own owner, a two-unit home has one owner but two residential units. Assessor's records indicate that Brewster has 47 two-unit homes, nearly half of which are owner-occupied and most of which were built prior to 1980.

²³ Town of Brewster Assessor's Records, FY 2022.

²⁴ Brewster Landing has 28 condominiums total, with 24 detached and 4 in duplex structures.



LARGER MULTI-UNIT PROPERTIES

Brewster's multi-unit housing portfolio includes a very limited number of smaller, 4–8-unit structures (four, according to Assessor's records). Additionally, there are several larger multi-unit rental properties, all of which contribute or are expected to contribute to the Town's Subsidized Housing Inventory (SHI) and are described below.

- **King's Landing.** Constructed in 1975, King's Landing is Brewster's oldest multi-unit development and provides 108 rental units in a mix of one-, two-, three-, and four-bedroom apartments. King's Landing was acquired and renovated by Preservation of Affordable Housing (POAH) in 2013.
- **Huckleberry Lane.** One of two Brewster Housing Authority (BHA) properties, Huckleberry Lane was built in 1989 to provide family housing and includes 24 two- and three-bedroom rental units.
- **Frederick Court.** BHA's second property was built in 1990 and consists of 32 one-bedroom rental units for older adults and disabled persons.
- **Wells Court.** Built in 2004 on land provided by the BHA, Wells Court consists of one building housing 24 one-bedroom rental units for older adults.
- **Serenity at Brewster.** The former Wingate property has been redeveloped into 132 studio and one-bedroom rental units for older adults over age 55. Phase 1 opened in July 2021 and included 41 studios; Phase 2 is expected to be ready for occupancy in 2022 and will include 91 studios and one-bedroom units. Of the project's 132 total units, 27 are expected to be added to the Town's SHI in 2022.
- **Brewster Woods.** Currently in development and built on land leased from the BHA, Brewster Woods will provide 30 one-, two-, and three-bedroom rental units in two buildings.

MIXED USE

Assessor's records indicate 79 mixed use properties with some degree of residential use alongside commercial activity. This includes properties that are primarily residential with a secondary commercial use (e.g., an antique shop or art gallery), as well as properties that are primarily commercial with a secondary residential use such as a second-floor apartment.

NURSING HOMES & ASSISTED LIVING

Brewster has two assisted living facilities that provide a combined 191 units. Both **Maplewood** and **Pleasant Bay Woodlands Assisted Living** include ten percent affordable units, although these are not included on the Town's SHI.



Vacancy & Tenure

CHANGE IN VACANCY

From 2010 to 2020, the percentage of vacant units decreased in Brewster, as was the trend at the Lower Cape, county, and state levels, although to a greater degree than Brewster experienced (see Figure 10, which displays the percent change in housing occupancy from 2010 to 2020). While the percent of occupied units increased, this figure should not be considered a metric for the availability of year-round housing because it does not account for the vacancy *type*. For census purposes, “vacant” units include those used for seasonal, recreational, or occasional use, so much of Brewster’s vacant housing units are used as second homes or short-term rentals. Because Census 2020 data has only been partially released, the official year-round housing count (which subtracts these seasonal homes) is not yet available. However, ACS estimates indicate an increase in housing units used for this purpose, as shown in in Figure 11. Thus, while the percentage of vacant units has decreased, these units considered “vacant” are increasingly used for seasonal, recreational, or occasional use – a trend described during the community engagement process. Map 8 shows the percentage of vacant housing units by block group.

Figure 10. Percent Change in Housing Occupancy, 2010-2020

Source: US Decennial Census, 2010 and 2020

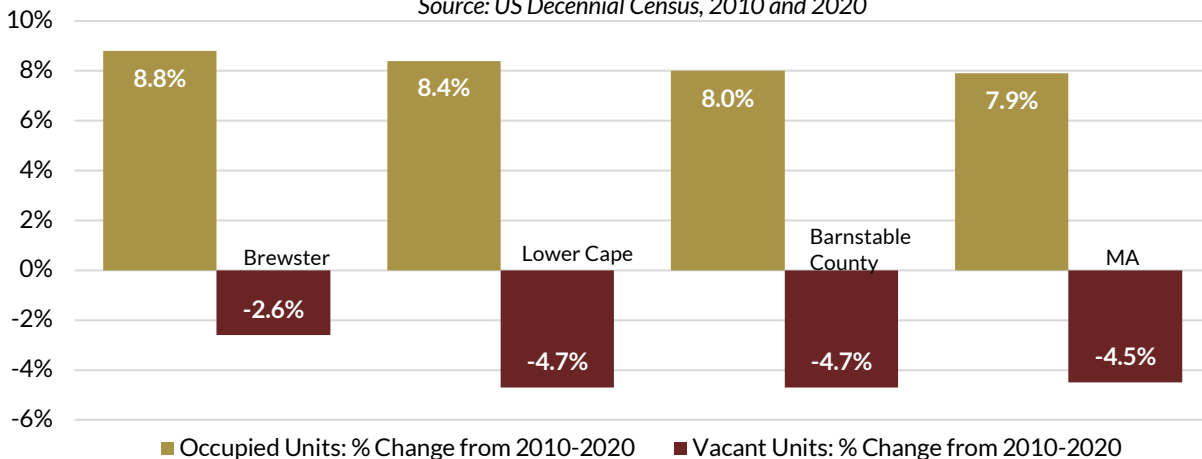
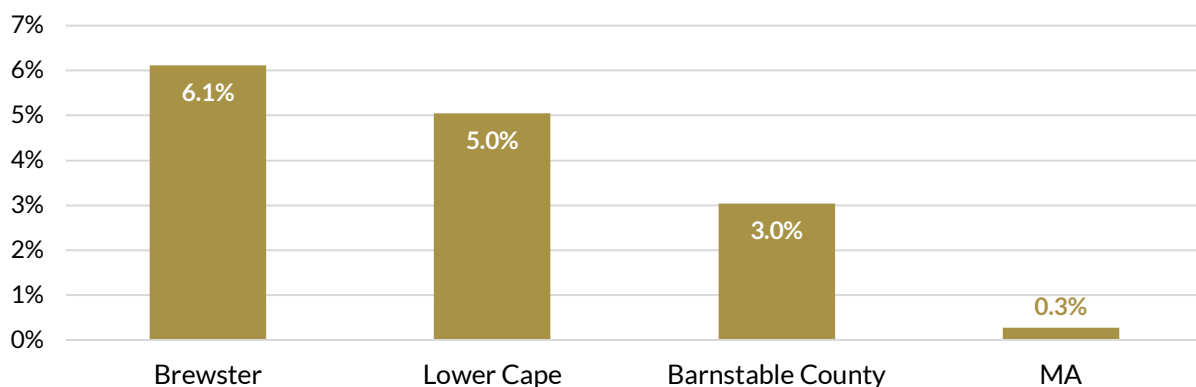


Figure 11. Percent Change in Total Housing Units Used For Seasonal, Recreational, or Occasional Use, 2010-2020

Source: ACS 5-Year Estimates, Table B25004



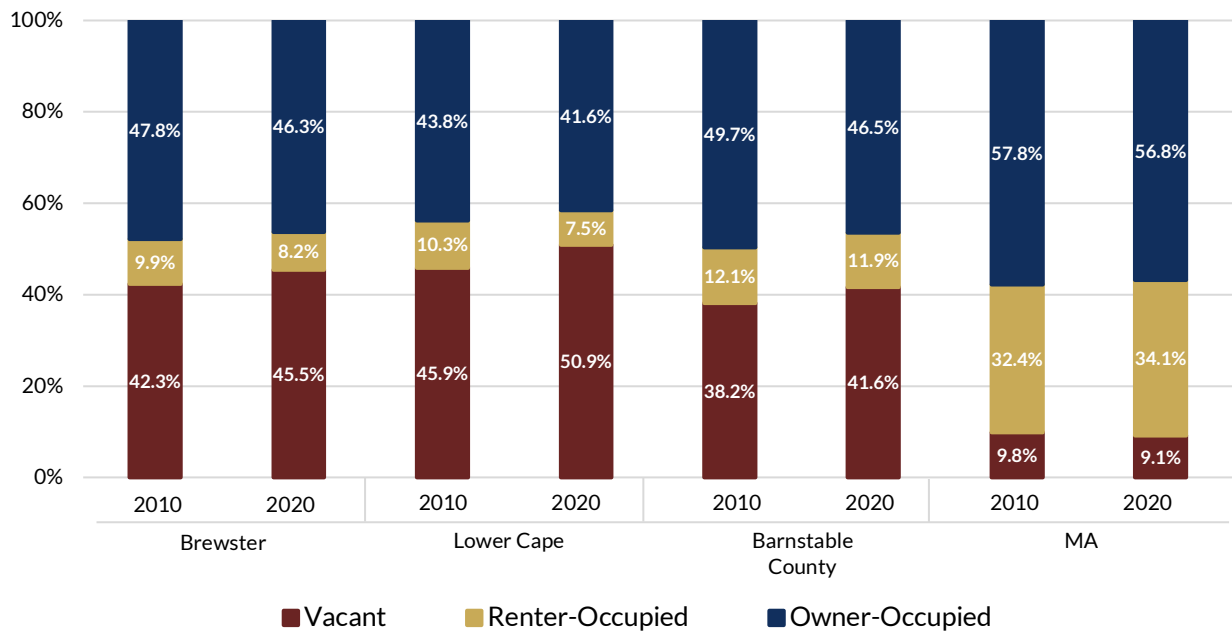


IMPACT ON YEAR-ROUND TENURE

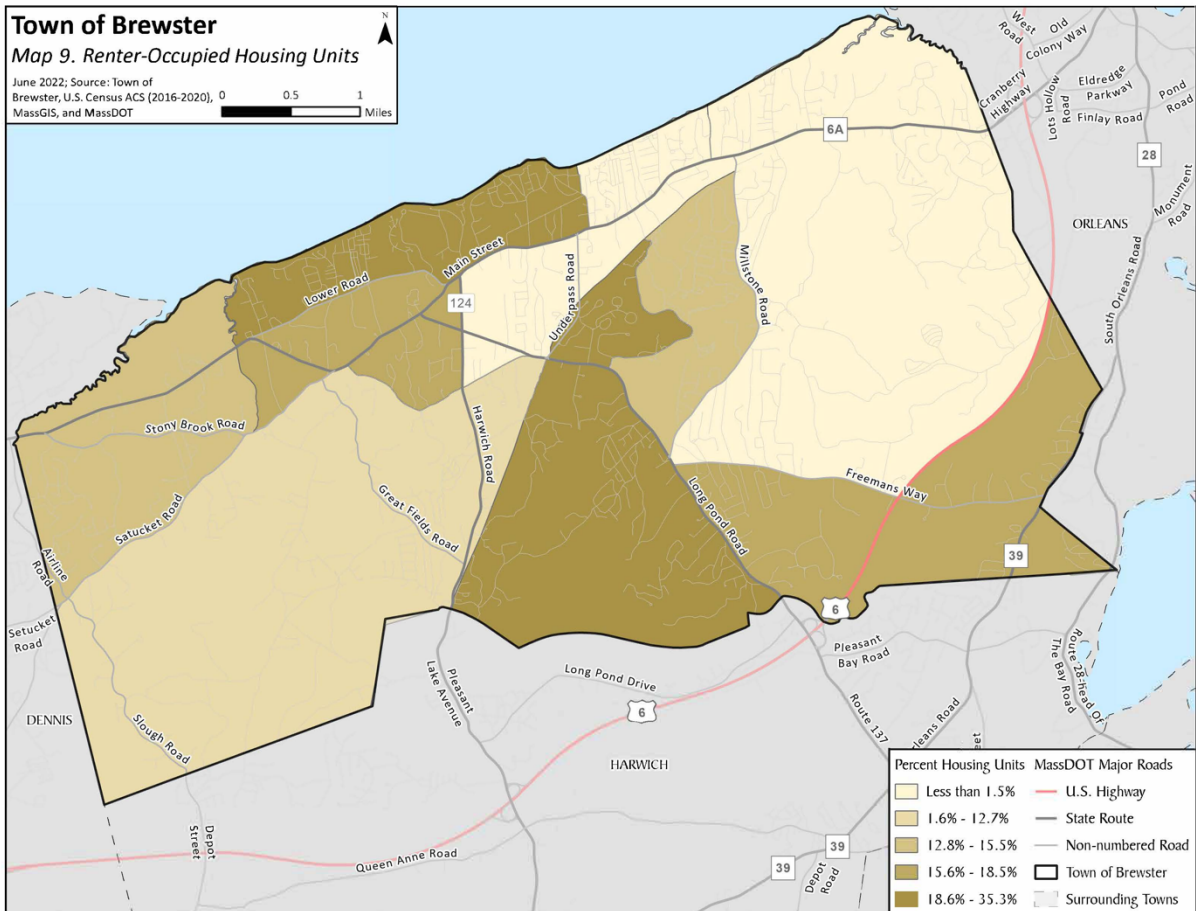
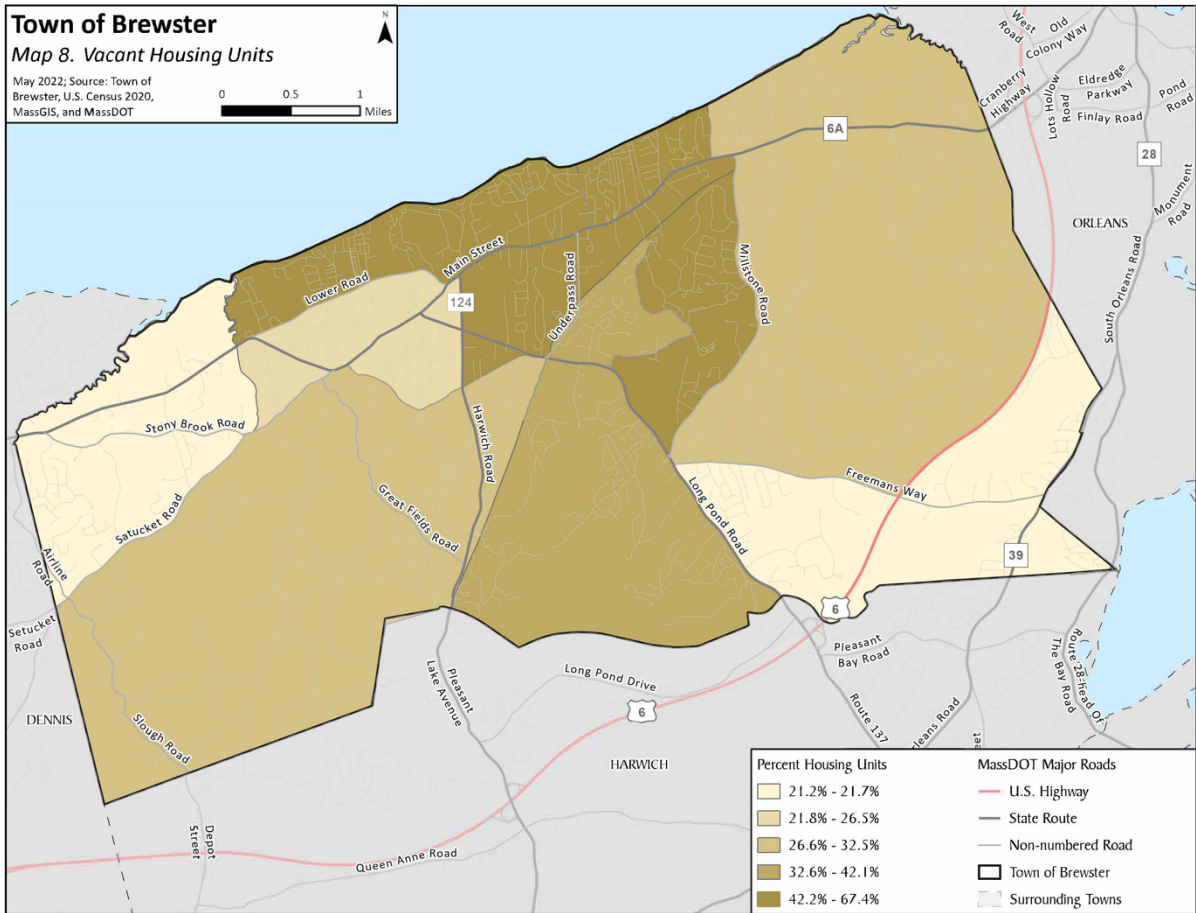
Housing tenure refers to whether a householder owns or rents their home. Feedback from the community engagement process indicates an observation that year-round rentals are being replaced by short-term rentals, leading to displacement of renter households. Brewster does not currently track whether a housing unit is an owner's primary or secondary residence (or whether it used for short-term rentals), nor is detailed Census 2020 vacancy status available as of the date of this plan. While it is difficult to determine the precise impact of short-term rentals on year-round tenure, the limited data available corroborates this feedback from residents: ACS estimates indicate a decline in the share of year-round renter households between 2010 and 2020, both in Brewster and the Lower Cape (and to a lesser degree, the county) with a corresponding increase in the share of vacant units, as Figure 12 demonstrates. In addition, a market analysis of advertised rental units in Brewster over the last 48 months indicates a very limited inventory, with an average of twelve units advertised per year.²⁵ Map 9 shows the percentage of renter households by census block group based on the most recent ACS 5-year estimates.

Figure 12. Housing Occupancy and Tenure

Source: ACS 5-Year Estimates, 2006-2010 and 2016-2020, Tables B25002 and B25003



²⁵ See attached report in Appendix A. This does not include units in Brewster's larger multi-unit residential developments; these properties (described on page 17) have very long waitlists of several years because they are all affordable units.





TENURE BY AGE & INCOME

Homeowners in Brewster tend to be older and wealthier, with the strong majority of householders over the age of 45 owning their homes. The breakdown by tenure shifts somewhat for older adults over age 75 who are more likely to rent than householders between the ages of 45 to 74.²⁶ Younger householders between 25 and 34 are much more likely to rent than own a home in Brewster.

Figure 13. Tenure by Age of Householder

Source: ACS 5-Year Estimates, 2016-2020, Table B25007

Note that a true 100% value is unlikely; ACS estimates are based on a rolling 5-year dataset and include a margin of error.

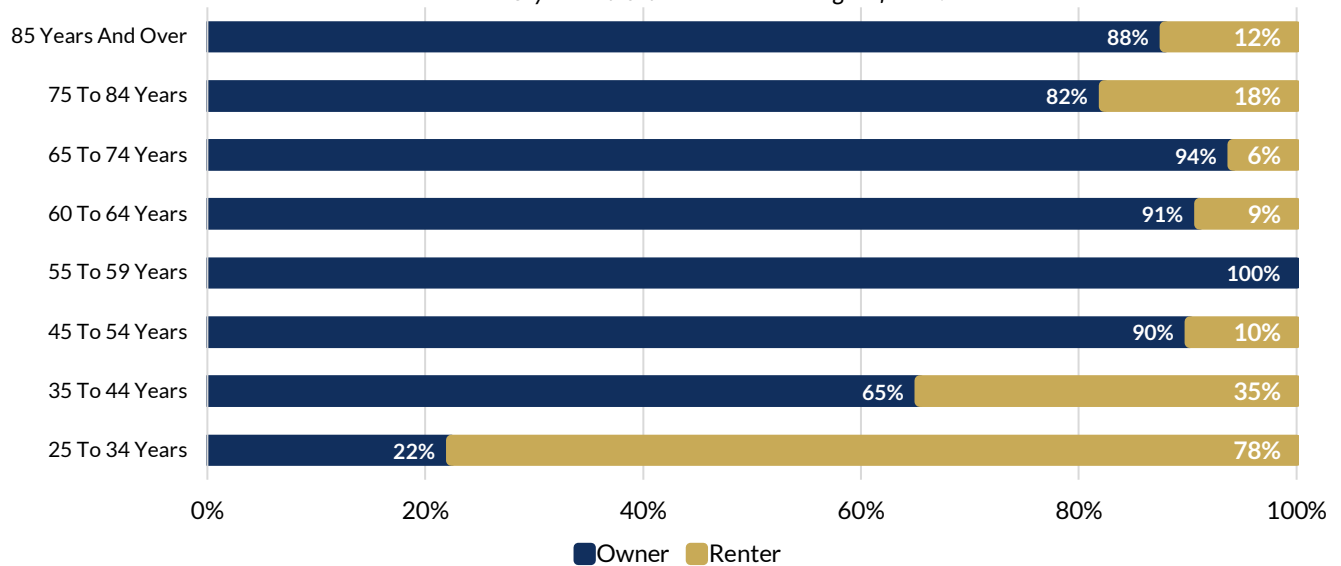
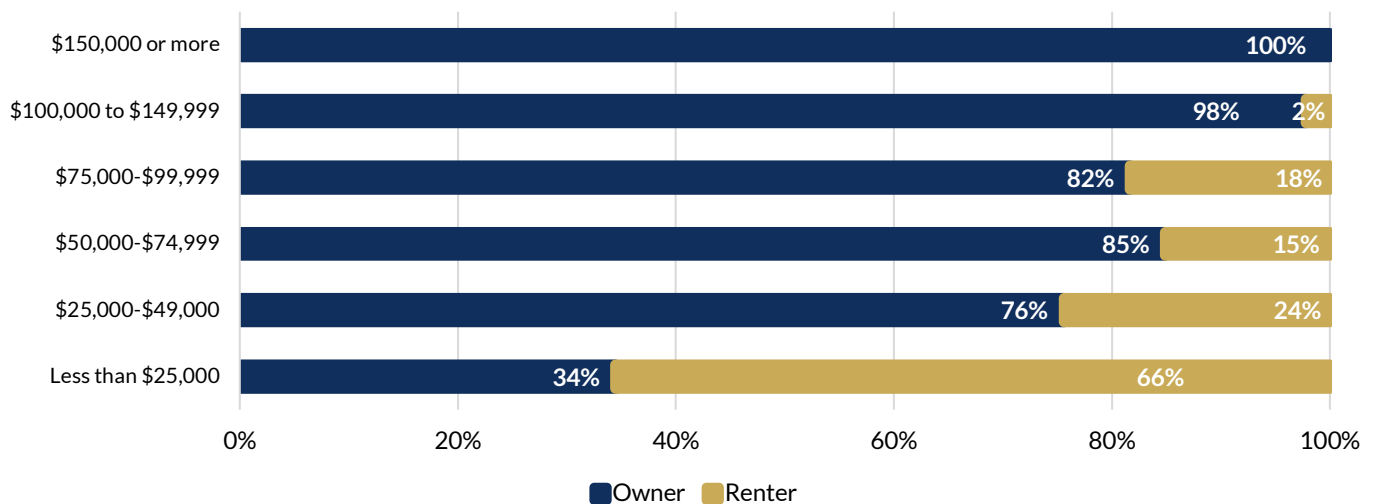


Figure 14. Tenure by Household Income

Source: ACS 5-Year Estimates, 2016-2020, Table B25118



²⁶ For census purposes, “householder” refers to the person or one of the people in whose name a housing unit is owned or rented; thus, because the number of householders for a geography equals the number of households, the data discussed in this section does not refer to all members of a household.



HOUSING MARKET

Development Trends

Building permits are a good indicator of housing activity within a town because they show the predominant types of development activity in a given year. Table 12 provides a snapshot of residential building permit activity from 2017-2021 and indicates that residential development continues to favor single-family homes, with teardown activity more prevalent in 2017 and 2018 than in recent years. Additionally, since the Town adopted its 2018 ADU / ACDU bylaw, over 20 building permits for ADUs have been issued.²⁸

Table 12. Residential Building Permit Data, 2017-2021

	Single Family Permits	Multi-Unit Permits ²⁷	Demolition Permits
2017	36		14
2018	41	7	22
2019	14		7
2020	22		4
2021	17	4	1

Source: Brewster Building Department, March 2022

The most recently permitted affordable housing developments have been multi-unit projects, including Serenity at Brewster and Brewster Woods. Looking forward, the Town recently accepted a proposal to develop 45 one-, two-, and three-bedroom rental units on 16.1 acres of Town-owned Land on Millstone Road. All other affordable developments over the last ten years have provided affordable ownership opportunities, including fourteen Habitat for Humanity homes on Paul Hush Way (permitted in 2017), seven homes at Brewster Landing (out of twenty-eight total homes; permitted in 2014), and three homes at White Rock Commons (out of twelve total homes; permitted in 2014). Apart from Brewster's two existing assisted living facilities, all larger multi-unit residential development in Brewster has been tied to the development of affordable housing — and all except Serenity at Brewster have been 100 percent affordable. While this is commendable and serves to meet the needs of the most vulnerable households, it also points to a lack of market rate rental available to households ineligible for an affordable unit but who want or need to rent for a variety of reasons, as well as the lack of regulatory mechanisms for creating this housing.

Housing Sale Prices

Housing prices have soared in Brewster, with a current 2022 median sale price (through April 2022) of \$753,500 for a single-family compared to \$602,000 for Barnstable County.²⁹ As shown in Figure 15, from 2020 to 2021, median sales prices in Brewster jumped \$135,500 for single-family homes and \$92,250 for condominiums, representing the largest one-year increase in over ten years. While this increase in median sales price is not unique to Brewster, Figure 16 shows that Brewster and the Lower Cape are experiencing this decrease in affordability to a greater extent than the county and state.³⁰

²⁷ 2018: seven multi-unit permits issued for modular dormitory-style buildings at Ocean Edge used to house J-1 visa workers. 2021: two multi-unit permits issued for each phase of Serenity at Brewster; two multi-unit permits issued for Brewster Woods.

²⁸ Brewster Housing Office, "2022 Housing Summary Update Paper," February 2022.

²⁹ Median Sales Price for Brewster and Barnstable County, Calendar Year, Banker & Tradesman via The Warren Group. Median sales price is based upon twenty-four sales in Brewster between January and April 2022 and 1,052 sales for Barnstable County.

³⁰ Lower Cape median sale prices based on average of median sale prices for Brewster, Chatham, Harwich, and Orleans.



Figure 15. Brewster Median Sales Prices, 2010-2021

Source: Banker & Tradesman via The Warren Group
Adjusted for Inflation to 2020 by Barrett Planning Group

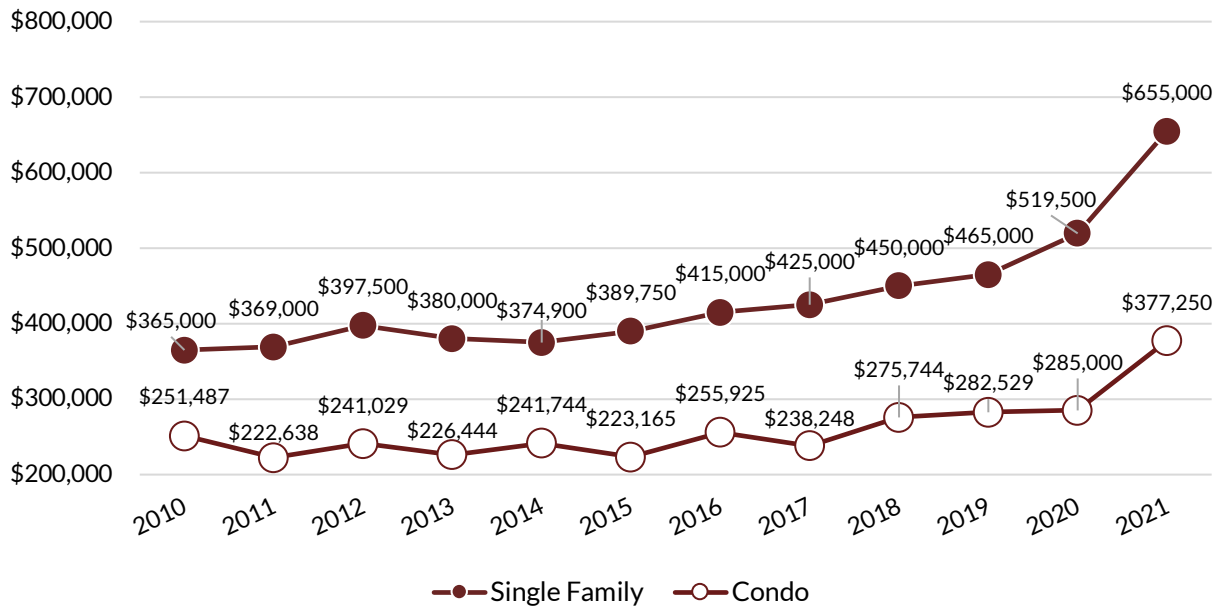
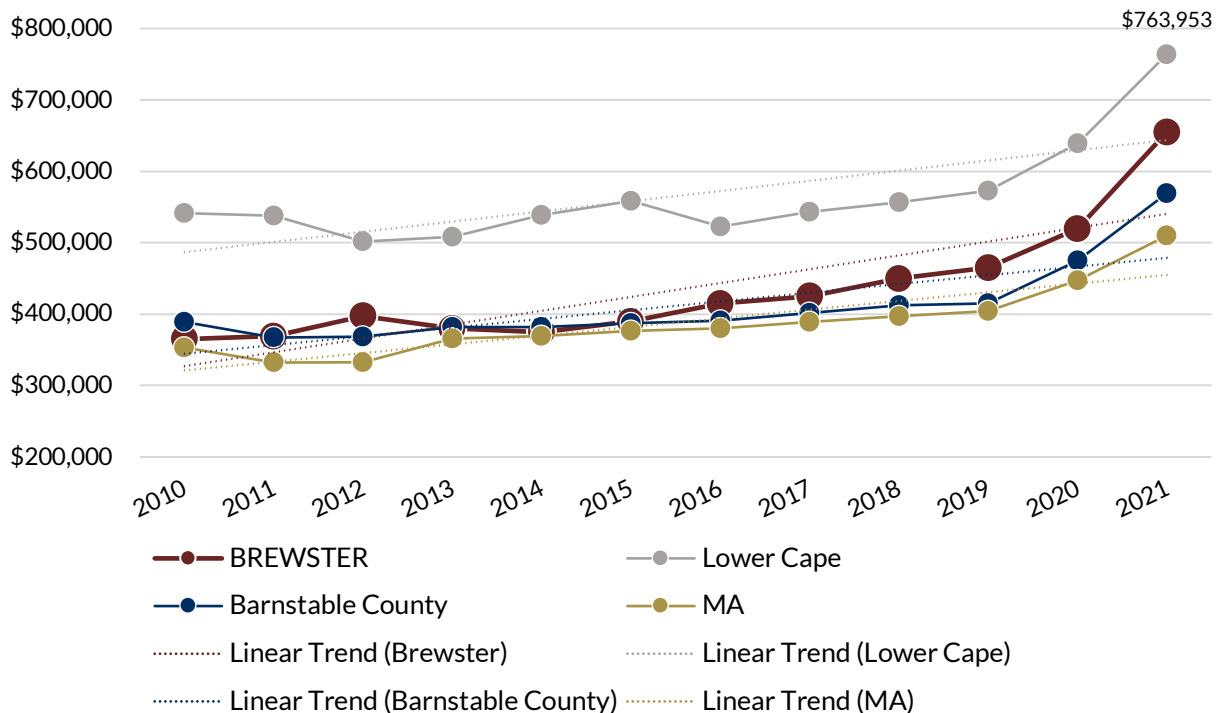


Figure 16. Median Single Family Sales Prices for Brewster and Comparison Geographies, 2010–2021

Source: Banker & Tradesman via The Warren Group
Adjusted for Inflation to 2020





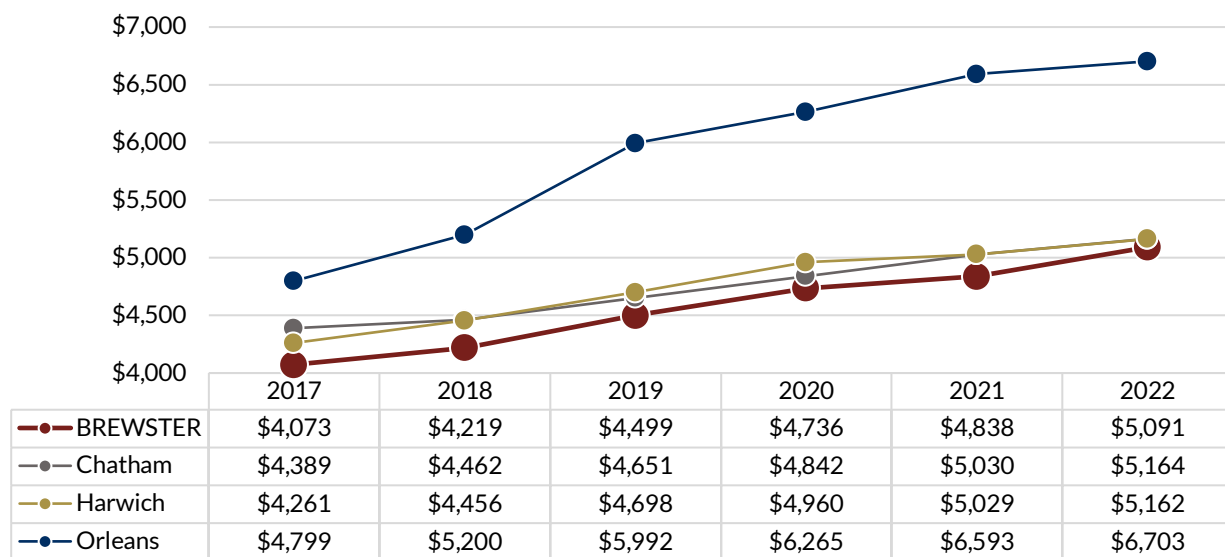
Property Taxes

Property taxes are often an important consideration for perspective residents when deciding where to purchase a home and are often cited as a concern for many retired adults who must account for increasing property tax bills against a fixed income. Residential property invariably accounts for the largest percentage total assessed value in cities and towns, particularly for communities with a limited commercial base. In Brewster's case, residential assessed values make up 94.5 percent of the total assessed value for FY2022, a higher share than all Cape communities except Truro, Wellfleet, and Eastham.³¹ While this speaks to the more rural character of Brewster that many residents cherish, it also means that property taxes may be more of a concern for residents.

That said, despite Brewster's limited commercial tax base, the average single family tax bill is consistently less than that of other Lower Cape communities, as shown in Figure 17.³² However, just because the average tax bill is lower in Brewster does not mean that the tax *rate* is lower. In fact, the residential tax rate for Brewster in 2022 is \$7.85 per \$1,000 in assessed value, higher than Chatham (\$4.62) and Orleans (\$7.20), although lower than Harwich (\$8.11).³³

Figure 17. Average Single Family Tax Bill for Lower Cape Communities, FY2017-2022

Source: Average Single Family Tax Bill, Division of Local Services, MA Department of Revenue



Communities can adopt a “residential exemption” which results in an increased tax rate but allows eligible owners of primary residences to deduct a predetermined amount from their property assessments before figuring taxes. Residential exemptions can ultimately shift the residential tax burden from year-round owners of moderately priced homes to owners of rental properties and

³¹ “Assessed Values by Class,” FY 2022. Division of Local Services, Massachusetts Department of Revenue.

³² “Average Single Family Tax Bill,” FY2017-2022. Division of Local Services, Massachusetts Department of Revenue.

³³ “Tax Rates by Class,” FY 2022. Division of Local Services, Massachusetts Department of Revenue.



vacation homes — as well as year-round owners of higher valued properties.³⁴ This tipping point for year-round homeowners occurs if the amount subtracted from assessed value is not enough to counteract the increased tax rate, an important consideration as home values continue to rise.

Although this practice is more common among seasonal communities, only a few Cape communities have adopted the residential exemption (most recently, Wellfleet, Truro, and Provincetown, with Barnstable having adopted the residential exemption in 2005). The percentage of year-round owner-occupied housing units can help a community determine whether a residential exemption makes sense — the smaller the share of eligible homeowners, the more balanced the shift in tax burden will be. The Outer Cape communities that have recently adopted the residential exemption have significantly lower shares of homeowners eligible for the residential exemption than Brewster and much higher percentages of homes used for seasonal, recreational, or occasional use. Based upon Brewster’s estimated share of owner-occupied homes, the Brewster Board of Assessors historically has not recommended adopting a residential exemption, although they continue to monitor these considerations and provide an analysis annually to the Brewster Selectboard.³⁵

Market Rents

Table 13. 2022 Fair Market Rent (FMR), Barnstable County MSA

Bedrooms	Monthly FMR
1 br	\$1,428
2 br	\$1,879
3 br	\$2,323
4 br	\$2,548

Source: 2022 FMR for Barnstable Metropolitan MSA, HUD

Determining a true “market rent” range for Brewster is difficult because of the limited inventory of market rate rentals from which to draw data. Additionally, ACS data for gross rent includes subsidized units, which lowers the median. For understanding market rent, this section uses HUD’s 2022 **Fair Market Rents (FMRs)** for the Barnstable County **Metropolitan Statistical Area (MSA)**. **FMRs** are “housing market-wide estimates of rents that provide opportunities to rent standard quality housing throughout the geographic area in which rental housing units are in competition.”³⁶ Table 13 displays the FMRs by bedroom for Brewster’s MSA.

Housing Market Projections

According to the Cape Cod Commission’s 2017 *Regional Housing Market Analysis*, housing demand is expected to increase most dramatically in the over-65 age group through the year 2025, which corresponds with the continued population increase for this cohort.³⁷ Additionally, while the total number of year-round housing units in Brewster is expected to continue to exceed the number second

³⁴ Residential exemptions are authorized under MGL c. 59, §5C.

³⁵ Memo from James Gallagher, Deputy Assessor, to Jill Scalise, Housing Coordinator. June 30, 2022.

³⁶ Code of Federal Regulations, § 888.113: “Fair market rents for existing housing: Methodology.”

³⁷ Cape Cod Commission, Cape Cod Commission, *Regional Housing Market Analysis and 10-Year Forecast of Housing Supply and Demand for Barnstable County, Massachusetts*, 2017, Table 3.8, Page 60. Prepared by Crane Associates, Inc. and Economic Policy Resources.



homes through 2025, the gap is anticipated to narrow; of the net 413 total housing units anticipated between 2015 and 2025, it is forecasted that 292 will be second homes compared to 131 year-round homes.

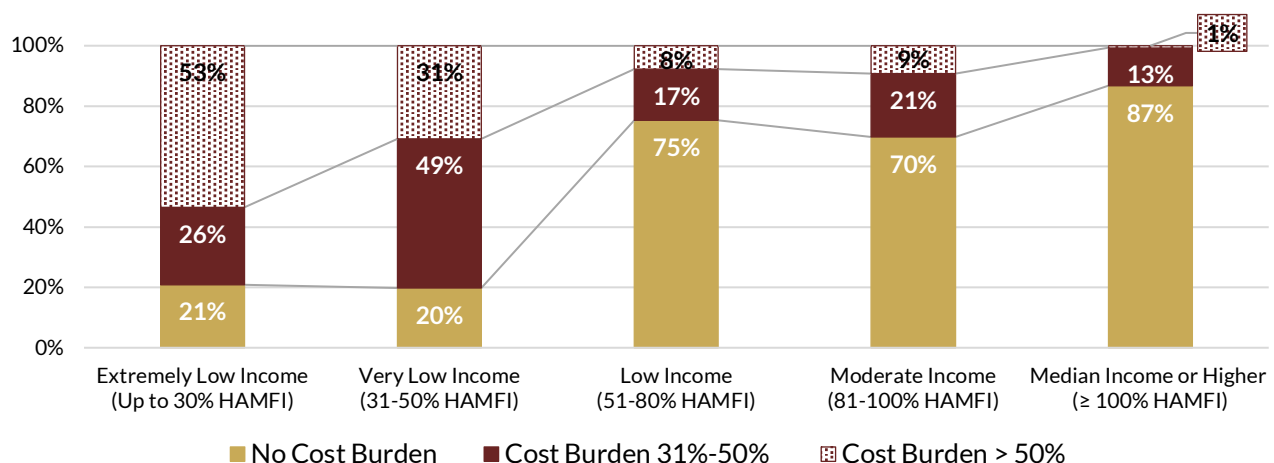
HOUSING AFFORDABILITY

Housing Cost Burden

One metric for understanding housing affordability is **housing cost burden**. The U.S. Department of Housing and Urban Development (HUD) defines cost-burdened households as those paying more than 30 percent of their income toward housing costs, and severely cost-burdened households as those paying more than 50 percent. Cost-burdened households have fewer funds left over for other expenses such as food, transportation, clothing, childcare, and medical care. This strain makes it difficult for these households to “get ahead” financially as they struggle to meet these necessities, let alone establish savings. In Brewster, an estimated 31 percent of all households are cost-burdened compared to 35 percent for Barnstable County.³⁸ Figure 18 displays the level of cost burden for households at different income levels using the Household Area Median Family Income (HAMFI, also abbreviated AMI for Area Median Income). While there is need at all levels, the lower income households are much more likely to be cost-burdened than households earning the median or higher. That said, there is still substantial need at levels over 80 percent AMI, and these households are not eligible for subsidized housing designated for households earning 80 percent AMI or less. In addition, the dataset used to analyze cost burden (Comprehensive Housing Affordability Strategy [CHAS] data) lags by several years and likely underrepresents cost burden in today’s housing market. Housing affordability gaps (discussed further below) use more current data and provide another metric of housing attainability.

Figure 18. Housing Cost Burden by Income Level - All Households

Source: CHAS, 2014-2018



³⁸ Comprehensive Housing Affordability Strategy (CHAS) data, 2014-2018. Note that these figures include severely cost-burdened households. Breaking it down further, an estimated 20 percent of Brewster households are cost-burdened at 31-50 percent and 11 percent are severely cost-burdened at over 50 percent. At the County level, 19 percent of households are cost-burdened at 31-50 percent and 16 percent are severely cost-burdened at over 50 percent.



HOUSEHOLD TYPES MOST AFFECTED BY COST BURDEN

Among low-to-moderate (LMI) households, 58 percent of households experience some degree of cost burden compared to 17 percent of non-LMI households. Tables 14A and 14B highlight the household types most affected by housing cost burden, with “somewhat cost-burdened” defined as paying more than 30 percent but less than or equal to 50 percent of household income on housing costs, and “severely cost-burdened” as paying more than 50 percent. Large families are most likely to be somewhat cost-burdened, whereas “other” LMI household types such as single householders under 62 or living in nonfamily housing situations are most likely to be severely cost-burdened.

Table 14A. Estimated Percentage of Cost-Burdened Households by Household Type, LMI Households

	LMI Households	Somewhat Cost-Burdened LMI Households	% Of Household Type	Severely Cost-Burdened LMI Households	% Of Household Type
Elderly family (2 persons, with either or both age 62 or over)	385	115	29.9%	90	23.4%
Elderly non-family	530	125	23.6%	135	25.5%
Large family (5 or more persons)	30	15	50.0%	0	0.0%
Small family (2 persons, neither person 62 years or over, or 3 or 4 persons)	250	120	48.0%	40	16.0%
Other	280	60	21.4%	155	55.4%
Total LMI Households	1,475	435	29.5%	28.5%	28.5%

Table 14B. Estimated Percentage of Cost-Burdened Households by Household Type, Non-LMI Households

	Non-LMI Households	Somewhat Cost-Burdened Non-LMI Households	% Of Household Type	Severely Cost-Burdened LMI Households	% Of Household Type
Elderly family (2 persons, with either or both age 62 or over)	820	165	20.1%	10	1.2%
Elderly non-family	340	50	14.7%	30	3.7%
Large family (5 or more persons)	185	60	32.4%	0	0.0%
Small family (2 persons, neither person 62 years or over, or 3 or 4 persons)	1175	120	10.2%	15	1.8%
Other (non-elderly non-family)	295	10	3.4%	10	1.2%
Total Non-LMI Households	2,815	405	14.4%	65	2.3%

Source: Detailed CHAS Tables, 2014-2018, Table 7

Table 15 below shows maximum monthly housing costs that would prevent cost burden at different income levels. This table uses HUD’s FY 2022 income limits, which are used to determine eligibility for certain assisted housing programs and are calculated up to 80 percent AMI, and income limits up to 100 percent AMI as determined by the Massachusetts Housing Partnership (MHP). For additional reference, Appendix B correlates income levels to different jobs to provide context.



Table 15. FY 2022 Income Limits and Maximum Affordable Housing Payments

	Extremely Low Income (Up to 30% AMI)		Very Low Income (Up to 50% AMI)		Low Income (Up to 80% AMI)		Moderate Income (Up to 100% AMI)		
	HUD Income Limit	Max. Affordable Housing Payment	HUD Income Limit	Max. Affordable Housing Payment	HUD Income Limit	Max. Affordable Housing Payment	MHP Income Limit	Max. Affordable Housing Payment	
Household Size	1	\$22,850	\$571	\$38,050	\$951	\$60,900	\$1,523	\$76,100	\$1,903
	2	\$26,100	\$653	\$43,500	\$1,088	\$69,600	\$1,740	\$87,000	\$2,175
	3	\$29,350	\$734	\$48,950	\$1,224	\$78,300	\$1,958	\$97,850	\$2,446
	4	\$32,600	\$815	\$54,350	\$1,359	\$86,950	\$2,174	\$108,700	\$2,718
	5	\$35,250	\$881	\$58,700	\$1,468	\$93,950	\$2,349	\$117,400	\$2,935
	6	\$37,850	\$946	\$63,050	\$1,576	\$100,900	\$2,523	\$126,100	\$3,153
	7	\$41,910	\$1,048	\$67,400	\$1,685	\$107,850	\$2,696	\$134,800	\$3,370
	8	\$46,630	\$1,166	\$71,750	\$1,794	\$114,800	\$2,870	\$143,500	\$3,588

Source: HUD Income Limits, 2022; Massachusetts Housing Partnership (MHP) ONE Mortgage Program 2022 Income Limits, and Barrett Planning Group. MHP Income Limits are extrapolated from HUD Income Limits. Maximum affordable housing payment calculation based on 30% of the annual income level divided by twelve.

Housing Affordability Mismatch: Owners

An estimated 29 percent of homeowner households in Brewster experience some degree of cost burden, with 17 percent considered cost-burdened and 12 percent severely cost-burdened. Table 16 breaks cost burden for owner households by income level, with the highest value in each cost-burdened category emphasized. Very low- and extremely low-income owner households are the most likely to experience cost burden, although a significant amount of households earning over 80 percent of the HAMFI are also cost-burdened. These households would not be eligible for any current subsidized units in Brewster at this income level.

Table 16. Income by Cost Burden (Owners Only)

Income Level	No Cost Burden	Cost burden 30%-49%	Cost burden > 50%
Extremely Low Income (Up to 30% HAMFI)	6%	10%	84%
Very Low Income (31-50% HAMFI)	19%	47%	34%
Low Income (51-80% HAMFI)	75%	16%	9%
Moderate Income (81-100% HAMFI)	70%	20%	10%
Median Income or Higher (≥ 100% HAMFI)	86%	13%	1%
All Incomes	71%	17%	12%

Source: Comprehensive Housing Affordability Strategy (CHAS) data, 2014-2018



Another method for understanding housing affordability is the **affordability gap**, which is the difference between a purchase price (or rent) and what a household can afford. Based on Brewster's current property tax rate and industry standards for housing affordability, mortgage terms, insurance rates, and other factors, households earning the HUD-defined Area Median Family Income (HAMFI, \$115,600) likely could not currently afford to purchase a single-family home in Brewster at the current median sale price, as shown in Table 17.

Table 17. Maximum Single-Family Home Affordability Based on Area Median Income

*2022 Brewster SF Median Sales Price	\$753,500
Max. Affordability at HAMFI (\$115,600)	\$420,579
Affordability Gap	-\$332,921
*As of April 2022. Sources: Banker & Tradesman Town Stats, 2022 Household Area Median Family Income (HAMFI), HUD	

Housing Affordability Mismatch: Renters

Brewster renters are more likely to experience cost burden than homeowners, with an estimated 41% of renter households experiencing some degree of cost burden. Table 1 below breaks cost burden for renter households by income level, with the highest value in each cost-burdened category emphasized. The limitations of CHAS data become apparent in the table below, as the sample size shrinks when looking at Brewster's limited number of renter households (an estimated 535 total for the most recent year CHAS data is available). Just as for homeowners, there is a substantial number of cost-burdened households earning over 80 percent area median income who would be ineligible for a traditional subsidized income but are nonetheless financially strained due to housing costs.

In Brewster's case, very low levels of cost burden in higher income levels (equal to or greater than 100 percent of the HAMFI) can also indicate another issue facing households: an insufficient supply of market rate rental units. There may be households who could afford market rate rentals, but the supply is not there. Thus, the sample size remains very small (an estimated 110 renter households at this income level), making the margin of error more substantial. While any true 0- or 100-percent figure is unlikely, this data still highlights the general trend that renter households earning at least 100 percent of the area median income are much less likely to experience cost burden — *and* that the very limited supply of market rate rentals accordingly limits the number of renter households at this income level.

Table 18. Income by Cost Burden (Renters Only)*

Income Level	No Cost Burden	Cost burden 30%-49%	Cost burden > 50%
Extremely Low Income (Up to 30% HAMFI)	46%	49%	6%
Very Low Income (31-50% HAMFI)	22%	57%	22%
Low Income (51-80% HAMFI)	78%	22%	0%
Moderate Income (81-100% HAMFI)	63%	38%	0%
Median Income or Higher (≥ 100% HAMFI)	100%	0%	0%
All Incomes	59%	35%	7%

Source: Comprehensive Housing Affordability Strategy (CHAS) data, 2014-2018.

*Any 0- or 100-percent figure is unlikely due to margin of error and small sample size.



In terms of the rental affordability gap, a household renting a 2-bedroom unit at the FMR (\$1,879) should have a household income of approximately \$75,000 to avoid housing cost burden, yet the estimated median household income of renter households in Brewster is \$35,000.³⁹

Chapter 40B Subsidized Housing Inventory

Also known as the Comprehensive Permit Law, Chapter 40B of Massachusetts General Law was enacted to provide for a regionally fair distribution of affordable housing for people with low or moderate incomes. Units created under Chapter 40B remain affordable over time because a deed restriction limits resale prices and rents for many years, if not in perpetuity. The law establishes a statewide goal that at least 10 percent of the housing units in every municipality will be deed restricted affordable housing to ensure that all communities meet the “regional fair share” of low- or moderate-income housing. Other options for measuring “fair share” include a general land area minimum and an annual land disturbance standard.⁴⁰

Chapter 40B authorizes the Zoning Board of Appeals (ZBA) to grant a comprehensive permit to pre-qualified developers to build affordable housing.⁴¹ A comprehensive permit covers all the approvals required under local bylaws and regulations, streamlining the application process. Under Chapter 40B, the ZBA can waive local requirements and (a) approve, (b) conditionally approve, or (c) deny a comprehensive permit; however, developers may appeal to the state Housing Appeals Committee (HAC) if their application has been denied in a community that does not meet one of the three statutory determinants of “consistent with local needs.” During its deliberations, the ZBA must balance the regional need for affordable housing against valid local concerns such as public health and safety, environmental resources, traffic, or design. Nonetheless, Chapter 40B tips the balance in favor of housing needs in towns that do not meet one the three statutory tests. In addition, ZBAs cannot subject a comprehensive permit project to requirements that “by right” developments do not have to meet.

The 10 percent statutory minimum is based on the total number of year-round housing units in the most recent decennial census. In seasonal communities the number of year-round housing units is significantly lower than the total housing unit count. In Brewster the 10 percent minimum is currently 480 units and is based upon the 2010 Census year-round housing count for Brewster (4,803). At 5.58 percent, Brewster currently falls short of the 10 percent minimum; to meet that standard, the Town would need an additional 212 units based on its current SHI, although this will change when the 2020 Census year-round housing count is released. Three projects have recently been permitted and are expected to add a total of fifty-nine units to the SHI in 2022. These projects include Serenity at Brewster

³⁹ ACS 5-Year Estimates, 2016-2020, Table B25119.

⁴⁰ The general land area minimum applies if SHI-eligible units have been developed on sites comprising 1.5 percent or more of the total land area zoned for residential, commercial, or industrial use; the annual land disturbance threshold applies if a comprehensive permit application would lead to the construction of SHI-eligible units on sites comprising more than 0.3 percent of the total land area zoned for residential, commercial, or industrial use or ten acres – whichever is greater – in one calendar year.

⁴¹ A “pre-qualified developer” has obtained a “Project Eligibility” letter from a state housing agency.



(twenty-seven rental units for adults 55+ or older), Brewster Woods (thirty rental units), and Red Top (two ownership units developed by Habitat for Humanity). Map 10 and Table 19 provide an overview of the Town's current SHI profile. Of the eighteen total projects either currently on the SHI or anticipated to be added to the SHI, nine were developed under Chapter 40B. Appendix C provides additional information about the Town's SHI units including funding sources, number of bedrooms, and other details.

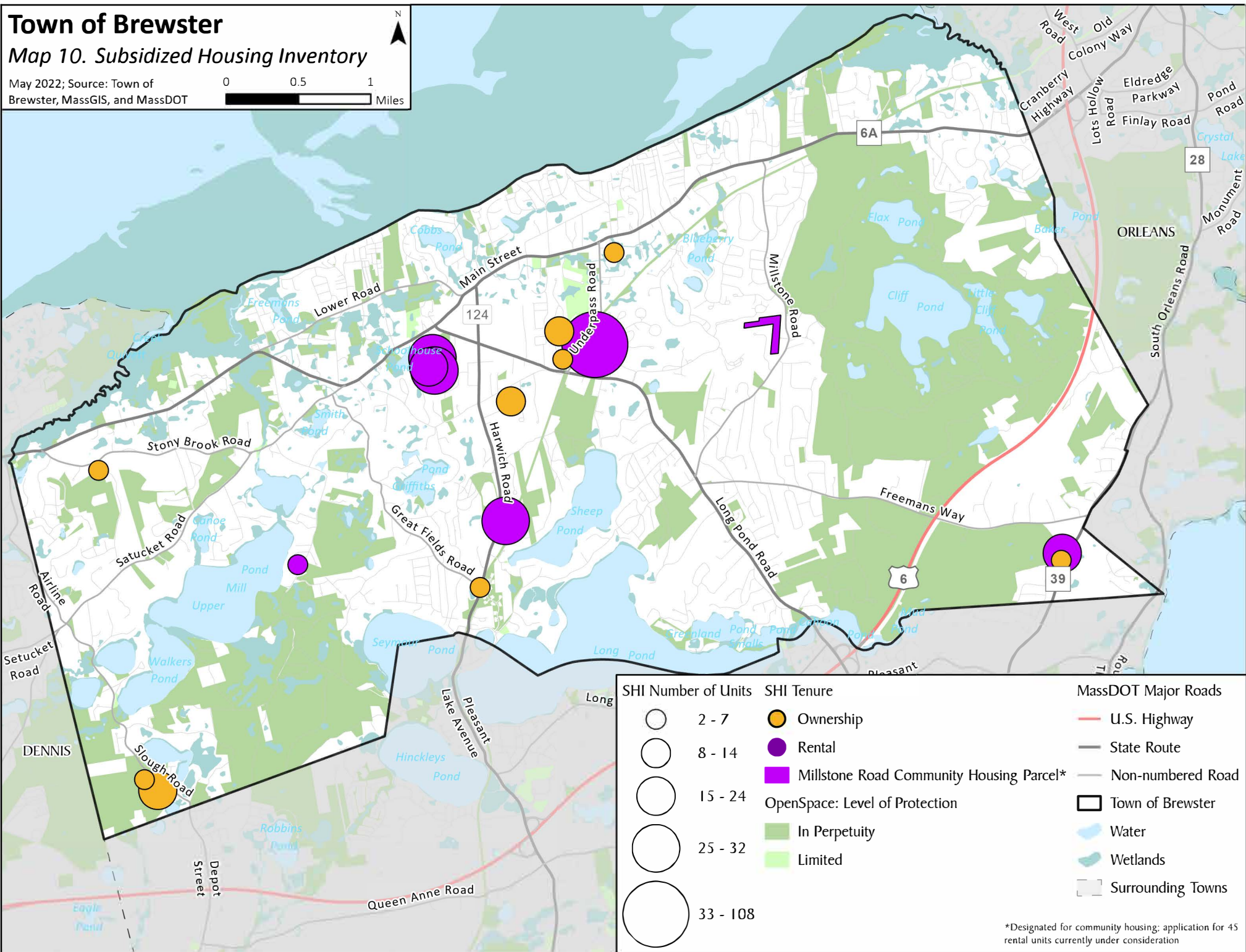
Table 19. Current Subsidized Housing Inventory and Anticipated Future Units

Current SHI Units					
Name	Location	Type	Units	Affordability Expires	40B Comprehensive Permit?
N/A	Frederick Court	Rental	32	Perp	No
Huckleberry Lane	Huckleberry Lane	Rental	12	Perp	No
Huckleberry Lane	Huckleberry Lane	Rental	12	Perp	No
Belmont Park	Belmont Park Drive	Ownership	20	Perp	Yes
Great Fields Affordable Housing	Great Fields Road	Ownership	2	Perp	No
King's Landing	Underpass Road	Rental	108	2033	No
Yankee Village	Signal Hill Circle	Ownership	12	2045	Yes
Frederick Court Expansion	Wells Court	Rental	24	Perp	Yes
Yankee Drive II	Yankee Drive	Ownership	3	2102	Yes
Eagle Point	Turning Mill Rd	Rental	3	2040	No
DDS Group Homes	Confidential	Rental	12	N/A	No
Habitat for Humanity	James Burr Road	Ownership	4	Perp	Yes
Tubman Road/Hush Way - Habitat for Humanity	Tubman Road, Hush Way	Ownership	14	Perp	No
Brewster Landing	Sachemus Path	Ownership	7	Perp	Yes
White Rock	South Orleans Rd	Ownership	3	Perp	Yes
Total SHI Current Units			268		
Anticipated Future Units					
Name	Location	Type	Units	Affordability Expires	40B Comprehensive Permit?
Brewster Woods	Brewster Road	Rental	30	Perp	Yes
Serenity at Brewster	Harwich Road	Rental	27	Perp	No
Red Top - Habitat for Humanity	Red Top Road	Ownership	2	Perp	Yes
Total Anticipated Units			59		
Anticipated Total, 2022			327		

Town of Brewster

Map 10. Subsidized Housing Inventory

May 2022; Source: Town of Brewster, MassGIS, and MassDOT





BARRIERS TO DEVELOPMENT

The following section discusses the most significant constraints that may affect Brewster's ability to address affordable housing and year-round housing needs. In Housing Production Plans, terms such as "barriers" or "constraints" are typically used as a value-neutral way to describe factors that objectively limit housing development. While some "barriers" such as sensitive environmental areas or historic resources can be considered constraints on development, they are also valuable community assets — moreover, these barriers are unlikely to change if under special protections. Other "barriers" can be remedied or improved upon, particularly those stemming from local regulations and policies under the community's direct control.

Environmental Constraints

Information for this section is summarized from 2021 Open Space and Recreation Plan (OSRP), unless otherwise noted.⁴²

TOPOGRAPHY

Brewster and the Cape were first formed when ice withdrew from the area of Martha's Vineyard and Nantucket at the end of the last ice age. This glacier movement deposited hundreds of feet of unconsolidated material in the area where the Cape is now located. Most of Brewster is comprised of the Harwich Outwash Plain, a relatively flat area caused by meltwater streams flowing off the front of a receding glacier. Large blocks of ice left by the retreating glacier settled and were surrounded by sediments deposited in outwash streams. These buried ice blocks finished melting long after the outwash plains were formed, resulting in kettle-hole ponds where the ice blocks left holes large enough to intersect the water table. In contrast to the relatively flat outwash plain areas making up much of Brewster, areas of higher elevation in the northwestern part of town are characterized by less well sorted sediments of varying particle sizes, including many boulders. Ultimately, this glacial history explains why most of Brewster is composed of sandy glacial deposits, with limited areas of more varied topography and pockets of wetlands, bogs, and clay.

SOILS

Soil types are broken into four categories (Groups A, B, C, D) depending on their level of permeability, with Group A soils having the highest rate of water transmission and Group D soils having a very slow infiltration rate. "Carver Association," a Group A soil, comprises more than 75 percent of the town's soils and has coarse lower layers that act as a reservoir for underground water replenished by precipitation. However, the downside of a highly permeable soil is that it also allows septage, contaminated road runoff, and other pollutants to quickly flow through the soil into the drinking water supply. The remaining 25 percent of soils in the Town are wet soils, low-permeability soils, wetlands, and surface waters.⁴³

⁴² Town of Brewster, *Open Space & Recreation Plan*. Prepared by the Town of Brewster, Horsley Witten Group, and The Cape Cod Commission. Conditionally approved January 2021; updated January 2022.

⁴³ *Ibid.*, Page 35.



WATER RESOURCES

Watersheds. Located within the Cape Cod Watershed, the Town of Brewster encompasses six embayment watersheds that it shares with neighboring jurisdictions. These include the Cape Cod Bay, Herring River, Namskaket Creek, Pleasant Bay, Quivett Creek, and Stony Brook watersheds. Brewster also contains a very small portion of the Bass River watershed. In Brewster, much of the focus has been on the Pleasant Bay watershed, as Brewster's nitrogen contribution is far greater to Pleasant Bay than it is to Herring River or Bass River. As such, the Pleasant Bay Watershed has been included in Brewster's Water Resources bylaw, while the Herring River and Bass River Watersheds have not.

Surface Waters: Freshwater Lakes and Ponds. Freshwater ponds are a major defining feature of Brewster. Over ten percent (or over 2,000 acres) of the Town's surface area is covered by approximately eighty freshwater ponds, providing Brewster with the largest pond area on the Cape. The 743-acre Long Pond shared with Harwich is the Cape's largest, while Cliff Pond with a depth of 84 feet is the deepest. At least eleven of Brewster's ponds are suitable for public swimming.

Marine Surface Waters. Brewster's marine resources exist primarily on the north shore along Cape Cod Bay. A small section of Brewster borders Pleasant Bay to the south, although there is no landing. While there are no large estuaries in Brewster, there are some substantial creeks including Paine's, Quivett and Namskaket. Nine of the ten saltwater beaches along Cape Cod Bay are accessible from a street connecting to Main Street (Route 6A), and one is accessible by trail. At low tide, Brewster's beaches become a part of expansive tidal flats that extend $\frac{3}{4}$ of a mile out into Cape Cod Bay.

Aquifer Recharge Areas. The town's groundwater system, like the whole of Cape Cod, is replenished entirely by precipitation. Brewster's drinking water supply source is its underground sole source aquifer, the Cape Cod Aquifer. This resource is comprised of six lenses, including the Monomoy Lens, which provides water to the Towns of Brewster, Dennis, Harwich, Chatham, and Orleans. The Town of Brewster owns the land of the "Zone I" areas for all of the town's drinking water wells. **Zone I** is the protective radius required around a public water supply well or wellfield, which is 400 feet for drinking water wells with approved yields of over 100,000 gallons per day. A **Zone II** is the area of an aquifer which contributes water to a well under the most severe pumping and recharge conditions that can be realistically anticipated (i.e., 180 days of pumping at approved yield with no recharge from precipitation). Any contamination of groundwater in a Zone II could impact drinking water quality at the public well drawing water from that area. Land acquisition in the Zone II areas to public drinking water wells is a proactive approach to protecting drinking water quality. Of the 4,360 acres (excluding surface water ponds) of Zone II areas in Brewster, 40 percent is protected as conservation land in the form of Town- and state-owned properties, conservation restrictions, and other conservation mechanisms. Brewster's Zone I and II areas are displayed in Map 12.

FLOOD HAZARD AREAS

As a participant in the Federal Flood Insurance Program, Brewster is required to ensure that new shorefront development meets engineering standards for flood proofing; however, development in



these areas is not outright prohibited. Map 11 displays Brewster's flood zones, and Brewster's Floodplain District (Section 179-7 of the Zoning Bylaw) is further described in the Regulatory Considerations section of this document.

WETLANDS AND WILDLIFE HABITAT

Wetlands cover more than 20 percent of Brewster's land area, with a total of 12,840 saltwater wetlands and 553 acres of freshwater wetlands. Brewster's saltwater wetlands consist of salt marshes, tidal flats and barrier beaches, while its freshwater wetlands include sensitive Atlantic White Cedar, Red Maple and shrub swamps, bogs, vernal pools and other wetlands. The Town's Wetlands Protection Bylaw is included in Section 172 of the Town's General Bylaws, and Section 179-6 of the Zoning Bylaw established the Town's Wetlands Conservancy District. Map 11 shows Brewster's wetlands by type, in addition to the two Areas of Critical Environmental Concern (ACEC) within Brewster — the Inner Cape Cod Bay ACEC and the Pleasant Bay ACEC. Designated by the Secretary of Energy and Environmental Affairs, ACECs first receive initial nomination at the community level for the quality, uniqueness, and significance of their natural and cultural resources. Upon designation, ACECs require stricter environmental review of certain kinds of proposed development under state jurisdiction within the ACEC boundaries.

Brewster's abundant natural resources make it home to a variety of wildlife, with the Massachusetts Natural Heritage & Endangered Species Program (NHESP) identifying much of the Town's land cover as "Critical Natural Landscape," defined as intact landscapes better able to support ecological processes and a wide array of species and habitats over long timeframes. While this designation does not carry any regulatory restrictions along with it, for planning purposes, it helps frame which areas to target for development versus preservation of contiguous natural habitat. In Brewster's case, much of the Critical Natural Landscape areas are already protected to varying degrees under conservation restrictions or as part of the DCPC.

PROTECTED OPEN SPACE

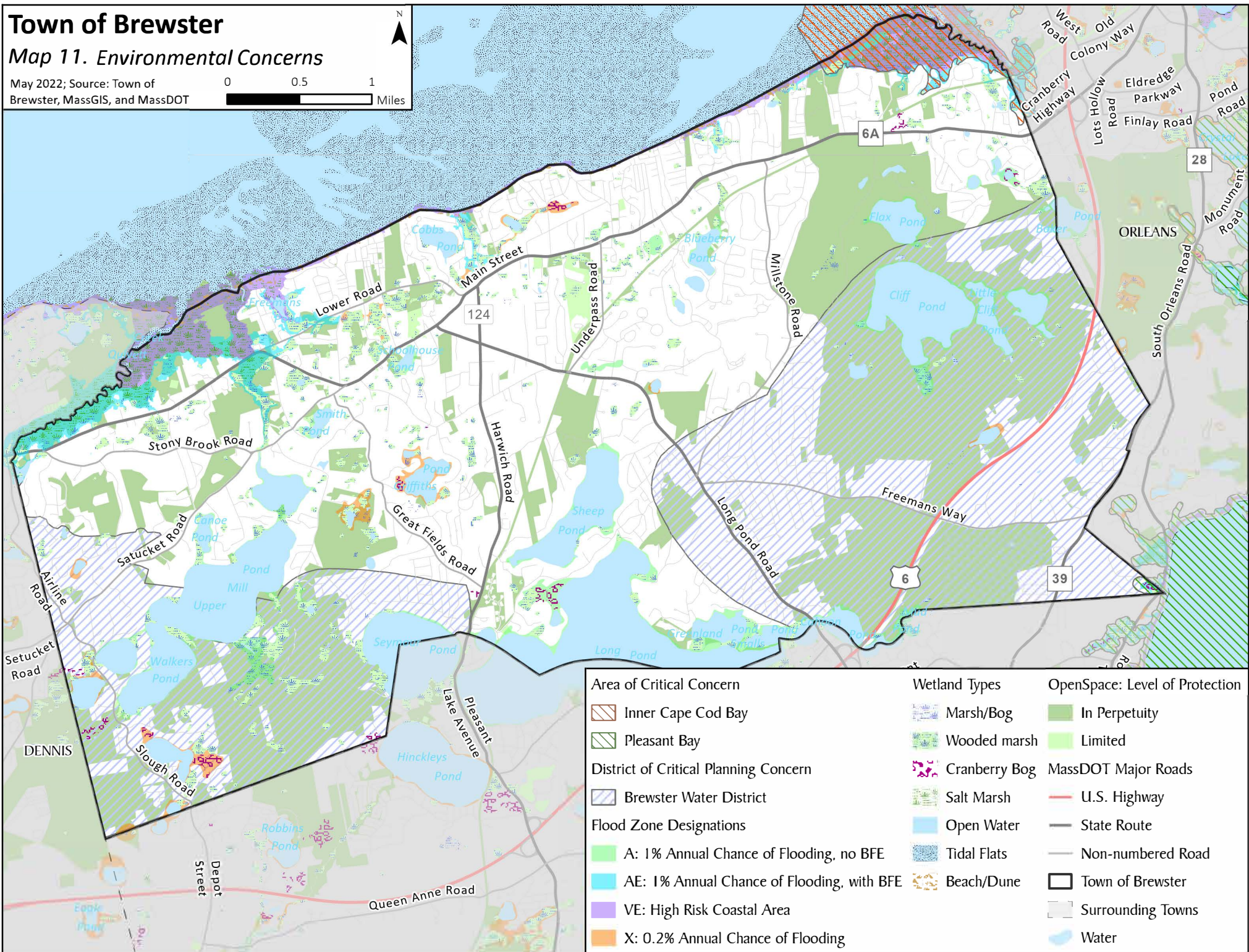
Protected open space or permanently restricted lands include those acquired by conservation restrictions, trust and gifts, town purchases, and tax takings. According to the 2021 Open Space and Recreation Plan, Brewster has over 2,200 acres of large State and non-profit open space and recreational holdings, such as Nickerson State Park, Camp Monomoy land acquired by the state, Brewster Conservation Trust lands, Orenda Wildlife Trust, and the Cape Cod Rail Trail. Additionally, lands associated with public buildings (e.g., Elementary Schools, Old Town Hall, Fire/Police Station, Town Hall) and privately-held lands currently under Chapter 61, 61A, and 61B enhance the Town's open space and rural character.

Town of Brewster

Map 11. Environmental Concerns

May 2022; Source: Town of Brewster, MassGIS, and MassDOT

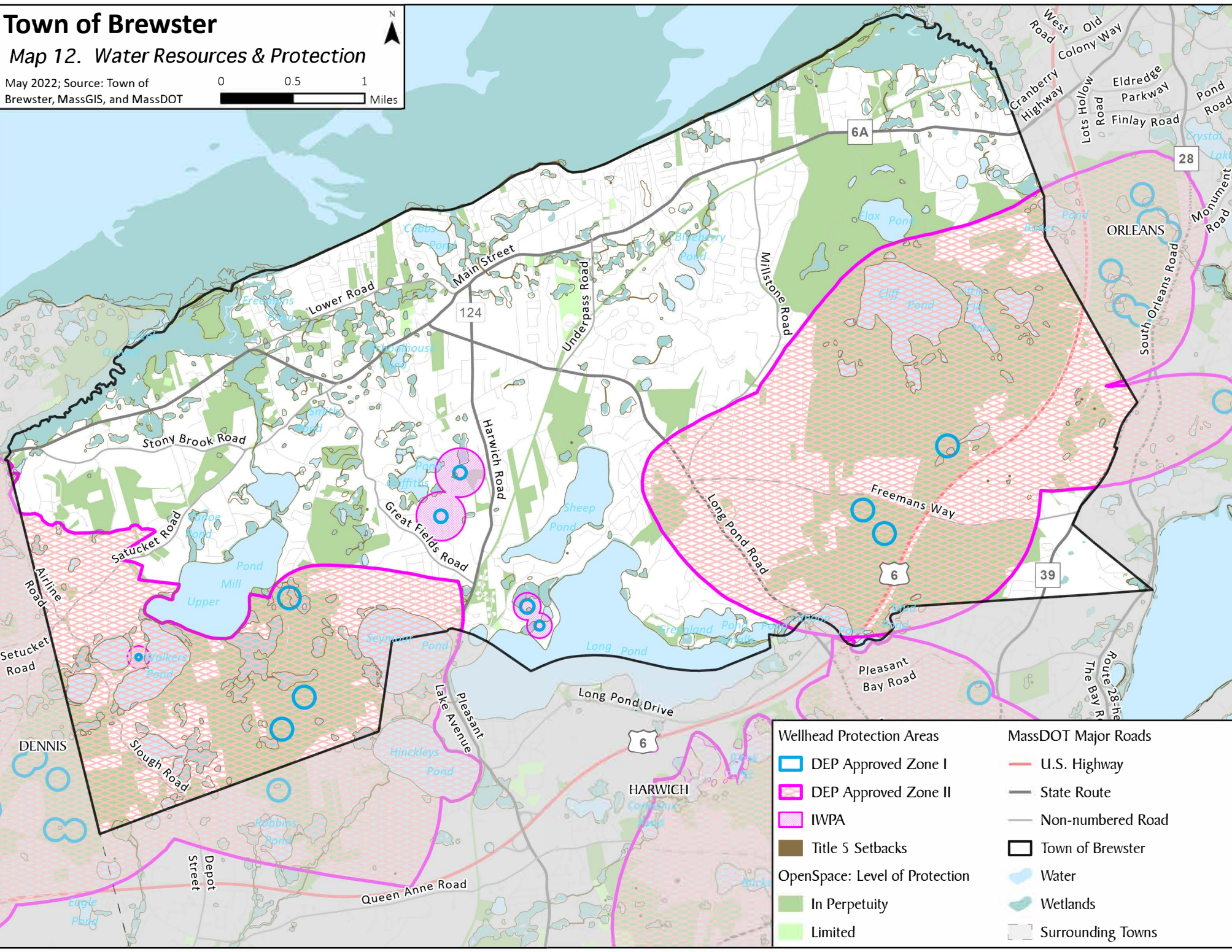
0 0.5 1 Miles



Town of Brewster

Map 12. Water Resources & Protection

May 2022; Source: Town of Brewster, MassGIS, and MassDOT



Wellhead Protection Areas	MassDOT Major Roads
DEP Approved Zone I	U.S. Highway
DEP Approved Zone II	State Route
IWPA	Non-numbered Road
Title 5 Setbacks	Town of Brewster
OpenSpace: Level of Protection	Water
In Perpetuity	Wetlands
Limited	Surrounding Towns



Infrastructure Considerations

Information for this section is summarized from 2021 Open Space and Recreation Plan (OSRP), unless otherwise noted.

WATER AND WASTEWATER

Drinking Water. As described in the previous “Water Resources” section, drinking water in Brewster originates from the Cape Cod Aquifer, a sole source aquifer. Drinking water comes through public wells owned and operated by the Brewster Water Department, as well as a number of private wells owned and operated by individual homeowners and businesses. The Town has five groundwater wells pumping water from the Monomoy Lens, with each well site having large Town-owned tracts of land surrounding them for water quality protection. Activity is restricted to passive recreation on Town wellfield acreage.⁴⁴

In addition to acquisition of lands for the protection of drinking water supplies, the town has also developed regulations that further the protection of these lands. Most notable is Brewster’s Water Quality Protection zoning bylaw (Article XI), which restricts development within Zone I and Zone II areas and imposes performance standards on development within the District of Critical Planning Concern (DCPC). The DCPC is a powerful planning tool that allows a town to adopt special rules and regulations to protect natural resources in defined areas, with the Cape Cod Commission responsible for recommending nominated DCPCs for official designation by the Barnstable County Assembly of Delegates. Brewster’s DCPC, designated by the Cape Cod Commission in 2008, includes the Town’s Zone I and Zone II areas as well as the Pleasant Bay Watershed. The Town’s wells and the protective areas surrounding them are displayed on Map 11.

Wastewater. Because Brewster is not served with public sewers or private sewage treatment facilities, wastewater discharges in Brewster are mostly from individual onsite septic systems. To address these impacts of wastewater-associated pollutants and lawn fertilizers on groundwater and surface water resources, the town has been involved in a multi-phase Integrated Water Resource Management Plan (IWRMP). This project is currently in Phase III, which will include an examination and prioritization of wastewater management alternatives identified in Phase II of the project.

TRANSPORTATION

Public Transit. The Cape Cod Regional Transit Authority (CCRTA) provides public transportation services for all fifteen Cape Cod communities. The CCRTA Harwich-Provincetown Flex Bus provides daily bus service along Routes 137 and 6A in Brewster, with fixed stops at Snow Road/Underpass Road and the Senior Center. Riders can flag the bus down along its route and can also schedule the bus “flex” stops up to three-quarters of a mile (by reservation) to serve people who have difficulty getting to a regular bus stop. The Flex Bus route runs from Harwich up to Provincetown and connects with other CCRTA routes, as well as the Plymouth & Brockton bus service to Boston.

⁴⁴ Town of Brewster Water Department, “2020 Annual Water Quality Report.”



DART Service (Dial-A-Ride, a demand response service) is a fare-based door-to-door, ride by appointment transportation service offered by the CCRTA in all fifteen Cape communities Monday through Saturday, with limited service on Sunday.

Roadways. Brewster is located midway on Cape Cod and is accessible by major highways (Route 6, 6A, 124 and 137). Route 6A extends the length of Brewster and is Brewster's Main Street. It is a designated scenic road and also registered as the Old King's Highway National Register District, which protects it from pressure to accommodate increased traffic that would diminish the roadway's historically valuable character. According to the 2021 Open Space and Recreation Plan, "Pressure increases each year to expand the roadway to accommodate bike traffic and reconfigure some intersections where left hand turns cause back-ups in traffic. Attempts to expand the paved width of roads to accommodate pedestrian, bike, and skate traffic have been met with strong opposition from abutters to the road."⁴⁵

Sidewalks & Pedestrian Paths. As noted in the 2017 HPP, Brewster does not many public sidewalks, and the sidewalks that exist are incomplete. While many pedestrian paths run along portions of these roads, shoulders tend to be narrow and somewhat steep, with utility poles, trees, and smaller vegetation interrupting the pathways and sidewalks. The 2021 OSRP notes that while Brewster many walking trails and informal walkways throughout its conservation land, these pathways currently do not provide alternative means of transportation without connecting to destination points, other links, or modes of transportation. Linking these recreational resources and facilities with safe pedestrian or bike paths could eliminate a significant amount of vehicular traffic in the future.

In 2015, Town Meeting approved a \$10M road bond to undertake several road reconstruction projects. After completing upgrades to Underpass and Snow Roads, the Town began to plan for similar upgrades to Millstone Road. As of February 2022, this project as planned will include ADA-compliant sidewalk along Millstone Road.

Bikeways. The 22-mile Cape Cod Rail Trail (CCRT) provides passage through the Town from Dennis to South Wellfleet. The CCRT is about six miles long in Brewster and is the only designated bike path in town. It is heavily used and serves as a primary corridor, with thousands of bicyclists, hikers, and riders using the trail each year. Nickerson State Park also has an eight-mile bike path, which connects to the CCRT. While cyclists also ride along local roads, this is dangerous and illustrates the need for local and roadside bike lanes.

SCHOOLS

The Town of Brewster's public schools consist of two elementary schools: Eddy Elementary School (grades 3-5) and Stony Brook Elementary School (grades PK-2). Located off Underpass Road, Stonybrook Elementary was built in 1973. In 1999, the town constructed Eddy Elementary on Main

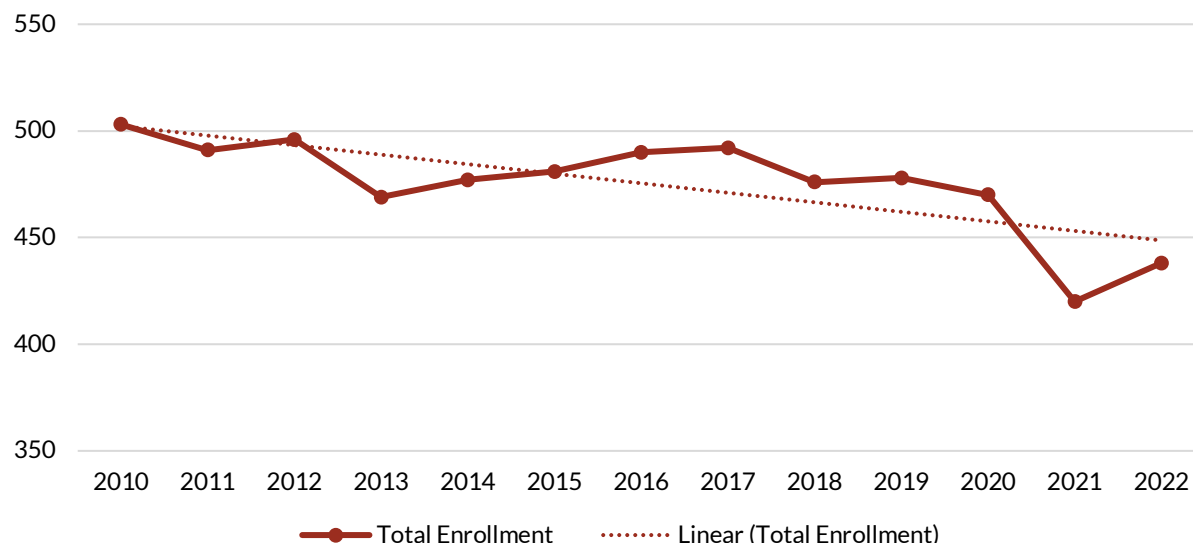
⁴⁵ Town of Brewster, *Open Space & Recreation Plan*. Prepared by the Town of Brewster, Horsley Witten Group, and The Cape Cod Commission. Conditionally approved January 2021; updated January 2022. Page 25.



Street to meet increased student enrollment and projections. The Town is now considering a consolidation of its elementary schools due to declining enrollment (see Figure 19), and future projections anticipating similar trends.^{46, 47}

Figure 19. School Enrollment for Brewster's Elementary Schools, 2010-2022

Source: MA Department of Elementary and Secondary Education, District Profile



Special Needs. The Brewster Elementary Schools do not appear to have disproportionate over-representation of special needs populations. Approximately 18.9 percent of the elementary student population in Brewster has disabilities, compared with 19.1 percent statewide. The percentage of English Language Learners is significantly lower for Brewster's schools (4.1 percent) than the state (11.0 percent).⁴⁸

Nauset Regional Public School System. Brewster is part of the Nauset Regional Public School System for middle school and high school, with both schools located in other towns; Nauset Regional Middle School (grades 6-8) is located in Orleans, and Nauset Regional High School (grades 9-12) is located in Eastham. The district consists of students from the four towns that comprise the region (Brewster, Eastham, Orleans, and Wellfleet), together with tuition agreement students from Provincetown and Truro and school choice students from other towns on the Cape. According to data provided by the district, the total enrollment for the 2021-2022 school year was 1,390 for both schools, with 36 percent of students coming from Brewster.

⁴⁶ While enrollment increased from 2021 to 2022, it is possible that the significant drop in 2021 was due to the COVID-19 pandemic and resulting increase in the number of homeschooling families that year. As such, it is also important to look at the overall trendline (dotted in Figure 19).

⁴⁷ Town of Brewster, *Elementary Schools Master Plan*. Prepared by Habib & Associates Architects for the Town of Brewster, December 31, 2021.

⁴⁸ Department of Elementary and Secondary Education, Brewster Schools Profile.



Regulatory Considerations

ZONING

As noted in the 2017 HPP, The Brewster Zoning Bylaw includes minimal provisions to encourage the creation of affordable housing or multifamily housing. Most land is zoned for lower density residential development (see Table 20 and Map 13), requiring minimum lot sizes of at least 60,000 square feet (RL and RM) or 100,000 square feet (see Table 22).

Table 20. Brewster Zoning Districts

	% Land by Parcel	% Area Zoned
Residential Rural (RR)	53.3%	48.4%
Residential Low Density (RL)	7.0%	12.8%
Residential Medium Density (RM)	33.1%	34.6%
Commercial High Density (CH)	2.5%	1.8%
Village Business (VB)	4.0%	0.6%
Industrial (I)	0.1%	1.5%
Municipal Refuse District (MRD)	0.0%	0.3%
TOTAL	100.0%	100.0%

Sources: Town of Brewster GIS and Assessor's Records

The CH and VB districts allow residential and commercial uses, and the I districts allow residential, wholesale, manufacturing, and industrial uses. Table 21 below shows the residential uses allowed in each district, with "P" indicating that a use is allowed by right and "S" indicating uses that require a special permit.

Table 21. Uses Regulations for Residential Uses

P = Permitted Use, S = Special Permit Use

Type of Residential Use	RR	RL	RM	CH	VB	I
Accessory residential building	P	P	P	P	P	-
Accessory commercial dwelling unit (ACDU)	-	-	-	S	S	-
Accessory single-family dwelling unit (ADU) on 30,000+ sq ft lot	P	P	P	S	S	-
Accessory single-family dwelling unit (ADU) on < 30,000 sq ft lot	S	S	S	S	S	-
Affordable multifamily dwelling units (AMFDU)	-	-	-	P	-	-
Cluster residential development	S	S	S	-	-	-
Construction trailer	P	P	P	P	P	P
Major residential development	S	S	S	S	-	-
Multifamily dwelling	-	-	-	S	-	-
One-family detached dwelling unit	P	P	P	-	P	-
One-family security dwelling	-	-	-	P	P	P
Planned residential development	-	S	S	-	-	-
Row or town houses	-	-	-	S	-	-
Subsidized elderly housing	S	S	S	S	-	-

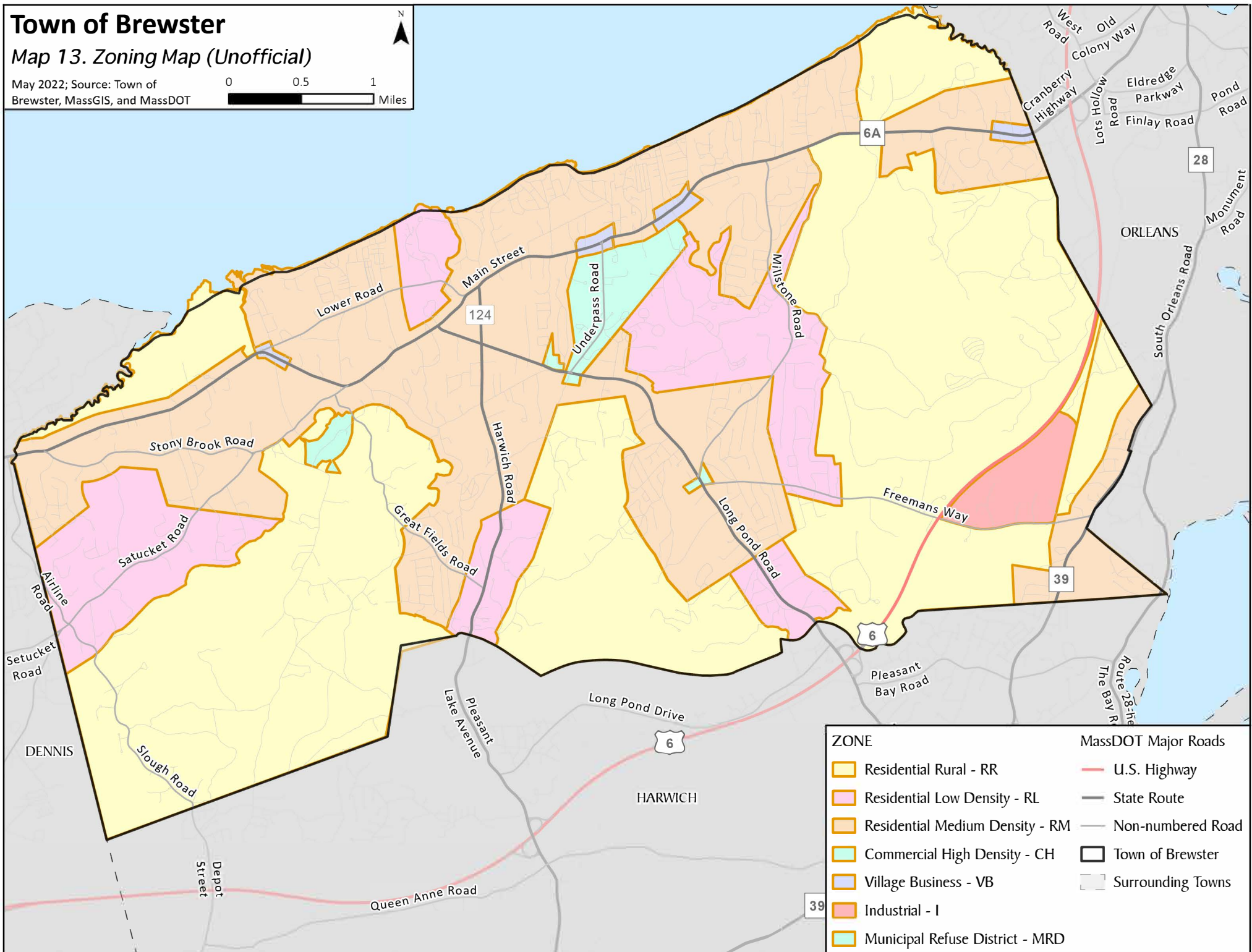
Source: Town of Brewster Zoning Bylaw, Section 179: Attachment 1 Use Regulations.

Town of Brewster

Map 13. Zoning Map (Unofficial)

May 2022; Source: Town of Brewster, MassGIS, and MassDOT

0 0.5 1 Miles





Accessory Residential Uses. Town’s current ADU bylaw (Section 179-42.2) was passed in 2018 and allows homeowners in the Town’s residential districts to add an accessory dwelling unit (ADU) by right on lots over 30,000 square feet, and by special permit on smaller lots, lots within the CH or VB districts, or within certain water protection areas.⁴⁹ Additionally, the ACDU bylaw (Section 179-42.3) allows property owners to add an accessory dwelling unit to a commercial property by special permit in the CH and VB zoning districts. The current bylaws require that ADUs and ACDUs not be more than 40 percent of the habitable area of the primary building, or 900 square feet, whichever is smaller.

Despite passing these bylaws in 2018, the Town retained an older special permit provision for “accessory residential buildings” as a residential use in the Use Regulations and “accessory apartments” as a footnote in the zoning bylaw’s Area Regulations. Dwelling units created under this provision are allowed by special permit in all residential districts, as well as the CH and VB districts, with a lower maximum unit size of 600 square feet.

Other Residential Uses Permitted. Assisted Living Facilities and Nursing Homes are allowed in all three residential districts through a special permit, and they are permitted by right in the CH district. Assisted Living Facilities are defined in the Brewster Zoning Bylaw as a “combination of housing, supportive services, personalized assistance, and health care designed to respond to the individual needs of those who need help with activities of daily living....” Nursing Homes are defined as a “home for the aged, chronically ill, persons requiring care or incurable persons in which three or more persons, not of the immediate family, are received, kept or provided with food and shelter or care for compensation....”

Lodging Houses are allowed in all three of the residential zoning districts through a special permit, and they are permitted by right in the CH and VB districts. Lodging Houses are defined in the Brewster Zoning Bylaw as a “structure originally designed for single-family use which may be converted to provide rooms (not more than twelve) for the use of one or more individuals not living as a single housekeeping unit and may provide a common dining facility. It shall include boarding house, tourist homes, and rooming houses but does not include motels or hotels.”

Area, Height, and Bulk Regulations. As noted above, Brewster has large lot size requirements, with the three residential districts from about one and a third acre to two and a third acres. Different lot coverage requirements distinguish the RL and RM districts, with the former having a maximum of 20 percent building coverage and the latter 25 percent.

Multifamily Dwellings. The Town’s Zoning Bylaw defines multifamily dwellings as “a building containing three or more dwelling units,” without distinguishing further between smaller multi-unit residential buildings (e.g., 4-8 units) and larger developments. Multifamily dwellings are only allowed

⁴⁹ Sections 179-42.2, Paragraph B: “An ADU may be located within a Zone II (Zone of Contribution to a Public Drinking Water Well), in the watershed of the Herring River, or the watershed to Pleasant Bay, subject to approval of a Special Permit by the Zoning Board of Appeals. All ADUs within these areas shall be required to install advanced nitrogen treatment septic systems, if deemed necessary.”



by special permit in the CH districts and have a stricter lot coverage limits than other uses allowed in the district (25 percent of buildable uplands within a lot for multifamily compared to 40 percent for other uses in the CH).⁵⁰ Multifamily dwellings are also allowed by special permit in a Planned Residential Development (PRD) under Section 179-36 of the Zoning Bylaw. PRDs, which require twenty-five acres of contiguous buildable area, and are described further in the “Alternative Development Patterns” section below.

Table 22. Area, Height, and Bulk Regulations

District	Use	Min. Lot Size (Square Feet)	*Max. Building Coverage of Lot Area	Lot Frontage (Feet)	Front (Feet)	Side (Feet)	Rear (Feet)
RR	Any permitted structure or principal use	100,000 plus 100,000 for second unit of duplex	15%	200	40	25	25
RL	Any permitted structure or principal use	60,000 plus 60,000 for second unit of duplex	20%	150	40	25	25
RM	Any permitted structure or principal use	60,000 plus 60,000 for second unit of duplex	25%	150	40	25	25
CH	Row Commercial	40,000	40%	150	30	20	20
CH	Multifamily dwellings	130,000 plus 10,000 per bedroom	25%	200	100	30	30
CH	Hotel and motel	130,000 plus 2,000 per bedroom	40%	200	100	30	30
CH	Row house or townhouse	130,000 plus 10,000 per bedroom	40%	200	100	30	30
CH	Any other permitted structure or principal use	15,000	40%	80	30	15	15
VB	Any permitted structure or principal use	15,000	30%	80	30	15	15
I	Any permitted structure or use, other than those listed for CH Zone	20,000	50%	100	30	15	40

Source: Town of Brewster Zoning Bylaw, Section 179: Attachment 2, Area Regulations and Attachment 3, Height and Bulk Regulations

*For CH and I districts, the lot coverage is based upon buildable uplands within a lot; for all other districts, lot coverage is based upon total lot area. For all districts, maximum building height is 30 feet.



ALTERNATIVE DEVELOPMENT PATTERNS

Cluster Development. Section 179-35 under Article IX provides for cluster residential development, which is intended to allow flexibility in lot sizes and building arrangements while maintaining the existing character of the town. Cluster residential development, however, is only permitted by special use permit granted by the Planning Board. Any parcel of at least ten acres in size in the RR, RL, and RM districts may be used for a cluster development and divided into lots for a single-family residential use, and the basic number of dwelling units may not exceed the number of units which could be developed with a conventional plan for land in the RR, RL, or RM districts.

Major Residential Development. Also under Article IX, Section 179-35.2 allows for major residential development, permitted by special use permit from the Planning Board. The Planning Board may authorize flexible development within a major residential development, including the provision that each lot shall have an area of at least half that required under Table 2.2 of Section 179-16 – Area Regulations. The Planning Board may also approve a density bonus for major residential developments for up to 15 percent more units than the basic number of maximum dwelling units to encourage development of affordable units. Such an approval must be satisfactory to the Brewster Housing Authority and include long-term income eligibility restrictions that meet the guidelines of state or federal housing programs. Subsidized elderly housing is also allowed in a major residential development. As a condition of the special permit, the Planning Board may require a development schedule limiting the rate of development. In no event can a development be limited to fewer than six lots or dwelling units per year or be obliged to spread development out over more than eight years.

Planned Residential Development. Section 179-36 under Article IX allows for Planned Residential Development (PRD), which is intended to provide an alternate pattern of land development to that permitted in the RM and RL residential zones while encouraging a greater mixture of housing types. Planned residential development is only permitted by special permit in the RM and RL residential districts and requires a minimum of twenty-five contiguous acres of buildable upland. Single-family attached or detached dwellings, two-family, and multifamily dwellings are permitted within a planned residential development; there is no minimum lot size for individual lots, no minimum percentage of lot coverage, and no minimum lot width in a planned residential development, thus allowing for greater density.

Natural Resource Protection Design. Lastly, under Article XIII, Section 179-69, Natural Resource Protection Design (NRPD) is intended to protect water resources and preserve the open space in the District of Critical Planning Concern (DCPC, described below in the “Special Districts” section). Similar to the alternative development patterns described above, the NRPD bylaw uses flexible regulations for density and lot dimensions to promote and encourage creativity in neighborhood design, protect water resources, and preserve contiguous open space and environmental resources. The primary difference is that NRPD not involving other uses requiring a special permit is allowed by right in the DCPC in areas with an underlying residential designation, subject to the requirements regulating the subdivision of land (if applicable) and subject to endorsement by the Planning Board.



To enable the Planning Board to determine whether a proposed NRPD satisfies the purposes and standards of the bylaw, an applicant must present sufficient information on the environmental and open space resources for the Board to make such determination. Each underlying residential district has a minimum requirement for preserved open space, and there is no minimum lot size or maximum number or units; rather, a net acreage calculation described in Section 179-72.1 is applied to the plan, and the allowable number of residential units is determined by this net acreage calculation and an allowed density that varies by district (Section 179-72.2)

SPECIAL DISTRICTS

Floodplain District. The purpose of this overlay district is to regulate development in areas subject to coastal storm flowage, particularly high hazard velocity zones, in order to minimize threats to public safety, potential loss of life, personal injury, destruction of property, and environmental damage inevitably resulting from storms, flooding, erosion and relative sea level rise. All uses otherwise permitted in the underlying district are allowed; however, where the Floodplain District Bylaw imposes additional or conflicting regulations, the more stringent local regulations prevail. All development in the Floodplain District must comply with the Massachusetts State Building Code dealing with construction in floodplains and coastal high hazards.

Wetlands Conservancy District. The purpose of these districts is to preserve and maintain the groundwater table; to protect coastal and inland waters; to protect public health and safety; to protect persons and property from the hazards of flood and tidal waters; and to conserve the natural character of the environment, wildlife, and open space for the general welfare of the public. No residential or commercial structures, sewage disposal systems, storage tanks or other potential sources of substantial pollution are permitted in this district.

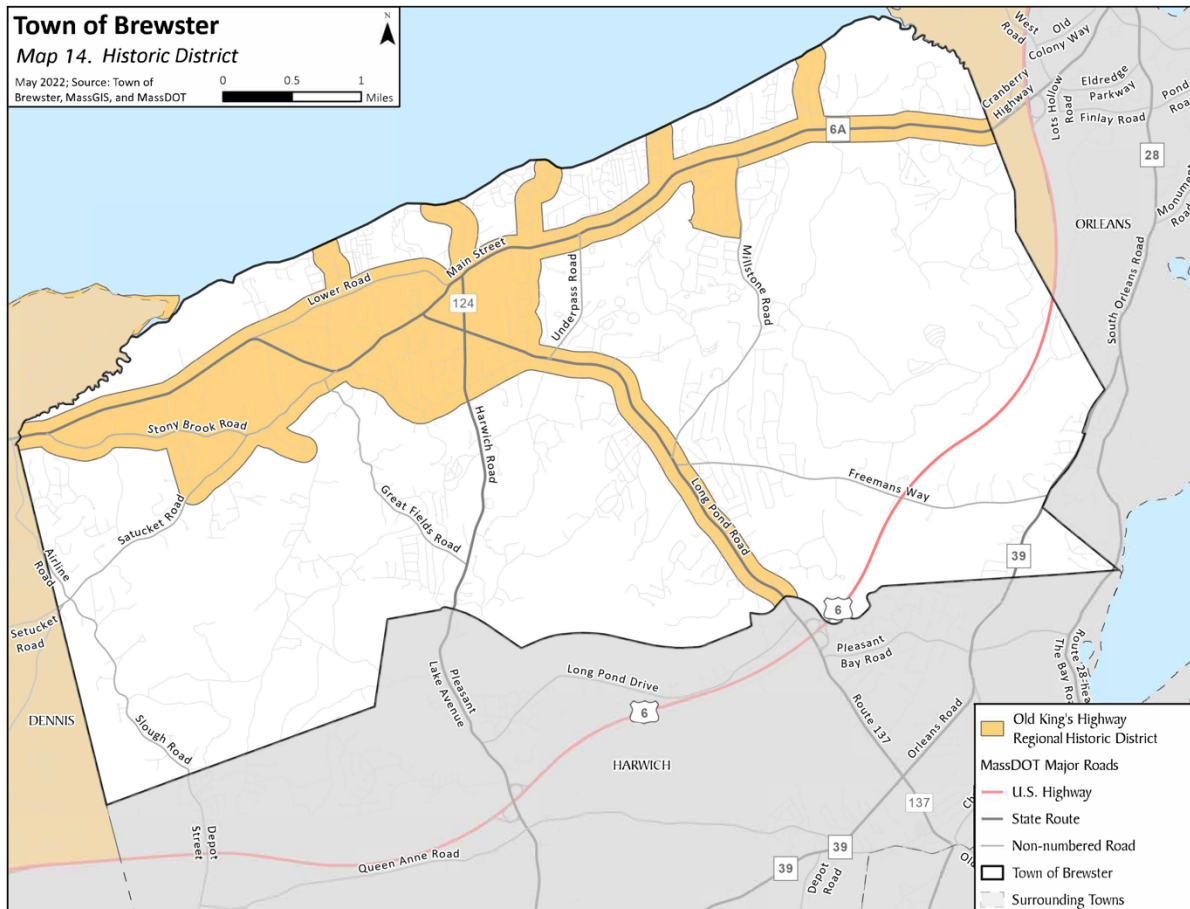
Water Quality Protection District. Article XI establishes the Water Quality Protection District, which ensures an adequate quality and quantity of drinking water for the residents, institutions, and businesses of Brewster. The provisions of this Article are superimposed over all zoning districts and all land within Brewster and function as an overlay district. In addition, this article establishes specific requirements for land uses and activities within the District of Critical Planning Concern (DCPC), which includes Zone I and Zone II areas, as well as the Pleasant Bay Watershed. The construction of ten or more dwelling units in the Water Quality Protection District requires a special permit from the Planning Board. No building permit or certificate of occupancy will be issued by the Building Commissioner unless a certificate of water quality compliance has been applied for or obtained by the owner of a property from the Water Quality Review Committee.

HISTORIC DISTRICTS

In 1973 the **Old King's Highway Regional Historic District** was created, following Route 6A and covering portions of Brewster and five other Cape towns. Individual properties were not inventoried as part of the district's creation. Property owners must submit any exterior changes that are visible from a public way, park, or body of water to the Old King's Highway Regional Historic District Commission for



approval. A variety of exterior features are often exempt such as air conditioning units, storm doors, storm windows, paint color, and temporary structures. The decision on which features are exempt from review depends on the specifics of the local bylaw. Map 14 displays the portion of the Old King's Highway Regional Historic District that runs through Brewster.



Socio-Political Considerations

Input gathered during this Housing Plan community engagement process indicated public acknowledgement that the cost of housing is a barrier for the average household and that supply is a growing issue for a range of income levels. However, survey open response comments on indicate there may be the continued need for community conversations about housing, with “NIMBY”-ism (“not in my back yard”) and resistance to change identified as significant barriers toward housing development by survey respondents. Additionally, results from the recent Vision Planning community survey showed overall less support for the housing goals than other topics. Making progress on these efforts will require continued strong political leadership regarding housing issues and raising community awareness about the relationship between housing and other issues facing the community.



Housing Production Plan Goals

State regulations and DHCD Housing Production Plan Guidelines describe the required framework the goals of a Housing Production Plan, directing communities to include both qualitative and quantitative goals based upon community and regional needs.⁵¹ Qualitative goals should support a mix of housing types that: are affordable at a range of income levels; provide for a range of housing types for families, individuals, persons with special needs, and older adults; and are feasible within the housing market.

In addition, plans must include a quantitative goal for an annual increase in SHI-eligible housing units by at least 0.50 percent of its year-round housing count. Communities that meet their annual goal can request a one-year certification of compliance (often referred to as **safe harbor**) with DHCD, and communities that reach a 1.0 percent target are eligible for a two-year certification of compliance. Achieving this “safe harbor” threshold and receiving a one- or two-year certification allows communities to have a more flexible approach to managing the comprehensive permit process, despite being below the overall 10 percent target for SHI units.⁵² To meet this threshold for one-year certification of this plan, Brewster currently would need to produce **twenty-four new SHI-eligible affordable housing units** in a given calendar year based upon the 2010 Census year-round housing count, and forty-eight units for a two-year certification.⁵³

BREWSTER’S HOUSING GOALS

The following four major qualitative goals are based on the preceding Housing Needs Assessment and community participation. They are broken up into more specific “subgoals,” but this HPP’s four major goals serve to address the breadth of Brewster’s housing needs. The next section of this plan outlines specific strategies for achieving these goals over the next five years.

GOAL 1. Increase and diversify year-round housing options in Brewster for a range of income levels and household types.

- Increase the supply of market-rate and affordable rental housing for all types of households, such as young singles and couples, families, and older adults.

⁵¹ 760 CMR 56.03(4)(c) and corresponding DHCD Housing Production Plan Guidelines, October 2020.

⁵² If a community is certified compliant, decisions made by the Zoning Board of Appeals to deny a comprehensive permit will be deemed “consistent with local needs” by the Housing Appeals Committee and will be upheld as a matter of law.

⁵³ While the 2020 Census count for *total* housing units has been released as of publication of this plan, the *year-round* housing count has not. Appendix D offers three methodologies for calculating an estimated annual goal, all of which arrive at a similar threshold (24-26 units per year). However, these estimates are meant to be a guide, as DHCD ultimately will determine the threshold based upon the 2020 Census year-round housing count when it becomes available.



- Diversify housing types and forms to meet local needs.
- Ensure an adequate supply of housing that is affordable and accessible to older adults and people with disabilities.
- Integrate affordable housing into existing neighborhoods and developments through infill, reuse or repurposing of existing buildings, and the redevelopment of underutilized buildings or properties.
- Review and update Brewster’s zoning and other housing regulations and policies to support development that increases fair, affordable housing and housing choice.

GOAL 2. Prevent displacement of current residents and facilitate housing mobility for households looking to move within or into Brewster.

- Preserve Brewster’s existing supply of year-round rental housing.
- Ensure that older adults can age in place or within the community.
- Provide direct assistance to income-eligible households experiencing housing insecurity or looking for a new home.
- Preserve Brewster’s existing affordable housing stock.

GOAL 3. Align development with the principles of the Town’s Local Comprehensive Plan/Vision Plan.

- Build support for addressing housing needs through partnerships with groups and organizations connected to each of the Vision Plan’s ten core elements.
- Ensure adequate staff capacity and other resources for addressing the housing-related goals and actions of the Vision Plan.
- Continue to thoughtfully address concerns about issues sometimes seen as conflicting with the development of fair, affordable housing.
- Balance housing goals with protection of the natural environment by targeting housing production in and near areas where development already exists; in denser development nodes; or in areas with higher “walkability scores” and multimodal transportation opportunities.



GOAL 4. Continue to build capacity to produce housing through staffing, funding, regional partnerships, advocacy and education, and relationships with nonprofit and for-profit developers.

- Ensure regular collaboration between housing staff and other departments, Town bodies, regional entities, housing developers, and other relevant groups.
- Explore additional funding sources to support housing-related initiatives.
- Build awareness of affordable and fair housing needs within Brewster and the larger region, as well as Brewster's role in addressing these issues.
- Investigate and leverage available federal, state, and regional housing funds and resources.

ALIGNMENT WITH REGIONAL GOALS

In 2018, the Cape Cod Commission, Barnstable County's regional planning and regulatory agency, published its fifth Regional Policy Plan to outline a regional vision for Cape Cod.⁵⁴ This vision is based upon three systems – **natural systems**, **built systems**, and **community systems**. Housing is primarily addressed as part of the "community system" umbrella, although topics relevant to housing are discussed in all three systems. The goals of this Housing Production Plan align with the CCC's Regional Policy Plan's Housing Goal and supporting objectives, which are as follows:

Regional Policy Plan Housing Goal: To promote the production of an adequate supply of ownership and rental housing that is safe, healthy, and attainable for people with different income levels and diverse needs.

Supporting Objectives:

1. Promote an increase in housing diversity and choice.
2. Promote an increase in year-round housing supply.
3. Protect and improve existing housing stock.
4. Increase housing affordability.

Additionally, the CCC is embarking on a Regional Housing Strategy (an action described in the 2018 Regional Policy Plan) and Regional Housing Suitability Analysis, with both initiatives including specific strategies also incorporated in this HPP. The next section of this plan outlines these strategies and others — twenty-nine in total — that will enable the Town to achieve its housing goals and meet local needs.

⁵⁴ Cape Cod Commission, *Cape Cod Regional Policy Plan: Framing the Future*, 2018.



Housing Production Plan Strategies

As described in the previous section, DHCD encourages cities and towns to prepare, adopt, and implement a Housing Production Plan that demonstrates an annual increase in Chapter 40B (SHI-eligible) units equal to or greater than 0.50 percent of the community's year-round housing units. However, as noted elsewhere in this plan, Brewster's housing challenges go well beyond the affordability needs that Chapter 40B intends to address. Just as Brewster has many housing choice problems, it also has options available to address them. Namely, removing regulatory barriers to housing production, providing adequate resources to support housing initiatives, coordinating housing efforts with local comprehensive and other planning efforts, continuing to educate leaders and community members about housing needs, and collaborating with regional partners will all be important components of a successful housing program. Through this Housing Production Plan, Brewster can plan strategically and creatively about how to address its affordable housing needs.

PROGRESS SINCE 2017

Brewster has made significant progress implementing its 2017 Housing Production Plan and establishing a robust housing program. Steps taken in fulfillment of the 2017 HPP strategies include:

- ✓ Hiring a housing coordinator with CPA and Town funds (2017)
- ✓ Creating a municipal affordable housing trust and supporting with CPA and Town funds (2018)
- ✓ Adopting the current Accessory Dwelling Unit and Accessory Commercial Dwelling Unit bylaws (2018)
- ✓ Planning for the protection of existing SHI units through a \$500,000 CPA allocation to the Trust (2019)
- ✓ Supporting chapter 40B-permitted projects to create sixteen Habitat for Humanity ownership homes (Paul Hush Way, fourteen units completed in 2020; Red Top Road, two units permitted in 2021) and thirty affordable rental units (Brewster Woods; expected to be ready for occupancy in 2022)
- ✓ Establishing a policy (via the Select Board) to allocate 50 percent of the new short-term rental revenue to the Trust (2021)
- ✓ Teaming with Dennis and Wellfleet to apply for a \$1,300,000 regional Housing Rehabilitation and Childcare Community Development Block Grant (CDBG) and continuing this program into its second year (2021-2022)



- ✓ Redeveloping the former Wingate Rehabilitation Center into 132 rental units — 27 of which are affordable — for adults 55+ through a public-private partnership with Elevation Financial (2021-2022)
- ✓ Using CPA funds to support regional housing development, including: FORWARD in Dennis, a housing development for adults with autism (2019, \$80,000); a veterans' home in Dennis for the Cape and Islands Veterans Outreach Center (2021, \$50,000); and most recently, Pennrose in Orleans (2022, \$105,000).
- ✓ Contributing CPA funding to support Community Development Partnership's Housing Institute, a training program to equip local officials and residents with knowledge to support the creation of more year-round housing in Brewster and the region (2018-2022)
- ✓ Issuing an RFP for the development of a 16+ acre parcel of Town-owned land off Millstone Road (2021) and accepted a proposal to develop a compact, energy-efficient neighborhood of forty-five rental units in twelve buildings (2022)

LOOKING FORWARD: 2022-2027 STRATEGIES

Organization

The actions outlined in this plan fall into overarching groups modeled after the categories of the 2017 HPP (**Regulatory Strategies**, **Funding & Assets**, **Education & Advocacy**, and **Local Policy & Planning**) with the addition of a fifth category, **Community Resources & Local Support**. In addition, 760 CMR 56.03(4)(d) outlines requirements for strategies that will facilitate the production of SHI-eligible housing units, although plans can include additional strategies based on local need. The strategies of this HPP dovetail well with DHCD's requirements, as shown in Table 23, which outlines the relationship between these two organizational frameworks.



Table 23. Relationship Between Regulatory Framework & Brewster HPP Strategies

760 CMR 56.03	4(d)(1)	4(d)(2)	4(d)(3)	4(d)(4)	4(d)(5)	Other
DHCD Housing Production Plan Regulatory Requirement	The identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating SHI Eligible Housing developments to meet its housing production goal.	The identification of specific sites for which the municipality will encourage the filing of Comprehensive Permit applications.	Characteristics of proposed residential or mixed-use developments that would be preferred by the municipality (examples might include cluster developments, adaptive re-use, transit-oriented housing, mixed-use development, inclusionary housing, etc.).	Identification of municipally owned parcels for which the municipality commits to issue requests for proposals to develop SHI Eligible Housing.	Participation in regional collaborations addressing housing development.	<i>While these strategies fall outside of the regulatory framework because they do not address production of SHI-eligible units, they nonetheless address existing housing needs including capacity as well as support for households struggling to remain in or move to Brewster.</i>
Regulatory Reform Strategies 1-6	✓ Strategies 1-3		✓ Strategies 4-5			✓ Strategy 6
Funding & Assets Strategies 7-13			✓ Strategy 11	✓ Strategies 12-13	✓ Strategy 7	✓ Strategies 8-10
Education & Advocacy Strategies 14-15						✓ Strategies 14-15
Local Policy & Planning Strategies 16-19		✓ Strategy 16	✓ Strategy 17			✓ Strategies 18-19
Community Resources & Local Support Strategies 20-22						✓ Strategies 20-22



APPROACH TO IMPLEMENTATION

The table below summarizes the plan strategies, each of which are summarized further in the next section. This table includes potential responsible parties for each strategy, as well as possible time frames for select strategies. The final two columns on the right indicate whether the strategy follows a recommendation from the 2017 Housing Production Plan, and whether the strategy is connected to DHCD guidelines for Housing Production Plans (as outlined in Table 23 of this HPP).

Table 24. Implementation Table

Implementation Strategies		POTENTIAL Responsible Entities		POTENTIAL Time Frame TBD	Follow-up to 2017 HPP Strategy #	Meets DHCD Guidelines for HPP Strategies
		Lead	Support			
Regulatory Reform						
#1	Reevaluate the existing ADU and ACDU bylaws and other references to accessory apartments; explore amendments to streamline these provisions and improve their efficacy.	Planning Building	BHP HC SB	Early (discussed)	#1	✓
#2	Amend zoning to clearly allow mixed uses that include housing in business-zoned areas.	Planning	BHP, SB HC, TA	TBD	#2	✓
#3	Reevaluate the existing multifamily dwelling bylaw (Section 179-34) and consider changes and other regulatory measures to facilitate multi-unit residential development.	Planning	HC, TA SB	TBD	#5	✓
#4	Explore measures to require or encourage the inclusion of affordable units in residential development over a certain number of units.	Planning	HC, TA SB	TBD	#4	✓
#5	Allow and incentivize the adaptive reuse of existing buildings for the creation of affordable and mixed income housing.	Planning Building TA, SB	HC ZBA	TBD	#6	✓
#6	Utilizing the findings of the ongoing Integrated Water Resource Management Plan, continue to identify appropriate wastewater treatment systems to enable the creation of denser housing development that can support the inclusion of affordable units.	Interdepartmental: Health TA, SB, Planning Natural Resources	HC	TBD	--	



Table 24. Implementation Table

Implementation Strategies		POTENTIAL Responsible Entities		POTENTIAL Time Frame TBD	Follow-up to 2017 HPP Strategy #	Meets DHCD Guidelines for HPP Strategies
		Lead	Support			
Funding & Assets						
#7	Continue to work with nearby communities on the Cape by pooling CPA funds and other resources to construct affordable housing in suitable locations throughout the region and meet regional housing needs.	CPC TA HC SB	BHP BAHT	Ongoing	#9	✓
#8	Develop a five-year financial plan for the BAHT and determine whether additional funding streams should be explored.	BAHT & Finance (FT) Team & SB	HC CPC	First (In process)	#7 & #8	
#9	Based upon the BAHT five-year financial plan, explore other funding opportunities to support housing initiatives at a range of income levels.	BAHT, CPC, FT, SB, TA & HC		After #8	#7	
#10	Explore local property tax incentives for the creation of affordable housing, such as offering a reduction of property taxes to an owner renting an affordable unit.	SB TA Finance	Assessor HC BAHT	TBD	#8	
#11	Develop criteria for assessing a property's suitability for the creation of affordable and attainable housing.	Planning HC BAHT Building Health	Cons Comm, Open Space TA, SB	First	#15	✓
#12	Inventory existing Town-owned land using the criteria developed to determine suitability for housing; develop and issue an RFP for the development of affordable and attainable housing on properties identified as suitable for housing development.	Planning HC TA BAHT Cons Comm	Assessor SB Open Space	After #11	#15	✓
#13	If deemed necessary based upon the findings of the Town-owned land inventory, develop and issue an RFP for the acquisition of privately held land for the creation of affordable and attainable housing.	BAHT TA HC	Planning SB	After #12	--	✓



Table 24. Implementation Table

Implementation Strategies		POTENTIAL Responsible Entities		POTENTIAL Time Frame TBD	Follow-up to 2017 HPP Strategy #	Meets DHCD Guidelines for HPP Strategies
		Lead	Support			
Education & Advocacy						
#14	Develop a collaborative housing education plan that connects to the Town's Local Comprehensive Plan (LCP).	BAHT BHP HC	Vision BHA COA	Early (In process)	#13 & #16	
#15	Continue to ensure regular participation by staff and members of Town bodies in available trainings on housing-related issues including fair housing, local and regional housing needs, comprehensive permit administration, and other relevant topics.	HC BAHT BHP	Planning CPC ZBA SB Finance	Ongoing	#13	
Local Policy & Planning Strategies						
#16	Continue to make good use of 40B, including the Local Initiative Program (LIP), as a vehicle for creating affordable housing.	BHP BAHT HC, TA	SB ZBA CPC	Ongoing (Brewster Woods, Habitat)	#14	✓
#17	Encourage public/private partnerships to facilitate the collaborative production of affordable housing to meet a range of community needs.	BAHT BHP HC TA	SB Planning CPC	TBD	--	✓
#18	Continue to monitor the impacts of short-term rentals on the availability of year-round rental units; review and consider changes to local policies accordingly.	SB Finance TA	BAHT HC	Ongoing	--	
#19	Increase housing staff capacity to ensure continued and consistent collaboration with the Building, Conservation, Health, and Planning Departments.	TA Finance HC	Interdepartmental: Building Planning	TBD	#12	



Table 24. Implementation Table

Implementation Strategies		POTENTIAL Responsible Entities		POTENTIAL Time Frame TBD	Follow-up to 2017 HPP Strategy #	Meets DHCD Guidelines for HPP Strategies
		Lead	Support			
Community Resources & Local Support						
#20	Continue the CDBG-funded housing rehabilitation program to enable income-eligible homeowners to make critical home repairs.	HC TA Finance Building	SB	Ongoing	--	
#21	Evaluate current CPC-funded housing initiatives and consider adjusting to meet current needs.	BAHT CPC, SB HC	BHP	Early/ Ongoing (Discussed)	--	
#22	Explore other opportunities for direct support for eligible households, including partnerships with local non-profits and housing assistance providers.	HC BHP BAHT	COA CPC BHA	TBD	--	

Notations:

BAHT- Brewster Affordable Housing Trust
BHA- Brewster Housing Authority
BHP- Brewster Housing Partnership
COA- Council on Aging
CPC- Community Preservation Committee
Cons Comm- Conservation Committee

FT- Finance Team
HC- Housing Coordinator
SB- Select Board
TA- Town Administration
ZBA- Zoning Board of Appeals



STRATEGIES EXPLAINED

Regulatory Reform

STRATEGY 1. Reevaluate the existing ADU and ACDU bylaws and other references to accessory apartments; explore amendments to streamline these provisions and improve their efficacy. The Town's current ADU bylaw (Section 179-42.2) allows homeowners in the Town's residential districts to add an accessory dwelling unit (ADU) by right on lots over 30,000 square feet, and by special permit on smaller lots, lots within the C-H or V-B districts, or within certain water protection areas.⁵⁵ Additionally, the ACDU bylaw (Section 179-42.3) allows property owners to add an accessory dwelling unit to a commercial property by special permit in the C-H and V-B zoning districts. Prior to the addition of this bylaw in 2018, Brewster's zoning allowed *affordable* accessory dwelling and commercial dwelling units (AADUs and AACDUs) that had to meet the bylaw's definition of "affordable housing," making it very difficult for homeowners to create such a unit. This 2018 bylaw amendment also removed a provision in Section 179, Table 2 (Area Regulations), Footnote 13 that required "accessory apartments" allowed by special permit to be rented to immediate family members or healthcare professionals providing service to the family members.

While these amendments have made it easier for homeowners to create ADUs, the Town should reexamine the current bylaw and consider whether some current provisions limiting its use could be removed. As an example, the current bylaw requires that an ADU not be more than 40 percent of the primary residence or 900 square feet, whichever is smaller. This 40 percent limit may preclude owners of smaller homes from creating an ADU. Other Lower Cape communities either do not have a percentage limitation (only a square footage cap) or have a 50 percent limit, which is in line with the Cape Cod Commission's model ADU bylaw.⁵⁶ Lastly, keeping the special permit provision for "accessory apartments" as a footnote in the zoning bylaw's Area Regulations may make the process confusing to homeowners, particularly because this provision does not include the 40 percent limit and allows a different maximum unit size of 600 square feet. The Town may wish to consolidate any references in the bylaw to accessory residential units to avoid duplication or confusion.

STRATEGY 2. Amend zoning to clearly allow mixed uses that include housing in business-zoned areas. While Brewster has a limited supply of mixed-use properties that include some balance of residential and commercial uses, the Town does not have a mixed use bylaw that explicitly defines and allows commercial/residential mixed use in specific zoning districts.⁵⁷ More clearly allowing mixed use in the C-H or V-B districts and building it into the Use Regulations and Area Regulations as a distinct

⁵⁵ Sections 179-42.2, Paragraph B: "An ADU may be located within a Zone II (Zone of Contribution to a Public Drinking Water Well), in the watershed of the Herring River, or the watershed to Pleasant Bay, subject to approval of a Special Permit by the Zoning Board of Appeals. All ADUs within these areas shall be required to install advanced nitrogen treatment septic systems, if deemed necessary."

⁵⁶ Cape Cod Commission, "Inventory of Accessory Dwelling Unit Provisions by Town." Updated November 2021. Available at: https://www.capecodcommission.org/resource-library/file/?url=/dept/commission/team/Website_Resources/housing/ADU_Table_Nov2021.pdf

⁵⁷ Outside of an existing reference in the underutilized Planned Residential Development provision



use could provide an avenue for creating much-needed additional rental units. While the ACUDU bylaw allows the creation of an accessory dwelling unit within or adjacent to a commercial building, it only does so as an accessory use and within the area requirements for commercial buildings currently defined under Table 2, Area Regulations. Creating a “mixed use” designation as a use category would allow the Town to consider specific area regulations suitable for mixed use, and could potentially also allow “top of the shop” housing units that are not accessory to the commercial use below it, but could be divided from the commercial space below and owned separately.

STRATEGY 3. Reevalue the existing multifamily dwelling bylaw (Section 179-34) and consider changes and other regulatory measures to facilitate multi-unit residential development. As described in the Barriers Analysis of this plan, the Town’s current multifamily dwelling bylaw has density and lot size requirements that are unlikely to result in multi-unit residential development, demonstrated by the fact that this portion of the bylaw has not been exercised.⁵⁸ In addition, “multifamily dwellings” (defined in the bylaw as a building containing three or more dwelling units) are only allowed by in the C-H district by special permit. The Town could consider revisiting the current density and lot size requirements for Section 179-34, as well as expanding the locations where such development is allowed.

The Town could also consider developing residential design standards for multi-unit housing. Design standards have the benefit of addressing concerns that come from poor design rather than density itself, as visual compatibility with a neighborhood is often cited as an important consideration for residential development. This action aligns with the Cape Cod Commission’s current work developing a Regional Housing Strategy, which is anticipated to include the development of residential design guidelines to “create more diversity in housing options and types . . . in forms that still complement and fit in with the character of the region.”⁵⁹

STRATEGY 4. Explore measures to require or encourage the inclusion of affordable units in residential developments over a certain number of units. Such measures can include the adoption of an Inclusionary Zoning (IZ) bylaw, which requires the provision a minimum percentage of affordable units in residential developments over a specified size. Adopting an IZ bylaw may be particularly important if the Town moves to implement the previous recommendation to amend the multifamily dwelling bylaw, which could spur the production of such units; by establishing an IZ bylaw, the Town can ensure that multi-unit residential development occurring under a revised Section 179-34 — or any other residential development over a certain size — would include affordable units. As part of this review, the Town could also explore whether a new IZ bylaw should include a provision for “payments in lieu of units” (PILUs), whereby developers can pay an established fee to the Affordable Housing Trust in lieu of providing the required number of affordable units.

⁵⁸ There is one large multi-unit development within the C-H district (King’s Landing) and one property assessed as a smaller apartment building; both of these multi-unit properties were built prior to the adoption of the Town’s Zoning Bylaw in 1979.

⁵⁹ Cape Cod Commission, “Regional Housing Strategy Housing Work One Pager,” May 2022 Draft. (Project elements subject to change.)



Alternatively (or in addition to IZ), the Town could enrich the underutilized Major Residential Development (Section 139-35.2) or Planned Residential Development (Section 179-36) bylaws to encourage the inclusion of affordable units, as suggested in the 2017 HPP. The Town could also activate the “reserved” Affordable Multifamily Dwelling Units bylaw (Section 179-42.1[C][3]), which the Use Regulations table indicates would be allowed by right (as opposed to special permit) in the C-H district. However, as pointed out in the 2017 HPP, this should also involve revisiting the limitation on number of bedrooms in the definition of “Affordable Multifamily Dwelling Units (AMDU)” in Section 179-2 to eliminate potential fair housing conflicts. Additionally, reference to immediate family should be removed from the definition of “Affordable Housing” in Section 179-2 to avoid confusion about the intent of the bylaw.

STRATEGY 5. Allow and incentivize the adaptive reuse of existing buildings for the creation of affordable and mixed income housing. In 2020, the Zoning Board of Appeals granted Elevation Financial a use variance to develop the former Wingate Rehabilitation Center into housing. While this successful public-private partnership will lead to the creation of 132 units of 55+ housing (27 units of which are affordable), the legal mechanism by which this was accomplished is difficult to replicate. Massachusetts law outlines the specific findings a ZBA must make to grant a variance, and generally it is challenging to meet these requirements. Instead, the Town could explore allowing conversion of existing structures to residential uses by special permit or incentivizing adaptive reuse of existing structures to facilitate housing production.

STRATEGY 6. Utilizing the findings of the ongoing Integrated Water Resource Management Plan, continue to identify appropriate wastewater treatment systems to enable the creation of denser housing development that can support the inclusion of affordable units. The Town is currently in Phase III of its Integrated Water Resource Management Plan, or IWRMP, a long-term project to develop an integrated approach for the protection and restoration of the Town’s waters. This phase of the project will address water resources planning, including an evaluation of wastewater management alternatives and bylaw updates to implement the stormwater management recommendations of Phase II. The findings of this project will help inform solutions that may enable the provision of denser development alongside protection of the environment.

Funding & Assets

STRATEGY 7. Continue to work with nearby communities on the Cape by pooling CPA funds and other resources to construct affordable housing in suitable locations throughout the region and meet regional housing needs. Section 5(b)(1) of the Community Preservation Act legislation reads: “The community preservation committee shall study the needs, possibilities and resources of the city or town regarding community preservation, including the consideration of regional projects for community preservation.” (Emphasis added.) Recognizing that addressing regional housing creation benefits all area communities, Brewster has contributed CPA funds toward several regional housing initiatives in recent years, including funding for homes for adults with autism in Orleans (Cape Cod Village, 2016) and Dennis (FORWARD, 2019), a veterans’ home in Dennis (for CIVOC, 2021), and most recently



toward Pennrose in Orleans, a redevelopment project that will provide sixty-two rental units. The developer is proposing 65 percent local preference and 10 percent regional preference, the breakdown approved by DHCD for the Village at Nauset Green in Eastham. Based on DHCD local preference definitions, applicants who work in Orleans, for the Town of Orleans, or whose children attend the Nauset Regional Middle or High School, are considered part of the local preference pool even if they do not live in Orleans.

STRATEGY 8. Develop a five-year financial plan for the Brewster Affordable Housing Trust and determine whether additional funding streams should be explored. Both the Select Board and Affordable Housing Trust identify this as a key priority; the Select Board’s FY2022-2023 Strategic Plan includes Goal H-1 to “Identify Affordable Housing Trust operating/capital needs and develop funding plan,” and the Affordable Housing Trust’s Key Priorities for 2022 include developing a “5-Year Financial Plan for the Trust.”

STRATEGY 9. Based upon the BAHT five-year financial plan, explore other funding opportunities to support housing initiatives at a range of income levels. Depending on the needs identified through the BAHT’s financial plan, the Town can also look at creative ways to increase funding for housing initiatives. As an example, the BAHT could establish a “Housing Opportunity Fund” and regularly apply for CPA funds to build and replenish this resource annually. While Brewster has made excellent use of CPA funds for housing initiatives, having more substantial funds available would enable the BAHT to act quickly on property acquisition opportunities that may arise. The BAHT would still have to apply to annually for such funds, but once these CPA funds were awarded to the Trust, they would not need to be reappropriated at Town Meeting for a specific purpose. The Town of Hingham follows this practice and has for several years, with their AHT stating in their 2021 CPA application, “Often unknown opportunities to create new affordable housing units arise and require immediate responses.... Replenishing the ‘opportunity fund’ will allow the Trust to respond quickly to those opportunities...” The Town could also work to raise resident awareness that the BAHT can receive tax-deductible gifts in the form of “real property, personal property or money, by gift, grant, contribution, devise or transfer from any person, firm, corporation or other public or private entity...”⁶⁰ Strategy 14 discusses developing a collaborative housing education plan, which could include a “fundraising” component that explains how residents can make such tax-deductible gifts to the BAHT, sets fundraising goals, describes how funds and other gifts will be used, and so forth.

The Town can look to support the mission of the BAHT and the income levels it is intended to serve (up to 110 percent AMI), as well as potentially funding housing initiatives *beyond* this level. While the primary purpose of a Housing Production Plan is to increase the share of SHI-eligible units within a community and work toward the state’s 10 percent minimum goal, there are also substantial housing needs outside of these income levels because the supply of housing — particularly rental housing — does not meet the demand. Provincetown addressed this need by passing of a home rule petition to establish its Year-Round Market Rate Rental Housing Trust to “create and preserve year-round rental

⁶⁰ MGL c. 44A, § 55C: Municipal Affordable Housing Trust



units in the town of Provincetown including, but not limited to, market rate units for the benefit of residents of the Town.” The Legislature approved the Town’s home rule petition, and the Trust was officially established in 2016. Chatham has recently taken a similar step, approving three home rule petitions in 2021 relating to funding the creation of housing for households earning up to 200 percent of the area median income. One such measure was the local approval of a real estate transfer tax of 0.5 percent on the sale of homes over \$2,000,000, paid by the purchaser, with proceeds going into a “Housing Fund” that would have more leeway than the CPC or AHT in terms of income levels served. In 2021, several other Massachusetts communities approved the submission of home rule petitions relating to real estate transfer fees to the Legislature, although all of these petitions are pending at the state level.

Because Brewster’s housing needs at lower income levels are the greatest as demonstrated by the Needs Assessment, the Town should take care not to propose diverting existing funding sources away from these needs and instead may wish to consider new funding solutions for income levels over 80 percent.

STRATEGY 10. Explore local property tax incentives for the creation of affordable housing, such as offering a reduction of property taxes to an owner renting an affordable unit. By offering to reduce property taxes for property owners that voluntarily participate in meeting the Town’s affordable housing needs, Brewster can convert existing units to affordability fairly quickly and easily. Provincetown has had affordable housing property tax exemptions of this type on the books for years. The law, passed in 2002, makes residential properties occupied by low-income households exempt from taxes. If only some of a parcel is occupied by an eligible household, taxes are reduced proportionally to the percentage of the square footage of the structure occupied by that household. Unlike many other strategies in this section, a Provincetown-style tax incentive would not necessarily involve any formal deed restrictions, meaning that affordable units created under such a law would not count towards Brewster’s Subsidized Housing Inventory, but still can address important local needs. In addition, such a measure would require Town Meeting approval to submit a home rule petition to the Legislature.

Another way for a town to utilize property taxes to incentivize affordable housing development is through tax increment financing (TIF). This approach targets new development by allowing a property owner to waive or reduce property taxes for a set period, which can then be phased back in gradually, in exchange for including some number of affordable units. TIFs require the establishment of TIF-designated area approved by the Economic Assistance Coordinating Council, which essentially requires that the area present “exceptional opportunities for economic development.” Such a measure may be dependent on the direction of the Vision Planning process with regards to establishing a true the Town Center or Town Centers.

STRATEGY 11. Develop criteria for assessing a property’s suitability for the creation of affordable and attainable housing. Once developed, such criteria can be used in a variety of ways – as part of an RFP for acquiring land for housing; to assess Chapter 61 properties being considered for acquisition; or for



evaluating current Town-owned properties or privately held properties of particular interest for their potential to create housing. Massachusetts Housing Partnership has developed a list of considerations for determining the feasibility of land for housing development, and the Cape Cod Commission is also planning to develop criteria to screen parcels for housing development suitability as part of their current Regional Housing Suitability Analysis project. The Town may wish to build upon these resources or create its own unique criteria to support the next two strategies of this plan.

STRATEGY 12. Inventory existing Town-owned land using the criteria developed to determine suitability for housing; develop and issue an RFP for the development of affordable and attainable housing on properties identified as suitable for housing development. This process was recently undertaken on a 16+ acre of Town-owned land off Millstone Road that was previously landlocked until the Town used CPA funds in 2018 to acquire an access parcel. The Town then undertook a community engagement process to determine criteria that would ultimately inform the development of an RFP to develop housing on the site. This RFP was issued in 2021 and the Town has since accepted a proposal to develop forty-five units of rental housing in twelve buildings through the comprehensive permit process. The Town could undertake a similar process for other Town-owned properties deemed suitable for housing, or use the findings of the Millstone Road community engagement process as a starting point for RFP criteria for other parcels.

With the recent acquisition of the two Sea Camps properties (the 66-acre Pond Parcel extending to Long Pond and the 55-acre Bay Parcel extending from Route 6A to Cape Cod Bay), Brewster has a unique opportunity to consider the use of Town-owned properties for the creation of a substantial amount of housing. In particular, the Bay Parcel has existing structures that could be explored for housing, as does the adjacent Town-owned Spruce Hill property, which was acquired by the Town in 1985 and is managed by the Brewster Conservation Commission. The Spruce Hill property has one unoccupied home on it, built in 1890 and previously leased by the Brewster Historical Society. In addition, the Brewster School Committee is currently considering whether to consolidate the Town's two elementary schools. Two of the three options outlined in the Town's recently completed *Elementary Schools Master Plan* propose closing one of the two schools and having all elementary students (grades PK-5) in one building.⁶¹ Should the Brewster School Committee decide to move forward with one of these consolidation options, the vacant school building could be considered for housing.

Of these Town-owned properties, the two Sea Camps parcels present the most currently viable option for the creation of affordable housing, as the Town Meeting warrant articles for their acquisition specified community housing as a potential use. The Town is beginning parallel planning processes for both Sea Camps parcels and will continue to consider the creation of community housing through the comprehensive permit process for both municipally-owned sites.

⁶¹ Town of Brewster, *Elementary Schools Master Plan*. Prepared by Habib & Associates Architects for the Town of Brewster, December 31, 2021.



STRATEGY 13. If deemed necessary based upon the findings of the Town-owned land inventory, develop and issue an RFP for the acquisition of privately held land for the creation of affordable and attainable housing. The Town of Nantucket developed a standard RFP for the acquisition of land for housing and reissues the RFP at regular intervals. Brewster could follow a similar strategy if the inventory of currently held Town-owned land reveals a lack of properties currently available to the Town for the creation of affordable housing. The Town could also expand its analysis of site suitability to include privately held property and maintain dialogue with property owners so that both parties are prepared to act in the event that a desirable property that meets the criteria described in Strategy 15 becomes available.

Education & Advocacy

STRATEGY 14. Develop a collaborative housing education plan that connects to the Town's Local Comprehensive Plan. Building upon Brewster's 2018 Vision Plan, the Town is currently developing a Local Comprehensive Plan following the guidelines of the Cape Cod Commission. The Vision Planning Committee has centered their work around ten building blocks – Local Economy, Housing, Water Resources, Open Space, Governance, Community Infrastructure, Coastal Management, Climate Mitigation, Community Character, and Solid Waste Management. While housing has its own building block, housing needs and solutions relate to all of the LCP's core elements. Tying the Town's housing program and related educational initiatives to the Town's LCP ensures continuity of planning efforts and can build community awareness of the connection between housing and many other local and regional concerns.

As part of this education plan, the Town can consider hosting an annual Housing Forum and inviting regional partners to cohost or collaborating and co-sponsoring existing regional opportunities. The BAHT has included hosting an annual forum (at minimum) as a priority initiative for FY2022-2023, in addition to holding or participating in other community housing educational initiatives. At the local level, the BAHT could partner with the Brewster Housing Partnership and Brewster Housing Authority to co-sponsor such an effort, which could be further enriched by inviting regional partners or representation from other Lower Cape towns.

STRATEGY 15. Continue to ensure regular participation by staff and members of Town bodies in available trainings on housing-related issues including fair housing, local and regional housing needs, comprehensive permit administration, and other relevant topics. Since 2018, CPC funds have helped fund the Cape Housing Institute, a training program for local officials and interested residents in support of the creation of more year-round housing in Brewster and the Lower Cape. Over seventy-five Town staff and residents have participated in this and other educational trainings and workshops since the 2017 HPP. The Town should continue to encourage this commendable level of involvement, both among staff and Brewster residents.



Local Policy & Planning

STRATEGY 16. Continue to make good use of Chapter 40B, including the Local Initiative Program (LIP), as a vehicle for creating affordable housing. As shown in Appendix C, “Brewster 40B and Affordable Housing Table,” Brewster has a strong track record of using 40B as a tool to create both affordable ownership and rental opportunities in partnership with developers. Habitat for Humanity’s Red Top Road project, permitted in 2021 as a LIP project, will create two affordable ownership units and provides the most recent example of Brewster’s success using 40B in a cooperative manner. The Local Initiative Program, or LIP, is often referred to as the “Friendly 40B” process because the municipality and developer submit a joint application to DHCD. If the LIP application is approved, DHCD issues a project eligibility letter so that the developer can apply for a Comprehensive Permit application with the Zoning Board of Appeals. Thus, going through the LIP process ensures that the Town is involved in shaping project plans *before* a developer applies for a Comprehensive Permit. As described in Strategy 12, the Town recently accepted a proposal to develop forty-five units of affordable rental housing on a Town-owned parcel on Millstone Road through the “Friendly 40B” process and will also consider this option as part of the planning processes for two recently-acquired Sea Camps properties.

Nonconforming lots also present an opportunity to make good use of the LIP process. The Town could educate owners of lots otherwise unbuildable under zoning about the possibility of partnering with mission-based organizations like Habitat for Humanity or Housing Assistance Corporation of Cape Cod to develop affordable housing through the LIP comprehensive permit process. Assessor’s records indicate that there are over 300 parcels considered “undevelopable residential land.” Typically, this designation is used for parcels that do not meet lot size or frontage requirements as opposed to indicating an environmental constraint. These parcels appear to be scattered throughout Town with varying degrees of access from roadways. If staff capacity allows, the Town could inventory these lots and assess their suitability for housing depending on their degree of nonconformity, neighborhood context, environmental concerns, and other considerations.

STRATEGY 17. Encourage public/private partnerships to facilitate the collaborative production of affordable housing to meet a range of community needs. The business community in the Lower Cape clearly recognizes the need for affordable housing to sustain the local economy and has a vested interest in partnering with Towns to find solutions. As a somewhat recent example, in 2017 the Planning Board granted a special permit to Ocean Edge, allowing the company to develop fourteen modular homes to house 84 seasonal workers.⁶² While housing for seasonal workers may not directly relate to the housing needs of year-round households at face value, providing for seasonal housing can ease the already-challenging competition for limited rental units and addresses an important community need nonetheless. More recently, the Zoning Board of Appeals granted Elevation Financial a use variance in 2020 to develop the former Wingate Rehabilitation Center into Serenity Apartments at Brewster, a successful public-private partnership that will lead to the creation of 132 units (27 affordable) of 55+ housing.

⁶² Donna Tunney, “Brewster OKs workforce housing at Ocean Edge,” *Wicked Local*, October 5, 2017. Available at: <https://www.wickedlocal.com/story/cape-codder/2017/10/06/brewster-oks-workforce-housing-at/64884570007/>



Nonprofit Community Land Trusts (CLTs) are another example of public/private partnerships that have created affordable homeownership opportunities in other communities. A community land trust is a strategy pioneered in urban areas experiencing gentrification that attempts to address the problem of rapidly growing real estate values pricing existing residents out of their own community. Brewster is experiencing a similar problem related to the seasonal housing market, where housing units previously available to residents are purchased by relatively wealthy out-of-towners to serve as vacation homes. A CLT purchases parcels of land and holds them in perpetuity rather than allowing them to enter the commercial real estate market. CLT housing differs from most town-facilitated development in that the Trust retains ownership of the land while selling the houses. Because homeowners are not buying land, merely leasing it (usually for a long period such as ninety-nine years), the cost of land is removed from the price of the home, resulting in much more affordable housing than could otherwise be expected. CLT homeowners may even sell their homes for a profit, allowing their property to function as an investment like any other, albeit at a lower rate of return as most Trusts limit the amount that their homes may be sold for to keep them affordable. As a nearby example, the Island Housing Trust in Martha's Vineyard has created over 60 homeownership opportunities for income-eligible households.⁶³

STRATEGY 18. Continue to monitor the impacts of short-term rentals on the availability of year-round rental units; review and consider changes to local policies accordingly. As described in the Needs Assessment, the increase in short-term rentals and seasonal homes appears to have had a negative impact on the Town's already-limited supply of year-round rental units. The degree of this impact is currently based on *estimates* rather than actual counts and will become clearer with the full release of the 2020 Census — although much has changed even in the last two years. Because of the lack of current data and the uniqueness of the Cape's housing situation, the Town should consider strategies to monitor whether a home is used a primary or secondary residence or as a short-term rental unit. Having a closer handle on these trends will allow the Town to carefully observe changing trends and their impacts and adjust Town policies if needed.

STRATEGY 19. Increase housing staff capacity to ensure continued and consistent collaboration with the Building, Conservation, Health, and Planning Departments. The 2017 HPP recommended hiring a Housing Coordinator to facilitate the implementation of the plan, an action quickly undertaken by the Town in 2017 with Town Meeting approval of the use of CPA funds to support this position. Initially, this position was approved for nineteen hours a week but increased to twenty-five hours in 2020 and most recently was approved in 2022 for thirty hours per week due to the increased number of housing initiatives and support services. This HPP includes more strategies than the 2017 plan, and implementing such a robust housing program requires time and a central "point person" to oversee the Town's housing program in coordination with other Town departments.

⁶³ Island Housing Trust, "Affordable Homes and Rentals." Available at: <https://www.ihtmv.org/affordable-homes-rentals/>



Additionally, the Town should explore expanding the Town Administration's budget to fund this position rather than doing so through annual application to the CPC. Not only would this free CPA funds for additional housing projects, but funding the position through the Annual Budget reinforces the Town's commitment to maintaining this important position, implementing this Housing Production Plan, and serving residents with housing needs.

Community Resources & Local Support

STRATEGY 20. Continue the CDBG-funded housing rehabilitation program to enable income-eligible homeowners to make critical home repairs. Brewster is entering its second year of a \$1.3 million-dollar regional Community Development Block Grant (CDBG) for housing rehabilitation and childcare. The funds aid eligible low to moderate income residents, earning up to 80 percent of the area median income. The housing rehabilitation funds can provide a forgivable deferred 0.0 percent interest loan up to \$40,000 to make critical home repairs. The BAHT has identified examining the reach of this program and considering whether the Trust needs to supplement the program as a current priority initiative.

STRATEGY 21. Evaluate current CPC-funded housing initiatives and consider adjusting to meet current needs. With the support of CPA funds, the Town currently provides up to \$30,000 of grant assistance for eligible buyers purchasing a home in Brewster. This homebuyer grant program is contingent on existing funds and is available to households qualifying at 80 percent of area median income who agree to place a permanent affordable housing deed restriction on the home. The Town could reevaluate this program and consider adjustments to meet current needs, an effort in line with the BAHT's current priority initiative to determine the future of this program.⁶⁴ Additionally, the Town offers a Rental Assistance Program, managed by the Housing Assistance Corporation and supported with CPA funds. Like the homebuyer grant program, this rental assistance program could also be reevaluated to consider adjustments that could better meet current needs.

STRATEGY 22. Explore other opportunities for direct support for eligible households, including partnerships with local non-profits and housing assistance providers. Housing Assistance Corporation and Community Development Partnership both offer a variety of programs for households, including homebuyer education programs, Rental Assistance for Families in Transition (RAFT), and foreclosure prevention. In addition, the BAHT's current priority initiatives suggest revisiting the feasibility of a "rent-to-own" program; housing authorities that participate in the Homeownership Voucher Program can use an eligible participant's Housing Choice Voucher (HCV) — typically used for rental assistance — to pay for monthly homeownership expenses. The Brewster Housing Authority could also consider developing what HUD refers to as a "Family Self-Sufficiency (FSS) Program". As the income of an individual holding a Section 8 rental voucher increases, their portion of rent is increased due to program rules. A FSS program takes this difference between the new increased rent and the old rent and places it into an escrow account that the individual can access upon graduating from the program.

⁶⁴ Brewster Affordable Housing Trust, "Housing Trust Priority Initiatives for FY 2022-23." Available at: <https://www.brewster-ma.gov/files/affordableht22.pdf>



These accumulated funds can help mitigate the costs associated with moving into a new home. Lastly, the Town can collaborate with energy service providers and nonprofits such as Housing Assistance Corporation to ensure that Brewster households are taking full advantage of available efficiency incentives, fuel assistance programs, weatherization services, and other opportunities for reducing utility costs.



Appendices

Summary of Appendices

- Appendix A. Summary of Published Rental Listings from May 2018-2022
- Appendix B. Income Levels and Household Examples, FY2020
- Appendix C. Brewster Comprehensive Permit Projects (40B) Approved Since 2003 & Additional Reference Information
- Appendix D. Numerical Goal Methodology
- Appendix E. Community Engagement Summary
- Appendix F. Glossary of Housing Terms

APPENDIX A

Summary of Published Rental Listings from May 2018-May 2022 *Source:*

Rentometer, May 26, 2022

Rent	Size	Beds	Baths	Bldg Type	Listing Month	Listing Year
\$1,975	1,400 ft ²	4 bed	2ba	House	April	2018
\$270		2 bed	1ba	Apartment	May	2018
\$1,750	1,200 ft ²	3 bed	2ba	House	June	2018
\$7,500	1,100 ft ²	2 bed	2ba	House	June	2018
\$1,900		3 bed	2ba	House	August	2018
\$1,050	1,100 ft ²	2 bed	1ba	House	August	2018
\$2,000	1,688 ft ²	3 bed	2ba	House	September	2018
\$900	900 ft ²	3 bed	1ba	House	September	2018
\$1,025		studio	1ba	Condo	October	2018
\$1,500	768 ft ²	2 bed	1ba	House	January	2019
\$1,200		1 bed	1ba	Apartment	February	2019
\$1,500	2,000 ft ²	4 bed	3ba	House	May	2019
\$2,200	1,300 ft ²	2 bed	1ba	Apartment	May	2019
\$1,950	1,040 ft ²	2 bed	1.5ba	House	May	2019
\$2,200	1,500 ft ²	3 bed	2.5ba	House	July	2019
\$2,600	2,200 ft ²	4 bed	2.5ba	House	September	2019
\$1,250	1,000 ft ²	2 bed	2ba	Condo	September	2019
\$1,500		1 bed	1ba	Apartment	September	2019
\$1,175		3 bed	2ba	House	October	2019
\$1,750	800 ft ²	2 bed	1ba	Apartment	November	2019
\$2,200	1,560 ft ²	3 bed	2ba	House	December	2019
\$2,400	1,446 ft ²	3 bed	2ba	House	December	2019
\$1,500	800 ft ²	2 bed	1ba	Cottage/Cabin	December	2019
\$1,400	579 ft ²	1 bed	1ba	Apartment	January	2020
\$1,950		3 bed	2ba	House	March	2020
\$1,100	300 ft ²	studio	1ba	Apartment	March	2020
\$1,800		3 bed	1ba	Apartment	May	2020
\$2,400		2 bed	1ba	Apartment	May	2020
\$1,100	600 ft ²	1 bed	1ba	Condo	May	2020
\$1,100	1,196 ft ²	3 bed	2ba	Apartment	July	2020
\$1,500	2,373 ft ²	3 bed	2ba	House	July	2020
\$1,000		1 bed	1ba	Apartment	July	2020
\$900		1 bed	1ba	Apartment	August	2020
\$3,000	2,100 ft ²	4 bed	2.5ba	House	November	2020
\$1,800	424 ft ²	1 bed	1ba	Apartment	April	2021
\$1,800	424 ft ²	1 bed	1ba	Apartment	May	2021
\$1,700	579 ft ²	1 bed	1ba	Apartment	May	2021
\$1,450		4 bed	3ba	House	June	2021
\$1,200	600 ft ²	1 bed	1ba	Condo	June	2021
\$665		1 bed	1ba	Apartment	July	2021
\$2,000	2,000 ft	4 bed	2ba	House	August	2021
\$3,000	2,400 ft ²	3 bed	3ba	House	September	2021
\$2,300	1,592 ft ²	2 bed	2ba	House	October	2021
\$1,500	424 ft ²	1 bed	1ba	House	October	2021
\$1,416	400 ft ²	studio	1ba	Apartment	October	2021
\$2,000	1,021 ft ²	2 bed	2ba	Apartment	November	2021
\$1,100		1 bed	1ba	Apartment	November	2021
\$2,000	2,712 ft ²	4 bed	3.5ba	House	December	2021
\$900		2 bed	1ba	Apartment	May	2022

APPENDIX B

Income Levels and Household Examples

Note that this table uses FY2020 income limits instead of FY2022 because 2020 is the most current year available for the corresponding Employment and Wages information.

Income Levels and Household Examples, 2020

FY 2020 Income Limits	Household Size						Household Examples
	1	2	3	4	5	6	(2 examples per category)
Extremely Low Income (Up to 30% HAMFI)	\$ 20,300	\$ 23,200	\$ 26,100	\$ 29,000	\$ 31,350	\$ 35,160	<ul style="list-style-type: none"> A florist (\$23,608) with 2 children An office supply store worker (\$21,320) with 1 child
Very Low Income (Up to 50% HAMFI)	\$ 33,850	\$ 38,650	\$ 43,500	\$ 48,300	\$ 52,200	\$ 56,050	<ul style="list-style-type: none"> A single home health aide (\$28,340) A social worker (\$43,368) and stay-at-home parent with 1 child
Low Income (Up to 80% HAMFI)	\$ 54,150	\$ 61,850	\$ 69,600	\$ 77,300	\$ 83,500	\$ 89,700	<ul style="list-style-type: none"> An auto repair technician (\$33,488) and restaurant server (\$28,236) An architectural assistant (\$56,472) and retail worker (\$26,936) with 3 children
Moderate Income (Up to 100% HAMFI)	\$ 67,688	\$ 77,313	\$ 87,000	\$ 96,625	\$ 104,375	\$ 112,125	<ul style="list-style-type: none"> A construction worker (\$62,140) and masonry contractor (\$31,460) with 2 children A plumber (\$66,092) and personal care assistant (\$16,484) with 1 child
Upper Moderate Income (Up to 120% HAMFI)	\$ 81,225	\$ 92,775	\$ 104,400	\$ 115,950	\$ 125,250	\$ 134,550	<ul style="list-style-type: none"> Computer systems designer (\$124,488) and a stay-at-home parent with 3 children A single dental hygienist (\$71,968)

Sources: HUD FY 2020 Income Limits; 2020 Labor Market Information, Employment and Wages (ES-202)

APPENDIX C

Brewster Comprehensive Permit Projects (40B) Approved Since 2003 & Additional Reference Information

Tables provided by the Brewster Housing Office.

TOWN SUPPORTED DEVELOPMENTS (LAND OR CPA FUNDING)

Date	Name	Land Size	Units	Bedrooms	% Affordable	Funding	Additional
2021	Habitat for Humanity 26 Red Top Road	1.34 acres total	2 new homes (& original home)	New: 6 bedrooms	New: 100%	Land donation, \$100,000 CPA	Comp Permit approved 2021.
2017	Brewster Woods Brewster Housing Authority (BHA)	5.82 acres	30 rental 2 buildings 5 units/acre	55 1, 2 & 3 Bedrooms 9.5 beds /acre	100% Up to 60% AMI	\$550,000 CPA BHA Land Lease	70% open space, 12% buildings, 18% pavement/ parking. 1 unit for manager or maintenance.
2016	Habitat for Humanity Paul Hush Way	13.92 acres	14 homes 6- Phase 1 8- Phase 2 1 unit/acre	39 2.8 beds /acre	100% Up to 65% AMI	\$600,000 & \$247,000 CPA land 2013 & 2014. & 2016 CPA \$350,000. & \$200,000 in 2018	
2007	Habitat for Humanity James Burr Road	1.06 acre & 3.4 acres Open space	4 homes 4 units/acre or 1 unit/acre	12 11.3 beds/ acre or 2.7 beds/ acre	100% Up to 65% AMI	Town gave land \$95,000 CPA funds \$80,000 HOME funds	Homes clustered on 1 acre; 3.4 acres open space in perpetuity. Additional town owned conservation land across Slough Rd.
2003	Wells Court (BHA)	3 acres	24 rental Seniors, 1 building 8 units/acre	24 (1 bedroom) 8 beds/acre	100% Up to 50%AMI	Land provided by BHA	CPA not in existence in 2003, thus no funding.

NON-TOWN SUPPORTED 40B DEVELOPMENTS (NO TOWN FUNDING)

Date	Name	Land Size	Units	Bedrooms	% Affordable	Funding	Additional
2014	Cape View/ Brewster Landing/ Sachemus Trail	9.43 acres	28 homes, 7 affordable 3 units/acre	76 8.1 beds/acre	25% Up to 80% AMI	----	
2014	White Rock Commons	3.64 acres	12 homes, 3 affordable 3 units/acre	36 bedrooms 9.9 beds/acre	25% Up to 80% AMI	----	

ADDITIONAL INFORMATION FOR SHI RENTAL PROPERTIES

Date	Name	Land Size	Units	Bedrooms	% Affordable	Funding	Additional
1973	Kings Landing	14.4 acres	108 rental 10 buildings & community center 7.5 units/acre	210 bedrooms 26- 1 bed, 66- 2, 12-3 & 4-4 14.5 beds/acre	100% Up to 80% AMI	Mixed funding sources. LIHTC, Project based vouchers	POAH
1990	BHA Frederick Court	10.26 acres	32 rental Townhomes 3.1 units/acre	32 bedrooms 3.1 beds/acre	100% Up to 80% AMI	State 667	Elderly & Disabled
1989	BHA Huckleberry Lane	6.55 acres	24 rental 12 duplexes 3.7 units/acre	57 bedrooms (9-3 & 15- 2bed) 8.7 beds/acre	100% Up to 80% AMI	State 705	Family
2000	Eagle Point, Inc.	.53 acre	3 rental Single home 5.6 units/acre	4 beds 7.5 beds/acre	On SHI	----	Latham Center, SHI extended to 2040.

ADDITIONAL SHI HOME OWNERSHIP

Date	Name	Land Size	Units	Bedrooms	% Affordable	Funding	Additional
1990	Belmont Park	26.93 acres or (10.35 acres w/ 15+ acres open space)	20 homes 1 unit/ acre or 2 units/ acre	55 beds 2 beds/ acre or 5.13 beds/acre	100% affordable Up to 80% AMI	Land provided by Town	Development located on 10.65 acres. 15.81 acres owned by Brewster & designated for open space.
1995	Yankee Drive		12 homes		25% affordable Up to 80% AMI	----	LIP program. 48 Total homes (McShane)
2003	Yankee Drive Condos		3 condos		Up to 80% AMI	----	Original comp permit for 7 total units.

AGE 55+ HOUSING

Date	Name	Land Size	Units	Bedrooms	% Affordable	Funding	Additional
2021	Serenity at Brewster (Former Wingate)	10 acres	132 units 88 Studios & 44 One-bedrooms	132	20% affordable (Lottery 2022) 27 units, requested 50% local preference	----	LAU application to DHCD 12/2021. Phase 1- 41 studios opened 7/ 2021 Phase 2- 91 studios/ 1-bedrooms, opening 2022

NURSING HOMES & ASSISTED LIVING

Date	Name	Land Size	Units	Bedrooms	% Affordable	Funding	Additional
2015	Maplewood	22.59 acres	132 units 66 independent assist. 66- leveled care 5.8 units/ acre		10% (14 units) application	----	1 building 33 Memory/nursing 33 assisted with help
1994	Pleasant Bay Nursing & Rehab	12.6 acres	135 beds 10.7 beds/acre		----	----	1 building
2006	Pleasant Bay Woodlands Assisted Living	13.0 acres	59 units 4.5 units/acre		10% (internal process)	----	1 building

RFP ISSUED FOR POTENTIAL TOWN SUPPORTED RENTAL HOUSING

Date	Name	Land Size	Units	Bedrooms	% Affordable	Funding	Additional
2022	Town-owned parcel at 0 Millstone Road	16+ acres	Rental Units	Up to 90 bedrooms	100% affordable	Land	RFP issued by Housing Trust 10/2021. Proposal received 12/2021 and selected by Trust.

APPENDIX D

Numerical Goal Methodology

State regulations and DHCD guidelines require that the Housing Production Plan include a numeric goal for annual housing production that would increase the number SHI-eligible units by at least a 0.5 percent of the municipality's total year-round housing units as determined by the current decennial census. Achieving this goal in a given year allows municipalities with an approved HPP to request a one-year certification granting "safe harbor" that allows more flexibility in managing the comprehensive permit process. The year-round housing count based upon the 2020 Census is not available as of publication of this HPP, but based upon the 2010 Census Year-Round Housing Count, Brewster's annual numeric goal should be at least 24 units. Estimates based on extrapolated 2020 year-round housing counts yield a slightly higher goal of 25-26 units annually. Ultimately, DHCD will determine the updated 0.5 percent target based upon the 2020 Census year-round housing count when it becomes available, but the tables below are meant to provide the Town with an estimate of the anticipated future "safe harbor" threshold.

METHOD #1: Based on 2010 Year-Round Housing Count (Current Official Target)						
	2022	2023	2024	2025	2026	Five Year Overall Goal
Current Total Year-Round Census Units	4,803	4,803	4,803	4,803	4,803	
Target SHI Units	24	24	24	24	24	120
Revised SHI Count	292	316	340	364	388	388
Revised SHI	6.1%	6.6%	7.1%	7.6%	8.1%	8.1%
10% Requirement	480	480	480	480	480	
Gap	188	164	140	116	92	92
METHOD #2: Based on Estimated 2020 Year-Round Housing Count, Extrapolated from 2010 Percentage of Vacant Units for Recreational, Seasonal, or Occasional Use						
	2022	2023	2024	2025	2026	Five Year Overall Goal
Estimated Total Year-Round Census Units	5,180	5,180	5,180	5,180	5,180	
Target SHI Units	26	26	26	26	26	130
Revised SHI Count	294	320	346	372	398	398
Revised SHI	5.7%	6.2%	6.7%	7.2%	7.7%	7.7%
10% Requirement	518	518	518	518	518	
Gap	224	198	172	146	121	121
METHOD #3: Based on Estimated 2020 Year-Round Housing Count, Extrapolated from 2010 Percentage of Total Housing Units for Year-Round Housing						
	2022	2023	2024	2025	2026	Five Year Overall Goal
Estimated Total Year-Round Census Units	4,981	4,981	4,981	4,981	4,981	
Target SHI Units	25	25	25	25	25	125
Revised SHI Count	293	318	343	368	393	393
Revised SHI	5.9%	6.4%	6.9%	7.4%	7.9%	7.9%
10% Requirement	498	498	498	498	498	
Gap	205	180	155	131	106	106

APPENDIX E

Community Engagement Summary

In this section, the “project team” refers to the project consultant (Barrett Planning Group LLC), Brewster Housing Partnership, and Town staff overseeing the development of this Housing Production Plan – Housing Coordinator Jill Scalise and Assistant Town Administrator Donna Kalinick.

OPPORTUNITIES FOR ENGAGEMENT

The Town of Brewster and Housing Production Plan project team provided multiple opportunities for participation by local officials and the community at large to guide the development of this plan, as outlined in the sections below.

Regular Housing Partnership Meetings

The Brewster Housing Partnership met monthly from March 2022 through June 2022 to discuss the development of this plan with Town staff and the consultant team. Meeting dates and topics were as follows:

February 10, 2022. During this kickoff meeting, Barrett Planning Group reviewed the project timeline, community engagement plan, and community survey with the Housing Partnership.

March 10, 2022. Barrett Planning Group discussed the community survey launch, plan for promotion, and findings of small group interviews. In addition, Barrett Planning Group proposed a strategy called a “Meeting in a Box” (later updated to a “Community Conversation”) to the Housing Partnership as a means for creating additional community engagement opportunities.

March 31, 2022. Barrett Planning Group presented preliminary takeaways from community survey and highlights of the Needs Assessment. The project team also discussed the final protocol for the Community Conversations, and reviewed plans for the April 28, 2022 community meeting.

April 21, 2022. Barrett Planning Group shared draft slides and plans for the April 28, 2022 community meeting with the project team.

May 19, 2022. The project team discussed draft goals and strategies for the plan.

June 30, 2022. The project team discussed written comments received on the draft plan and reviewed proposed edits to the document.

Small Group Interviews

During the month of March 2022, the consultant team conducted small group interviews with a total of thirty-five individuals familiar with Brewster's housing needs to get a sense of what has changed since the last HPP and what needs still remain. Participants included Town staff, members of Town bodies, representation from housing advocacy groups and social service providers, members of the business community, realtors, and residents. Common themes from these conversations include:

- There is an insufficient supply of year-round rental units – and some participants made observations that this is worsening as more renter households are displaced due to the property owner wanting to sell or convert to short-term rentals.
- The cost of homes has become astronomical (this not unique to Brewster, but a challenge nonetheless).
- Businesses and some Town departments have difficulty staffing, recruiting, and retaining employees.
- While there isn't agreement about precise *solutions* to these issues, there is consensus that there is a housing crisis – and the community at large seems to be more aware and willing to engage in dialogue about this issue.
- The best ways to educate people should focus on: personal stories that highlight the need of neighbors, those in the community, etc.; the reality of the income levels/limits and different jobs; and the link between services and housing.
- Environmental concerns raised during this process will primarily focus on water protection, but tree removal and land disruption are also common concerns.
- Well-received projects tend to have one or more of the following qualities: the project went through a respectful process where people felt their concerns were heard; the project involved redevelopment or reuse of existing buildings; the project featured Cape-friendly design; and the project was for ownership.
- Sites identified for future housing development included the Sea Camps properties (although there was a lack of clarity / consensus from participants about which of the two parcels made better sense for housing), Eddy School if the elementary schools consolidate, shifting of municipal spaces that could allow for reuse of buildings, and focusing on mixed use development in commercial corridors.

Community Survey

A community survey was available online and in paper form from March 10 through April 8, 2022. This survey asked questions about the respondent's own housing needs as well as their perspectives on the needs of the community. A total of 881 individuals participated in this survey, the results of which are included in the next section of this Appendix E.

Community Conversations

The project team developed “Community Conversations” kits and made this opportunity publicly available. The tool included all materials needed for volunteer hosts to hold conversations in smaller settings with fellow community members. There were at least three such conversations held, including one at the Council on Aging, one with the Brewster Affordable Housing Trust during their May 5, 2022 meeting, and one held at a housing location. The feedback during these meetings was reflective of themes, concerns, and ideas heard throughout this process.

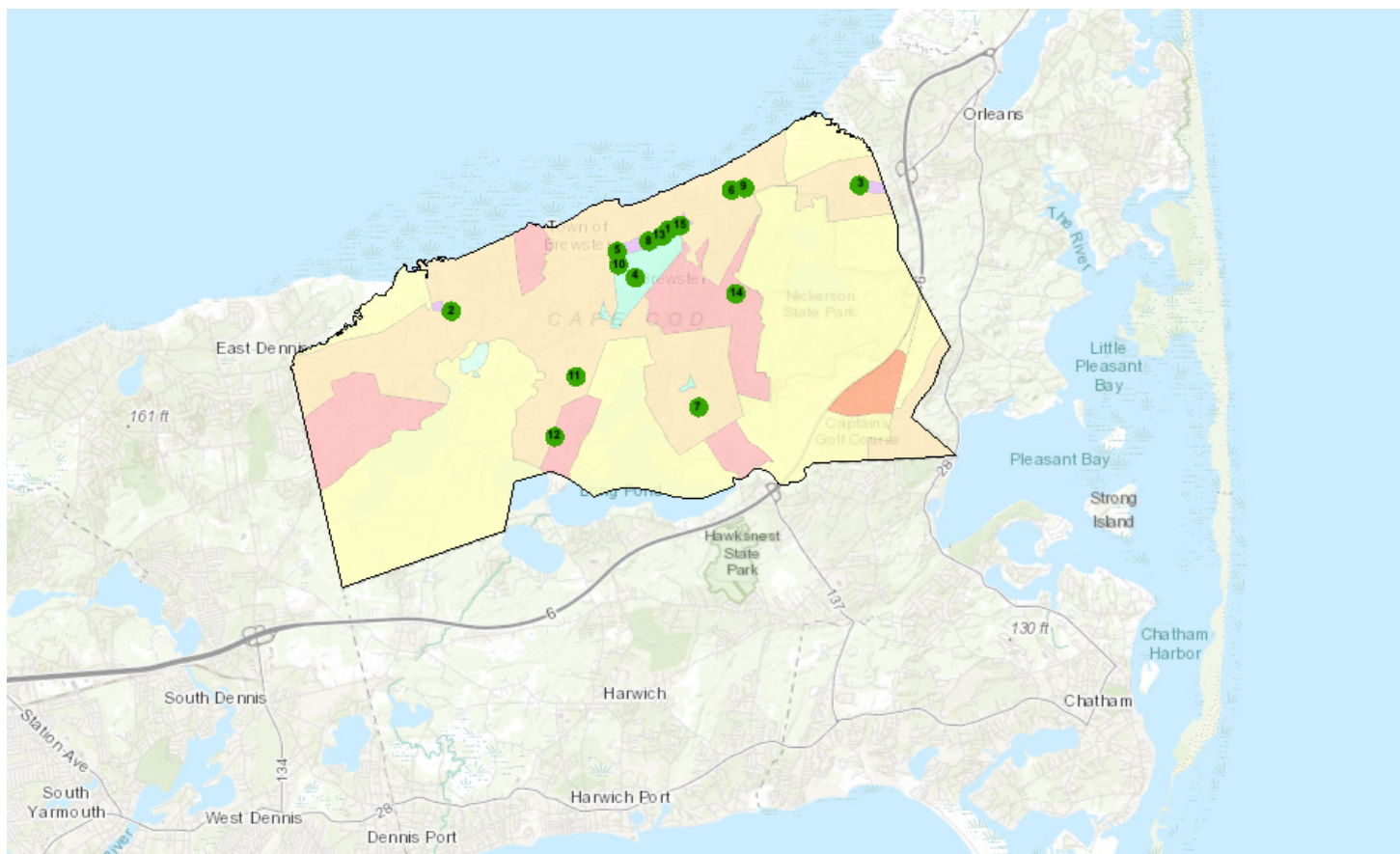
First Community Meeting

The Housing Partnership hosted a virtual community meeting on April 28, 2022 to share key findings from the Needs Assessment and invite participants to join breakout groups focused on the following topics: housing needs; development constraints; mapping housing solutions; housing goals and strategies; and regional context. Common themes that came out of the group discussions included:

- There is a desperate need for increasing the number of affordable rental units in Brewster.
- Renter households are suffering from increasing rents or displacement because property owners are either raising rents, want to sell, or are shifting to short-term or seasonal rental model.
- Some participants had strong concerns about the impact of short-term rentals on housing and wanted the Town to take more action.
- There is a labor shortage due to low wages not meeting increasing rents.
- Some participants noted that Brewster and Harwich used to be communities where people could have families, working class communities, but this is changing.
- Some strategies raised by participants included offering tax abatements or incentives, placing a cap on seasonal rentals, focusing on redevelopment of underutilized properties, and encouraging more ADUs.
- Regional projects have had a lot of value and the Town should continue to look at regional partnerships.
- Multifamily housing is more likely to be accepted if it looks more like Cape homes. In addition, top-of-the-shop housing could provide a lot of opportunity for year-round housing for people who work in Brewster.

The results of the group mapping exercise are provided on the next page.

Figure E1. Mapping Activity - Sites for Development of Affordable Housing



MassGIS, Esri Canada, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS | Massachusetts Highway Survey Section, MassGIS. Identified sites and notes generated from community meeting responses, April 28, 2022. Participants also identified some private properties in addition to these general areas and Town-owned parcels.

MEETING NOTES

1. Foster Square — Add rental housing, mixed-use zoning.
2. Lemon Tree Shops — Add rental housing, mixed-use zoning.
3. Village Business district by Orleans — Mixed-use options, easy transportation (so close to bus stop, able to walk to Brewster Farms market). Important for people to walk to places they need to go to.
4. Underpass Road — More mixed-use opportunities in the commercial district by Underpass Rd.
5. Route 6A from Eddy Elementary to the Orleans Town Line — This is part of the area of Town to get some apartments over businesses, both rental and home ownership options. Not in the watershed, properties available to develop. The Town would need to discuss potential zoning changes.
6. Sea Camps Bay — Buildings that are on the could provide housing options.
7. Long Pond Parcel — access to major roads, especially if sited fairly close to 137 so utilities would not have to be brought too far.
8. Proactively watch for vacant buildings that could be reused as housing especially if parking is there already.
9. Spruce Hill Property — There is an existing empty house. Conservation land, so can't build new building but the existing structure may be able to be repurposed.
10. One of the schools (Eddy or Stony Brook) if consolidation takes place — Already has utilities, parking, space. This site has also been discussed as a potential community center. Could combine a community center with housing within walking distance.
11. Land by the police station — Is there additional space there? Target areas not in zone 2 and far enough away from wetlands.
12. Area by the town owned sand pit — Target areas not in zone 2 and far enough away from wetlands.
13. Village business districts and commercial areas — Will need to address zoning and should be evaluated on a case by case basis. For example, if you are talking about an industrial area depending on nature of business may not be appropriate to have residential but some would be fine.
14. Multi-generational housing on Town-owned land.
15. Area by Snowy Owl and Foster Square — mixed use zoning – Great because people work there, walk to businesses walk to work. There are sidewalks there. Walkable areas and easy transportation.

Focus Groups

Between May 10 and May 20, 2022, the consultant team conducted eight focus groups with Town staff, nonprofit and for-profit developers, representation from regional housing partners, and members from Town bodies, a total of approximately twenty-five participants. Attendees were asked to review and provide comments on draft strategies for the HPP before they were integrated into the draft plan.

Presentation to Select Board and Planning Board

On June 6, 2022, the consultant team presented the Needs Assessment, Goals, and Implementation Strategies to the Select Board and Planning Board for their review. Both boards were invited to provide comments through the Housing Office on the presentation.

Second Community Meeting on Draft Plan

Held as a virtual meeting of the Housing Partnership, this June 16, 2022 community meeting consisted of a consultant-led presentation of the draft plan. Attendees (approximately 30 in total) were invited to ask questions and provide comments during the meeting.

Public Comment Period

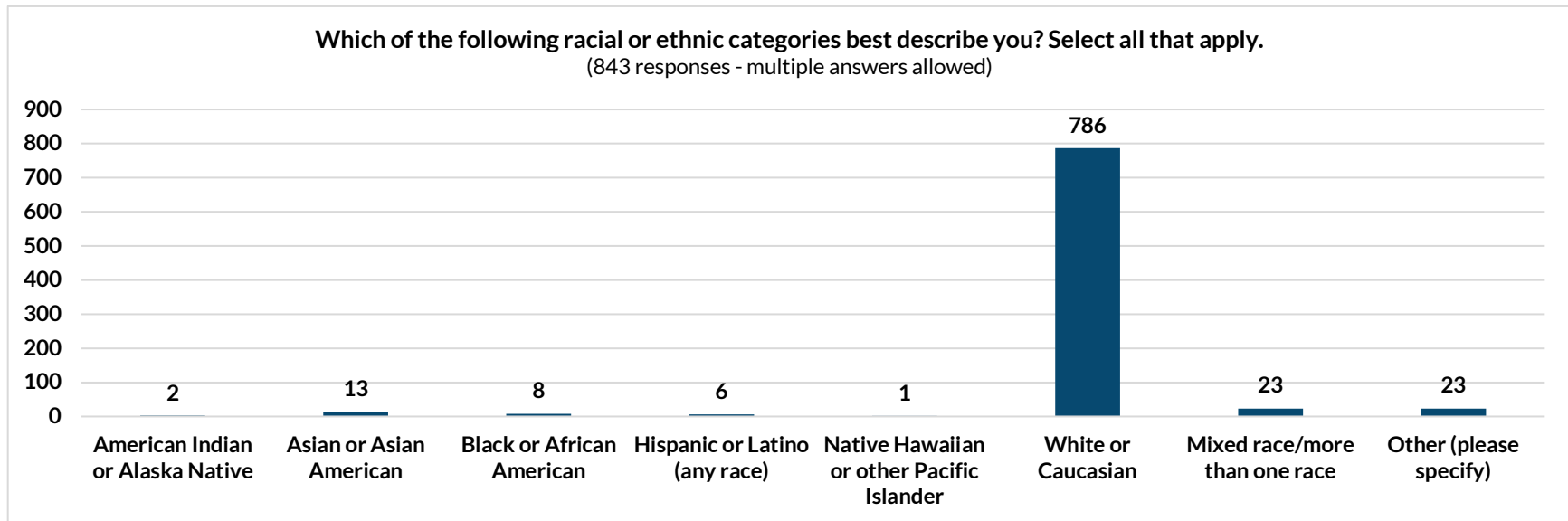
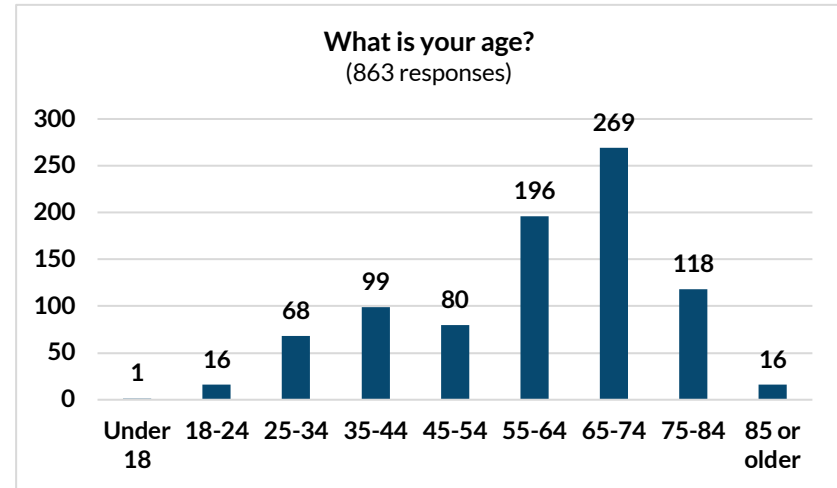
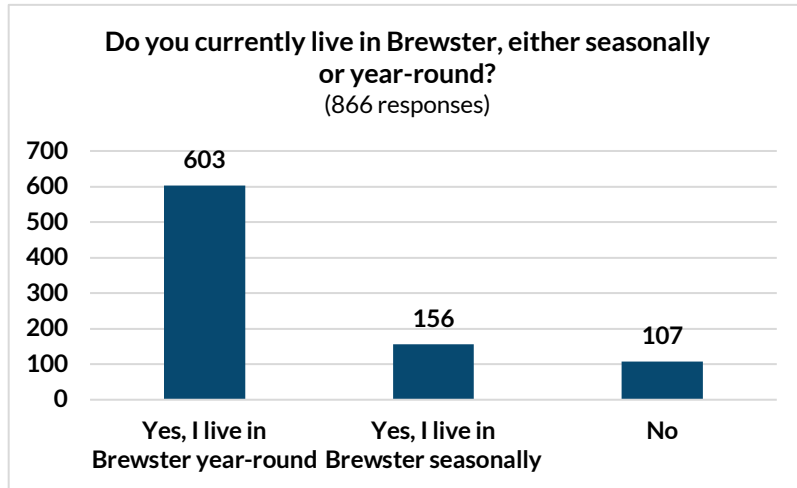
Members of the public were encouraged to provide written comments on the draft plan for two weeks from June 16-June 30, 2022. Three written comments were submitted during this time, in addition to five written comments received previously following the June 6 presentation to the Select Board and Planning Board. Town staff and the consultant team discussed the comments and necessary changes to the plan. These comments are on file with the Brewster Housing Office.

Final Presentation and Plan Adoption

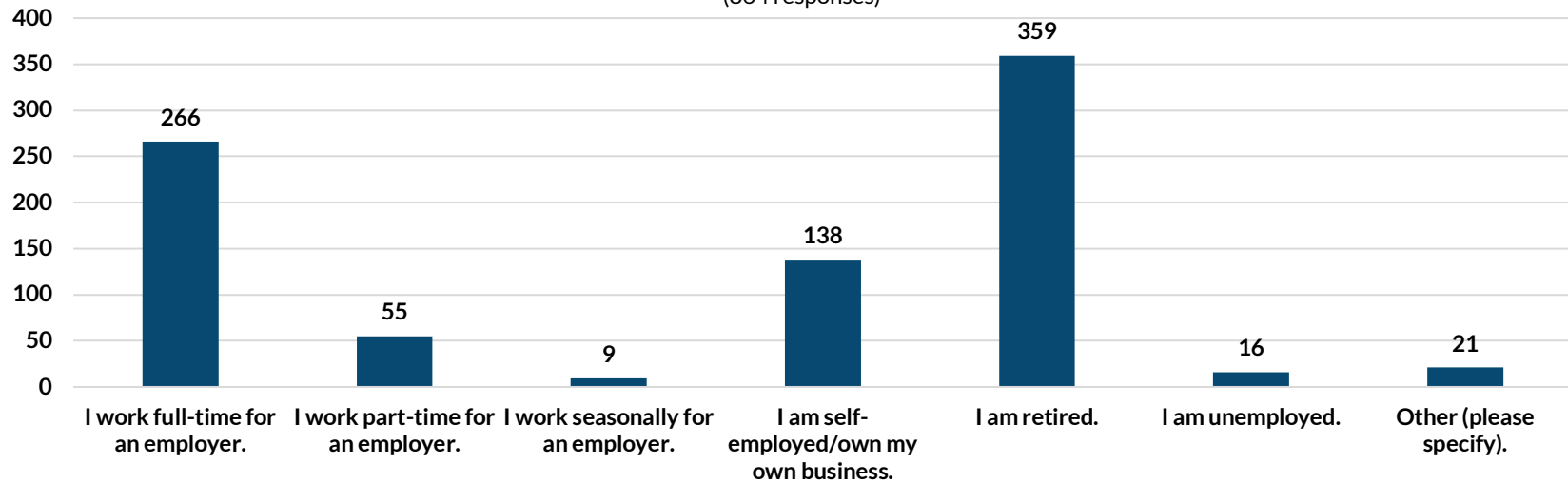
On July 11, 2022, the consultant team presented the revised final plan to the Select Board and Planning Board for review. Both boards adopted the plan at this joint meeting.

COMMUNITY SURVEY SUMMARY – GENERAL RESPONSES

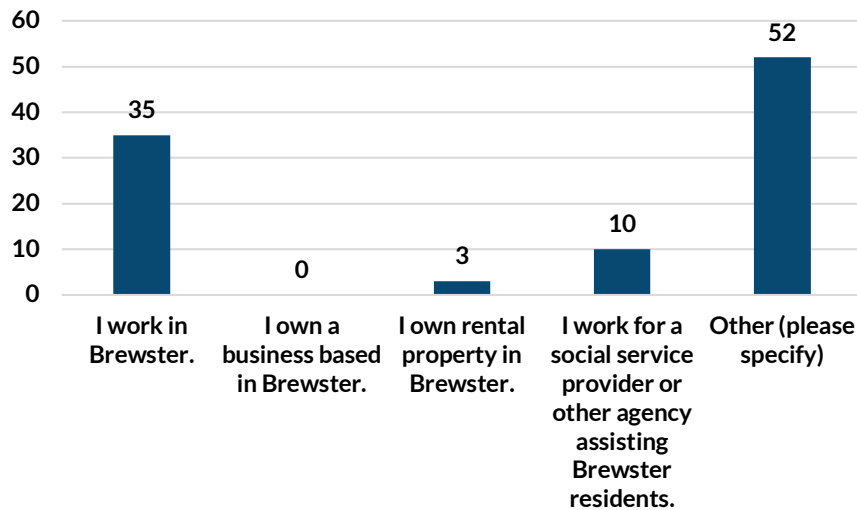
The next section of this Appendix provides a detailed analysis of responses. Open responses to applicable questions are available at the Brewster Housing Office upon request.



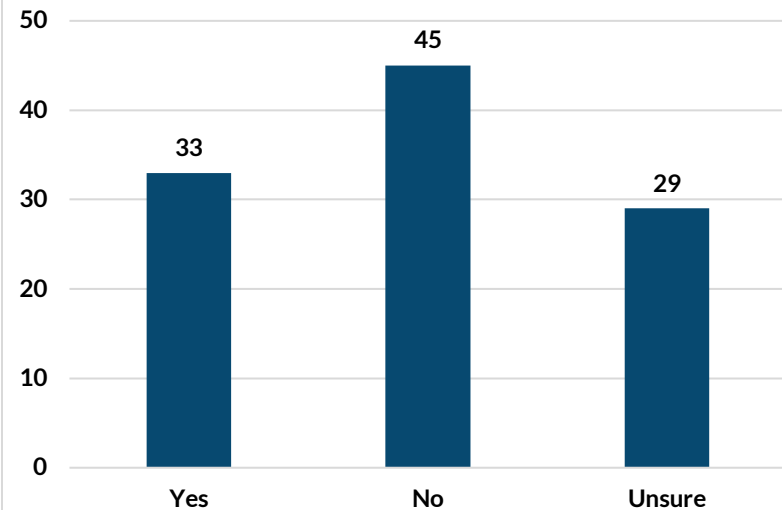
What describes your current employment status?
(864 responses)



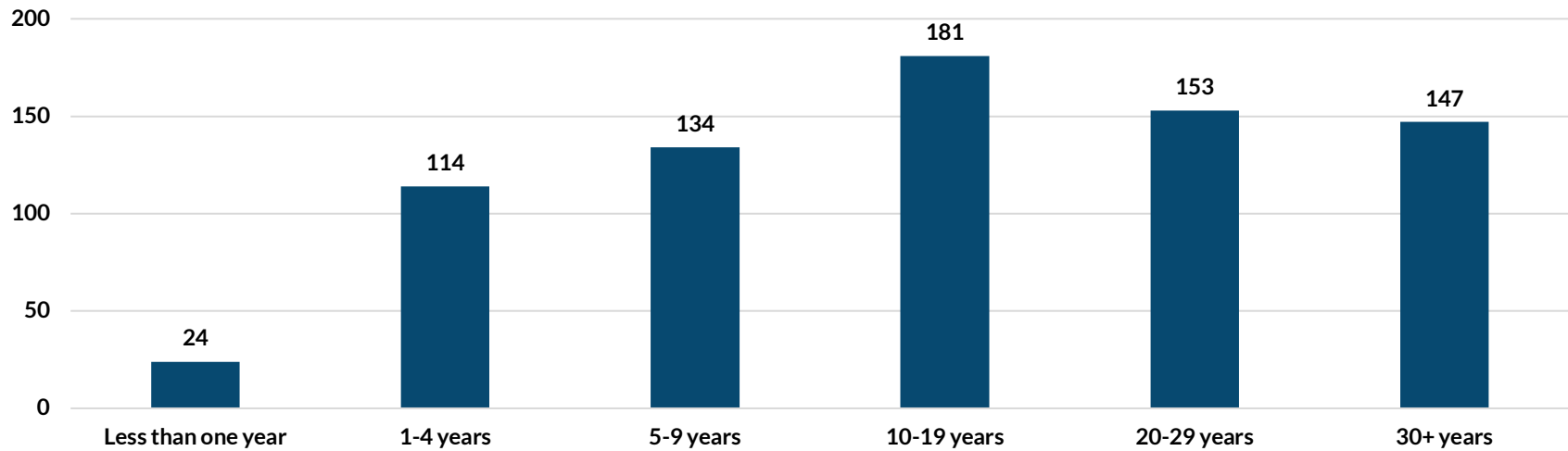
You indicated that you do not reside in Brewster. What is your connection to Brewster?
(100 responses; non-residents only)



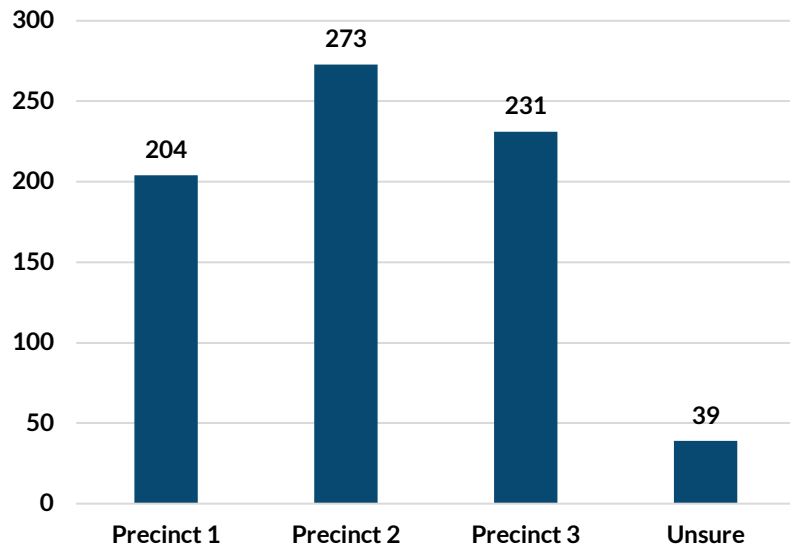
Are you considering moving to Brewster or do you want to move to Brewster within the next five years?
(107 responses; non-residents only)



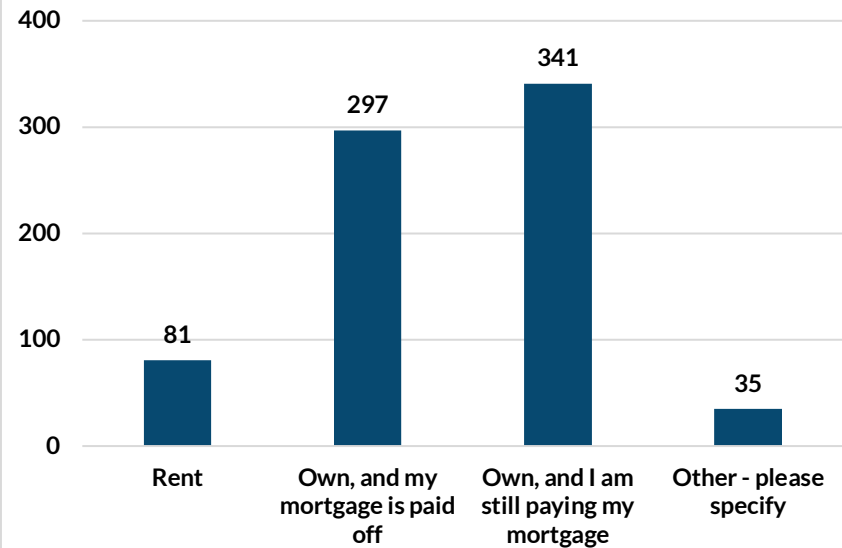
How long have you lived in Brewster?
(753 responses; residents only)

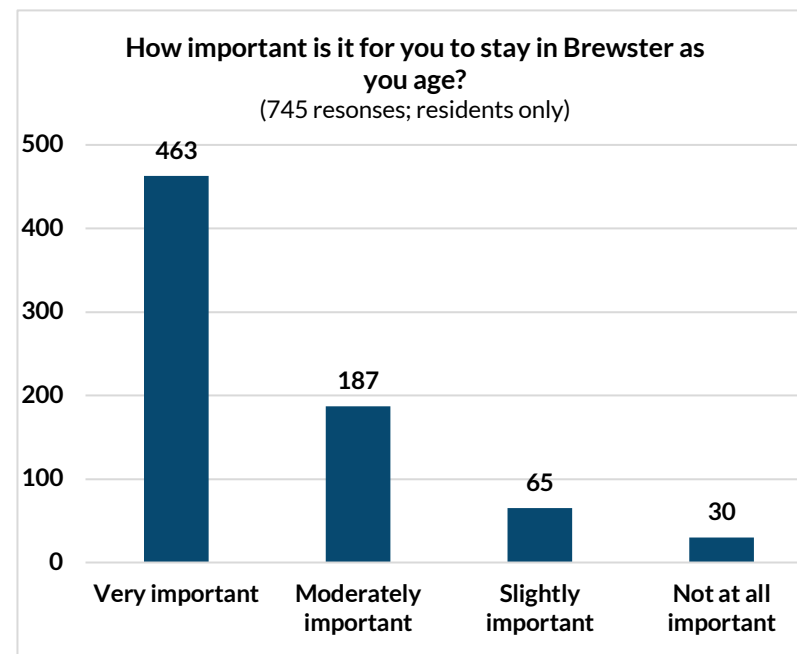
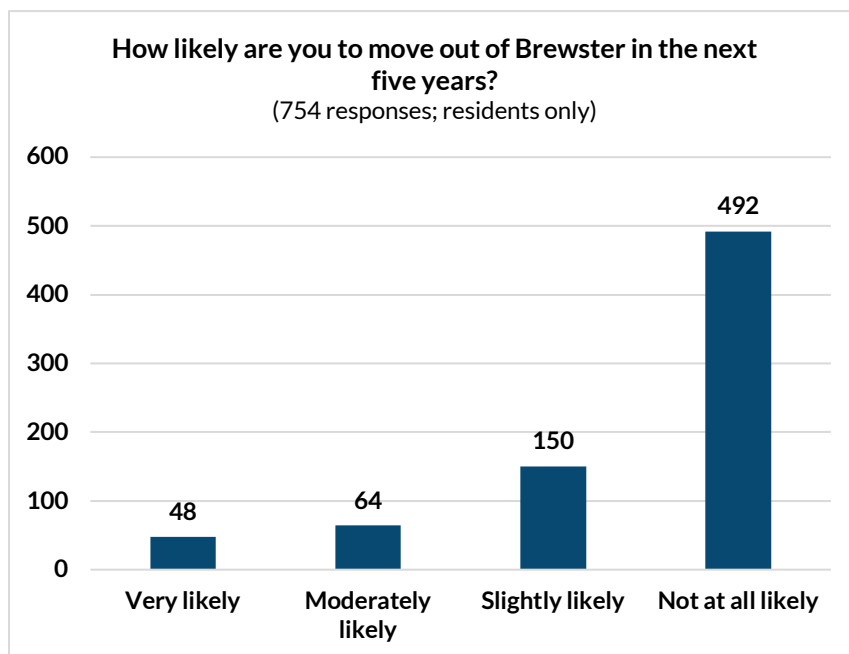
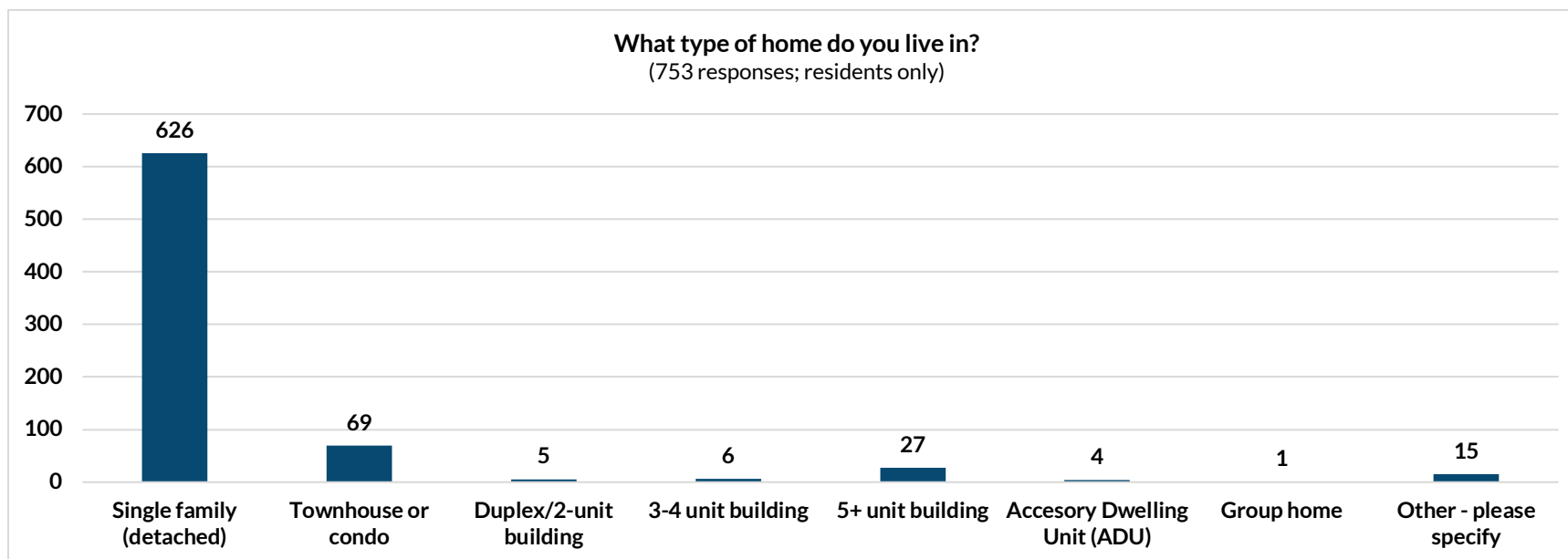


In which voting precinct do you live?
(747 responses; residents only)



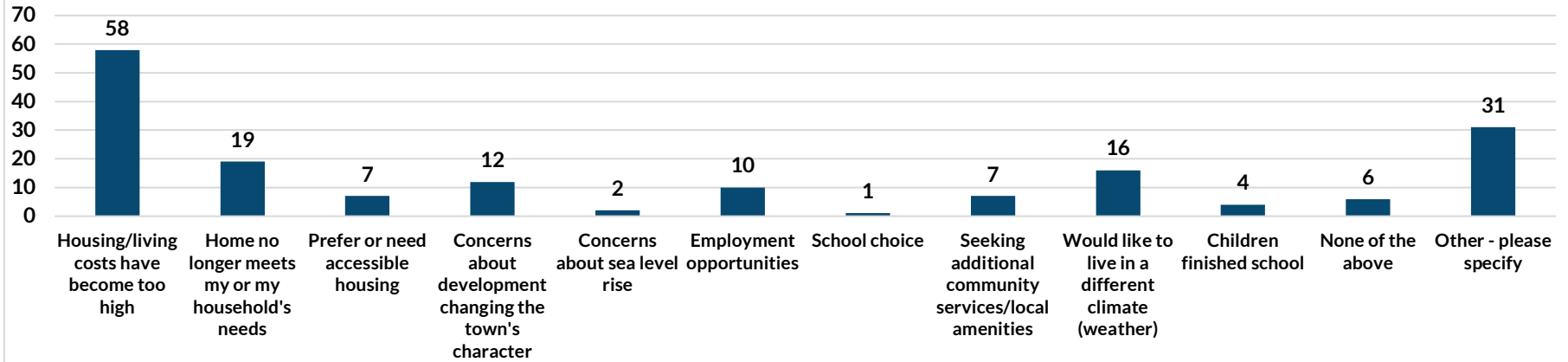
Do you rent or own your home in Brewster?
(754 responses; residents only)





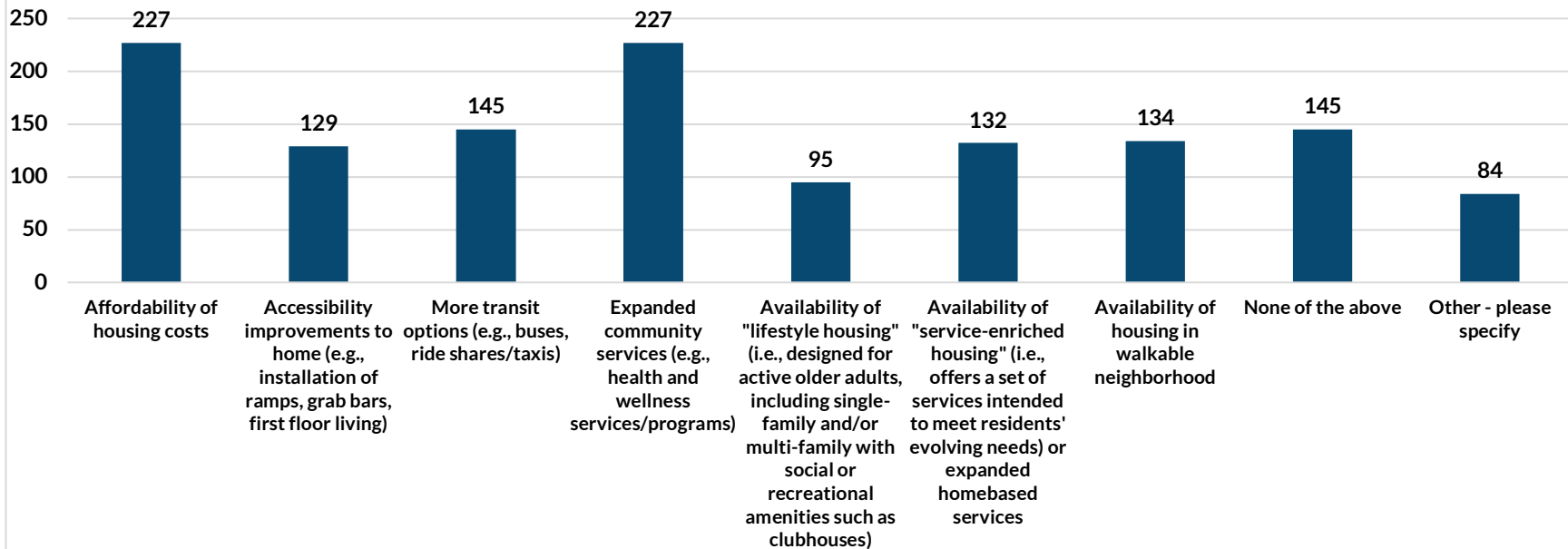
You've indicated that it is very likely or moderately likely that you will move out of Brewster in the next five years. Which of the following factors do you believe most influence your likelihood of moving out of Brewster? Select all that apply.

(110 res)

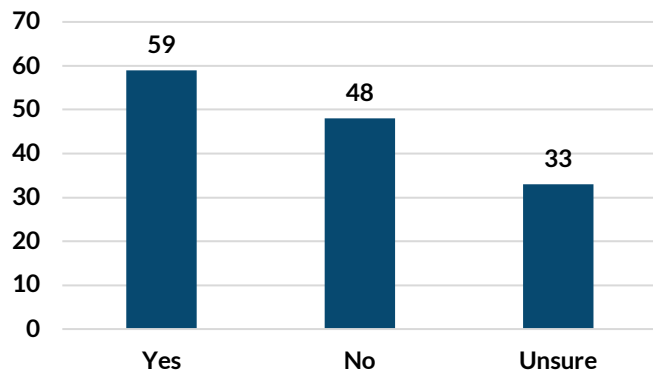


You've indicated that it is very important or moderately important to stay in Brewster as you age. What factors need to change/improve to enable you to stay in the community as you age? Select all that apply.

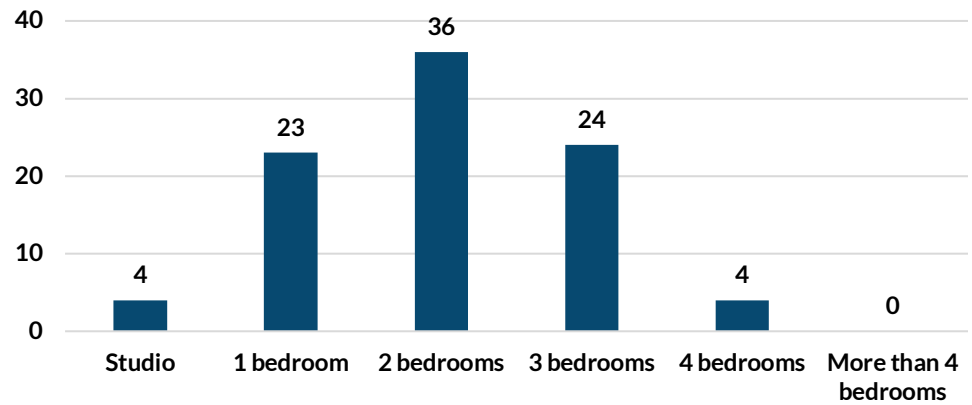
(644 responses - multiple answers allowed; res)



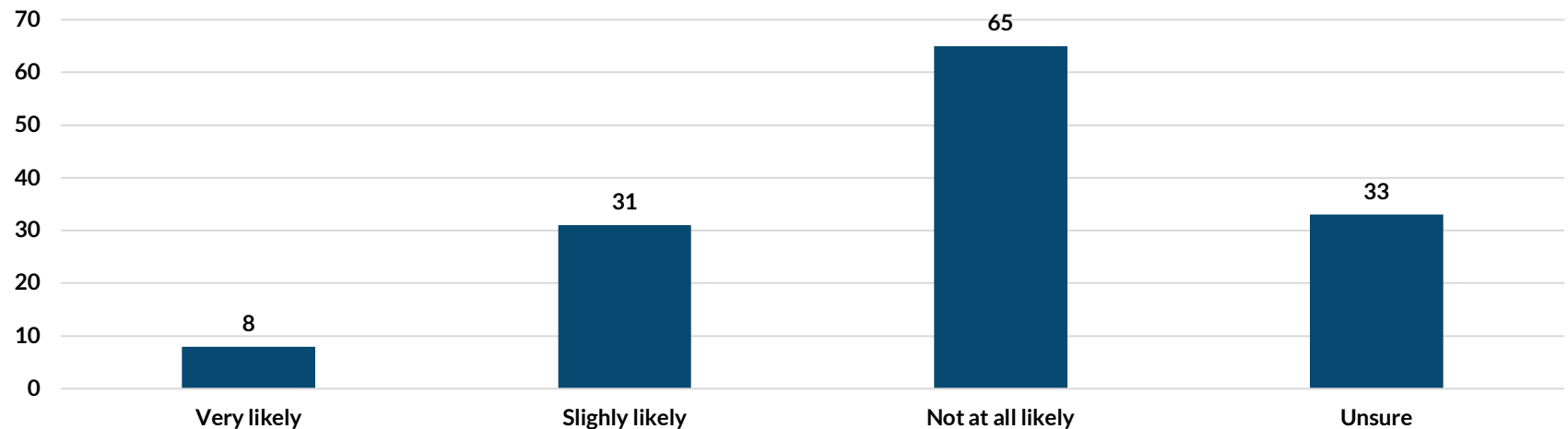
Are you currently looking or do you anticipate looking for rental housing in Brewster within the next five years?
(140 responses; non-residents or current non-homeowner residents only)



How many bedrooms would your household need to live comfortably in a rental home in Brewster?
(91 responses; non-residents or current non-homeowner residents only based on previous response)

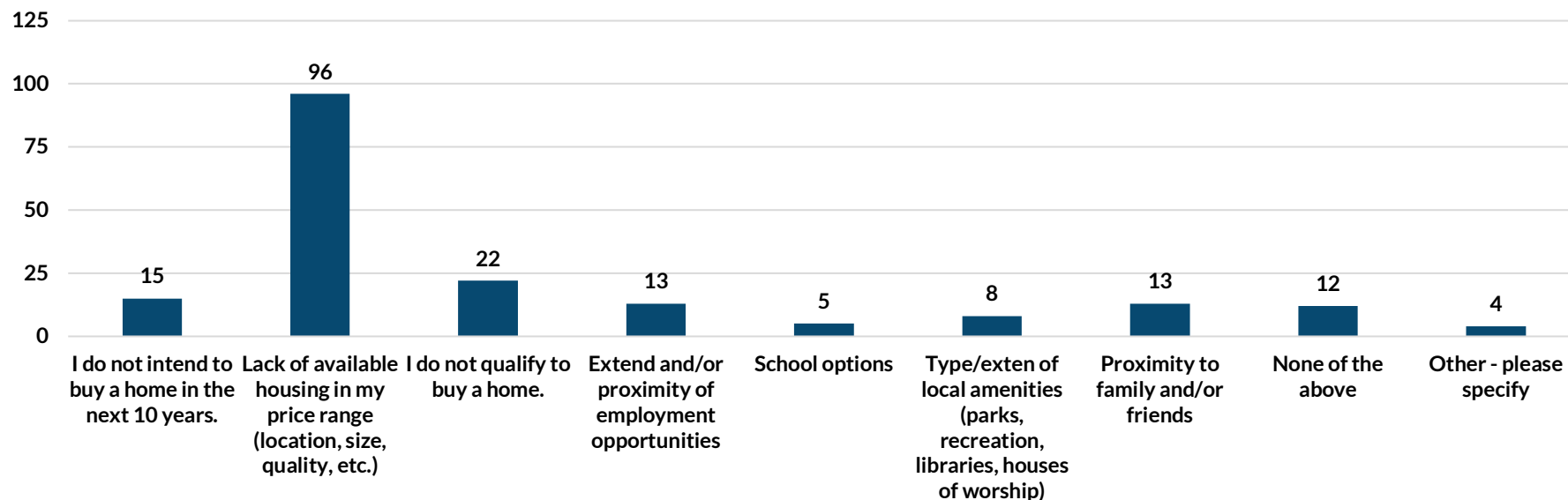


How likely is it that you will buy a home in Brewster in the next five years?
(137 responses; non-residents or current non-homeowner residents only)



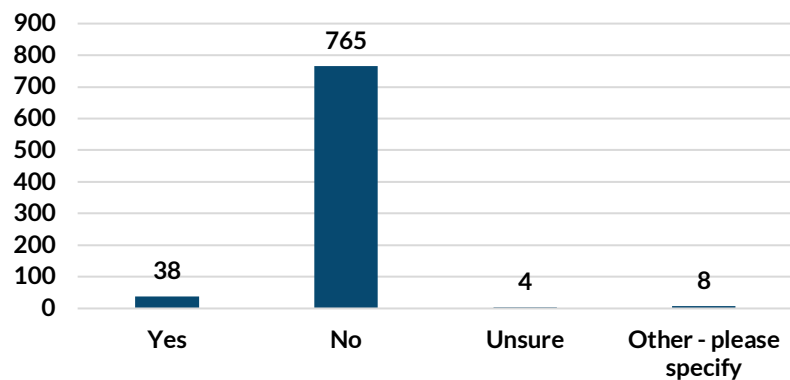
You've indicated that buying a home in Brewster within the next five years is slightly likely, not likely, or that you are unsure. Which of the following factors most influence this decision? Select all that apply.

(127 responses - multiple answers allowed;



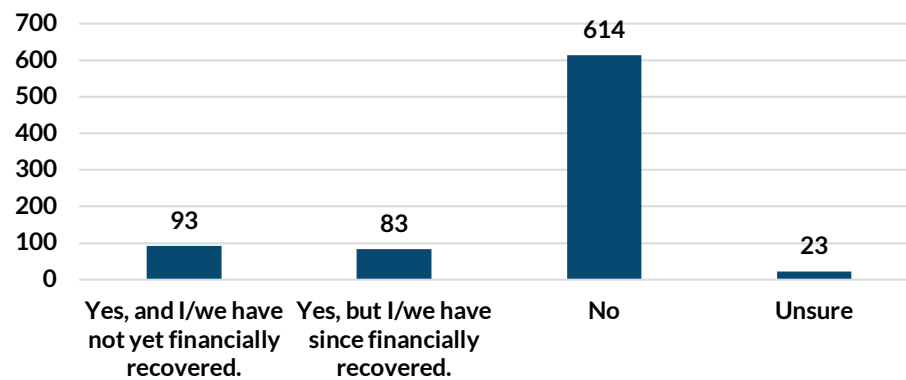
Do you receive any income-based housing assistance or live in a housing unit with income restrictions?

(815 responses; current residents or non-residents interested in moving to Brewster only)

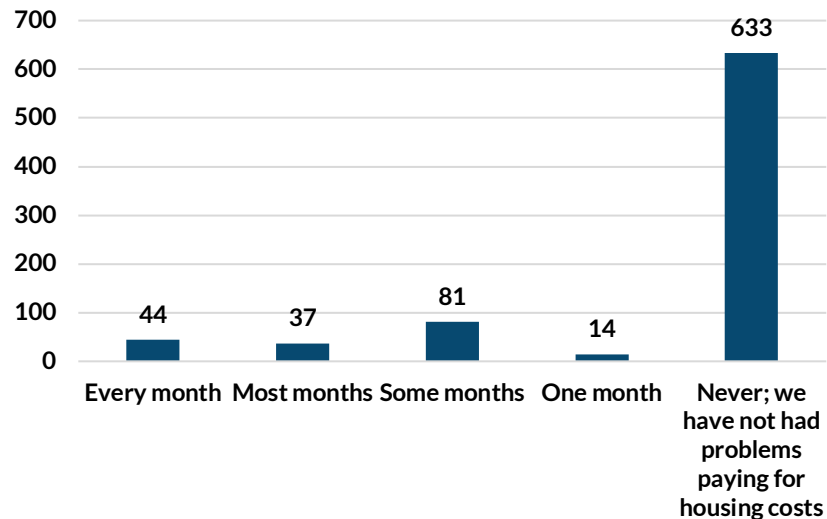


Did you or anyone in your household experience a significant loss of wage or salary income due to the COVID-19 pandemic?

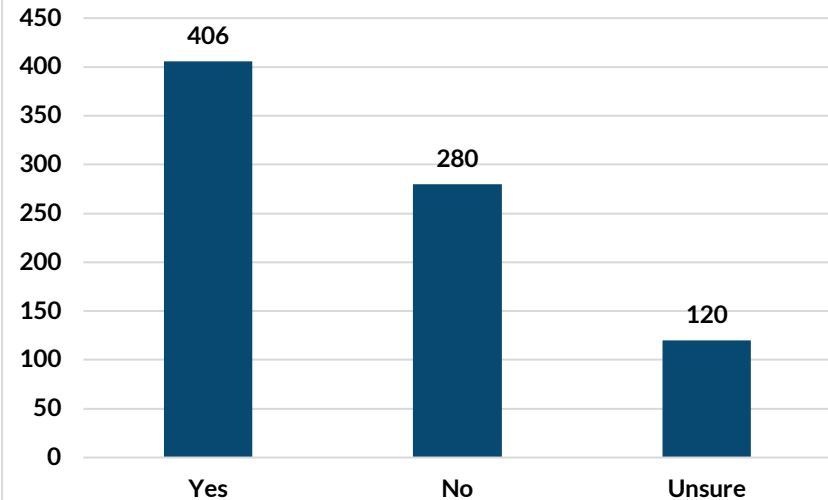
(813 responses; current residents or non-residents interested in moving to Brewster only)



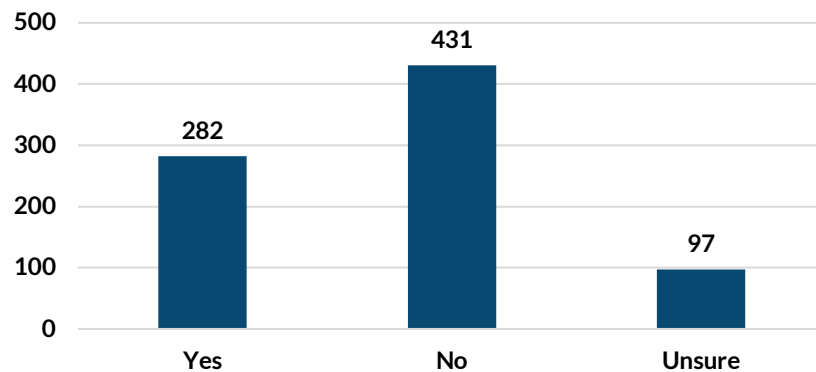
How often in the last 12 months did you find it hard to pay your rent, mortgage, or other housing costs?
(809 responses; current residents or non-residents interested in moving to Brewster only)



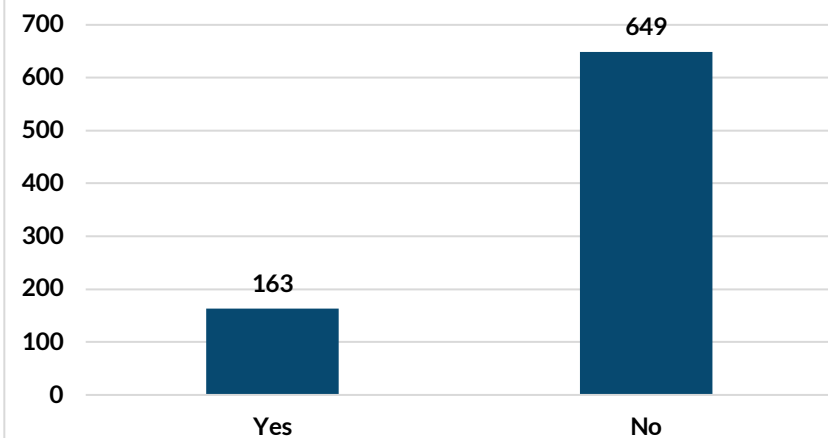
According to the U.S. Department of Housing and Urban Development (HUD), the 2022 "fair market rents" for Brewster's metropolitan statistical area (MSA) are as follows: 1br: \$1,428; 2br: \$1,879; 3br: \$2,323; 4br: \$2,548. If you needed to seek rental housi



The median sales price for a single-family home in Brewster was \$655,000 in 2021. If you were to buy today, would you be able to afford to purchase a home in Brewster at this price?
(810 responses; current residents or non-residents interested in moving t

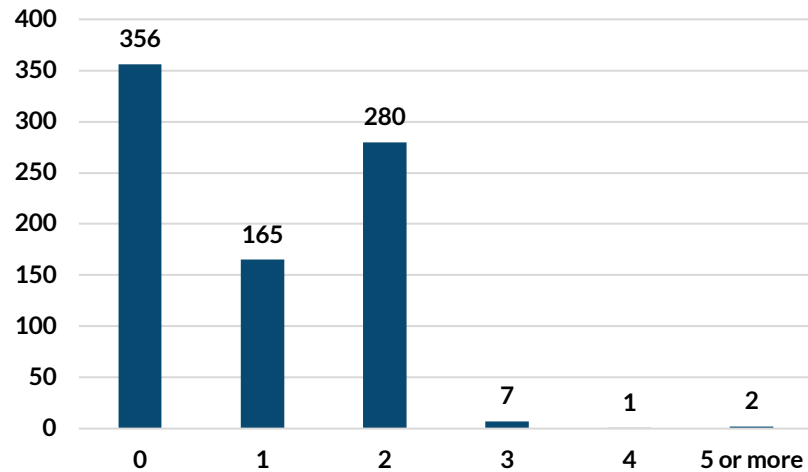


Do you have children under 18 who reside in your household for more than 3 months/year?
(812 responses; current residents or non-residents interested in moving to Brewster only)



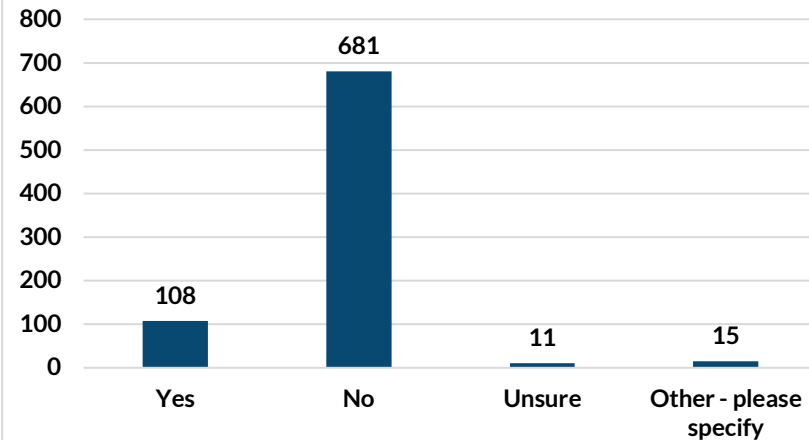
How many members of your household are 65 or older, including yourself?

(811 responses; current residents or non-residents interested in moving to Brewster only)



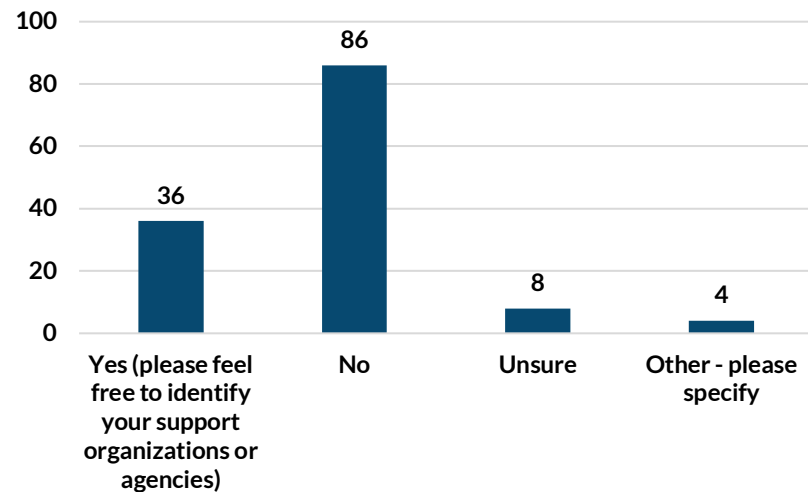
Does anyone in your household have a disability (any physical or mental impairment that substantially limits one or more major life activity)?

(815 responses; current residents or non-residents interested in moving to Brewster only)



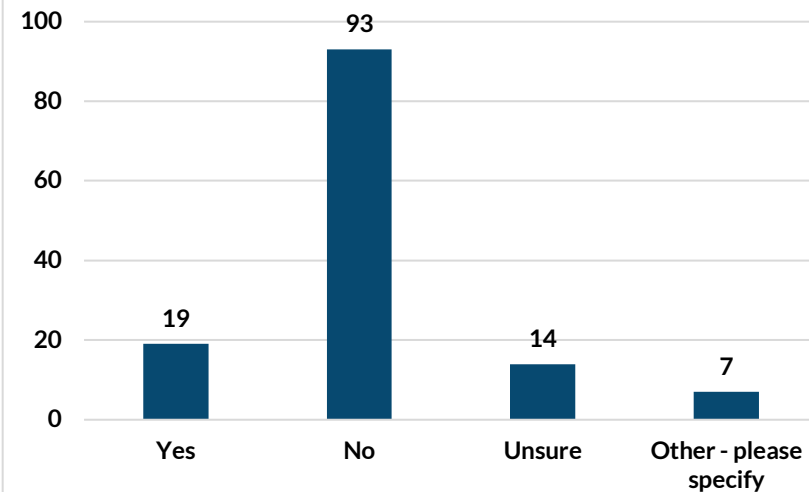
Do you or any member(s) of your household receive support services through an outside organization or agency to assist with home or life activities?

(134 responses; households with someone with disability only)



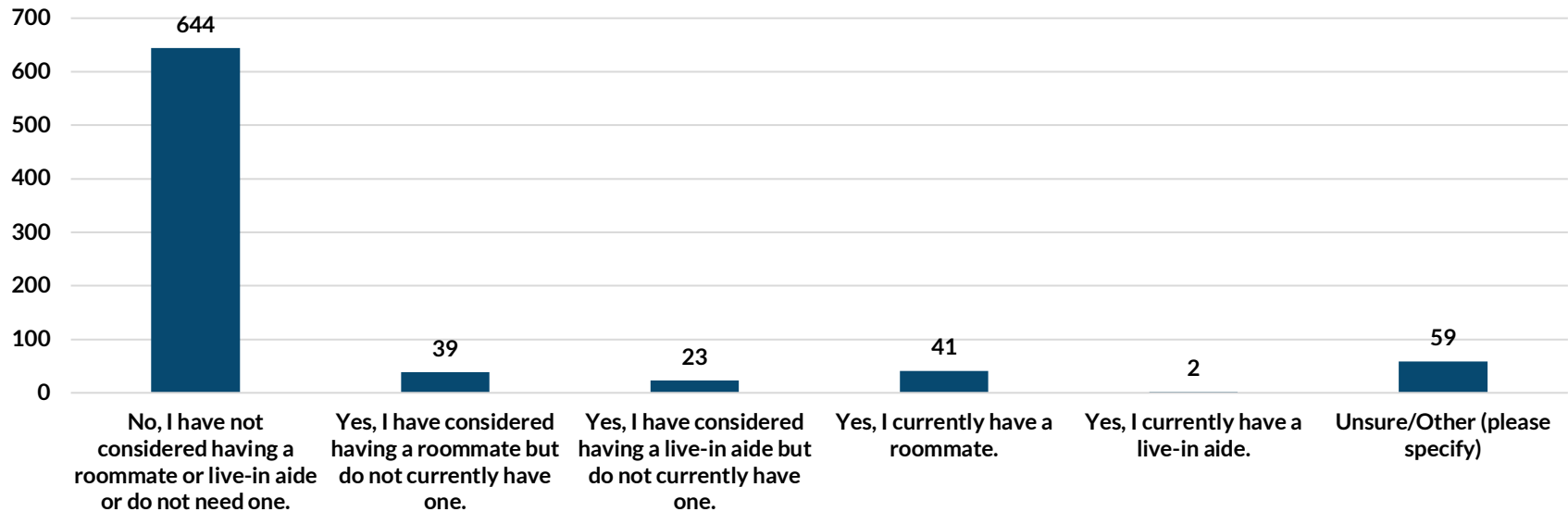
Do you or any member(s) of your household require assistive services that you/they are unable to afford or access for some other reason?

(133 responses; households with someone with disability only)



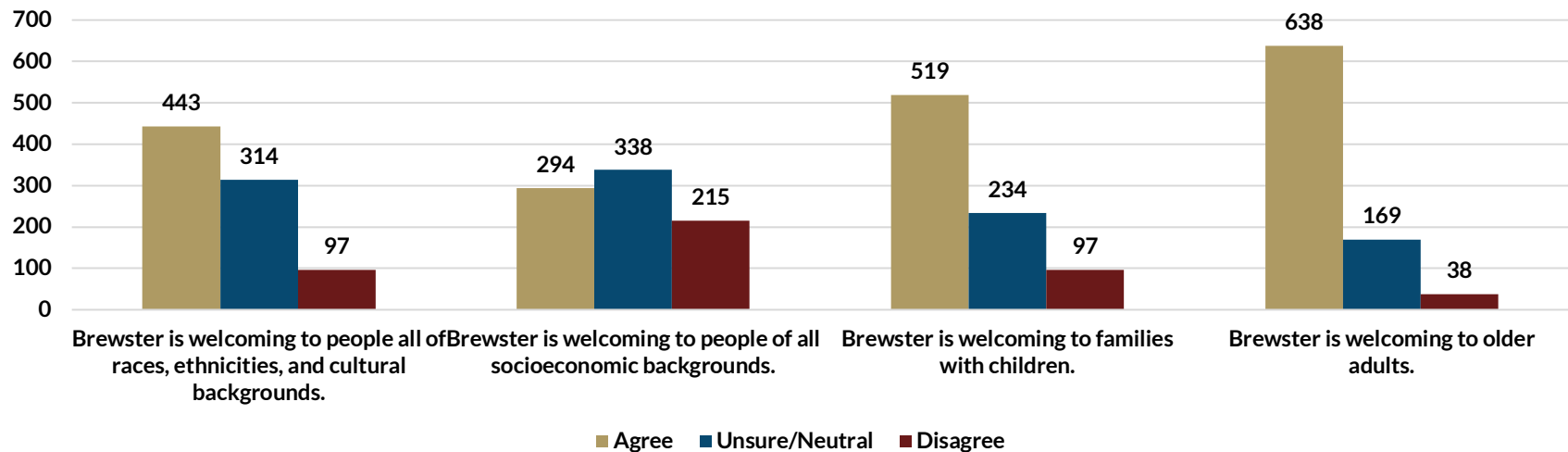
Do you currently have or have you considered having a roommate or live-in aide?

(808 responses; current residents or non-residents interested in moving to Brewster only)

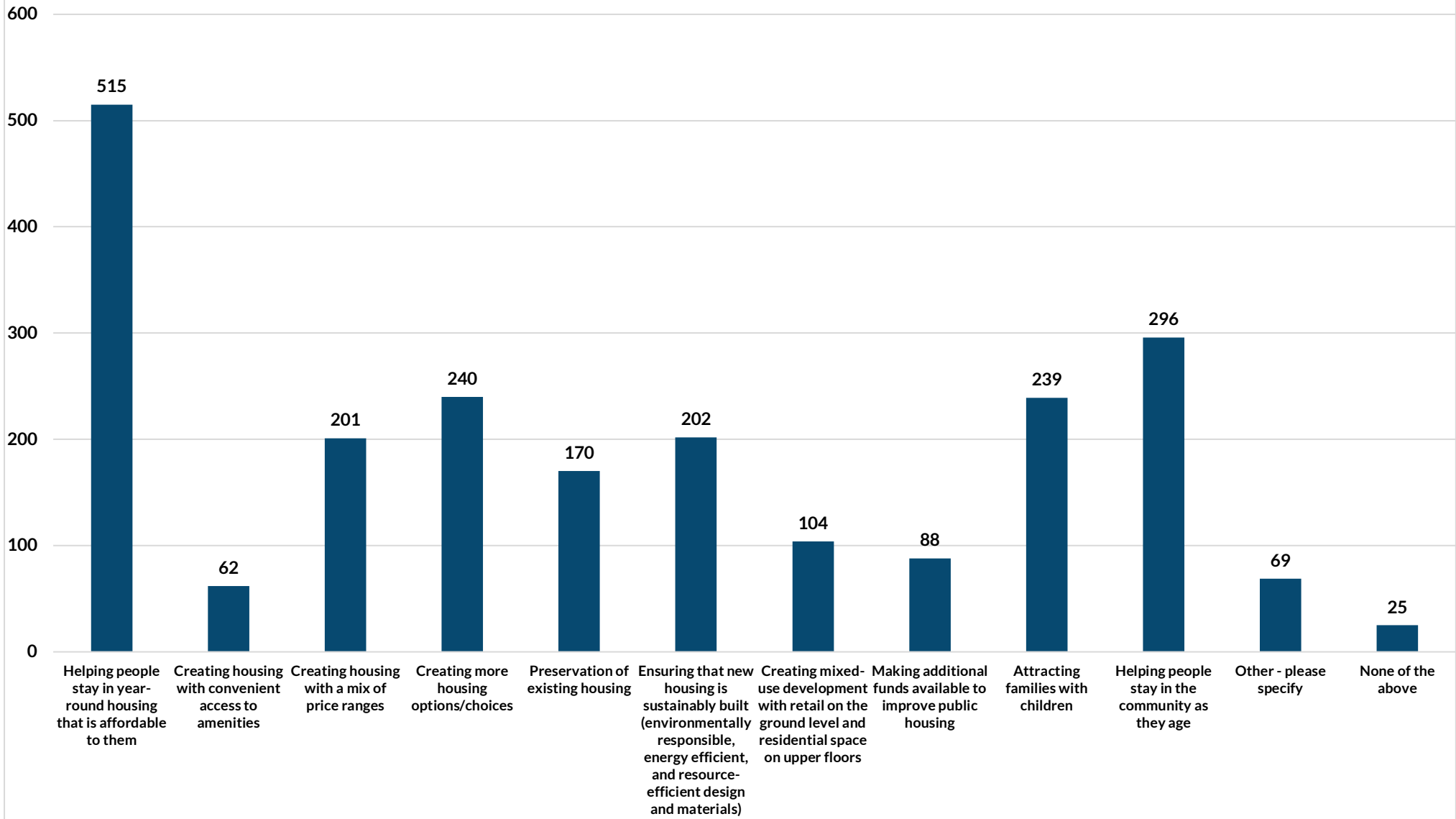


Please indicate your thoughts on the following statements.

(Between 845 and 854 responses - varies per statement)

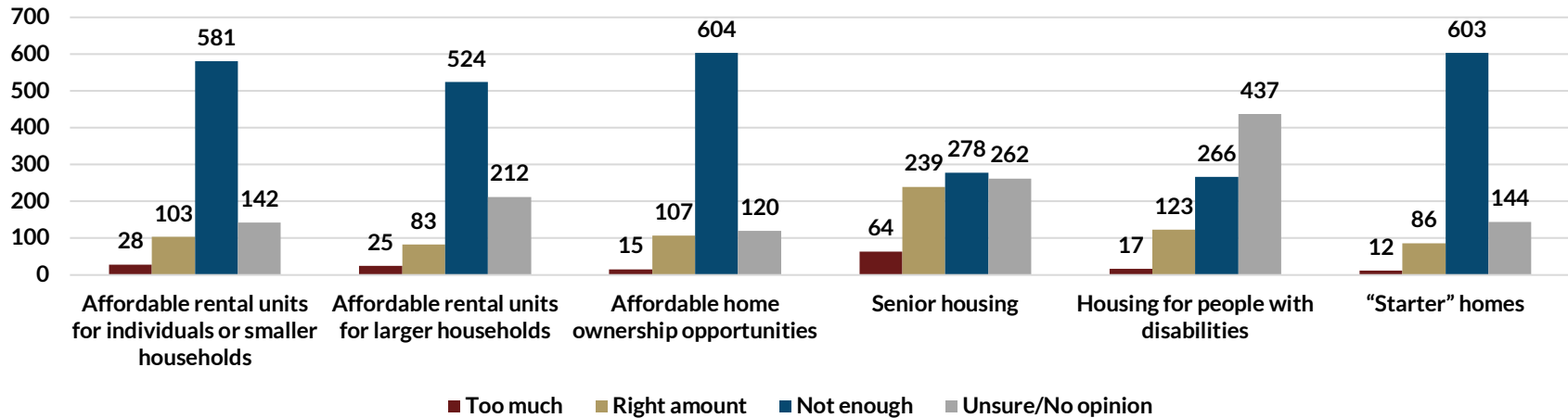


Which of the following housing initiatives are most important to you?
(856 responses - allowed to check up to three answers)



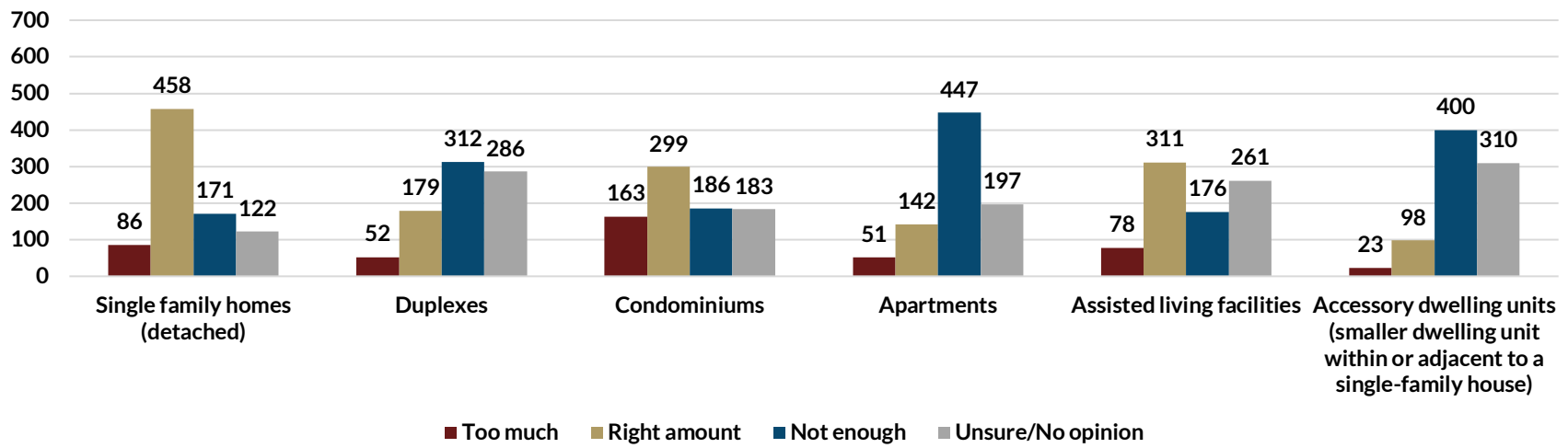
Do you think Brewster has too much, not enough, or just the right amount of the following specialized categories of housing?

(Between 843 and 854 responses - varies per category of housing)



Do you think Brewster has too much, not enough, or just the right amount of the following types of housing?

(Between 826 and 837 responses - varies per housing type)



COMMUNITY SURVEY ANALYSIS

The Community Survey for the Brewster Housing Production Plan launched on March 10 and closed on April 8, 2022. The survey was available online as well as in paper-copy at Town Hall, and it was advertised on the Town's website with the assistance of the Housing Office. The survey received 881 responses in total.

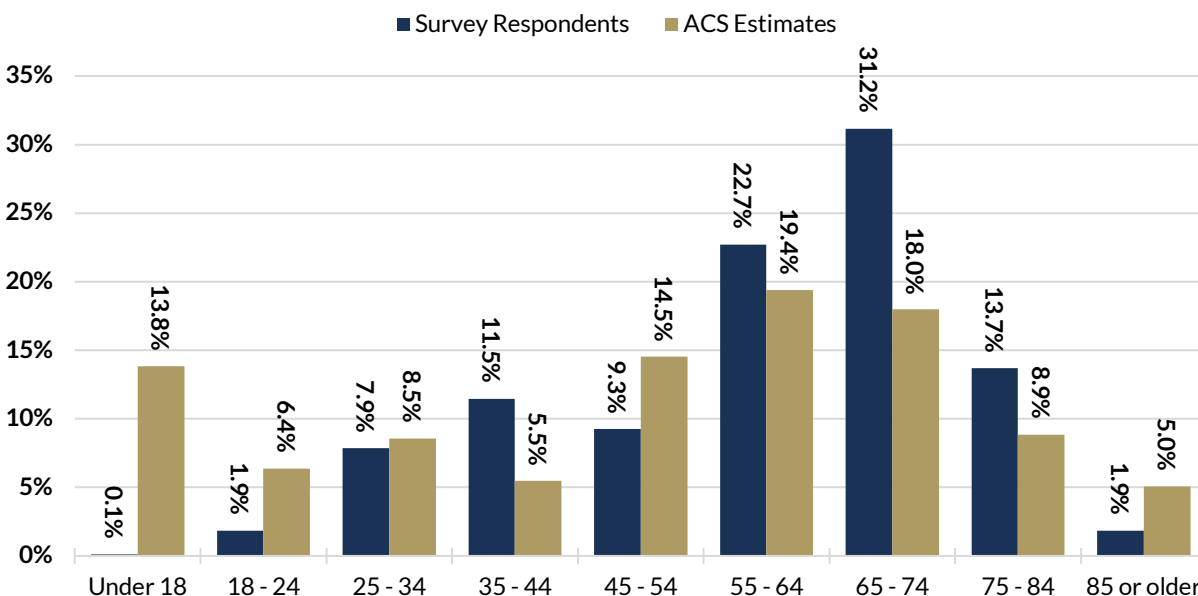
The purpose of the survey was to engage members of the Brewster community through an accessible outreach tool and to learn about the housing needs and challenges that exist in Town. The survey included questions about demographics, income, and affiliation with the Town of Brewster to help identify the priorities and interests of different groups. This survey does not constitute a decision-making or voting tool, but its results informed the needs, goals, and recommendations discussed and considered throughout the Housing Production Plan process.

Who took the survey?

Of 866 respondents who indicated whether they live in Brewster, the majority (69.6 percent) were year-round residents, 18.0 percent were seasonal residents, and 12.4 percent were non-residents.

Figure E2. Age Composition of Survey Respondents and Town Population

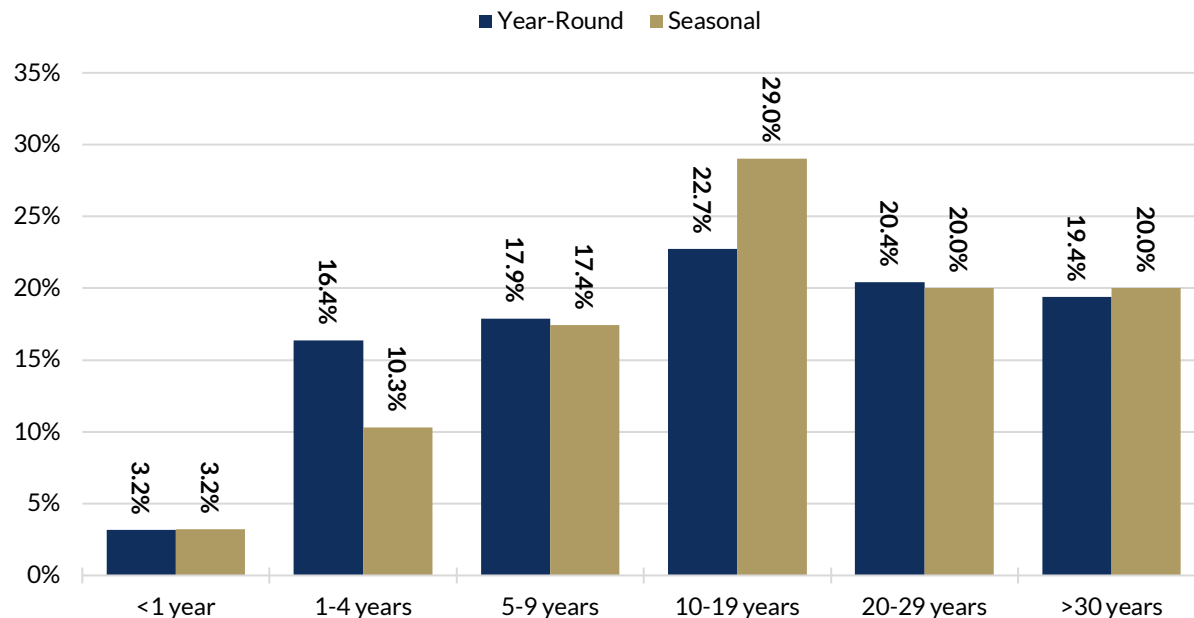
Source: ACS 5-Year Estimates. Table B01001



The best-represented age group was 65 to 74 years old, and 53.9 percent of respondents were between the ages of 55 and 74. About equal numbers of respondents were under 25 or over 85, and these groups made up less than 4.0 percent of survey-takers. Figure E2 shows the age distribution of respondents compared with the US Census Bureau's American Community Survey (ACS) Five-Year Estimates for 2016 to 2020.

Figure E3 shows the duration that resident respondents have lived in Brewster as a percent of each group of residents. Combined, the largest proportion of respondents (24.0%) have lived in Brewster for 10-19 years, followed by 20.3% for 20-29 years, 19.4% for more than 30 years, 17.8% for 5-9 years, 15.1% for 1-4 years, and 3.2% for less than a year.

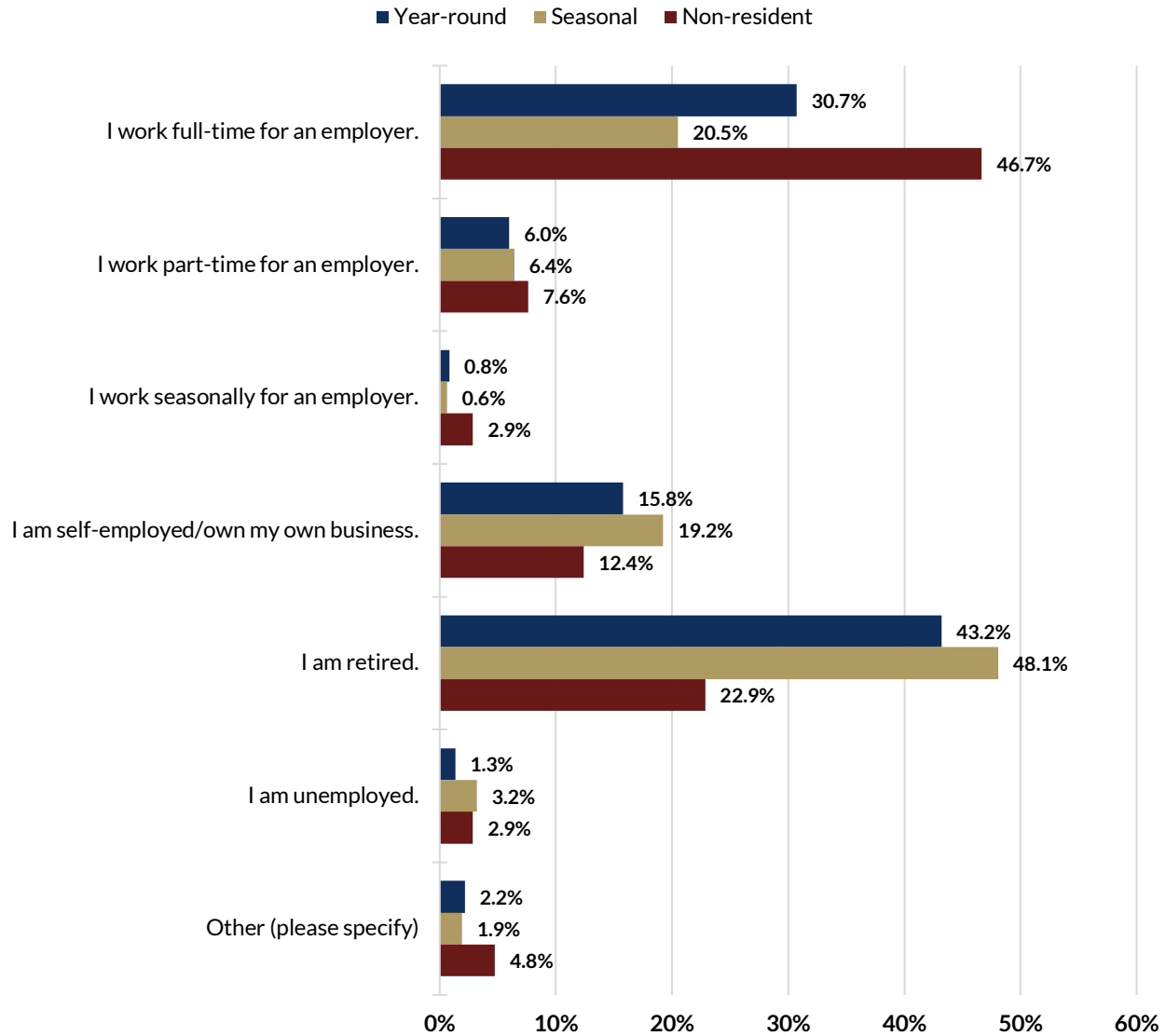
Figure E3. Duration of Residence in Brewster by Year-Round or Seasonal Status



Only one in five respondents indicated that they had one or more children in their home. More than half of respondents (56.1 percent) have at least one older adult (over 65) in their household. Forty-one respondents had roommates, and two had live-in aides. Between 108 and 134 respondents have members of their household with a disability (this range is because some respondents were unsure or selected “other” and specified health conditions). Of 134 respondents asked whether a member of their household receives supportive services due to disability, 36 (26.9 percent) said yes, and 12 were unsure or selected other. Nineteen respondents indicated their household had a need for supportive services that they were unable to afford or access (for other reasons).

Asked about their current employment status, most respondents indicated that they work, 41.6 percent are retired, and 1.9 percent are unemployed. Figure E4 illustrates respondents’ employment by residence status, which shows that year-round and seasonal resident respondents had similar employment statistics, but many fewer non-resident respondents were retired (45.0 percent work in Brewster or serve Brewster residents in a professional capacity).

Figure E4. Respondents' Employment Status by Residence Status



The survey captured responses from a population with a racial or ethnic composition that aligned closely with the 2020 Census. Survey takers were able to select as many or as few racial or ethnic categories as they wished, and the list of options matched Census categories.¹ The racial/ethnic breakdown of survey respondents was within 1 percent of the Town's population statistics for all categories except Hispanic or Latino, White or Caucasian, and Other. Table E1 compares the racial or

¹ Because survey takers were able to select multiple options, there were a total of 862 selections by 843 respondents. This is the reason that the "Survey Percent" column adds up to more than 100 percent. Because Hispanic or Latino origin is considered an ethnicity rather than race, the U.S. Census Bureau breaks down race into Hispanic or Latino status (note "any race" designation of Hispanic or Latino population), so the census totals equal 100 percent.

ethnic composition of the survey respondents with census data. Sixteen of the respondents who selected “other” expressed their unwillingness to answer or asked about the relevance of racial or ethnic demographics to the Housing Production Plan’s Community Survey. The purpose of the question was to help the team assess the effectiveness of outreach in engaging a cross-section of the members of the Brewster community and to evaluate if there is or could be a relationship between race or ethnicity and housing needs or perceptions of housing needs in Brewster.

Table E1. Demographic Comparison: Survey Respondents and 2020 US Decennial Census

Race or Ethnicity*	Survey		2020 Census		Comparison
	Number	Percent	Number	Percent	Survey % - Census %
American Indian or Alaska Native	2	0.2%	17	0.2%	0.1%
Asian or Asian American	13	1.5%	104	1.0%	0.5%
Black or African American	8	0.9%	161	1.6%	-0.6%
Hispanic or Latino (any race)	6	0.7%	306	3.0%	-2.3%
Native Hawaiian or Pacific Islander	1	0.1%	7	0.1%	0.1%
White or Caucasian	786	93.2%	9,363	90.7%	2.5%
Mixed race/more than one race	23	2.7%	314	3.0%	-0.3%
Other (please specify)	23	2.7%	46	0.5%	2.3%
Total	843	102.3%	10,318	100.0%	

Source: 2020 US Decennial Census. Survey total does not equal 100 percent because participants were able to select more than one option.

What did we hear about housing in Brewster today?

Survey takers were asked whether they rent or own their homes and about their mortgage status. More than four out of five respondents indicated that they own their homes, and Figure E4 illustrates the relatively even split between homeowners who did and did not have remaining mortgage obligations. This question provided a useful point of comparison versus ACS data and sought to clarify whether mentions of high housing costs are the result of mortgage payments, property taxes and utility costs, or a combination of these. According to ACS data, 38.1 percent of housing units in Brewster do not have a mortgage, and 39.4 percent of respondents paid off their mortgages, so responses were well-aligned with official estimates. The proportion of year-round renters among respondents (10.2 percent) was also close to estimates of the Town’s housing stock occupied by year-round renter households (8.2 percent).

Figure E5 shows the tenure of year-round and seasonal Brewster residents, and it provides both the number of responses (left) and proportions of each group of residents represented in each tenure category (right). This figure shows that the proportion of seasonal residents without a mortgage on their homes in Brewster is more than 20 percent higher than that of year-round residents. Residents who rent year-round in Brewster responded at a considerably higher rate than seasonal resident renters.

Figure E5. Resident Tenure by Residence Status

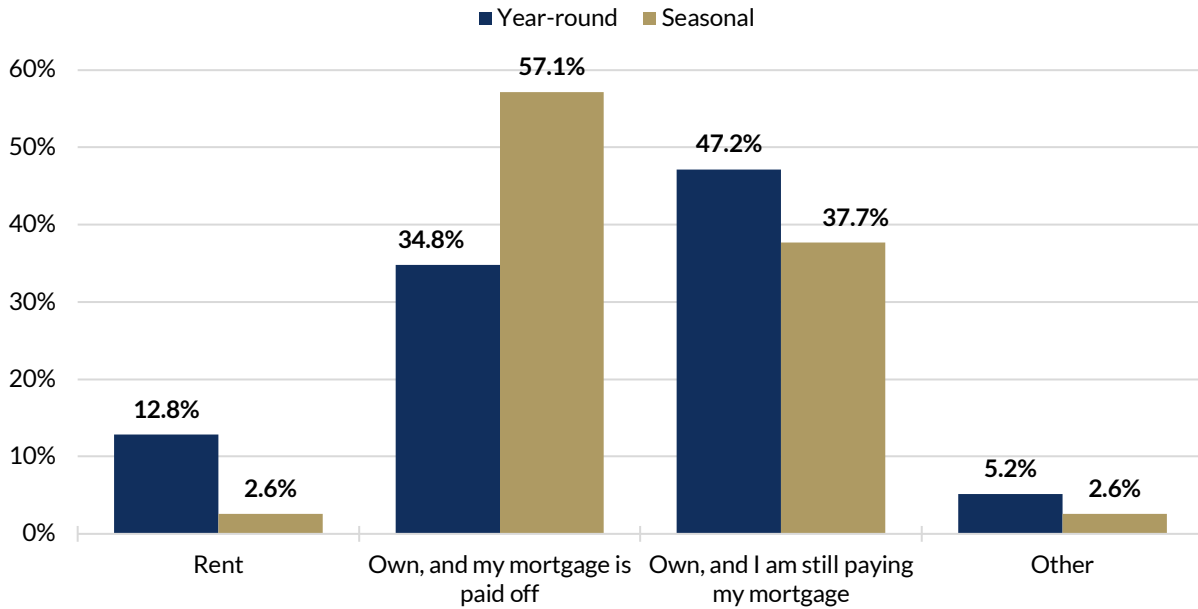


Table E2 shows the housing types of year-round and seasonal residents, and it shows that while most respondents (regardless of residence status) live in single-family homes, townhouses and condos are also particularly popular among seasonal residents.

Table E2. Respondents' Housing Type by Residence Status

Housing Type	Year-round		Seasonal	
	Number	Percent	Number	Percent
Single family (detached)	507	84.9%	119	76.3%
Townhouse or condo	35	5.9%	34	21.8%
Duplex/2-unit building	5	0.8%	0	0.0%
3-4-unit building	6	1.0%	0	0.0%
5+ unit building	26	4.4%	1	0.6%
Accessory dwelling unit (ADU)	4	0.7%	0	0.0%
Group home	1	0.2%	0	0.0%
Other - please specify	13	2.2%	2	1.3%
Total	597		156	

Thirty-eight respondents were residents of income-restricted housing units: 32 were year-round Brewster residents, and 6 were non-residents. Three respondents wrote-in answers to this question indicating their unmet needs for affordable units. More than 1 in 5 respondents (22.6 percent) indicated that their households suffered losses in income related to the COVID-19 pandemic, and about half of these respondents (10.2 percent) report that they have not yet financially recovered. Figure E6 shows how often respondents reported they had difficulties paying their housing costs in the past year. Among respondents, seasonal residents had the least difficulty paying housing costs (91.7 percent report “never”), while about a quarter of year-round residents and nearly half of non-residents had trouble one or more months.

Figure E6. Respondents’ Frequency of Difficulty Paying Housing Costs in the Past Year by Residence Status

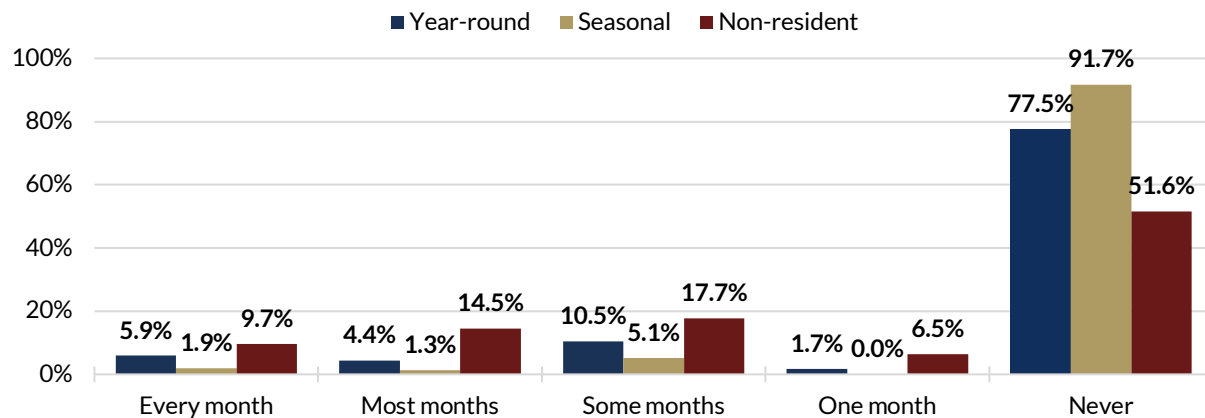
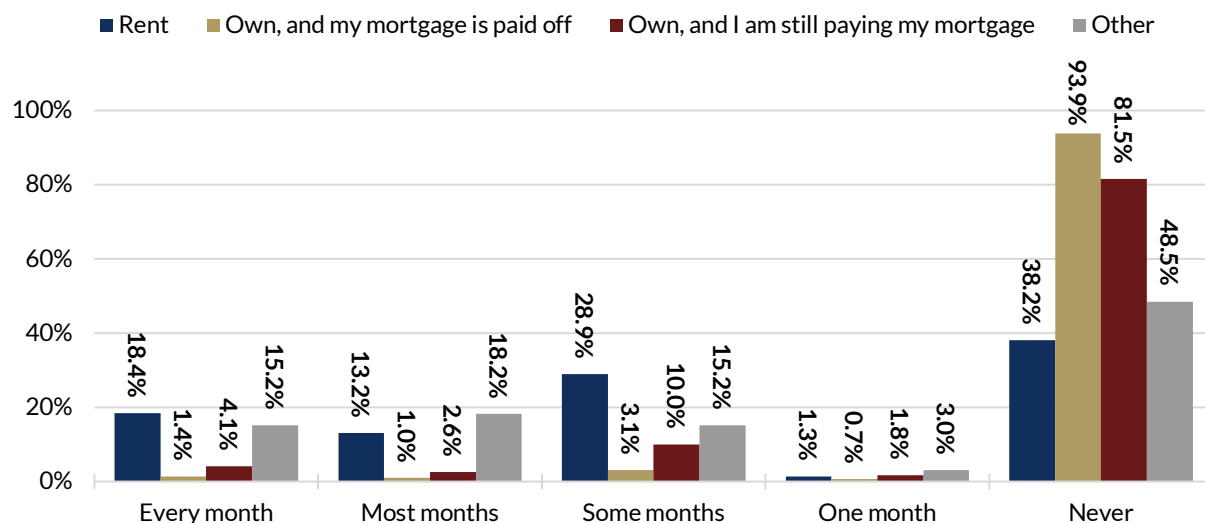


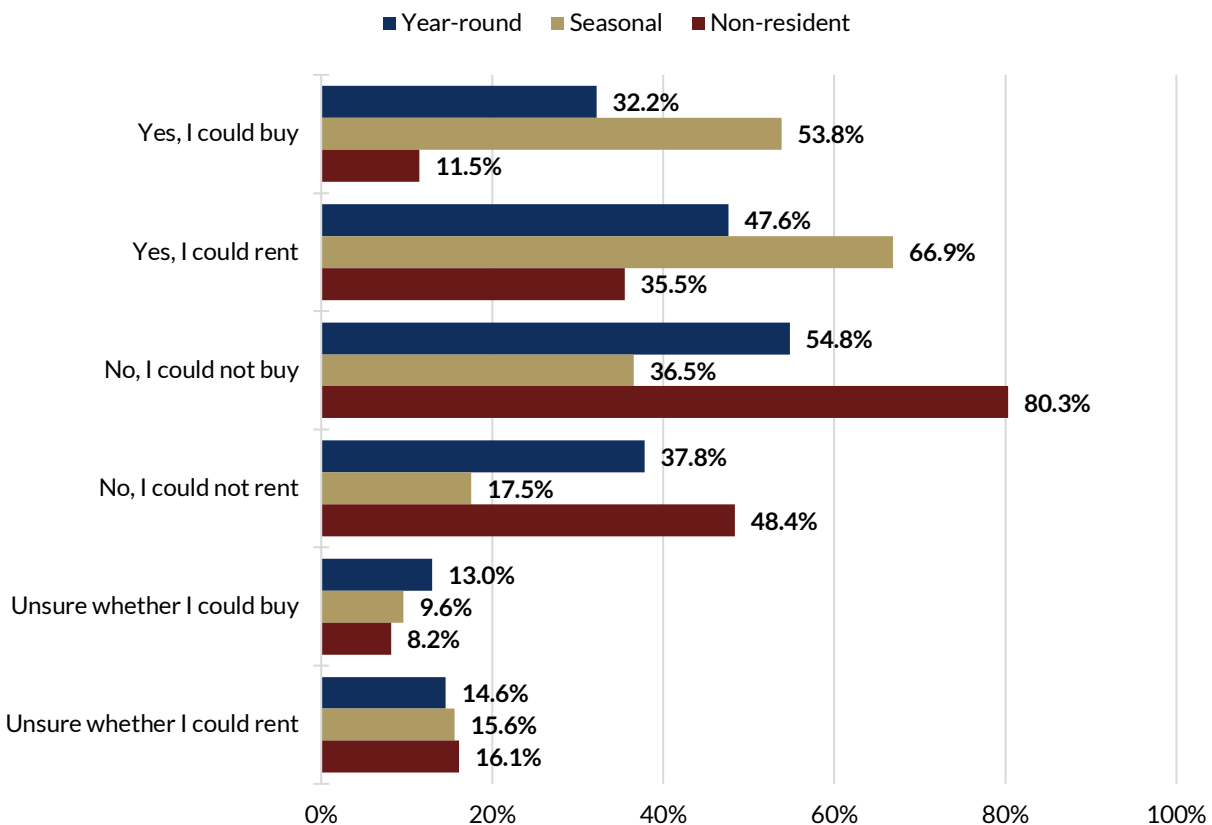
Figure E7 also shows how often respondents had difficulties paying their housing expenses, and it groups respondents by tenure type. Less than 40 percent of renter respondents indicated never having trouble paying their housing expenses, whereas 85.3 percent of homeowners reported no difficulty.

Figure E7. Respondents’ Frequency of Difficulty Paying Housing Costs in the Past Year by Tenure



The survey presented respondents with the median sales price for single-family homes in Brewster in 2021 as well as 2022 “fair market rents” (from the U.S. Department of Housing and Urban Development) for apartments with 1-4 bedrooms in Brewster’s area. We asked survey takers whether they would be able to afford to buy or rent at these prices today. Figure E8 shows the combined results of these questions for year-round, seasonal, and non- residents. Less than one third of year-round resident respondents said they could afford to buy today, and less than half said they could rent. More seasonal resident respondents reported being able to afford current prices, and considerably fewer non-resident respondents reported that they would be able to afford to move to Brewster today.

Figure E8. Respondents' Ability to Buy or Rent Homes in Brewster at Current Prices by Residence Status



What did we hear about the future?

More than 85 percent of resident survey takers reported that they are unlikely (either “not at all likely” or “slightly likely”) to move out of Brewster in the next five years, and more than 87 percent reported that it was very or moderately important to stay in Brewster as they age. If respondents indicated that they were somewhat likely to move, the survey asked about factors that will influence the decision. Of 110 respondents who received the question, 58 respondents (52.7 percent) cited high housing/living expenses. About a quarter of respondents wrote in their own answers, which was the

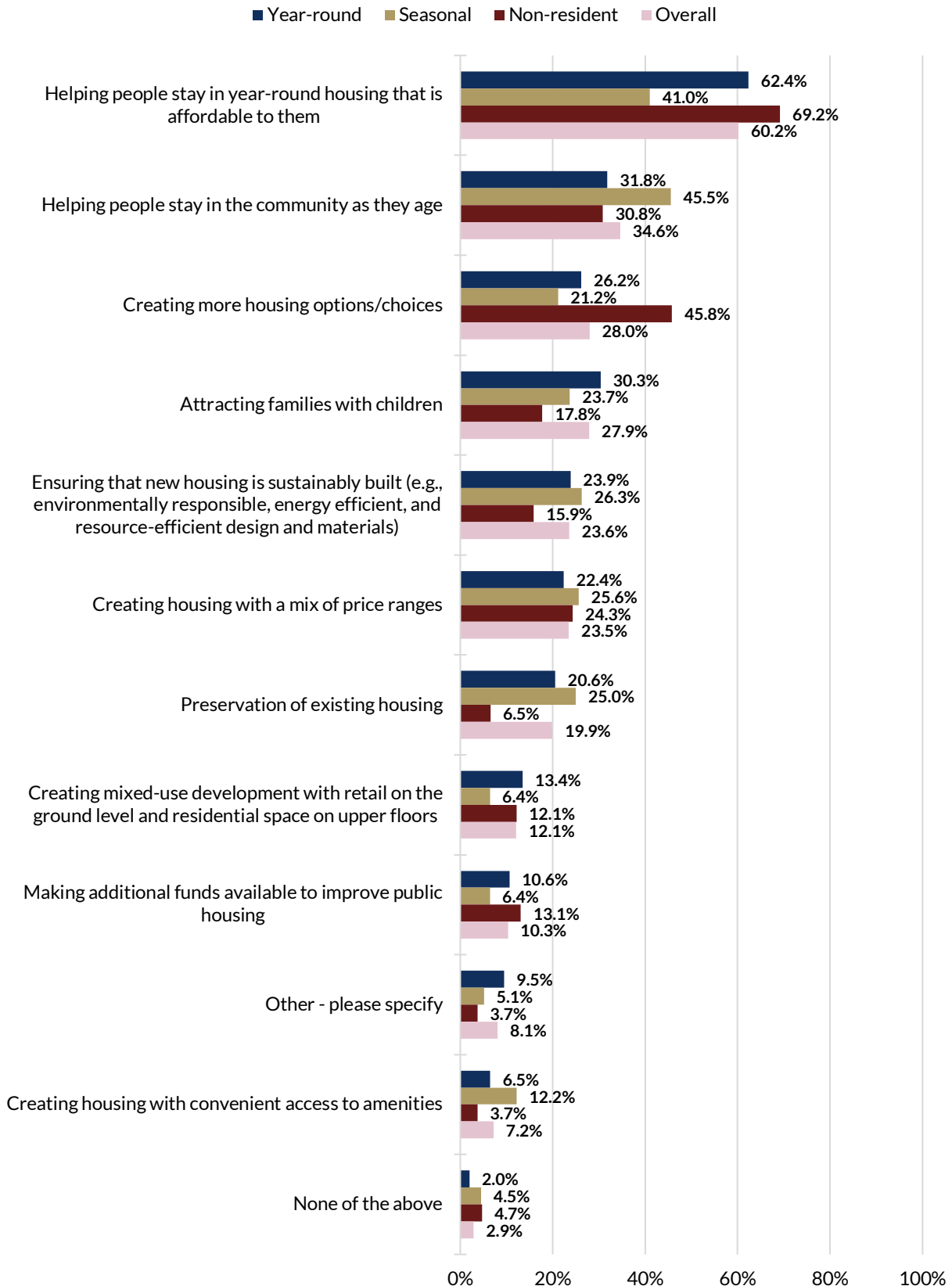
second most common selection. These responses varied considerably, but several suggested that changes in their housing or financial circumstances will render them unable to stay in Brewster. Similarly, for those who indicated it was important to them to age in Brewster (of whom there were 644), affordability of housing costs and expanded access to community services were each selected by 35.2 percent of respondents as factors that would need to change or improve to enable respondents to stay in the community. Nearly one quarter of respondents indicated that no changes or improvements would be necessary, but there was a statistically significant difference between responses from year-round and seasonal residents, with seasonal resident respondents citing no barriers to aging in Brewster at a rate more than 10 percent higher than that of year-round residents.

Ninety-two respondents indicated that they will or may be looking for rental housing in Brewster in the next five years: 36 indicated they would look for a 2-bedroom rental home, 24 for 3 bedrooms, 23 for 1 bedroom, and 4 each said they would need 4 bedrooms or studio units. Renter and non-resident respondents were also asked whether they would buy a home in Brewster in the next five years, and about half said that was not at all likely. Among non-resident respondents, 42.1 percent indicated that they are not considering moving to Brewster within the next five years (“yes” and “unsure” were separated by 3.7 percent). Of 127 respondents who indicated they were unlikely to buy a home in Brewster soon, 96 (75.6 percent) cited lack of available housing in their price range.

FUTURE PRIORITIES

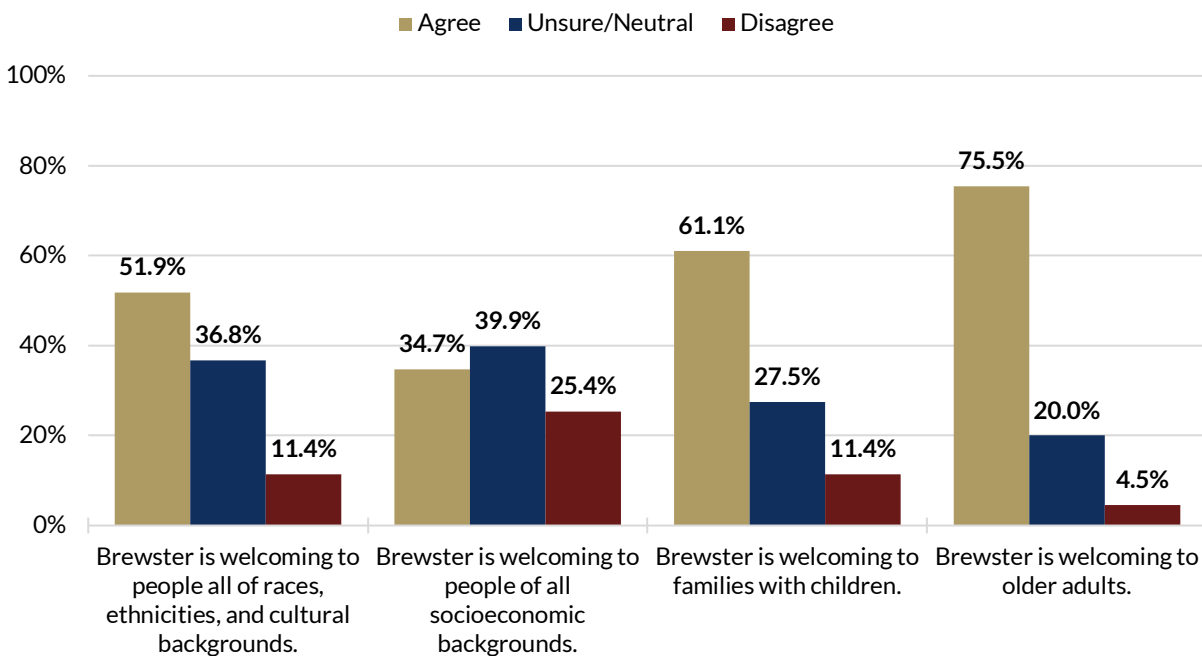
We asked respondents about housing initiatives that are important to them, and we asked them to select their top three priorities. The most popular selection (by a margin of 25 percent) was helping people stay in year-round housing that is affordable to them with support from 60.2 percent of respondents overall. This option was the top choice among year-round and non-residents, but the top choice among seasonal residents was helping people stay in the community as they age, which was second most popular overall. Figure E9 illustrates the percentages of respondents who selected each answer among year-round, seasonal, and non- residents as well as the combined total popularity of each response.

Figure E9. Top Housing Initiatives by Residence Status and Overall Popularity



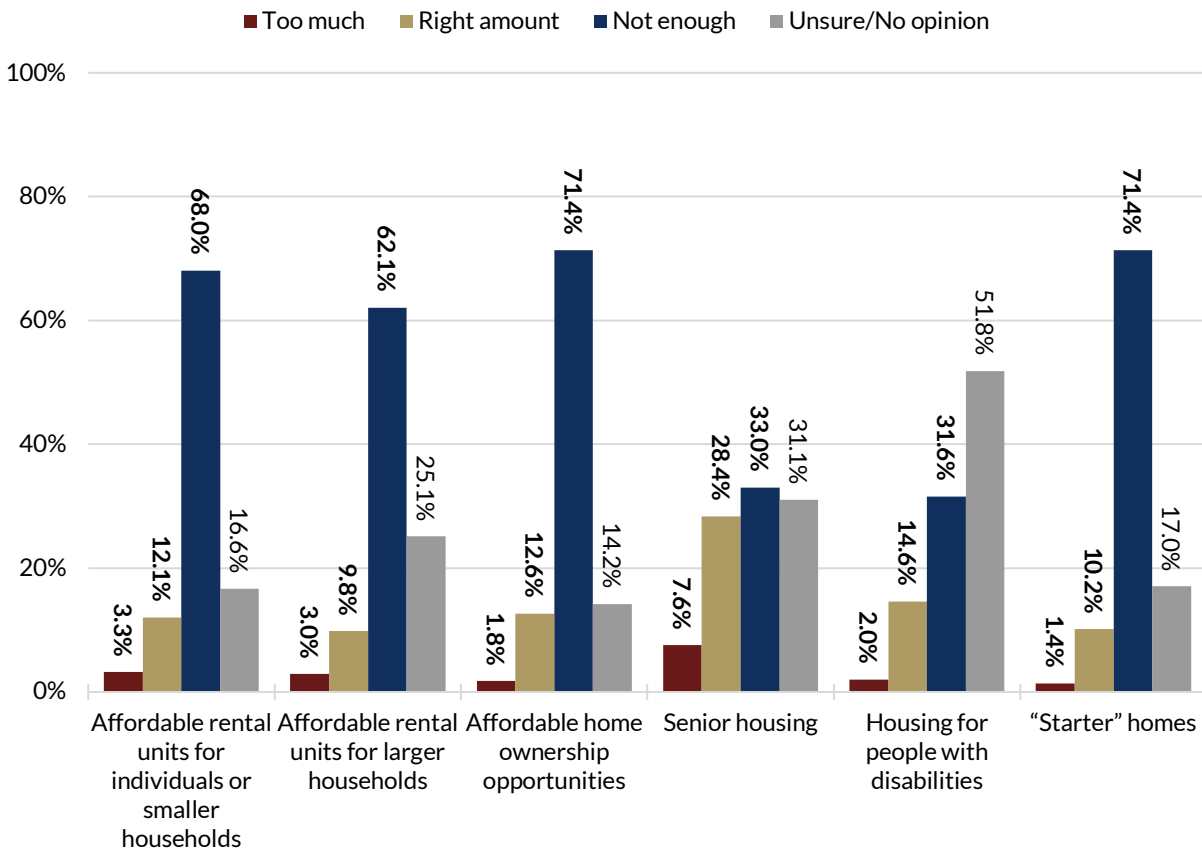
The survey asked respondents to respond to a series of statements about whether Brewster is welcoming to different populations: people of all races, ethnicities, and cultural backgrounds; people of all socioeconomic backgrounds; families with children; and older adults. Figure E10 shows the percentage of respondents who gave each answer. More than three-quarters of respondents agreed that Brewster is welcoming to older adults, but only about a third (34.7 percent) agreed that Brewster is welcome to people of all socioeconomic backgrounds. The largest difference in agreement between year-round, seasonal, and non- residents showed that while 72.4 percent of seasonal residents agree that Brewster is welcoming to families with children, 59.9 percent of year-round residents agreed, and only 50.5 percent of non-residents agreed.

Figure E10. Is Brewster Welcoming to Different Groups of People?



Respondents indicated how they felt about the quantity of homes in Brewster for households looking for homes that accommodate specialized housing needs. Figure E11 shows that at least 60 percent of respondents indicated that there were not enough affordable homes, regardless of whether they serve large or small households. There was even stronger response (71.4 percent) indicating that the number of affordable homeownership opportunities and “starter” homes in Brewster was not enough. There was some variation by residence status, but in general, year-round and non-resident populations indicated that there were not enough of each of the specialized housing type at rates between 9 percentage points (senior housing) and 33 percentage points (large affordable units) higher than those of seasonal residents.

Figure E11. Sufficiency of Specialized Housing Options



Survey respondents indicated how they felt about the number of housing units in Brewster of several housing types. Figure E11 shows that more than half of survey respondents think Brewster has the right amount of single family detached homes and not enough apartments. If respondents had opinions on the number of accessory dwelling units (ADUs), they tended to respond that there were not enough (only 14.6 percent said there were too many or the right amount). There was greater variability in answers about duplexes, condos, and assisted living facilities.

There was also considerable variation in the opinions of survey respondents about the composition of Brewster's housing mix between year-round, seasonal, and non-resident respondents. Using the same data as is presented in Figure E12, Figures E13-E18 shows the responses of year-round, seasonal, and non-residents for each housing type.

Figure E12. Opinion on Sufficiency of Housing Mix

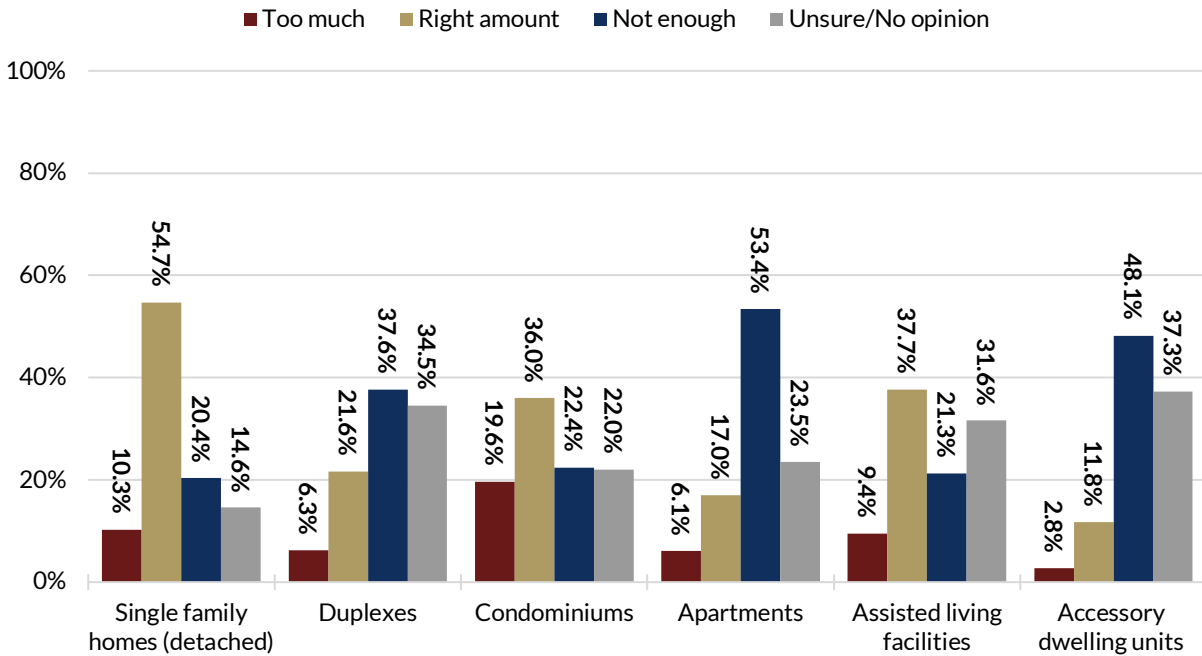


Figure E13. Opinion on Sufficiency of Single Family Homes According to Residency Status

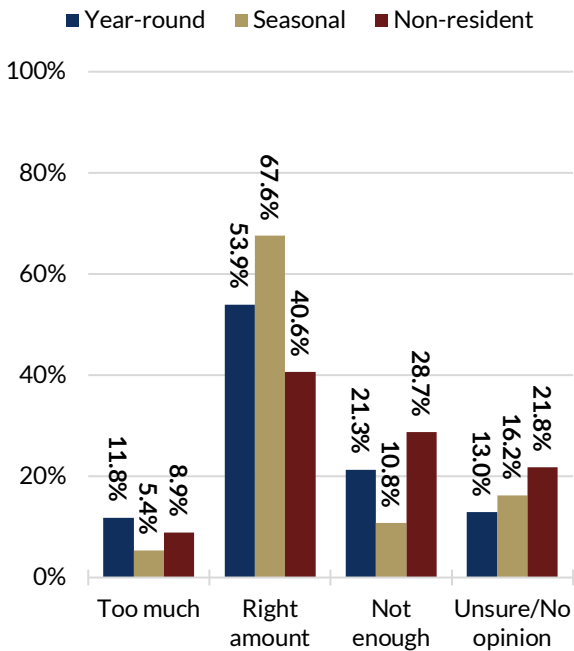


Figure E14. Opinion on Sufficiency of Duplexes According to Residency Status

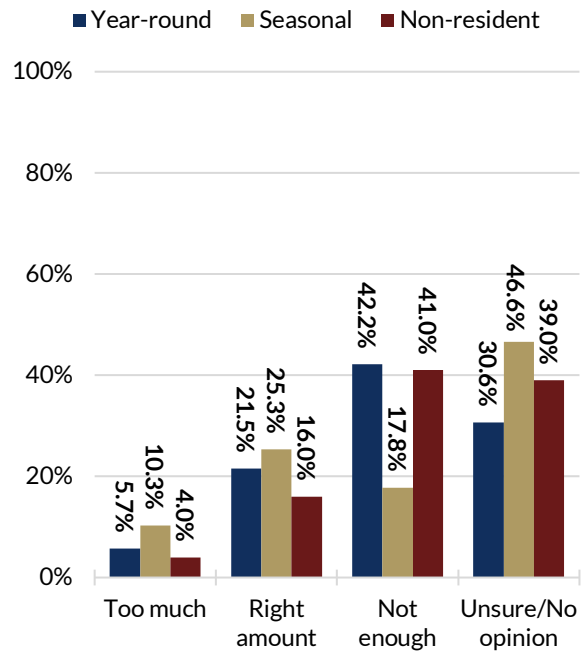


Figure E15. Opinion on Sufficiency of Condominiums According to Residency Status

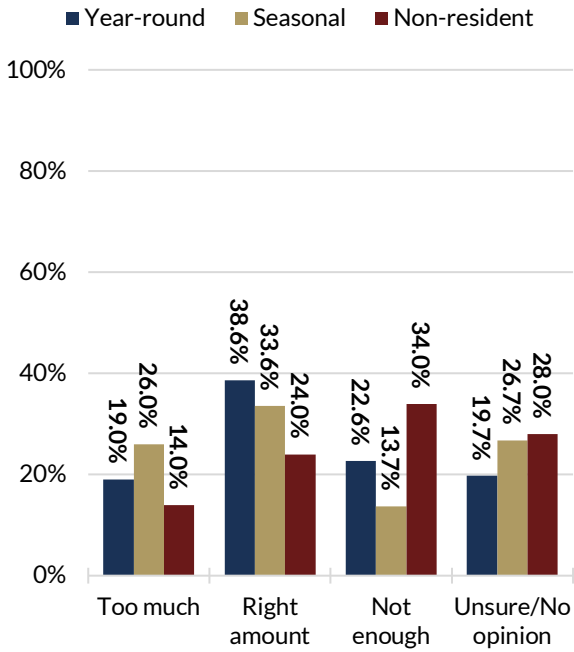


Figure E16. Opinion on Sufficiency of Apartments According to Residency Status

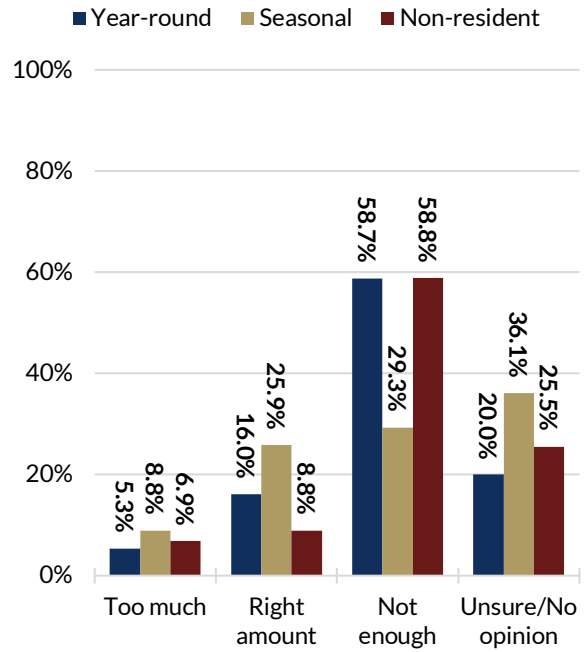


Figure E17. Opinion on Sufficiency of Assisted Living Facilities According to Residency Status

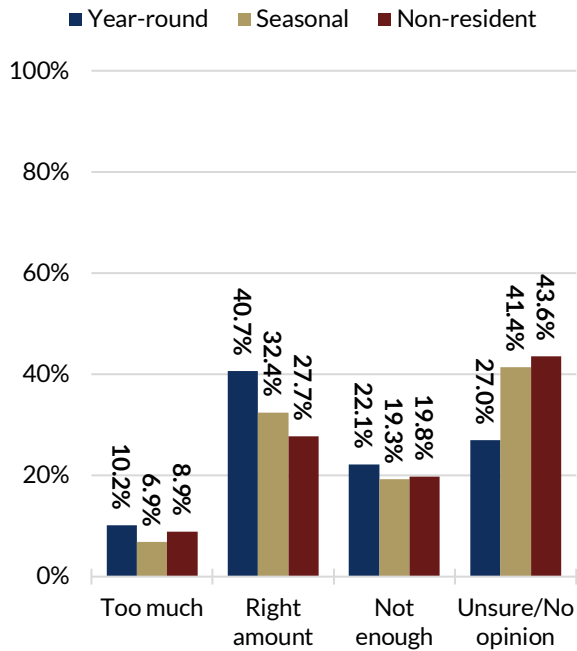


Figure E18. Opinion on Sufficiency of Accessory Dwelling Units (ADUs) According to Residency Status

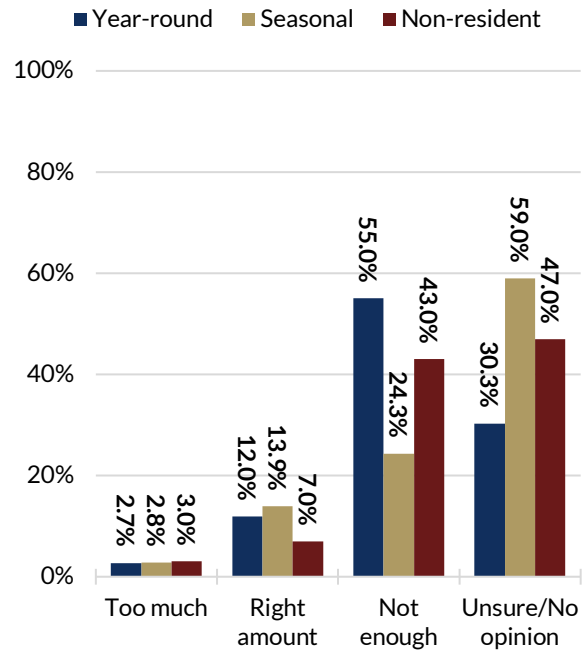


Figure E19 shows the most common words respondents used to describe the most significant barriers to affordable housing in Brewster. Prices and costs were the most popular responses, but other common themes included land availability, housing availability, the Town zoning bylaw and building restrictions, seasonal rentals, and low wages. A full record of open responses can be viewed upon request at the Brewster Housing Office.

Figure E19. Word Cloud of Barriers to Affordable Housing in Brewster



APPENDIX F

Glossary of Housing Terms

Affirmative Fair Housing Marketing Plan (AFHMP). A plan that meets the fair housing and non-discrimination requirements of the Department of Housing and Community Development (DHCD) for marketing affordable housing units. The plan typically provides for a lottery and outreach to populations protected under the federal Fair Housing Act of 1968, as amended. The plan must be designed to prevent housing discrimination on the basis of race, creed, color, national origin, sex, age, disability, familial status, sexual orientation, gender identity, or any other legally protected class under state or federal law.

Affordable Housing. As used in this report, "affordable housing" is synonymous with low- or moderate-income housing, i.e., housing available to households with income that does not exceed 80 percent of area median income and at a cost that does not exceed 30 percent of their monthly gross income.

Affordable Housing Restriction. A contract, mortgage agreement, deed restriction or other legal instrument, acceptable in form and substance to the Town, that effectively restricts occupancy of an affordable housing unit to a qualified purchaser or renter, and which provides for administration, monitoring, and enforcement of the restriction during the term of affordability. An affordable housing restriction runs with the land in perpetuity or for the maximum period allowed by law. It should be entered into and made enforceable under the provisions of G.L. c. 184, §§ 31-33 or other equivalent state law.

Affordable Housing Trust. The mechanism used to account for and report revenues and expenditures for affordable housing, including but not limited to Community Preservation Act (CPA) receipts and other affordable housing funding sources.

Area Median Income (AMI). The median family income, adjusted for household size, within a given metropolitan or non-metropolitan area, updated annually by HUD and used to determine eligibility for most housing assistance programs.

Average-Income Household. Loosely defined term for households with incomes over the maximum for affordable housing but typically outpriced by housing costs in affluent suburbs. An income between 81 and 120 percent of AMI generally encompasses average-income households.

Chapter 40A. G.L. c. 40A, the state Zoning Act. The current version of the Zoning Act was adopted in 1975 (1975 Mass. Acts 808).

Chapter 40B. G.L. c. 40B, § 20-23 (1969 Mass. Acts 774), the state law administered locally by the Board of Appeals to create affordable housing. It provides eligible developers with a unified permitting process that subsumes all permits normally issued by multiple town boards. Chapter 40B establishes a basic presumption at least 10 percent of the housing in each city and town should be affordable to low- or moderate-income households. In communities below the 10 percent statutory minimum, affordable housing developers aggrieved by a decision of the Board of Appeals can appeal to the state Housing Appeals Committee, which in turn has authority to uphold or reverse the Board's decision.

Chapter 44B. G.L. c. 44B (2000 Mass. Acts 267), the Community Preservation Act, allows communities to establish a Community Preservation Fund for open space, historic preservation, and community housing by imposing a surcharge of up to 3 percent on local property tax bills. The state provides matching funds (or a partial match) from the Community Preservation Trust Fund, generated from Registry of Deeds fees.

Community Housing. As defined under Chapter 44B, “community housing” includes housing affordable and available to (a) households with incomes at or below 80 percent AMI and (b) between 81 percent and 100 percent AMI.

Community Land Trust. Community land trusts are nonprofit, community-based organizations designed to ensure community stewardship of land. They are used primarily to ensure long-term housing affordability. To do so, the trust acquires land and maintains ownership of it permanently. With prospective homeowners, it enters into a long-term, renewable lease instead of a traditional sale. When the homeowner sells, the family earns only a portion of the increased property value. The remainder is kept by the trust, preserving the affordability for future low- to moderate-income families.

Community Preservation Act. Chapter 44B. G.L. c. 44B (2000 Mass. Acts 267) allows communities to establish a Community Preservation Fund for open space, historic preservation, and community housing by imposing a surcharge of up to 3 percent on local property tax bills. The state provides matching funds (or a partial match) from the Community Preservation Trust Fund, generated from Registry of Deeds fees.

Comprehensive Permit. The unified permit authorized by Chapter 40B for affordable housing development.

Department of Housing and Community Development (DHCD). The state's lead housing agency, originally known as the Department of Community Affairs (DCA). DHCD oversees state-funded public housing and administers rental assistance programs, the state allocation of CDBG and HOME funds, various state-funded affordable housing development programs, and the Community Services Block Grant (CSBG) Program. DHCD also oversees the administration of Chapter 40B.

Extremely Low-Income Household. A household income at or below 30 percent of AMI. (In some housing programs, a household with income at or below 30 percent of AMI is called very low income.)

Fair Housing Act (Federal). Established under Title VII of the 1968 Civil Rights Act, the federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), sexual orientation, gender identity, and disability.

Fair Housing Law, Massachusetts. G.L. c. 151B (1946), the state Fair Housing Act prohibits housing discrimination on the basis of race, color religious creed, national origin, sex, sexual orientation, age, children, ancestry, marital status, veteran history, public assistance reciprocity, or physical or mental disability.

Fair Market Rent (FMR). A mechanism used by HUD to control costs in the Section 8 rental assistance program. HUD sets FMRs annually for metropolitan and non-metropolitan housing market areas. The FMR is the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market. (See 24 CFR 888.)

Family. Under the Federal Fair Housing Act (FFHA), family includes any of the following:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
- (2) A group of persons residing together, and such group includes, but is not limited to:
 - (a) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - (b) An elderly family;
 - (c) A near-elderly family;
 - (d) A disabled family;
 - (e) A displaced family; and
 - (f) The remaining members of a tenant family.

Gross Rent. Gross rent is the sum of the rent paid to the owner ("contract rent") plus any utility costs incurred by the tenant. Utilities include electricity, gas, water and sewer, and trash removal services but not telephone service. If the owner pays for all utilities, then gross rent equals the rent paid to the owner.

Group Home. A type of congregate housing for people with disabilities; usually a single-family home.

Household. One or more people forming a single housekeeping unit and occupying the same housing unit. (See definition of Family)

Housing Appeals Committee (HAC). A five-member body that adjudicates disputes under Chapter 40B. Three members are appointed by the Director of DHCD, one of whom must be a DHCD employee. The governor appoints the other two members, one of whom must be a city councilor and the other, a selectman.

Housing Authority. Authorized under G.L. 121B, a public agency that develops and operates rental housing for extremely low-income and very-low-income households.

Housing Cost, Monthly. For homeowners, monthly housing cost is the sum of principal and interest payments, property taxes, and insurance, and where applicable, homeowners association or condominium fees. For renters, monthly housing cost includes rent and basic utilities (oil / gas, electricity).

HUD. See U.S. Department of Housing and Urban Development.

Inclusionary Zoning. A zoning ordinance or bylaw that encourages or requires developers to build affordable housing in their developments or provide a comparable public benefit, such as providing affordable units in other locations ("off-site units") or paying fees in lieu of units to an affordable housing trust fund.

Infill Development. Construction on vacant lots or underutilized land in established neighborhoods and commercial centers.

Labor Force. The civilian non-institutionalized population 16 years and over, either employed or looking for work.

Labor Force Participation Rate. The percentage of the civilian non-institutionalized population 16 years and over that is in the labor force.

Local Initiative Program (LIP). A program administered by DHCD that encourages communities to create Chapter 40B-eligible housing without a comprehensive permit, e.g., through inclusionary zoning, purchase price buydowns, a Chapter 40R overlay district, and so forth. LIP grew out of recommendations from the Special Commission Relative to the Implementation of Low- or Moderate-Income Housing Provisions in 1989. The Commission prepared a comprehensive assessment of Chapter 40B and recommended new, more flexible ways to create affordable housing without dependence on financial subsidies.

Low-Income Household. As used in the terminology of Chapter 40B and DHCD's Chapter 40B Regulations, low income means a household income at or below 50 percent of AMI. It includes the HUD household income group known as very low income.

Low or Moderate Income. As used in Chapter 40B, low or moderate income is a household that meets the income test of a state or federal housing subsidy program. Massachusetts follows the same standard as the rest of the nation, which is that “subsidized” or low- or moderate-income housing means housing for people with incomes at or below 80 percent of the applicable AMI.

Massachusetts Housing Partnership (MHP). A public non-profit affordable housing organization established by the legislature in 1985. MHP provides technical assistance to cities and towns, permanent financing for rental housing, and mortgage assistance for first-time homebuyers.

MassHousing. A quasi-public state agency that provides financing for affordable housing.

Mixed-Income Development. A residential development that includes market-rate and affordable housing.

Mixed-Use Development. A development with more than one use on a single lot. The uses may be contained within a single building ("vertical mixed use") or divided among two or more buildings ("horizontal mixed use").

Moderate-Income Household. As used in the terminology of Chapter 40B and DHCD’s Chapter 40B Regulations, moderate income means a household income between 51 and 80 percent of AMI. However, in some federal housing programs, a household with income between 51 and 80 percent of AMI is called low income.

Non-Family Household. A term the Census Bureau uses to describe households composed of single people living alone or multiple unrelated people sharing a housing unit.

Overlay District. A zoning district that covers all or portions of basic use districts and imposes additional (more restrictive) requirements or offers additional (less restrictive) opportunities for the use of land.

Regulatory Agreement. An affordable housing restriction, recorded with the Registry of Deeds or the Land Court, outlining the developer's responsibilities and rights

Section 8. A HUD-administered rental assistance program that subsidizes "mobile" certificates and vouchers to help very-low and low-income households pay for private housing. Tenants pay 30 percent (sometimes as high as 40 percent) of their income for rent and basic utilities, and the Section 8 subsidy pays the balance of the rent. Section 8 also can be used as a subsidy for eligible rental developments, known as Section 8 Project-Based Vouchers (PBV), which are not "mobile" because they are attached to specific units.

Single Room Occupancy (SRO). A building that includes single rooms for occupancy by individuals and usually includes common cooking and bathroom facilities shared by the occupants.

Subsidized Housing Inventory (SHI). A list of housing units that "count" toward a community's 10 percent statutory minimum under Chapter 40B.

SHI-Eligible Unit. A housing unit that DHCD finds eligible for the Subsidized Housing Inventory because its affordability is secured by a long-term use restriction and the unit is made available to low- or moderate-income households through an approved affirmative marketing plan.

Subsidy. Financial or other assistance to make housing affordable to low- or moderate-income people.

Sustainability. To create and maintain conditions under which people and nature can exist in productive harmony while fulfilling the social, economic and other requirements of present and future generations. For housing, sustainability requires an equity framework that includes affirmative measures to provide greater energy-efficiency and healthy housing, to connect housing to jobs, to improve access to affordable transportation, and to enhance educational opportunity.

Typical, Non-substandard Rental Units. A term that defines the types of rental units that HUD includes and excludes in establishing the FMR for each housing market area. The term excludes: public housing units, rental units built in the last two years, rental units with housing quality problems, seasonal rentals, and rental units on ten or more acres.

U.S. Department of Housing and Urban Development (HUD). The lead federal agency for financing affordable housing development and administering the Fair Housing Act.

Very Low Income. See Extremely Low Income.

Workforce. People who work or who are available for work, either in a defined geographic area or a specific industry.

Workforce Housing. There is no single industry standard that defines “workforce housing.” HUD defines it as housing affordable to households earning between 80 and 120 percent of AMI. The Urban Land Institute has traditionally used the term “workforce housing” to describe units affordable to households with incomes between 60 and 100 percent AMI. By contrast, MassHousing defines “workforce housing” as housing affordable to individuals and families with incomes of 61 percent to 120 percent of AMI. In general, workforce housing is housing for people who work in a community and the pricing methodology should account for wages paid by local employers.