



# TOWN OF BROOKLINE Housing Production Plan

Planning for Affordability and Fair Housing in Brookline, Massachusetts

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with clarifications added on November 12, 2024 to pages 44, 45, 67, 71, and 74  
as part of state review and approval process

*“Dreaming of home. Asleep on concrete.”*

*Community submission to the Six-Word Stories Project*

## Table of Contents

<b>1. Introduction.....</b>	<b>1</b>
Why a Housing Production Plan? .....	5
Community Engagement.....	6
Sources of Information.....	10
<b>2. Housing Needs Assessment .....</b>	<b>14</b>
Population and Household Trends.....	14
Households .....	19
Housing Characteristics and Trends.....	25
Recent Housing Development and Projects in Pipeline .....	28
Housing Affordability .....	30
Critical Housing Needs .....	34
<b>3. Challenges and Opportunities.....</b>	<b>44</b>
MUNICIPAL INFRASTRUCTURE CAPACITY .....	44
Land Use Regulations .....	45
Brookline’s Zoning and Affordable Housing Production: Issues and Opportunities.....	56
<b>4. Housing Goals .....</b>	<b>62</b>
<b>5. Housing Strategies.....</b>	<b>67</b>
Regulatory Strategies .....	67
Policy and Advocacy Strategies .....	70
<b>Appendix .....</b>	<b>72</b>

*“Brookline is outperforming Greater Boston in housing diversity  
but underperforming in affordability and production.”*

*Greater Boston Housing Report Card*

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# 1. Introduction

In March 2022, Brookline accomplished what seemed like an impossible feat six years earlier because the Town had surpassed the 10 percent statutory minimum under Chapter 40B – at least for a while. Since the last Housing Production Plan (2016), Brookline had added 656 Chapter 40B-eligible units to the Subsidized Housing Inventory (SHI), from 2,245 to 2,910 units.<sup>1</sup> By the time this plan was completed, Brookline was “unofficially” below 10 percent again – unofficially because even though state government had not issued an SHI update, Planning and Community Development staff knew where the Town stood, and a new Chapter 40B application was in the offing for 621 Hammond Street.

There is more to the story of affordable housing in Brookline than project approvals under Chapter 40B, the Commonwealth’s comprehensive permit law. It has taken years of work by local affordable housing supporters and Town boards, commissions, and departments to create and protect the affordable housing that currently exists in Brookline.

- The Brookline Housing Advisory Board (HAB) is an appointed body that advises the Select Board, Planning Board, Town Meeting, and others on policy, investments, and regulatory matters affecting affordable housing. The HAB has played an instrumental role in providing financial support for affordable housing developments in Brookline and contributed significantly to the development of this Housing Plan.
- Brookline was among the first communities in Massachusetts to institute inclusionary zoning. The Town requires developers to provide affordable housing in any proposed development of four or more units.<sup>2</sup>
- The well-respected Brookline Housing Authority (BHA) has aggressively sought modernization funds to improve its federal public housing. In August 2023, the BHA had eight capital improvement projects under construction.<sup>3</sup>

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<sup>1</sup> Based on the Subsidized Housing Inventory last updated March 1, 2022.

<sup>2</sup> The inclusionary zoning bylaw (Sec. 4.08, Affordable Housing Requirements).

<sup>3</sup> Brookline Housing Authority, <https://www.brooklinehousing.org/modernization.aspx>. Projects are on four properties: High St. Veterans, Harris Street, Kickham, 22 High Street, and Kent Street.



- The Planning Board actively participates in many planning projects and makes recommendations to the Board of Appeals on all kinds of development applications, usually focusing on design.
- The Department of Planning and Community Development (DPCD) drafts zoning changes for the consideration of Town Meeting, manages the Affordable Housing Trust Fund, enforces affordable housing restrictions, and manages the Town's development permitting systems and helps volunteer boards and commissions accomplish all that they do, always while juggling multiple demands.
- There is broad support for affordable housing in Brookline, with numerous community-based advocates and supporters of affordable housing<sup>4</sup>. They have provided vocal support for this Housing Plan and assisted with organizing interviews, gathering information, and reaching out to people with affordable housing needs and challenges and added to the discussion of the issues around affordable housing that are obstacles to the Town achieving its goals.

The Town board with the hardest job in affordable housing and the heaviest workload is the Zoning Board of Appeals (ZBA). When the last housing plan was completed, the ZBA had four comprehensive permit hearings underway at the same time and the Town anticipated three more applications before the end of the year. In fact, many more would arrive before the Town finally reached 10 percent. Since 2016, the ZBA has handled over twenty comprehensive permit applications (Table 1.1) in addition to scores of special permits and variances. The ZBA's comprehensive permit approvals have played a critical role in helping Brookline gain more control over the location, scale, and type of developments that can provide affordable housing in the future.

Table 1.1 also shows that if all the approved projects had proceeded, over 1,200 new units would have been added to the SHI – almost twice the increase that happened over the past six years. Abutter appeals have blocked some projects, but that is not the only cause of the delays. Only one case led to an aggrieved developer's appeal. In other instances, developers have had to revise their plans in order to go forward with construction, or projects are on hold because of higher interest rates impacting the financial feasibility of projects.

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<sup>4</sup>A few of the organizations and groups whose members actively participated in this work, whether or not their organization expressly supports affordable housing, include the Brookline Community Development Corporation (formerly the Brookline Improvement Corporation), Brookline for Everyone, Building a Better Brookline, Brookline by Design, the Greater Boston Interfaith Organization (GBIO), and many others.



**Table 1.1. Brookline's Chapter 40B History, 2016-Present<sup>5</sup>**

Project	Developer	Total Units	Affordable Units	Status 1/24	Built?	Age Restricted	Approval Date	Notes
<b>384 Harvard</b>	JCHE (non-profit)	62	62	Approved	Yes	Yes	2017	
<b>21 Crown</b>	21 Crown LLC (The Basile Group)	8	2	Approved	Yes	No	2016; 2021	
<b>455 Harvard Street</b>	Harvard Danesh, LLC	17	5	Approved	Yes	No	2017	
<b>JFK Crossing/420 Harvard</b>	420 Harvard Associates LLC	25	7	Approved	Yes	No	2017	
<b>45 Marion Street</b>	M. H. Danesh LLC	64	16	Approved	Yes	No	2014	
<b>108 Centre Street</b>	Hebrew Senior Life, Inc. (non-profit)	54	54	Approved	U/C	Yes	2021	
<b>Residences of South Brookline</b>	Chestnut Hill Realty	175	44	Approved	Yes	No	2015; 2019	Amended
<b>Babcock Place</b>	Babcock Place, LLC	45	12	Approved	Yes	No	2018	Amended
<b>1180 Boylston</b>	Chestnut Hill Investments LLC	50	13	Approved	U/C	Yes	2017	Amended
<b>Puddingstone</b>	Chestnut Hill Realty	250	63	Approved	U/C	No	2018	Amended
<b>217 Kent Street</b>	New Kent Street LLC	100	25	Approved	No	No	2022	
<b>209 Harvard</b>	209 Harvard Development LLC	44	11	Approved	No	No	2021	
<b>83 Longwood</b>	83 Longwood Avenue, LLC	64	13	Approved	No	No	2022	
<b>32 Marion (Col. Floyd Apts.)</b>	BHA (public) (60 existing; 55 being added)	55	55	Approved	U/C	Yes	2021	
<b>45 Bartlett Crescent</b>	686 Lewis Hill, LLC	24	6	Approved	U/C	No	2022	
<b>445 Harvard Street/JFK Place</b>	445 Harvard, LLC	25	7	Approved	No	None	2022	Appealed; Settled
<b>500 Harvard Street</b>	500 Harvard Street, LLC	24	6	Approved	No	None	2021; 2022	HAC Appeal

<sup>5</sup> Based on Brookline Department of Planning and Community Development, "Chapter 40B Status" web page, current as of February 21, 2024.

Project	Developer	Total Units	Affordable Units	Status 1/24	Built?	Age Restricted	Approval Date	Notes
<b>40 Centre Street</b>	Roth Family LCC	40	10	Approved	U/C	None	2017; 2022	Appealed; Settled
<b>1299 Beacon Street</b>	Chestnut Hill Investments LLC	55	14	Approved	No	None	2019	Appealed; Settled
<b>845 Boylston Street</b>	Nine John Street LLC	40	10	Approved	No	None	2023	Appealed
<b>Subtotals</b>		1,221	435		No			

## Notes:

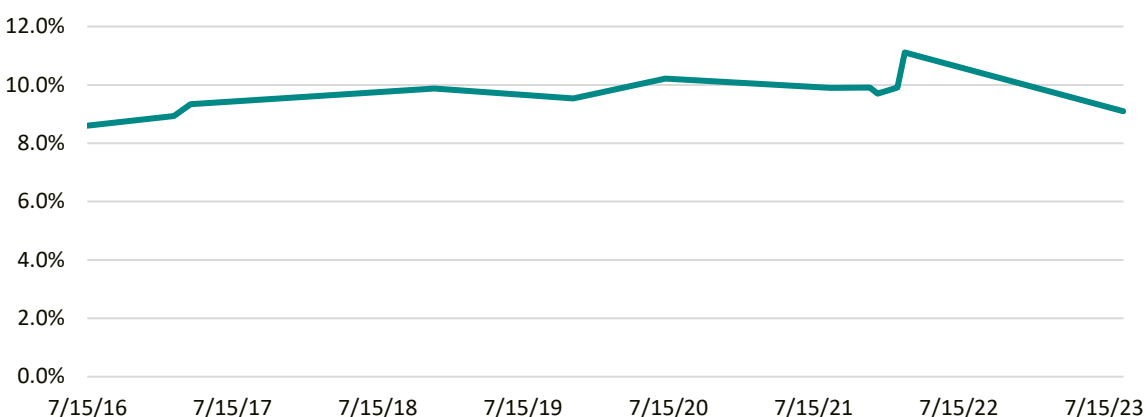
The ZBA received two additional applications from Chestnut Hill Realty, Hampton Court (123 units) and The Coolidge (299 units), but the application process is on hold at the proponent's request.

As of August 2023, a new request for Chapter 40B Project Eligibility has been filed with Massachusetts Housing Partnership for 96 units at 621 Hammond Street.

Each time the ZBA granted a comprehensive permit, the approved units became eligible for the SHI. The Town moved promptly to have the units added by the agency that maintains the list, the Massachusetts Executive Office of Housing and Livable Communities (HLC). However, project changes can happen between the comprehensive permit approval and construction, and the effects of this can be seen in Table 1.1. Sometimes applicants wanted to make changes to their approved plans and to do so, they had to file for a permit modification; that also took more time. In addition, some projects needed both local and state subsidy, which is highly competitive and can lead to delayed production. Regardless of the cause of a delay, when projects failed to obtain building permits within twelve months or obtained a certificate of occupancy within 18 months of the issuance of building permits, HLC removes the units from the SHI because that is how the state's Chapter 40B regulations work. Accordingly, the SHI continues to fluctuate, as shown in Fig. 1.1.

**Fig. 1.1. Implementing the 2016 Housing Production Plan  
2016-2023**

(Sources: Town of Brookline, EOHLC)



## WHY A HOUSING PRODUCTION PLAN?

Despite Brookline's accomplishments, the Town has many people living in homes or apartments they cannot afford, and many people wanting to live in Brookline who cannot find a place they can afford. The percentage of unaffordably housed residents continues to grow. The gap between market-rate housing and the prices that middle-income households can afford is wider today than it was in 2016. For low- or moderate-income residents, affordable housing comes only by chance, rarely by choice.

Brookline is a prestigious, distinctive, and very desirable town close to Boston and Cambridge, with excellent public schools, great services, walkable urban villages, private estates, and open space. People want to live there, and they will spend as much as they possibly can to find a home or an apartment within reach. For families, the local schools appear to be a significant factor in relocation to Brookline. The imbalance between regional housing demand and the available supply has contributed to a much higher price of entry. The continued erosion of housing affordability threatens the attainment of the most basic Comprehensive Plan goals, notably maintaining the town's commitment to population diversity.



Brookline and many of the towns around it are both beneficiaries and victims of the enormous employment growth that has occurred in Boston, Cambridge, and regional employment centers along Route 128/95. MetroBoston's high tech, life sciences, and professional services industries, world-renowned universities, and cultural institutions have brought significant wealth to the region and created demands for housing met by city centers and suburban neighborhoods, including neighborhoods in Brookline. As a result, some economic inequities exist in which the sheer size of the Boston/Cambridge employment base not only concentrates commercial development in these cities, but also tax revenue. Meanwhile, the demand for housing in adjacent suburbs – Brookline, Milton, Arlington, and others – is challenging for them to absorb, often leading to tensions about the cost of growth and change, and skyrocketing housing prices.

Brookline's expensive land and building costs present significant challenges to creating affordably priced housing. While the Town has a significant amount of land that is currently zoned for multifamily housing and an abundant multifamily housing stock, there are few remaining undeveloped sites to accommodate new mixed-income housing. For the developable land that remains, existing zoning often does not provide enough incentive to encourage housing production. As a result, several developers have pursued Chapter 40B comprehensive permits in order to bypass town requirements, take advantage of Brookline's strong housing market, and create enough units to withstand lengthy appeals and still have a financeable project. The proposals of some Chapter 40B developers greatly exceed what is allowable under zoning. As a result, in some cases residents have responded with concern, notably with respect to a large redevelopment of Hancock Village (Residences of South Brookline and Puddingstone) and as well as mixed-income units within a half-mile circle between Coolidge Corner and the JFK area.

## COMMUNITY ENGAGEMENT

From the outset, the Housing Plan Working Group directed the consultants to find effective ways to engage residents who are often not seen or heard from in major public policy conversations in Brookline but who would likely have a stake in the Housing Plan's recommendations. Developing Brookline's housing plan involved several opportunities for community members to contribute their ideas, share their concerns about housing growth and housing affordability, identify housing needs, and consider options for accommodating additional housing in a variety of neighborhood settings. A community engagement plan was developed early in the project schedule, outlining the modes of participation that would be available at various points during the planning process. Additional effort was built into the engagement plan to consult with groups such as Housing Authority tenants, people with Limited English Proficiency (LEP), people with disabilities, and others. Members of the public have served as important resources, and engagement activities have informed the content of this plan. The section that follows summarizes the components of community engagement that occurred throughout the planning process.

- **Meetings with the Housing Plan Working Group**, which included representatives from the Housing Advisory Board (HAB), Planning Board, Advisory Committee, and Brookline Department of Planning and Community Development.





- **Interviews and focus groups with stakeholders, advocates, advisors, community organizations, and local officials.** These efforts yielded input from 113 unique participants.
- **Three virtual community forums.** Attendees could participate aloud, via public chat, and through Zoom polling. Registration for the three meetings totaled more than 600 participants. Interpreters were available to speakers of Spanish, Russian, Mandarin, and Cantonese.
- **An online community survey.** Language Connections translated the survey so it could be offered in four languages. Intended to serve as a quick and easy asynchronous engagement activity, the survey attracted 831 participants.
- **Six-Word Stories** that capture a brief snapshot of participants' vision, ideas, or needs in a concise (and sometimes very powerful) format. These stories could be submitted at any of the Brookline Public Library branches, at Town Hall, or via email.
- **Meetings-in-a-Box**, with materials available to interested members of the public to host in their own homes or meeting places. These small get-togethers (sometimes called "kitchen conversations") help to reach people who may not have access to or be comfortable participating in larger public gatherings. A member of the Greater Boston Interfaith Organization (GBIO) organized a meeting-in-a-box and provided detailed input from eight participants.
- **Members of the consulting team and Town staff organized a participation activity for Brookline Day 2022**, encouraging residents to brainstorm ideas for potentially developing housing on Town-owned property.

## INTERVIEWS AND FOCUS GROUPS

From October 2021 through January 2022, Barrett Planning Group and Community Circle conducted two phases of interviews and outreach. The first phase, "reconnaissance," starting with a contact list provided by DPCD staff. These interviews helped to introduce the consultants to Brookline's current housing conditions and issues, and the individuals and organizations with specific interests in this plan. The contacts list grew at the conclusion of every interview when the team asked participants for referrals to other members of the community. Most of these small-group interviews had between two and five participants, although the interviews for organized groups such as Brookline by Design, Brookline for Everyone, and Building a Better Brookline attracted as many as ten participants. In the second phase of "deeper dive" interviews, the team's outreach was more targeted to people with close association to affordable housing, including tenants of the Brookline Housing Authority, elderly or disabled residents, housing and social service providers, members of faith organizations, other industry professionals, and students from Brookline High School's Environmental Justice Club. With the help of interpreters from Language Connections, this phase also included interviews conducted in languages other than English.



### **FIRST COMMUNITY FORUM: HOUSING REVIEW AND FUTURE HOUSING NEEDS**

Conducted on January 26, 2022, the First Community Forum started with a presentation from Barrett Planning Group that introduced what an HPP is and its relationship to state regulations concerning affordable housing. The meeting took place on Zoom with more than 290 registrants, and Brookline Interactive Group (BIG) also broadcast the meeting on local television.

Since this Plan represents an update to Brookline's 2016 HPP, the team highlighted progress toward its goals, including several regulatory updates, permitting for nearly one thousand units eligible for the Subsidized Housing Inventory (SHI), allocation of Town resources toward meeting affordable housing needs, extended affordability for more than seven-hundred units, and ongoing initiatives related to multi-family and affordable housing. Highlighting some of the other related changes in Brookline since 2016, including demographics, income and wealth, and dramatic increases to the cost of housing in Brookline, the team presented key findings from the community outreach process to date, which focused on housing needs and barriers identified through interviews and small-group discussions. Afterward, the team invited the audience to answer five discussion questions in the chat, which generated a lively, productive, and positive discussion. Some community members also shared some of the challenges and barriers they've faced related to affordable or public housing and suggested some solutions as well.

### **SECOND COMMUNITY FORUM: DEVELOPING COMMON VALUES AND GOALS FOR FUTURE HOUSING**

On February 23, 2022, the Second Community Forum began with a presentation from Barrett Planning Group that included a quick review of the HPP process and its purpose, a progress update on community participation and some of the key takeaways from the first community meeting, and an initial report on the results of the online community survey.

In the second segment of the meeting, Dodson & Flinker explained location-based testing. The 2016 HPP included site-suitability analyses, which included identifying opportunity nodes and corridors. Dodson & Flinker's work expanded on these areas to show recent development in Brookline along activity nodes and corridors, including layouts and potential benefits and tradeoffs, to understand community design and scale preferences. Then, the team illustrated development possibilities on test sites existing zoning. Using Zoom polls, attendees indicated which design and scale examples they believe to be most appropriate for the different test sites and their neighborhoods. The meeting concluded with a verbal and chat discussion about design suitability, scale, and contextual fit. There were more than 120 Zoom registrations, and the meeting was also available to BIG viewers.

### **THIRD COMMUNITY FORUM: IDENTIFYING OPPORTUNITIES FOR AFFORDABLE HOUSING DEVELOPMENT**

Conducted on Zoom on June 27, 2022, the Third Community Forum discussed the why, where, and how of affordable housing production goals in Brookline. Recapping some of the major barriers and points of contention raised throughout this process, Barrett Planning Group explored the affordability levels of Brookline's "affordable" housing stock. Through this discussion, the team asked attendees to consider what their objectives are for Brookline housing and how to meet those goals. Dodson & Flinker then presented current and possible build-out scenarios for location-based testing sites with varying densities



and configurations. In breakout groups, attendees participated in facilitated discussions about the projections they liked or didn't like, as well as the reasoning driving those opinions. The meeting had over 190 registrants, and it was also broadcast live on BIG. The results of the discussions in the large- and small-group components of the meeting largely form the basis for the analysis and recommendations in Sections 3 and 5 of this Housing Plan.

## COMMUNITY SURVEY

Between January 31 and February 18, 2022, the consulting team invited members of the Brookline community to participate in an online survey. The survey was not designed or intended to be "scientific." In community planning, surveys are typically used as a vehicle for public participation, giving people who may not have time or the desire to speak publicly a chance to express their views. It was in that spirit that Brookline's housing needs survey was designed and administered.

The survey was based on the 2016 HPP survey for easy "apples to apples" comparison, but it also included new elements. Language Connections translated the survey into Spanish, Russian, and Chinese (Simplified). In total, the survey attracted 831 respondents.<sup>6</sup> The survey results showed that between 2016 and 2022, Brookline residents indicated very little change in their thoughts on the most important characteristics of an "ideal community" and on priority housing initiatives. Respondents said that an ideal community is where they feel safe and have access to parks, retail and services, and public transit, and enjoy quality public schools. Respondents prioritized preservation of existing homes, more housing options for low- to moderate-income residents and a mix of housing types and prices, and helping members of the community age in place.

New questions asked what resources make a location suitable for affordable housing and where respondents would locate affordable housing development. While walkability was overwhelmingly the most popular among the possible characteristics with the top four responses being walkability to transit, parks, schools, and commercial centers, when it came to locations, there was less consensus. Respondents wrote in many answers, but the most common themes were "everywhere," "access to transit," and "South Brookline" (many who indicated South Brookline noted that extending transit would be necessary for success). Overall, the survey helped the consulting team to understand what the community wants, values, and hopes to see in the future.

## SIX-WORD STORIES

April is National Fair Housing month, and to celebrate the 54<sup>th</sup> anniversary of the passage of the Fair Housing Act (Civil Rights Act of 1968), Community Circle asked Brookline residents to share their housing vision, experience, or challenges in Six-Word Stories. These stories can be powerful and expressive, and they aim to get to the heart of a narrative or storyline. To promote participation, the consulting team set up stations in all three of Brookline's public library branches and also accepted them at Town Hall and via email. The project received 66 submissions from individuals, and while each story was unique, two themes

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<sup>6</sup> For comparison, the Housing Production Plan survey in 2016 received 601.



stood out in particular: Brookline housing is unaffordable, and many residents truly love their community. Excerpts from their stories appear throughout this document.

## SOURCES OF INFORMATION

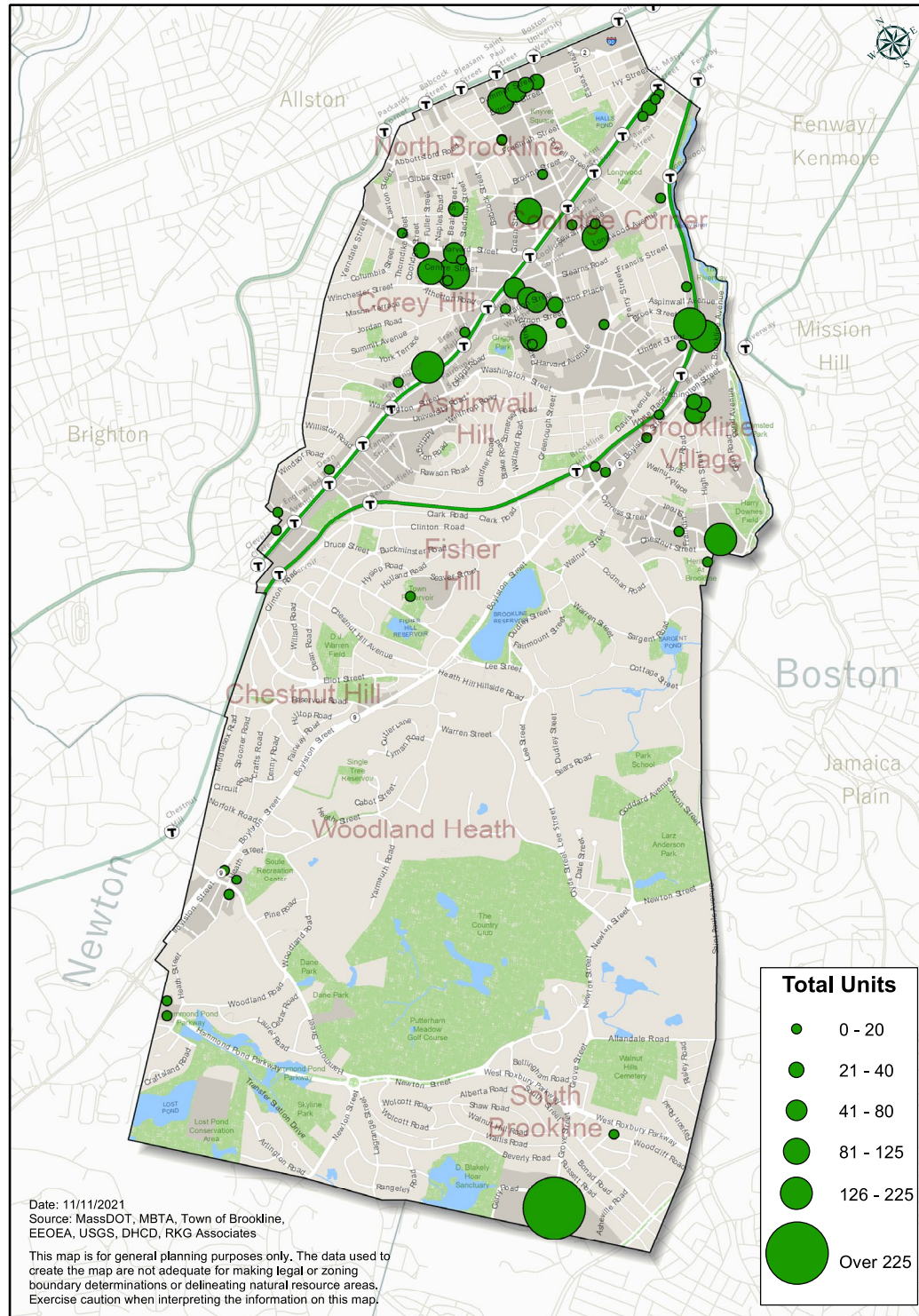
Information for this plan comes from a variety of sources, including the Town of Brookline, other plans and studies, the Metropolitan Area Planning Council (MAPC), MassGIS (the state's online GIS data library), licensed sources such as CoStar and ESRI Analyst, the U.S. Department of Housing and Urban Development (HUD), and the Bureau of the Census.

- The Census of Population and Housing (decennial census): mainly Census 2000 and Census 2010. It is important to note that as of the date of this plan, the Census Bureau has released very little information from Census 2020.
- The American Community Survey (ACS). The ACS became even more important for this housing plan update than it was for the 2016 HPP because so little information is available from Census 2020. Although ACS 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, the 2017-2021 series published in December 2022.
- 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 data. It provides information on HUD income categories and housing data for the Five-Year Consolidated Plan. The most recent CHAS Data are based on the ACS 2015-2019 estimates.

This plan has benefited from knowledge shared by residents, representatives of local organizations, developers, clergy, Town committees and departments, and others who participated in small-group interviews. In addition, 817 people responded to an online survey conducted in February 2022. Their responses made a significant contribution to the development of this plan. (The survey report can be found in Appendix B.)



# Map 1.1. Brookline Subsidized Housing Inventory

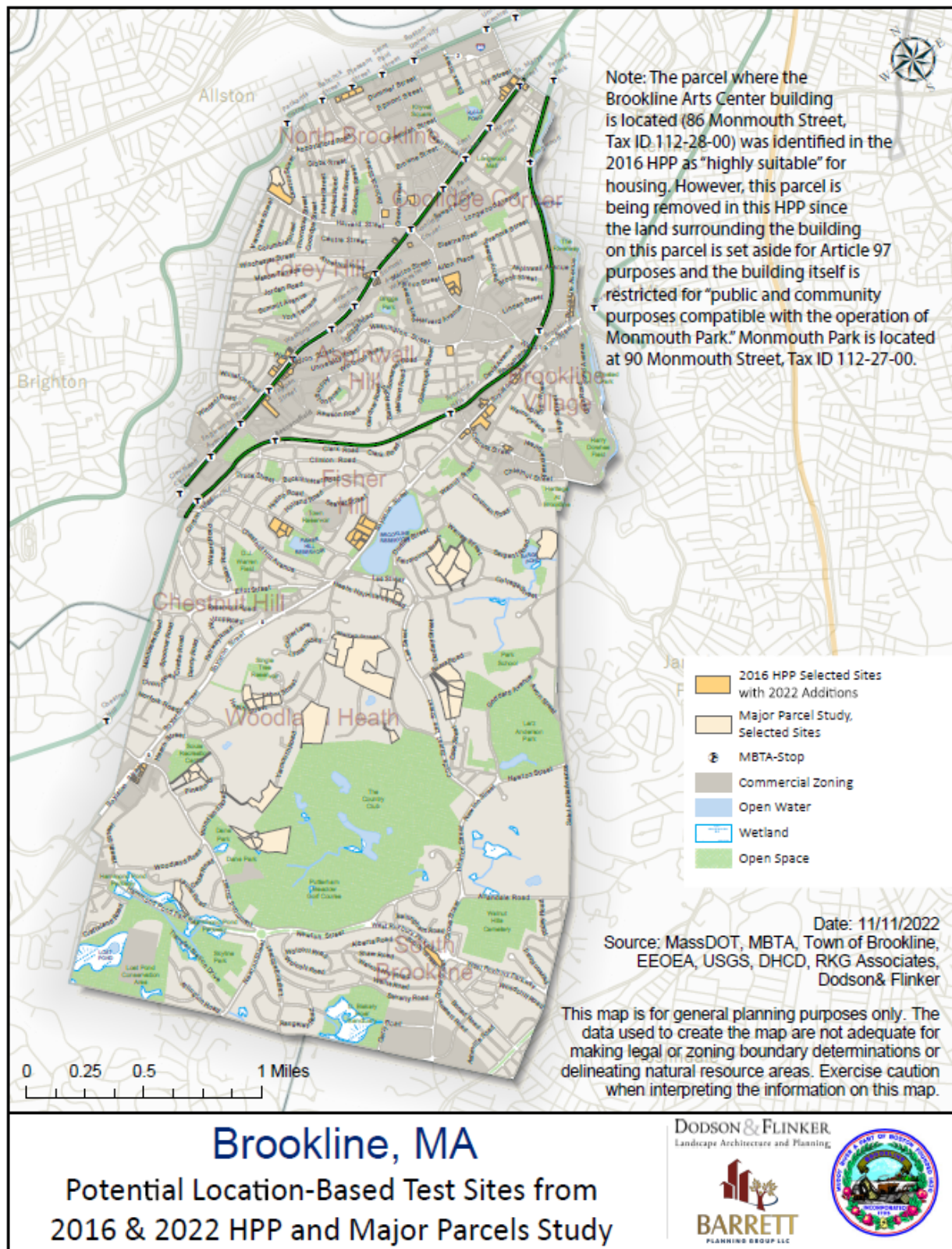


Brookline, MA  
 Affordable Housing Locations



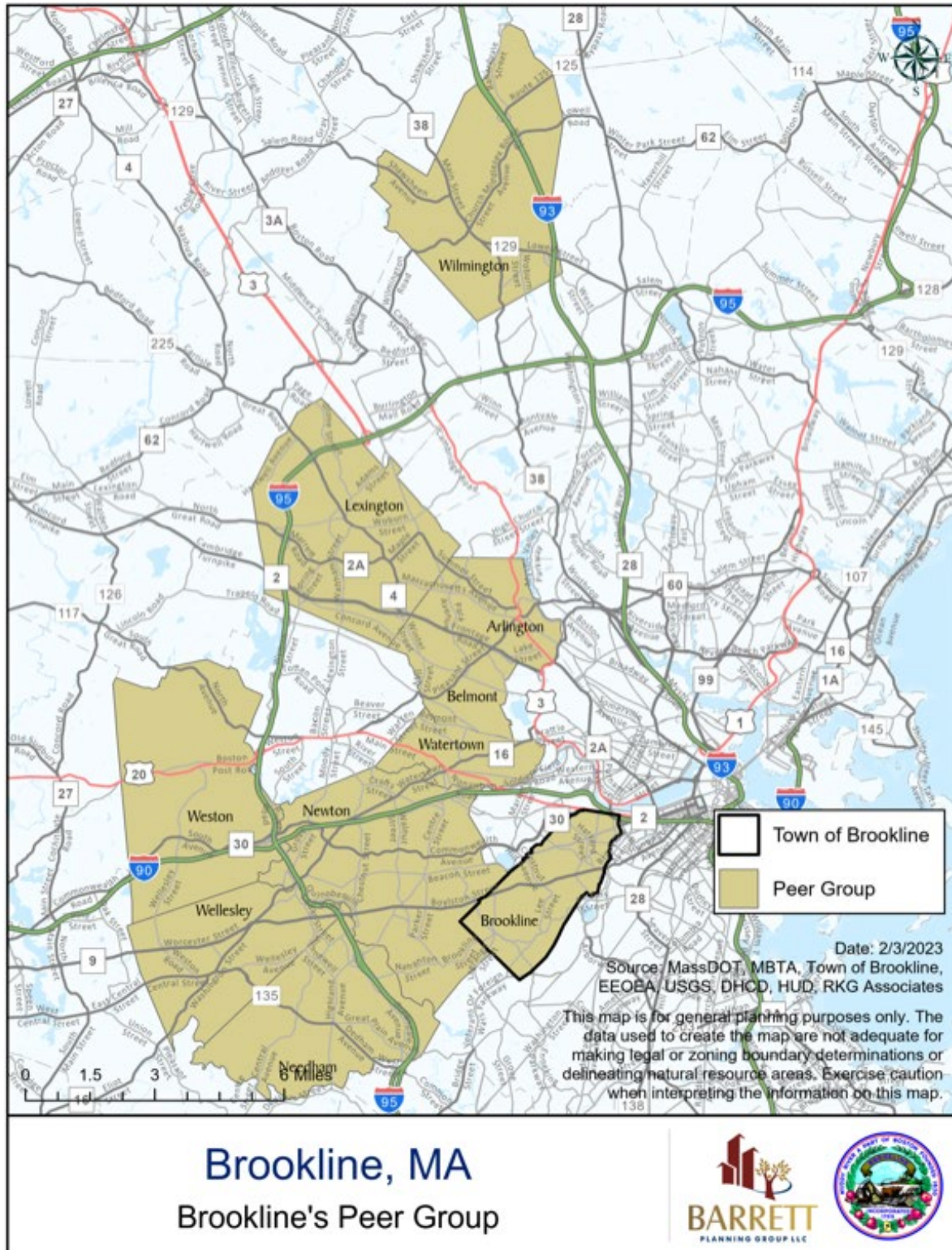


## Map 1.2. Location-Based Analysis: Focus Areas





## Map 1.3. Peer Group Communities



*Brookline is a multinational suburb, yet less racially diverse than the Greater Boston area.*

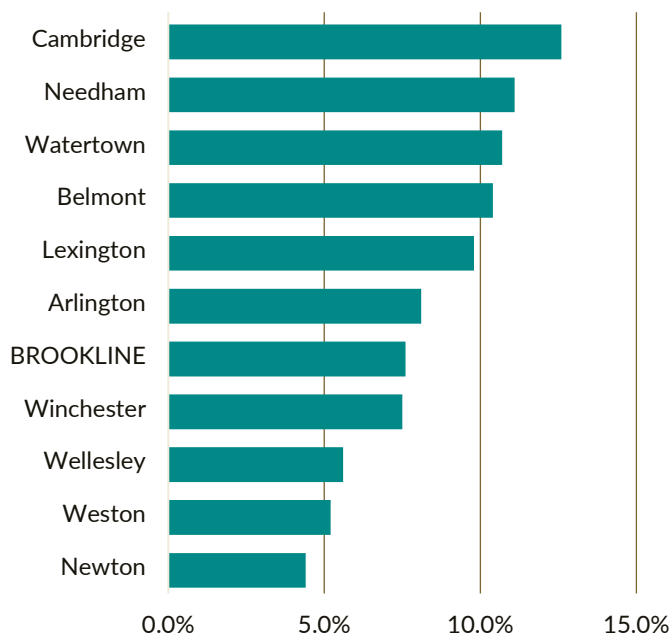
## 2. Housing Needs Assessment

### POPULATION AND HOUSEHOLD TRENDS

#### POPULATION GROWTH

Following several decades of modest changes in population – including periods of population decline – Brookline has steadily gained residents since 1990. The Town’s population increased by 3 percent from 2000 to 2010, and again by approximately 7 percent from 2010 to 2020. The University of Massachusetts Donahue Institute (UMDI) maintains and periodically updates population projections for all cities and towns in the Commonwealth. According to UMDI’s most recent projections, Brookline could grow rapidly over the next two decades, to 79,442 residents by 2040.<sup>7</sup>

**Fig. 2-1. Greater Boston Population Growth Rates, 2010-2020**  
(Source: Census 2020)



Brookline’s recent growth rate is like that of many communities around Boston. Fig. 2-1 compares Brookline with nearby peer communities and shows that Brookline falls in the middle range for decennial population growth. Population trends in Brookline tend to mirror what is happening regionally, and just

<sup>7</sup> U.S. Census Bureau, and Massachusetts State Data Center, Donohue Institute, University of Massachusetts, UMass Donahue Institute MassDOT Vintage 2018 Population Projections. September 2018. (UMDI-DOT V2018). Note: the Metropolitan Area Planning Council (MAPC) also produces population and household growth projections. The projections from UMass and MAPC are often different because they use different forecasting methods.





*“‘Refugees welcome’, but only if wealthy.”*

*Community submission to the Six-Word Stories Project*

as Brookline contends with a great deal of concern about the impact of growth on neighborhood character and town services, the same can be said for just about every community around Boston.

## POPULATION AGE

In some ways, Brookline is similar to the communities in its peer group and the larger Boston Metro Area in terms of population age. For example, children under 18 and older adults (65 and over) make up about the same percentages of the total population in Brookline and the comparison areas, as shown in Table 2.1. One area where Brookline noticeably differs is its large population of young adults – that is, the 18-to-24 and 24-to-35 age cohorts, illustrated in **Map 2.1, Brookline’s Millennials**. Together, they comprise 30 percent of Brookline’s total population. Offsetting the high rate of younger adults, the “Generation X” population is comparatively small.

**Table 2.1. Population Age Cohorts (Estimated; 2021)**

	Brookline		Peer Communities		Boston Metro Area	
Total Population	62,620	100.0%	389,628	100.0%	4,468,661	100.0%
0 - 4	3,484	5.6%	19,940	5.1%	234,738	5.3%
5 - 17	8,780	14.0%	67,250	17.3%	654,900	14.7%
18 - 24	7,625	12.2%	36,945	9.5%	447,006	10.0%
25 - 34	11,134	17.8%	43,017	11.0%	680,324	15.2%
35 - 44	8,180	13.1%	50,576	13.0%	577,255	12.9%
45 - 54	7,236	11.6%	55,567	14.3%	585,947	13.1%
55 - 64	6,108	9.8%	48,571	12.5%	593,003	13.3%
65 - 74	5,695	9.1%	37,747	9.7%	408,745	9.1%
75 +	4,378	7.0%	30,015	7.7%	286,743	6.4%

Source: ACS 2017-2021: B01001. Sex By Age.

## POPULATION DIVERSITY: CULTURE, ETHNICITY, RACE

Brookline is truly a multinational suburb. The foreign-born population continues to grow, and today, immigrants comprise 31 percent of all people living in Brookline.<sup>8</sup> **Map 2.2, Immigration**, shows the distribution of foreign-born residents by census block group. Census block groups with higher minority populations tend to be co-located with block groups that have lower household income, a greater percentage of rental units and a lower percentage of single-family homes. While the foreign-born population comes from all over the world, most of Brookline’s foreign-born residents are from China,

<sup>8</sup> Social Explorer, A06001. Nativity by Citizenship Status.



Japan, India, Iran, Israel, Russia, Ukraine, Spain, or Brazil.<sup>9</sup> Many Brookline residents are non-native speakers of English. Chinese, Russian, Japanese, Korean, Spanish, and Hebrew are common household languages in Brookline. Approximately 7 percent of Brookline’s households have Limited English Proficiency (LEP), i.e., people whose first language is not English and who have significant difficulty reading, writing, or understanding English.<sup>10</sup> Linguistic and cultural diversity is also found throughout Brookline’s public schools, where English Language Learners – that is, students not yet proficient in English – comprise 11.2 percent of the student population. Over the past few years, noteworthy increases have occurred in the Baker and Pierce elementary schools.<sup>11</sup>

Table 2.2. Race (2021)

	Brookline		Peer Communities		Boston Metro Area	
Total Population:	62,620	100.0%	389,628	100.0%	4,468,661	100.0%
White	43,875	70.1%	288,115	73.9%	3,162,300	70.8%
Black or African American	1,563	2.5%	10,006	2.6%	384,265	8.6%
AIAN	190	0.3%	550	0.1%	9,037	0.2%
Asian	11,152	17.8%	62,804	16.1%	396,849	8.9%
Native Hawaiian/Other Pacific Is.	0	0.0%	77	0.0%	1,842	0.0%
Other Race	720	1.1%	5,715	1.5%	220,803	4.9%
Two or More Races	5,120	8.2%	22,361	5.7%	293,565	6.6%
Social Explorer, A03001. Race						

Brookline’s population is less diverse racially than the Greater Boston area and many of the surrounding cities and towns. It remains primarily White (70 percent), with an Asian population that has grown dramatically, to 18 percent of the total population. By contrast, the Black population makes up a much smaller percentage in Brookline (2.5 percent) and the peer group communities (2.5 percent) than the Greater Boston Area as a whole (8.6 percent). Similarly, Hispanic or Latino residents account for about 7 percent of the population in Brookline, but 12 percent regionally.<sup>12</sup> See **Map 2.3, Black and Latino Residents**.

## EDUCATION

Brookline is home to a highly educated population. Fifty-five percent of residents 25 years and over hold a graduate or professional degree, which places Brookline ahead of all its Greater Boston peers except Lexington (59 percent).<sup>13</sup> Still, Table 2.3 illustrates that Brookline’s adult population significantly exceeds the county, Boston Metro, and state in terms of educational attainment (highest level of education completed). It also exceeds most of the communities in its peer group, but they also enjoy very high levels of educational attainment. This seems to reinforce the region’s desirability to an educated labor force,

<sup>9</sup> U.S. Census Bureau, American Community Survey (ACS) Five-Year Estimates 2017-2021, B05006, Place of Birth for the Foreign-Born Population.

<sup>10</sup> ACS 2017-2021, C16002. Household Language by Household Limited English Speaking Status.

<sup>11</sup> Brookline Public Schools, “October 1st ELE Program Enrollment Data,” February 1, 2019.

<sup>12</sup> ACS 2016-2020, B02001. Race, and B03001, Hispanic or Latino Origin by Specific Origin.

<sup>13</sup> ACS 2016-2020, B15003. Educational Attainment for the Population 25 Years and Over.



drawn here by the abundance of prestigious colleges and universities and the high-tech, medical, professional, science, and finance industries.

**Table 2.3. Educational Attainment: Population 25 and Over**

	Brookline	Peer Communities	Boston Metro Area	Massachusetts
Total	42,731	265,493	3,132,017	4,902,868
Less Than High School	2.5%	2.6%	8.2%	8.8%
HS Diploma or GED	5.6%	8.2%	20.7%	23.2%
Associate's Degree	7.5%	10.3%	20.5%	22.8%
Bachelor's Degree	27.6%	29.2%	27.0%	24.8%
Master's Degree	27.3%	28.5%	16.2%	14.3%
Professional Degree	13.0%	9.9%	3.7%	3.1%
Doctorate Degree	16.4%	11.4%	3.7%	3.0%
ACS 2017-21: B15003. Educational Attainment for the Population 25 Years and Over, and Barrett Planning Group.				

## LABOR FORCE & EMPLOYMENT

Brookline's labor force includes approximately 36,752 residents, or 71 percent of the population 16 years and older (labor force participation rate).<sup>14</sup> The unemployment rate in Brookline, 3.5 percent, is lower than the statewide rate of 5.7 percent and the Norfolk County rate of 5.3 percent.<sup>15</sup> Brookline's comparatively low unemployment rate, coupled with the earnings and occupations of Brookline residents, all can be attributed to the higher levels of educational attainment of its population. The same can also be said about the types of jobs held by Brookline residents. Sixty-two percent of the town's employed population works in two industry super-sectors: Professional, Scientific, and Management Services; and Educational Services and Health Care and Social Assistance. According to the Census Bureau, their employment is almost exclusively in the private sector, mainly with for-profit organizations. A strikingly high 79.8 percent of these workers have management, business, or science occupations.<sup>16</sup>

<sup>14</sup> Social Explorer SE: A17002. Employment Status for Total Population 16 and Over.

<sup>15</sup> Executive Office of Labor and Workforce Development, Dept. of Economic Research, Labor Force and Unemployment Data, 2021.

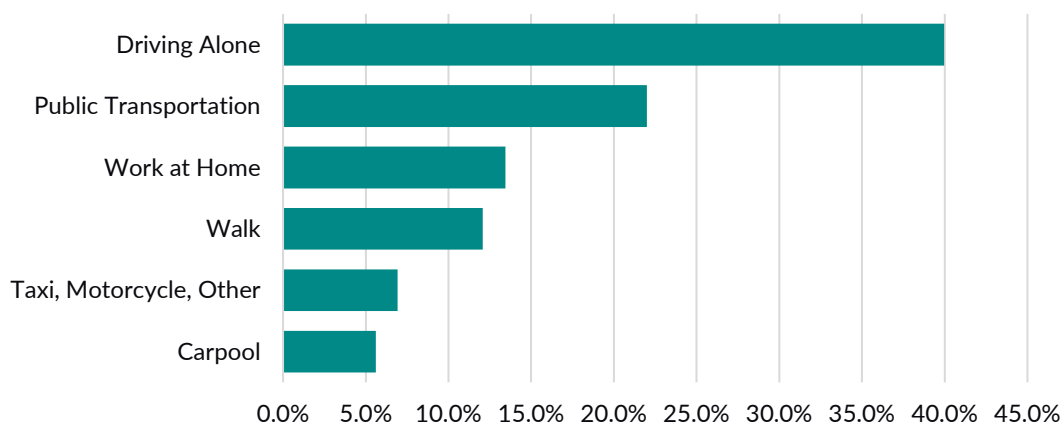
<sup>16</sup> ACS 2017-2021, SE: A17004 Industry by Occupation for the Employed Civilian Population 16 and Over.



For Brookline residents, where they work, what they do for work, and their employment earnings vary significantly by their age, whether they rent or own their home, and how they commute. For example, renters are more likely than homeowners to commute by public transportation, and over half of residents taking public transportation to work are in the 25-44 age cohort.<sup>17</sup> Employed residents with the highest earnings commute by car (Fig. 2.2), and those with the lowest earnings rely on public transportation or walking to work.<sup>18</sup>

**Fig. 2.2. Means of Transportation to Work for Brookline Residents  
Earning \$75,000 or More**

(Source: Census Bureau, OnTheMap, Brookline, MA)



According to the Census Bureau, a substantial majority of Brookline residents work for employers in Boston, Cambridge, Newton, or one of the smaller inner core cities. COVID-19 undeniably affected commuting patterns everywhere, so more residents probably work at home today than the most recent commuting flow statistics will show. Regardless of whether people are leaving Brookline every day for work somewhere in the region, they most likely still work for a non-local employer. Nearby Boston and Cambridge have substantially more jobs than residents. Conversely, Brookline does not have a large enough employment base to meet the needs of its residents, and the jobs that do exist locally are dominated by lower-wage occupations. This excludes self-employed residents working locally because traditional employment base sources omit them. They stand out from Brookline's employment and wage profile because self-employed owners of small businesses have among the highest earnings of all residents who work.

<sup>17</sup> ACS 2017-2021, B08101. Means Of Transportation to Work by Age, and SE:A09004B, Means of Transportation to Work (Renter-Occupied Housing Units).

<sup>18</sup> ACS 2017-2021, B08119. Means Of Transportation to Work By Workers' Earnings In The Past 12 Months (In 2021 Inflation-Adjusted Dollars).



## LOCAL EMPLOYMENT

Residents working for a local employer do not have many options when it comes to earning enough to afford housing in Brookline. While the town has employment in fields requiring higher education and advanced training, they do not comprise most of Brookline's jobs. For example, almost half of Brookline's employment base comprises desirable industries such as education, health care, and professional and technical services industries. However, some two-thirds of the jobs they offer pay wages that could not support the market cost of housing in Brookline. This helps to explain why Brookline imports labor from so many other communities while it exports its own residents to high-wage jobs elsewhere.

## POPULATION IN GROUP QUARTERS

Approximately 1,646 Brookline residents (2.6 percent) live in some type of group quarters arrangement.<sup>19</sup> The percentage of the population in group quarters has been fairly consistent in Brookline and elsewhere in the region. In federal census terms, "group quarters" includes unrelated people in a building or facility owned or managed by an organization that provides housing or services for the residents, such as custodial or medical care. Common types of group quarters in the Greater Boston area include nursing homes, group homes for adults with disabilities, dormitories for college students, and religious institutions.<sup>20</sup>

## HOUSEHOLDS

People often focus on change in population counts to measure growth in a community. For a housing study, however, household trends matter even more because households create demand for housing. In many Massachusetts cities and towns, the total population grew very little and, in some cases, declined between 2010-2020, yet the number of households increased. In other towns, like Brookline, the number of households grew very little or dropped. The Census Bureau defines a **household** as a single person or two or more people who occupy the same housing unit. "Household" in federal census terms includes "families<sup>21</sup>" (with or without children) and "non-family households." While these terms seem obsolete today, they remain in use because almost all household data – including incomes, tenure, housing costs, and many other topics addressed in a housing plan – continue to be reported by the federal government in terms of household types. When the last Brookline Housing Plan was prepared in 2016, the town had approximately 25,594 households. In 2022, the Census Bureau reports a total of 26,525 households or an increase of 931.<sup>22</sup>

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<sup>19</sup> ACS 2017-2021, B09019. Household Type (Including Living Alone) By Relationship.

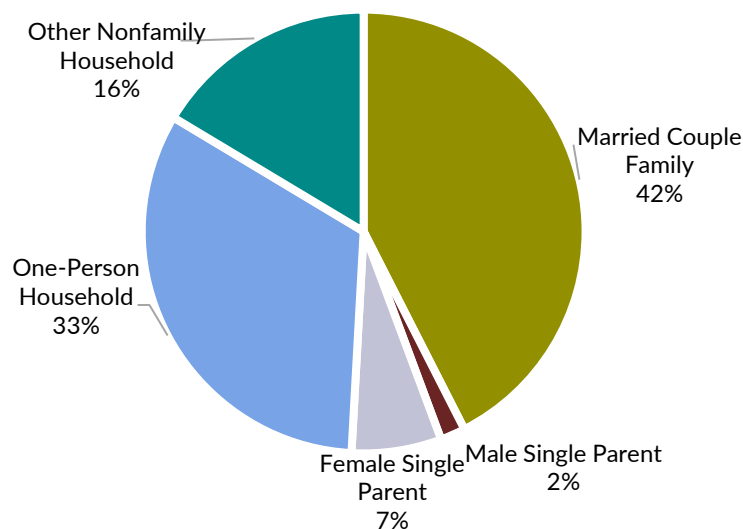
<sup>20</sup> The Census Bureau has not published current tables of group quarters populations by type for cities and towns.

<sup>21</sup> Family is defined by the Census Bureau as "a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together". The count of family members differs from the count of family household members because family household members include any non-relatives living in the household.

<sup>22</sup> Census 2020, Table SE:T3, retrieved from Social Explorer.



**Fig. 2.3 Brookline Household Types Reported by the Census Bureau**  
(ACS 2021, Table B11001)

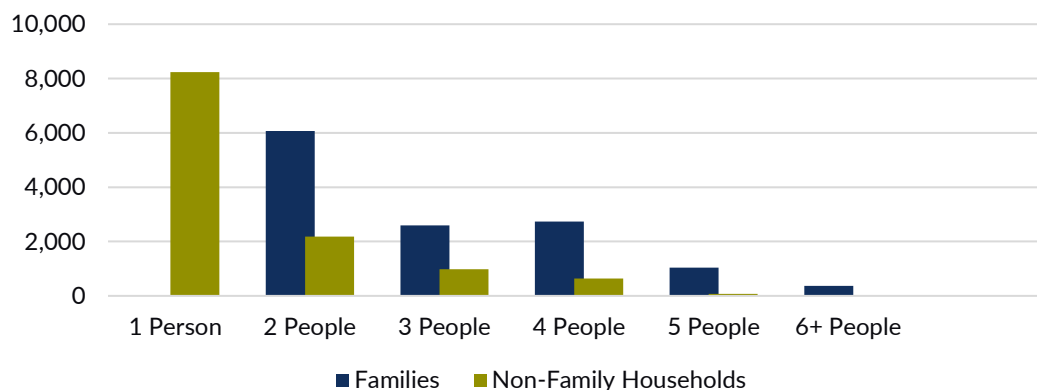


## HOUSEHOLD TYPES

A community with a variety of household types is often one that welcomes many different types of people. Urban centers tend to have far greater mix of people and households than outlying suburbs because they offer close access to educational, health care, and cultural institutions, jobs, and a greater likelihood of finding community with others. Different household types often have different housing needs and preferences, so urban centers often provide access to more housing options, too. The size and composition of a town's households can indicate how well-suited the existing housing inventory is to residents. For example, if the local housing supply is overwhelmingly comprised of large single-family homes but the average household size is quite small, there may be a difference between what smaller households need or want and what the market has to offer. Similarly, if families with children need rental units but most of the rental supply is small, it could be difficult for them to find suitable housing.

## HOUSEHOLD SIZE

**Fig. 2.4. Household Size and Types**  
(Source: ACS 2021, B11016)



In 2020, the average household in Brookline consisted of 2.3 people, approximately the same as the estimate reported in the last Brookline Housing Plan (2.27 per household). Brookline's households today are somewhat larger than both the Greater Boston average, 2.23, or the state as a whole, 2.21. The Metropolitan Area Planning Council's (MAPC) population and household forecasts appear to be tracking Brookline fairly well, because by 2030, MAPC predicts that Brookline's average household size will continue to increase to 2.34 people. Single people living alone (a subset of all non-family households) represent the largest number of households by size, followed by two-person households, either couple households (married or not) or a parent and child.

## HOUSEHOLDER AGES

Age of householder can indicate demand or need for particular types and sizes of housing units, building features, and preferred locations. Fig. 2.5 shows that in 2021, almost 30 percent of Brookline's householders are under 35, 46 percent are householders in their peak earning years – 35 to 64 – with the balance comprised of older adults (65 and over), roughly 25 percent of the total. Fig. 2.6 illustrates Brookline's households by types and age cohorts. While the largest single group of one-person households consists of people 65 and over, Brookline has an unusually large number of one-person households in the 35-to-64-year range as well. Younger people (under 35) make up 86 percent of all other non-family households, indicating the extent of shared housing arrangements among Brookline's youngest householders – often people in college or graduate school.

Fig. 2.5 Householders by Age Cohort

(Source: SE: A10020)

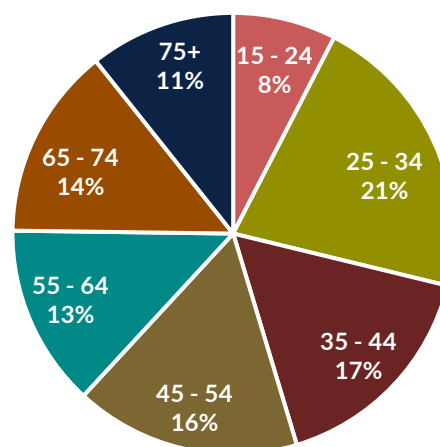
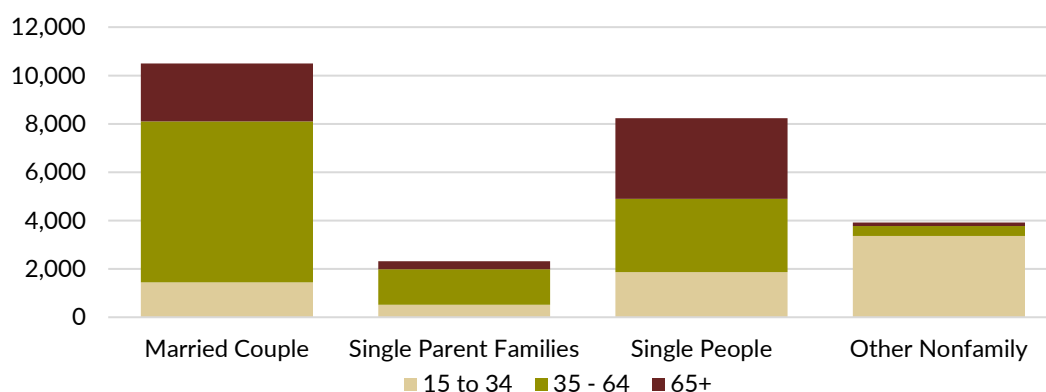


Fig. 2.6. Households by Type and Age

(Source: Social Explorer, A10025)

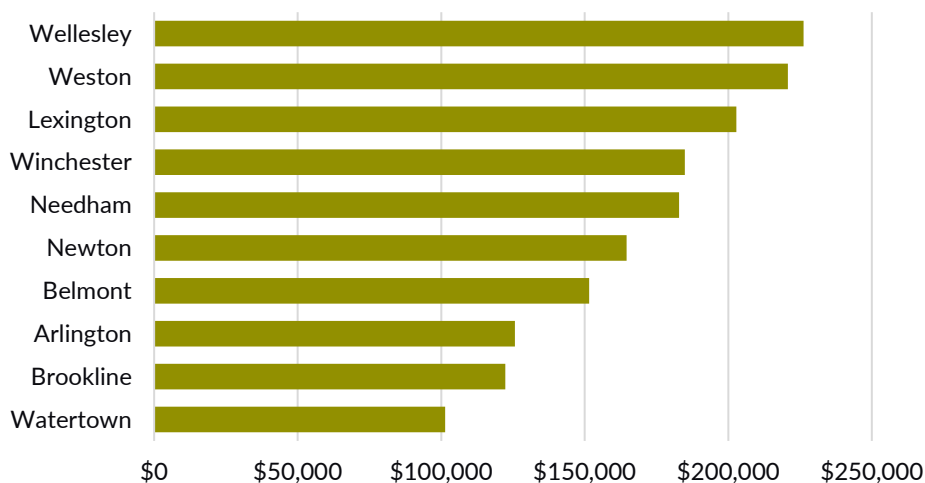


## HOUSEHOLD AND FAMILY INCOMES

Household income largely determines how much a household can afford to pay for housing and whether that household qualifies for some type of housing assistance. In Brookline's peer group, the median household income ranges from a low of \$101,402 (Watertown) to over \$226,250 (Wellesley). Brookline's is below the average for its peer group, at \$122,356, as shown in Fig. 2.7. **Map 2.4, Median Household Income**, shows the variation in median household income in Brookline's census tracts.

**Fig. 2.7. Median Household Income, Brookline and Peer Group Communities**

(Source: ACS 2021 B19003)



Householder age tends to affect income, too. The incomes of younger and older householders often fall below the median for all household types and householder ages. On the other hand, householders in the middle tend to have higher incomes. In Brookline, household income varies greatly by age of householder, as shown in Fig. 2.8. About half of the householders between 25-44 and 60 percent of householders between 45-64 earn \$125,000 or more per year, but the same can be said for less than one-third of households in the younger or older age cohorts. By contrast, over one-third of householders in the 25-44 or 65-plus age groups have incomes below \$40,000 a year.

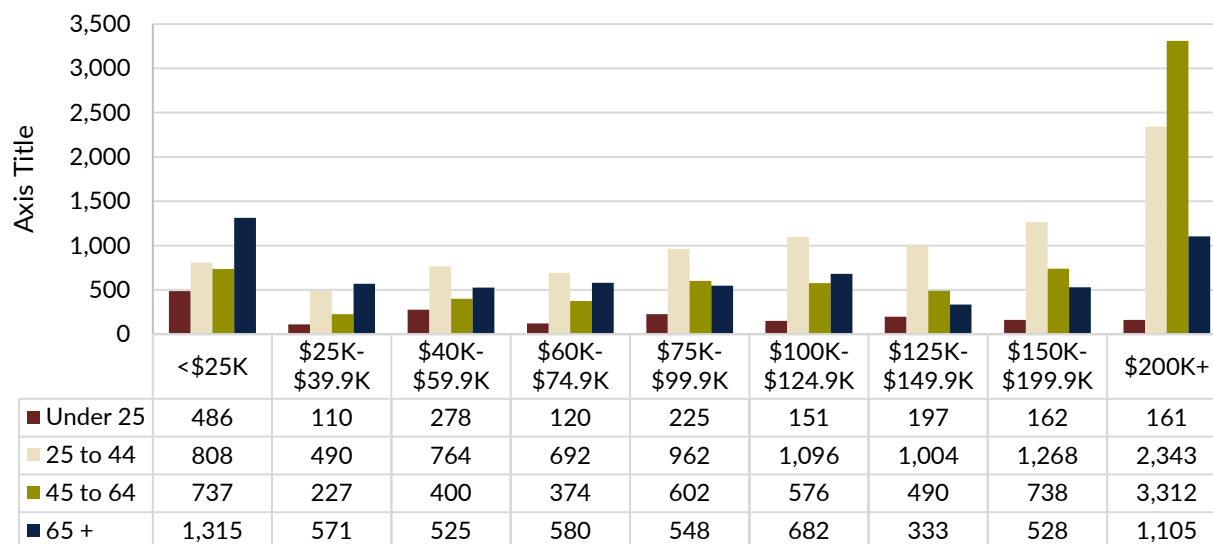
Brookline has a high median family income (\$195,101) and a very high median family income for married couples with dependent children (\$250,001), probably due to the presence of more than one wage earner. By contrast, the median non-family income is much lower for non-family households overall (\$79,915). The median for elderly women living alone remains extremely low (\$42,038).<sup>23</sup>

<sup>23</sup> ACS 2017-2021, B19126, Median Family Income In The Past 12 Months (In 2020 Inflation-Adjusted Dollars) By Family Type By Presence Of Own Children Under 18 Years; and B19215, Median Nonfamily Household Income In The Past 12 Months (In 2020 Inflation-Adjusted Dollars) By Sex Of Householder By Living Alone By Age Of Householder.



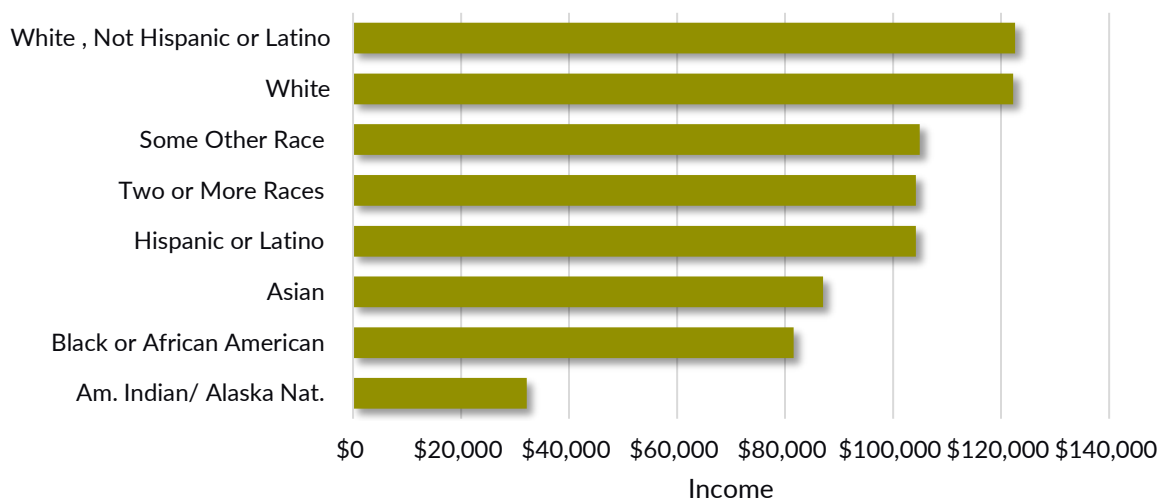


**Fig. 2.8. Householder Income by Householder Age**  
(ACS 2021, B19049)



In addition to householder age and type, race and ethnicity have an impact on access to the opportunities

**Fig. 2.9. Median Household Income by Race and Ethnicity**  
(Source: Social Explorer, A14007)



that correlate with employment, earnings, homeownership, and community or neighborhood setting. Fig. 2.9 illustrates the degree to which the wealth of Brookline's White households – especially White, Non-Hispanic – surpasses other racial and ethnic groups.

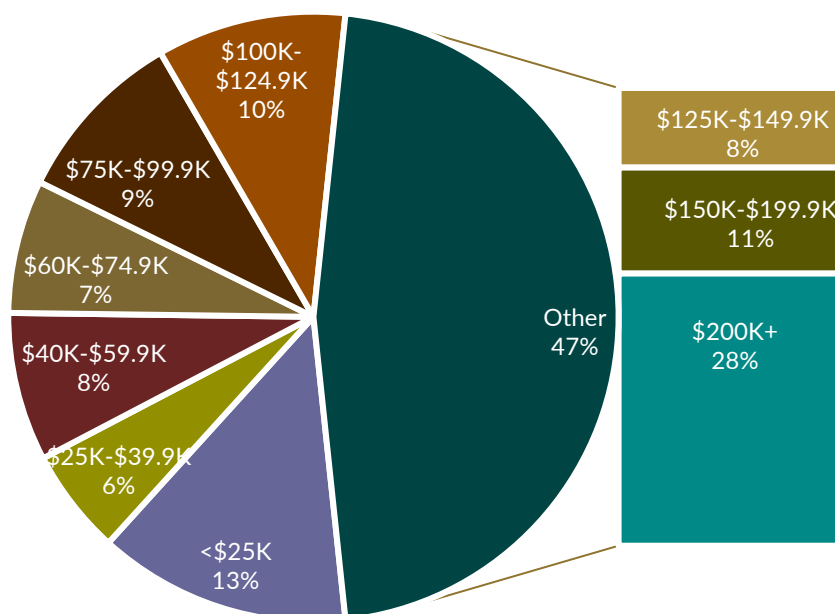
Median household income can be useful as an economic snapshot for comparing communities, but is only a snapshot. It is not an indicator of overall well-being. Its lack of granularity can mask the extent of householder struggles with housing affordability and instability, and the sacrifices families make in terms of food choices, health care, and other essential needs. Fig. 2.10 provides a closer look at the economic position of Brookline households. It shows that while almost half the households in Brookline have



incomes over \$125,000 (and close to 30 percent with incomes over \$200,000), 20 percent have incomes below \$40,000. Eleven percent of Brookline households have incomes below \$15,000. There are significant differences in household wealth in Brookline even without considering the additional advantages of homeownership.

**Fig. 2.10. Brookline Household Incomes**

(Source: ACS 2021, B19013)



## POVERTY

The incidence of poverty in Brookline is very low. Approximately 4.9 percent of Brookline's families live below the federal poverty line, up from 3.5 percent in the last Housing Plan. The primary driver of Brookline's family poverty percent is single-parent households headed by women, with or without dependent children. Approximately 11 percent of the population 65 and over is below poverty, comparable to Arlington (11 percent) and Somerville (13.2 percent). There are no other communities in Brookline's peer group close to these statistics.<sup>24</sup>

<sup>24</sup> SE:A13002. Poverty Status in of Families by Family Type by Presence of Children Under 18 Years (ACS 2017-2021).



*The high cost of housing continues to displace existing residents, including seniors on fixed incomes and municipal employees.*

*Five-Year Consolidated Plan 2021-25*

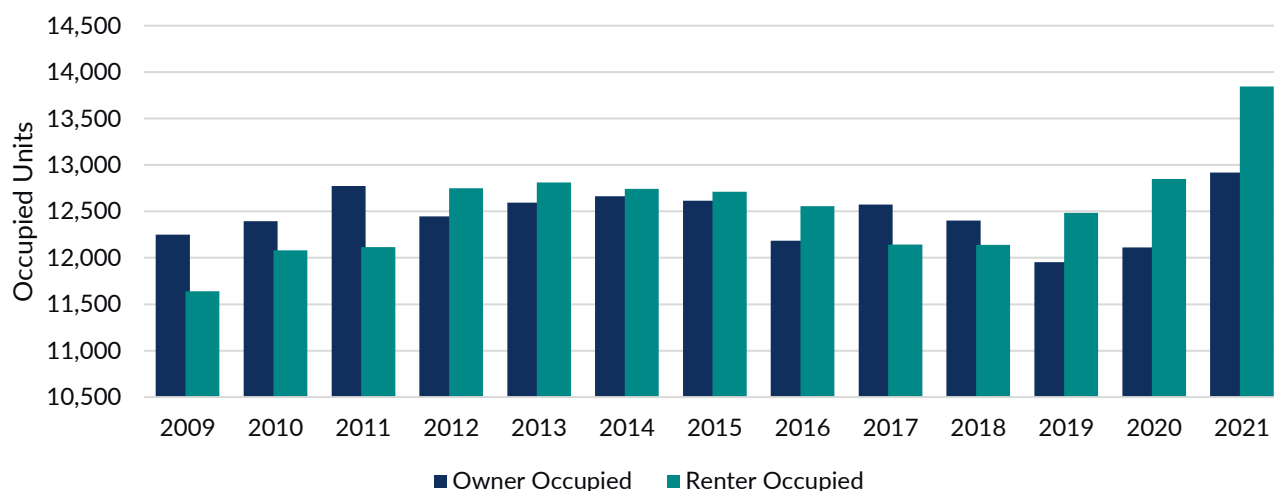
## HOUSING CHARACTERISTICS AND TRENDS

### HOUSING SUPPLY AND TENURE

The Census Bureau estimates that Brookline's total housing inventory includes 28,274 dwelling units. The present inventory represents an increase of about 3,000 units over 30 years.

The percentage of renter-occupied homes in Brookline has fluctuated over time, in part due to the conversion of older multifamily rental dwellings to condominiums. The development of new apartments under Chapter 40B and special permits has stimulated an increase in the Town's market-rate and affordable rental choices. Fig. 2.11 shows longer-term trends in housing tenure in Brookline based on ACS estimates published since 2009 and **Map 2.5, Renter-Occupied Units**, shows the percentage of units that are renter-occupied by census tract.

**Fig. 2.11. Housing Tenure Trends**  
(ACS 2009-2021 Five-Year Estimates)



### HOUSING VACANCY

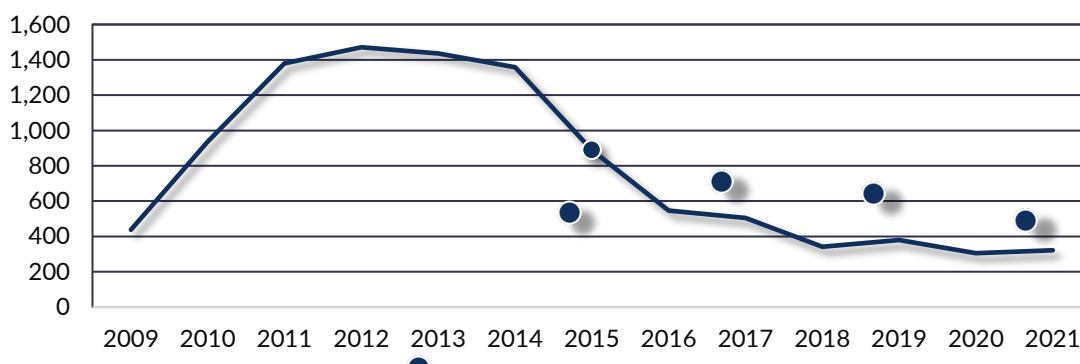
According to ACS 2017-2021 estimates, 95 percent of Brookline's housing units are occupied. However, the low overall vacancy rate of 4.8 percent seems to overstate the available supply, because the estimated number of vacant units (1,266) includes seasonal homes and other units that are not available to rent or



buy. Today, the vacancy rate for ownership homes is only 1.5 percent and for rental homes, 3.4 percent.<sup>25</sup> These vacancy rates indicate an extremely tight housing market, and they go together with Brookline's very high housing costs. Fig. 2.13 traces the estimated number of vacant, available units for rent or for sale in Brookline since 2009. The total *available* inventory has dropped dramatically from a high of 5.1% in 2012 to 1.1 percent today.

Fig. 2.12. Vacant and Available Housing Units

(ACS 5-Year Estimates, 2009-2021)

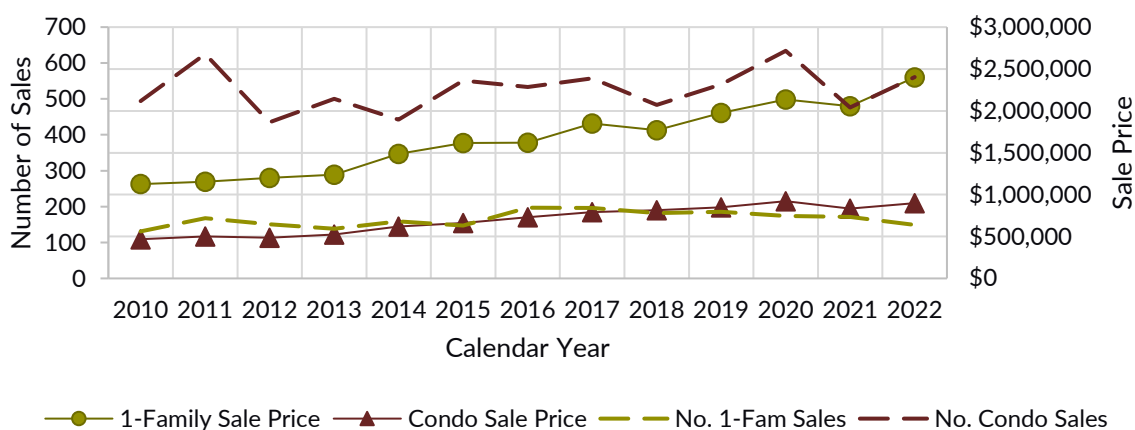


## HOUSING MARKET

**Housing Sale Prices.** For homebuyers, Brookline is the second most expensive town in Greater Boston, narrowly surpassing Wellesley, Weston, and other communities typically thought of as the region's most exclusive markets. This is true even after adjusting for "outlier" sale prices of unique properties. According to the *Greater Boston Housing Report Card 2022*, the median single-family sale price in Brookline jumped

Fig. 2.13. Median Housing Sale Prices in Brookline, 2010-2022

(Source: Banker & Tradesman)



<sup>25</sup> ACS 2016-2020, B25004, Vacancy Status. For additional information about the Census Bureau's methodology for estimating housing vacancies, see U.S. Census Bureau, "Differences between the Vacancy Rate Estimates from the American Community Survey, the Current Population Survey/Housing Vacancy Survey, and the American Housing Survey, 2011."

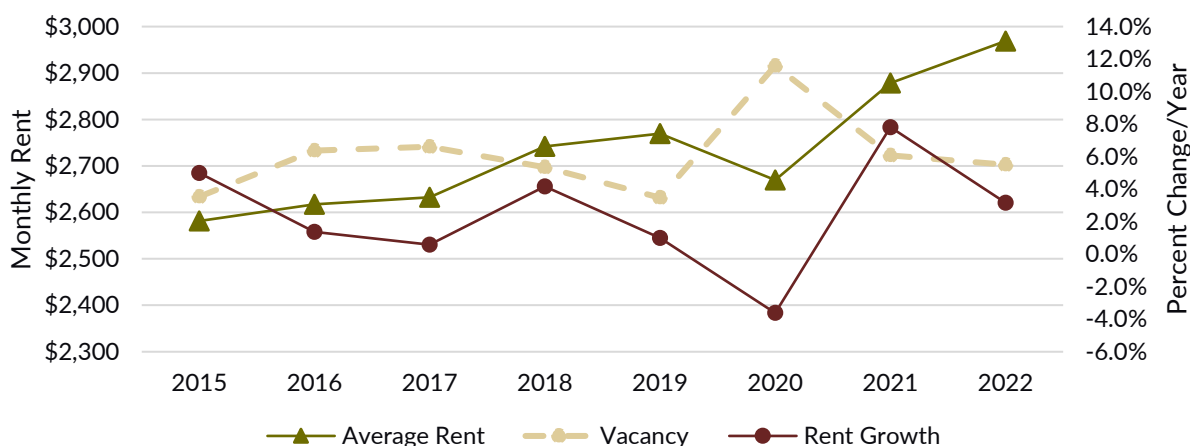


37 percent between June 2021-June 2022, the highest one-year jump inside Route 495. **Map 2.6, Single-Family Home Prices**, shows median single-family sale prices in Greater Boston communities as of June 2022.

**Market Rents.** Just as Brookline is highly desirable to homeowners and homebuyers, it is also highly desirable to renters. Though not quite as expensive as Boston's multifamily market, Brookline and the adjacent city of Newton play an integral part in Greater Boston's unaffordability to low-income and middle-income households.

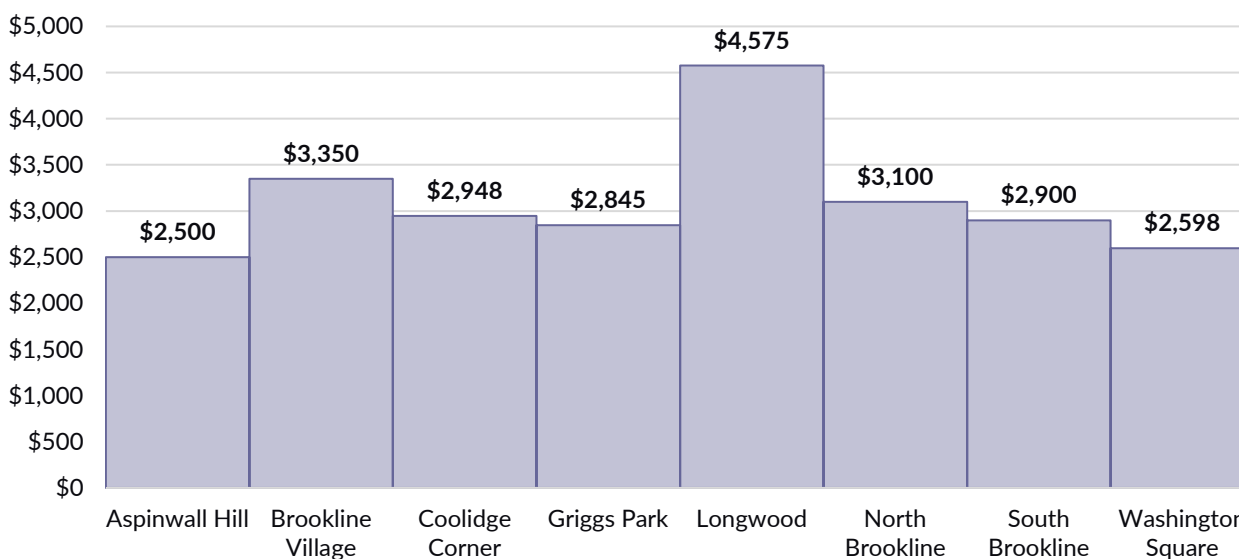
**Fig. 2.14. Brookline-Newton Market Rents**

(Source: CoStar, 2023)



**Fig. 2.15. Two-Bedroom Market Rents by Neighborhood (2021-2022)**

(Sample Source: Rentometer)



Brookline has a sizeable inventory of apartments, but except for the Brookline Housing Authority's public housing inventory and privately developed multifamily units supported with public subsidies, the



apartments that are available often exceed what low- or moderate-income renters can afford, even with Section 8 rental assistance. Fig. 2.15. shows a sample of market rents in Brookline neighborhoods, based on rental activity over the past 12 months.

## HOUSING QUALITY ISSUES

Data from the Comprehensive Housing Affordability Strategy (CHAS) helps cities and large towns like Brookline estimate the extent of housing problems in their communities. These problems can pertain to the cost of housing or the condition of a resident's home. According to the most recent CHAS, Brookline's housing stock is generally in good condition. According to the most recent Five-Year Consolidated Plan, 159 Brookline households occupy units lacking complete plumbing or kitchen facilities. Another 209 households live in overcrowded conditions, i.e., more than one person per room, though people interviewed for this Housing Plan say that federal data underestimate the incidence of over-occupied housing problems in Brookline. While the most significant housing problem in Brookline is lack of affordability, it is important to note that tenants of the Brookline Housing Authority have reported deficiencies in some of BHA's state-funded properties. It has been difficult for the BHA to address these problems due to the limited amount of funding the Commonwealth makes available to upgrade older public housing.

## RECENT HOUSING DEVELOPMENT AND PROJECTS IN PIPELINE

*Chapter 40B was the primary permitting pathway for larger housing developments, and especially projects that resulted in large numbers of affordable units.*

At the Town's request, the consultants analyzed housing developments that were permitted since the last housing plan was completed in 2016. Building permit, zoning permit, and Chapter 40B permit data were collected for the period from 2017 to 2021.

**Map 2.7. New Construction Housing Projects**, shows the locations of new construction housing projects that received zoning or building permits between 2017-2021. One-unit projects were predominantly located in South Brookline, with a cluster of permits in Corey Hill. Two and three dwelling unit projects and projects with four or more units are concentrated in North Brookline, with a few projects in Fisher Hill and clusters near the southern end of Boylston Street and in the southeast of Brookline at Hancock Village. This distribution largely reflects Brookline's zoning. Multifamily construction in Hancock Village has also been underway.

**Map 2.8. Affordable Units in New Construction** shows the distribution of permits for new construction housing projects that included provisions for affordable housing—either the creation of new affordable units or payments in lieu of creating affordable units. There are two mechanisms through which Brookline requires affordable units. The town's zoning includes affordable housing requirements in § 4.08.



These are designated as “IZ” for inclusionary zoning on the map. Depending on the scale of the project, they may be required to create new units on site, may opt to make cash payments, or may do both. Projects that pursue comprehensive permits through Chapter 40B are also required to include affordable housing units. As the map shows, Chapter 40B projects have been concentrated in Hancock Village and North Brookline, with a noticeable cluster near Harvard Street. Inclusionary zoning projects are mostly located along the Town’s major corridors, Beacon Street and Boylston Street. Of the eighteen Chapter 40B projects shown on the map, three had completed construction and six were under construction by the end of 2021, when the data for Map 2.9 were collected. Thirteen inclusionary zoning projects are shown on the map, but only two of these were building new affordable units on site. The remainder were slated to make cash payments to the Town. It is worth noting that almost all of the projects on the map are located in housing opportunity areas shown on the Site Suitability Analysis map included in Brookline’s 2016 Housing Production Plan.

This set of maps shows that development under Chapter 40B was the primary permitting pathway for larger housing developments, and especially projects that resulted in larger numbers of affordable units, in Brookline between 2017-2021. It also shows that 40B developments and inclusionary zoning projects were largely located in areas that were identified as being suitable for housing production by the 2016 Housing Production Plan. As Brookline is now more frequently above chapter 40B’s ten percent threshold for units on the subsidized housing inventory, 40B development in the Town may be less common in the future.

## DEMOLITION OF OLDER HOMES AND OTHER BUILDINGS

Brookline has nine local historic districts established under G.L. c. 40C, as well as a demolition delay bylaw to protect historically significant buildings throughout the town. Administering these bylaws falls to the Brookline Preservation Commission and the Planning Department’s preservation planners, who review full and partial demolition of all buildings in Brookline. For buildings deemed to have historic significance, the Preservation Commission may impose a stay of demolition for up to 18 months. The demolition delay period allows the Town and the owner to consider alternatives to demolition. Brookline continues to see older homes replaced with larger residences. Since 2005, approximately 480 residential demolition cases have been processed by the Town.<sup>26</sup>

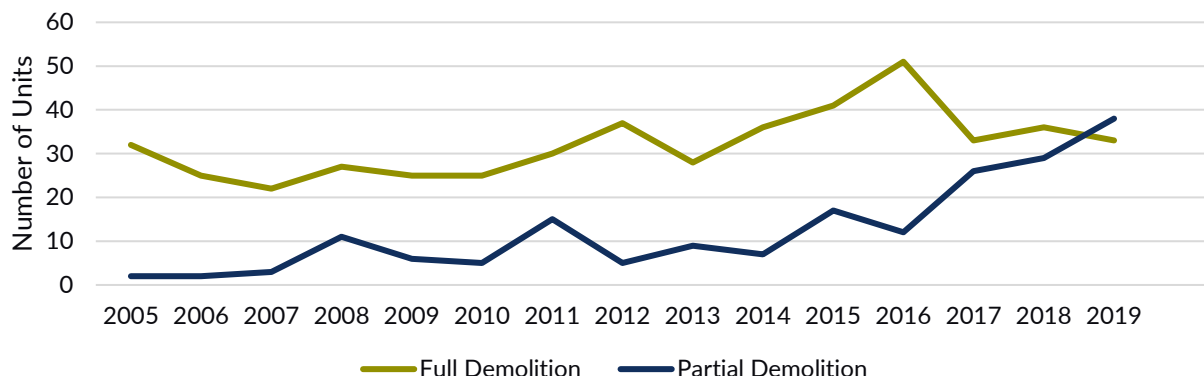
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<sup>26</sup> Brookline Planning Department, 2021.



Fig. 2.16. Demolition Delay Cases

(Source: Brookline Planning Department)



## HOUSING AFFORDABILITY

### CHAPTER 40B SUBSIDIZED HOUSING INVENTORY

Chapter 40B is the Commonwealth's regional planning statute, but most people associate it with the comprehensive permit, a mechanism that enables development of affordable housing without the constraints of local zoning and other local regulations. The four sections of the law that address affordable housing (Sections 20-23) went into effect in 1969. The purpose of Chapter 40B is to provide for a regionally fair distribution of affordable housing for people with low or moderate incomes. Affordable units created under Chapter 40B are required to remain affordable to low-income households over time, even under strong market conditions. They remain affordable because a deed restriction limits resale prices and rents for many years, if not in perpetuity.

Another type of affordable housing - generally older, moderately priced dwellings without deed restrictions, and which lack the features and amenities of new, high-end homes - can help to meet housing needs, too. These units are sometimes called **naturally occurring affordable housing**. They will remain affordable as long as the market allows. The crucial difference is that the market determines the price of unrestricted affordable units while a recorded legal instrument determines the price of deed-restricted units. There are other differences, too. For example, any household - regardless of income - may purchase or rent an unrestricted affordable unit, but only a low- or moderate-income household is eligible to purchase or rent a deed-restricted unit.

When deed-restricted affordable units comprise less than 10 percent of a town's housing, Chapter 40B all but directs the Zoning Board of Appeals (ZBA) to grant a comprehensive permit to developers who obtain a pre-qualification letter from a state housing subsidy program. The 10 percent statutory minimum is based on the total number of year-round housing units in the most recent federal census. For Brookline today, this means the 10 percent target is 2,775 units,<sup>27</sup> up from 2,621 in the 2016 Housing Plan (a 154-

<sup>27</sup> Based on the Census 2020 year-round unit count of 27,742.





unit difference). A comprehensive permit is a unified permit, i.e., a single permit that incorporates all the local approvals required under zoning and other local bylaws and regulations. Under Chapter 40B, the ZBA may approve, conditionally approve, or deny a comprehensive permit, but in communities that do not meet the 10 percent minimum, developers may appeal to the state Housing Appeals Committee (HAC). Although comprehensive permits may be granted after a town achieves the 10 percent minimum, the HAC no longer has authority to overturn a local board's decision.

As noted in Chapter 1, in March 2022, Brookline exceeded the statutory minimum with 11.1 percent of all units in Town being listed on the SHI. This was mainly because of comprehensive permits issued by the ZBA since 2016. However, since then, the Town has fallen below 10 percent again. Town staff report that as of January 1, 2024, Brookline's Chapter 40B Subsidized Housing Inventory (SHI) is approximately 9.8 percent of its Census 2020 year-round units. The decrease occurred because in some cases, applicants had not applied for building permits within 12 months of receiving their comprehensive permit or finished construction within 18 months of receiving a building permit<sup>28</sup>. As of March 2022, 98 percent of the housing units listed on the SHI in Brookline are rental units. In addition to comprehensive permits, Brookline has relied heavily on its affordable housing regulations, inclusionary zoning, HOME and CDBG subsidies, and Housing Trust Fund resources to create affordable units.

It is important to note that some developments listed on the SHI are subject to affordable housing restrictions that will eventually expire, potentially removing them from the SHI. These include the Village at Brookline (307 units) and Beacon Park (80 units) both of which may expire from the SHI in 2046 and 2036, respectively. In addition, Hebrew Senior Life owns three large properties (containing a total of 516 units), with use restrictions that will expire in 2044. It seems likely that a mission-driven owner like HSL will work with the Town to extend affordability beyond the expiration period. Town staff has worked diligently to extend use restrictions on expiring use properties developed with federal subsidies in the 1970s.

## HOUSING FOR PEOPLE WITH SPECIAL NEEDS

Brookline has a limited range of housing for people with disabilities, though it is not clear that the available units meet the needs of Brookline residents. Approximately half of the Brookline Housing Authority's (BHA) 945-unit public housing inventory is designated for seniors and people with disabilities, but these units are designed primarily to be accessible for people with mobility impairments. In addition to units owned and managed by the BHA, 10 developments with accessible units in Brookline were listed on the Housing Navigator site [housingnavigator.ma.org](https://housingnavigator.ma.org) as of February 2024. However, there are significant unmet needs for housing units with support services for people with other types of disabilities, e.g., mental health and cognitive impairments. The SHI (March 2022) indicates that Brookline has 79 group home units for clients of the Department of Developmental Disabilities (DDS) and Department of Mental Health (DMH).

Brookline recently analyzed a traditional set of special needs housing indicators in the Five-Year

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<sup>28</sup> See Appendix E.



Consolidated Plan (2021-2025) and identified these conditions:

- **Elderly:** over the past decade, Brookline has experienced a 9 percent increase in the number of people between 55 to 64 years and a 23 percent increase in the number of persons 65 to 74. The population 65+ accounts for 15.6 percent of Brookline's population, and 23 percent of all households have at least one person 65 and over.
- **People with Disabilities:** 7.2 percent of all Brookline residents have one or more disabilities. They are concentrated in the oldest age cohorts (75+), where 47.3 percent report a disability. Twenty-eight percent of this population reports having difficulty living independently and 32.1 percent report an ambulatory disability.
- **Domestic Violence:** 549 reported cases of households fleeing domestic violence and abuse are on the waitlist for the Brookline Housing Authority.

## HOUSING COST BURDEN

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

Table 2.4 reports tenure, household income, and housing cost burden in Brookline. It may seem that Brookline does not have a significant housing affordability problem because approximately 9,000 homeowners (80 percent of all homeowners) pay less than 30 percent of their income toward housing costs. However, there is a significant difference in owner-occupied housing affordability among households with incomes over 80 percent AMI and households with incomes at or below 80 percent AMI. About 16 percent of homeowners with incomes over 80 percent of AMI are cost-burdened, and 4 percent are **severely cost burdened** – that is, they pay more than 50 percent of their income on housing. However, 72 percent of households with incomes below 80 percent AMI are cost-burdened, and almost half are severely cost burdened.

**Table 2.4. Housing Cost Burden in Brookline**

Income by Cost Burden	Total	Renters			Homeowners		
		Total	Cost Burdened	Severely Burdened	Total	Cost Burdened	Severely Burdened
Income <= 30%	3,960	3,190	63.5%	55.2%	770	81.8%	71.4%
Income >30% to <=50%	2,180	1,360	83.1%	68.4%	820	77.4%	28.0%
Income >50% to <=80%	2,505	1,615	80.2%	18.6%	890	53.9%	28.7%
Income >80% to <=100%	1,560	800	46.3%	1.3%	760	46.1%	11.8%
Household Income >100%	14,225	5,515	9.3%	0.2%	8,710	12.8%	2.2%
Total	24,435	12,485	42.7%	24.1%	11,950	26.9%	11.0%

Source: HUD, Comprehensive Housing Affordability Strategy Data (from ACS 2015-2019).



**Map 2.9, Housing Cost Burden by Census Tracts**, geographically shows the percentage of households that are paying between 30 and 49% of their income on housing – in other words, those households that are cost burdened, but not severely cost burdened.

### AFFORDABILITY MISMATCH

Most towns have some older, modestly priced homes and apartments with low monthly rents. However, housing that is affordable due to its age, condition, limited amenities, or location is not necessarily occupied by low- or moderate-income people. HUD reports data for an affordable housing characteristic known as **affordability mismatch**, or housing units that are affordable but lived in by higher-income households. Of course, this metric does not account for the spectrum of reasons why households may not only elect, but require, affordable units for their basic living needs (e.g., costs of caring for an ill family member, lack of alternatives for elder care, lack of alternatives for people to move to while still being connected with their community and social or religious support systems). Affordability mismatch measures:

- The number of housing units in a community with rents or home values affordable to people with very low incomes (at or below 30 percent AMI), low incomes (between 31 and 50 percent AMI), and moderate incomes (between 51 and 80 percent AMI);
- The number of households in each income tier;
- How many of those households live in units they can afford, and
- How many of the affordable units have a high probability of housing problems in addition to housing costs, e.g., substandard or otherwise inadequate housing.

In Brookline, over 1,000 homeowners with incomes over 100 percent AMI live in homes that would also be affordable to people with lower incomes. There are mismatched rental units as well, most recently estimated at about 1,750 units.<sup>29</sup> The significance of affordability mismatch is that there is a supply of affordably priced housing – most likely naturally occurring affordable housing – that could provide affordability for people with lower incomes, but it is not available to them. This is why deed-restricted affordability is so important.

### AVAILABILITY OF AFFORDABLE HOUSING

According to the Consolidated Plan's Housing Needs Assessment (2021-2025), there are very long waiting lists for all types of affordable housing in Brookline. The public housing waitlist (including state and federal units) has 7,724 households in line waiting for housing at a BHA property. For older adults, the average wait time is around three years or more, and the average waitlist for families is six years or more. The BHA has seen a significant increase in housing demand because of the lack of affordable housing in the Greater Boston region. There are also 2,131 applicants on the BHA's Section 8 waitlist. It may take between eight and ten years to receive assistance from this federal program. Residents of public housing

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<sup>29</sup> HUD, Comprehensive Housing Affordability Strategy Data (from ACS 2015-2019), Tables 16-17.



and the Housing Choice program need case management and supportive services as well. The most pressing needs involve training, employment, and workforce readiness for self-sufficiency. The same needs were identified by BHA residents during the engagement process for this housing plan.

## CRITICAL HOUSING NEEDS

*Housing and transportation are the two biggest expenses in a typical U.S. household. . . . Access to alternative modes of affordable transportation, particularly transit, is critical to the lowest-income households.*

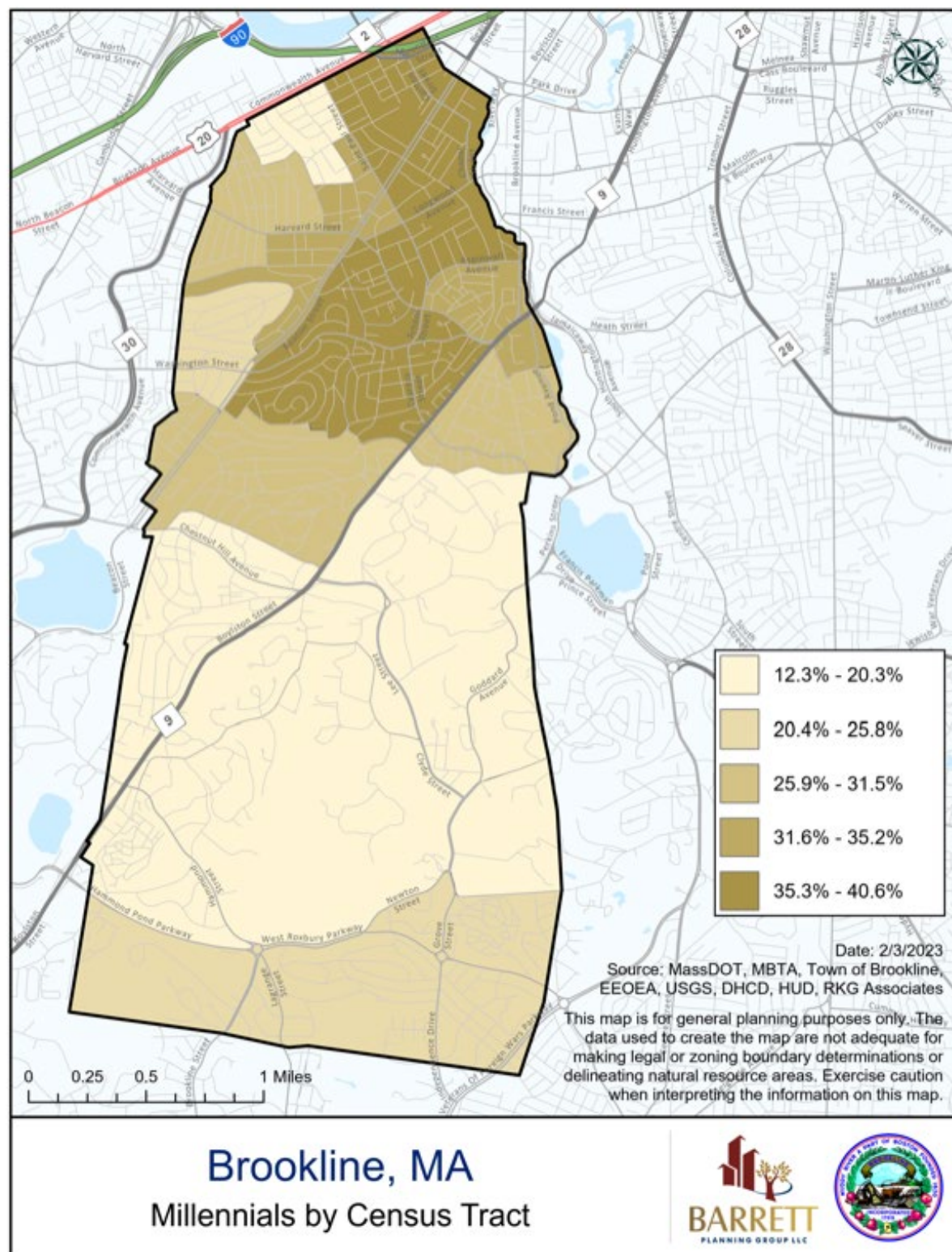
*APA Housing Policy Guide (2019)*

The Town conducted a housing needs assessment as part of the process for preparing the Five-Year Consolidated Plan in 2021. The needs Brookline identified at the time closely align with the needs identified by Brookline residents participating in the development of this housing plan. The community's most critical needs include:

- **New multifamily rental housing.** Just over half of Brookline's housing stock is occupied by renters. Forty years ago, rental units made up 67 percent of all housing in Brookline. Over time and partially in response to market pressure, multifamily buildings were converted to condominiums and offered as for-sale units. The apartments lost during that process have never been replaced with new rental housing. While an estimated 41 percent of all condominiums in Brookline are currently rented, they do not provide secure rental options. A change in market conditions could revert these units to for-sale housing for homeownership because there is no deed restriction in place to protect them as apartments.
- **Affordable housing for lower-income households (below 80 percent AMI).** Brookline continues to need more multifamily housing for low-income renters because they face significant hardships trying to find an affordable home in Brookline. The town's very high market rents prohibit low-income renters with Section 8 rental assistance to find affordable units. Higher-density multifamily housing that includes a significant share of affordable units should be developed around train stations connecting Brookline to local and regional employment and services, and in other locations, such as commercial corridors and along the edges of traditional residential areas, designed to fit within these locations, recognizing that maximizing the number of affordable units is the overarching goal.
- **Housing for people with special needs.** The inventory of units serving residents with special needs population is not aligned well with their needs. Half of the Brookline Housing Authority's 945-unit public housing inventory is designated for seniors and people with disabilities, but these units are designed primarily to be accessible for people with mobility impairments. There continue to be significant unmet needs for housing units with support services for people with other types of disabilities, e.g., mental health and cognitive impairments.

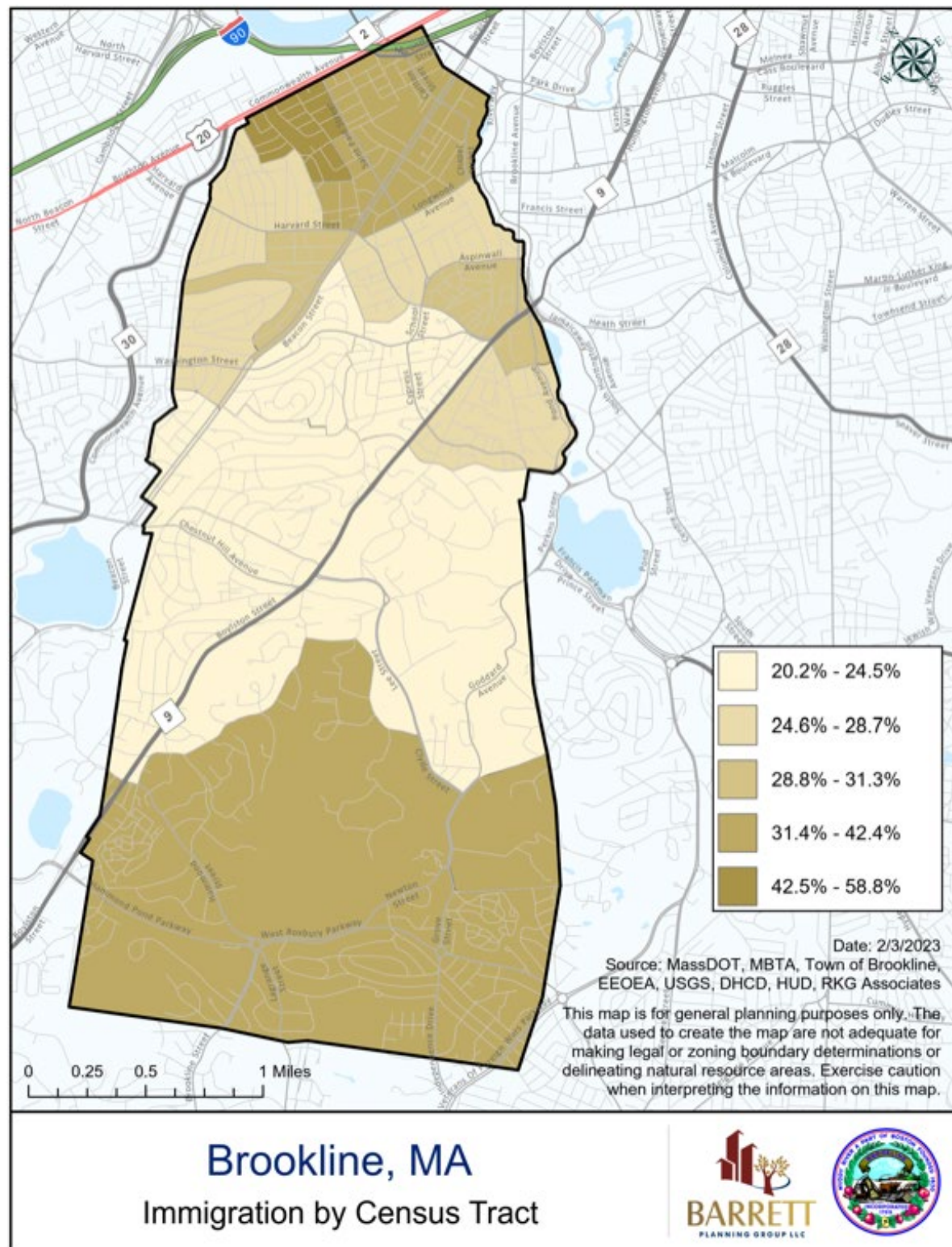


## Map 2.1. Brookline's Millennials

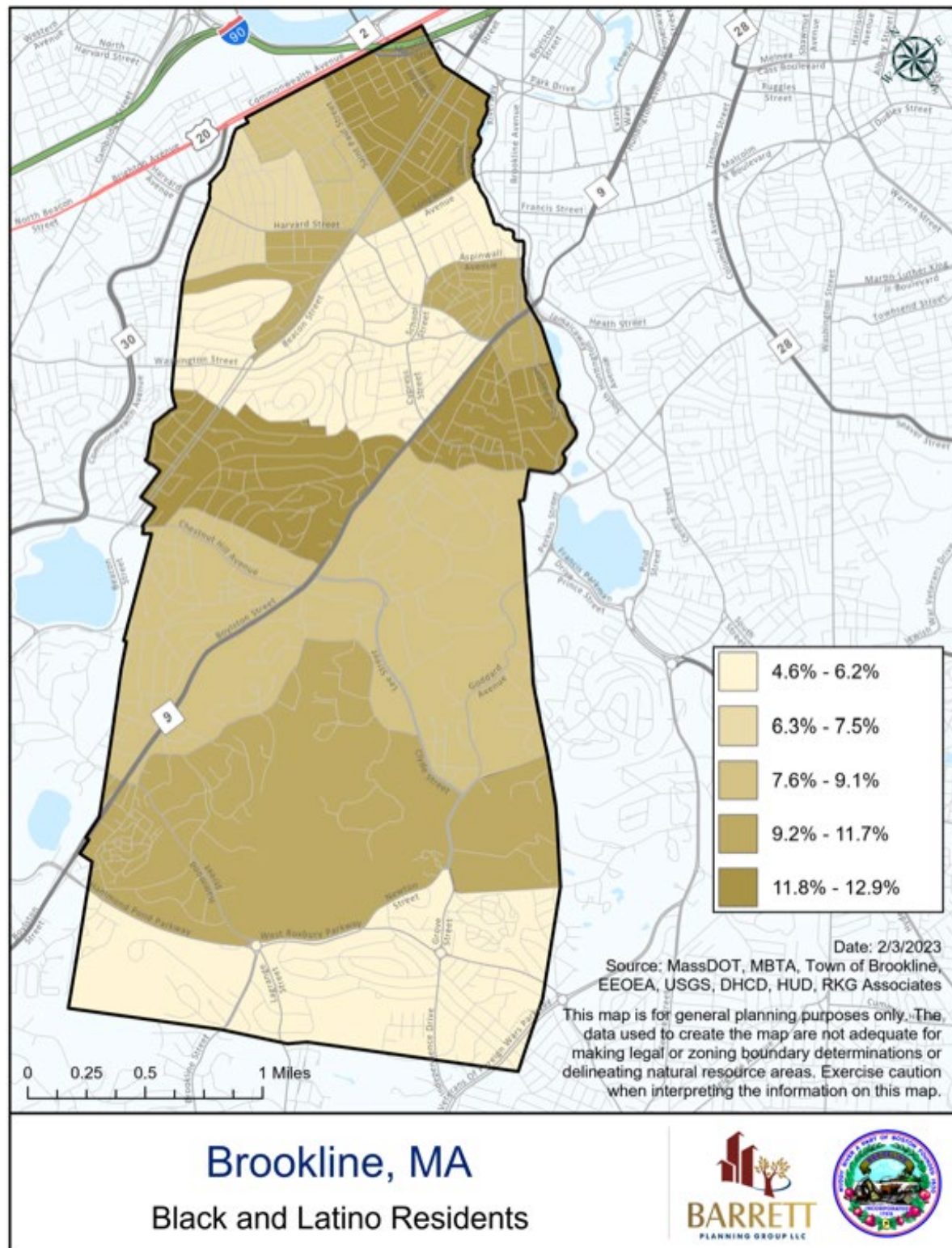




## Map 2.2 Immigration by Census Tract

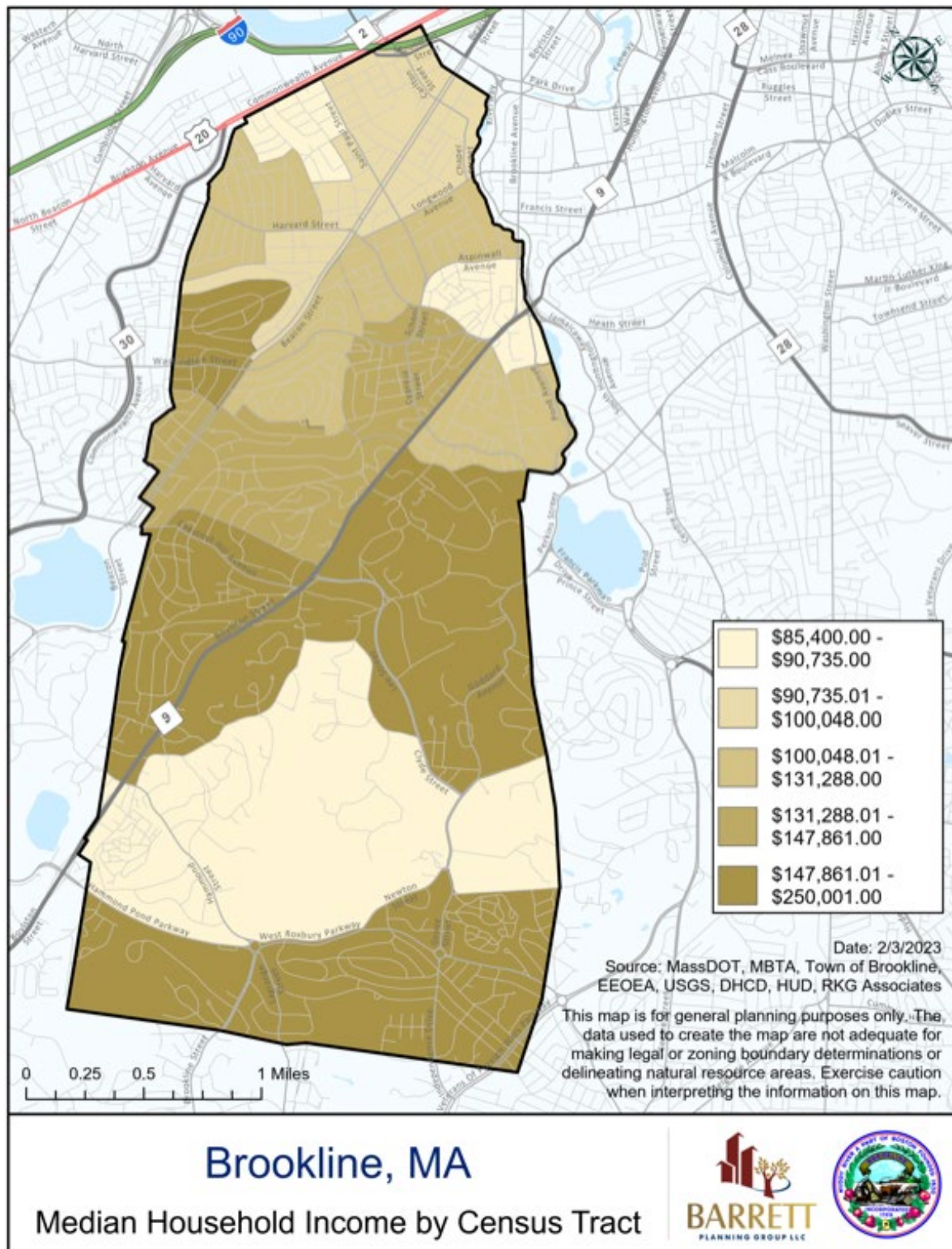


## Map 2.3 Black and Latino Residents



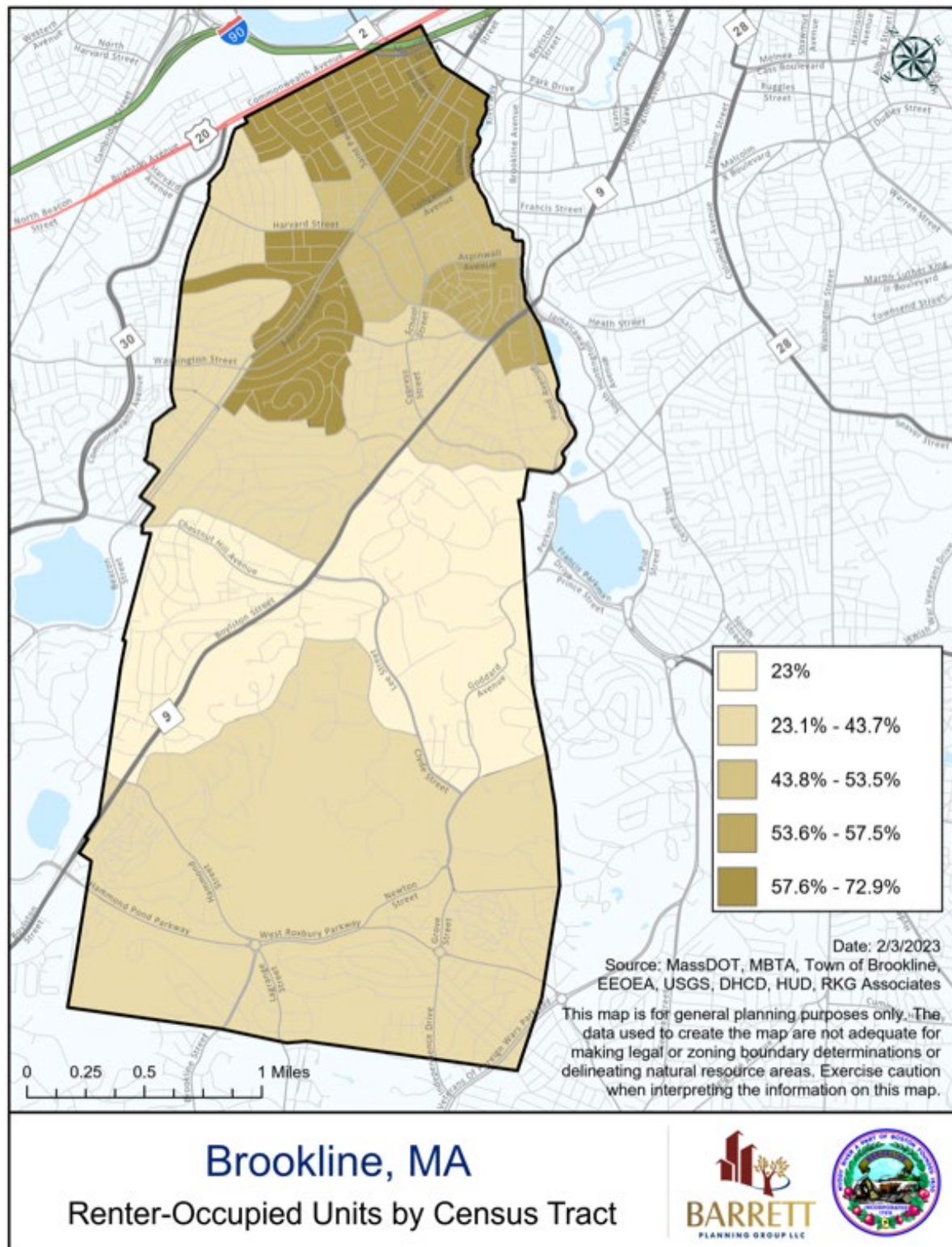


## Map 2.4 Median Household Income

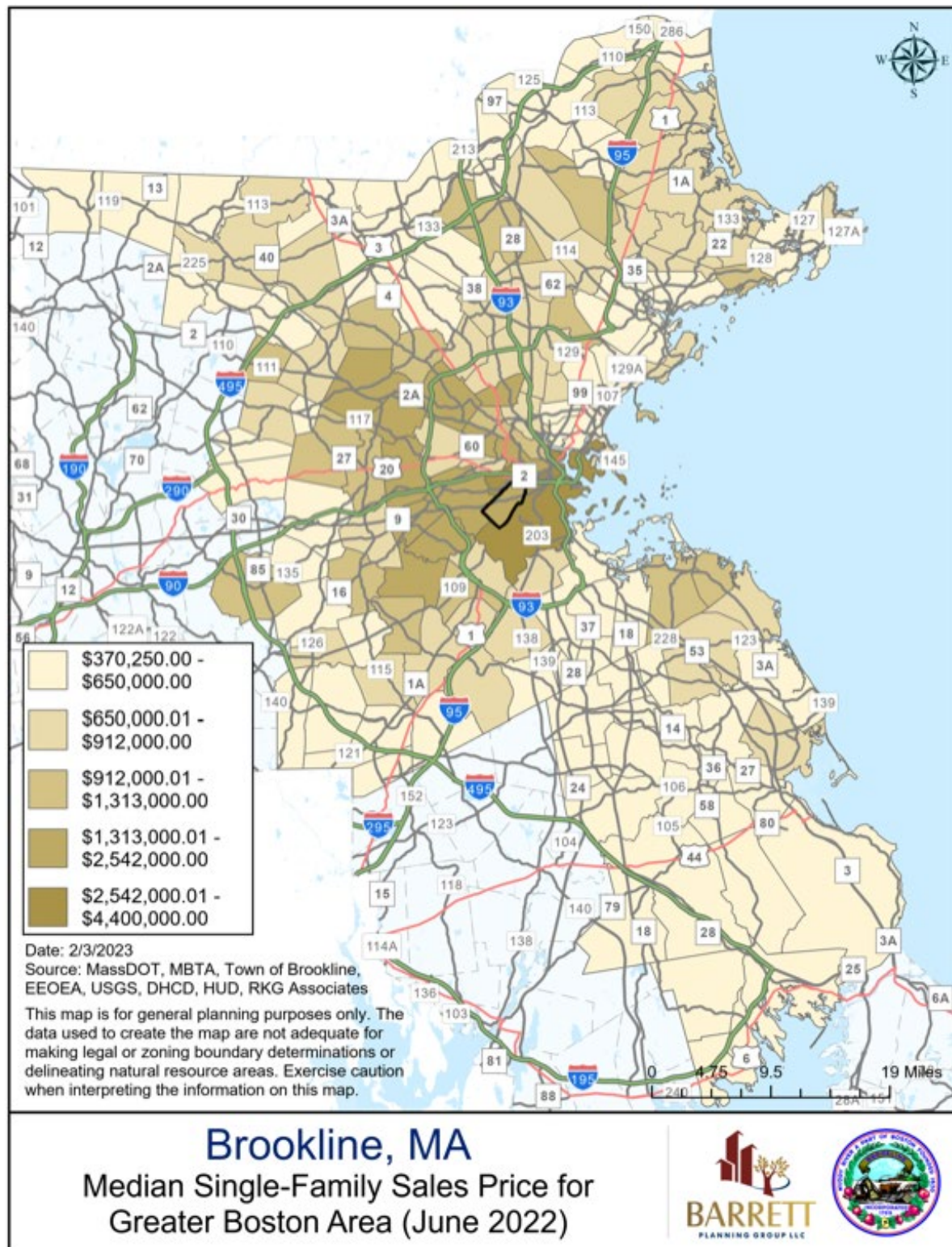




## Map 2.5 Renter-Occupied Units

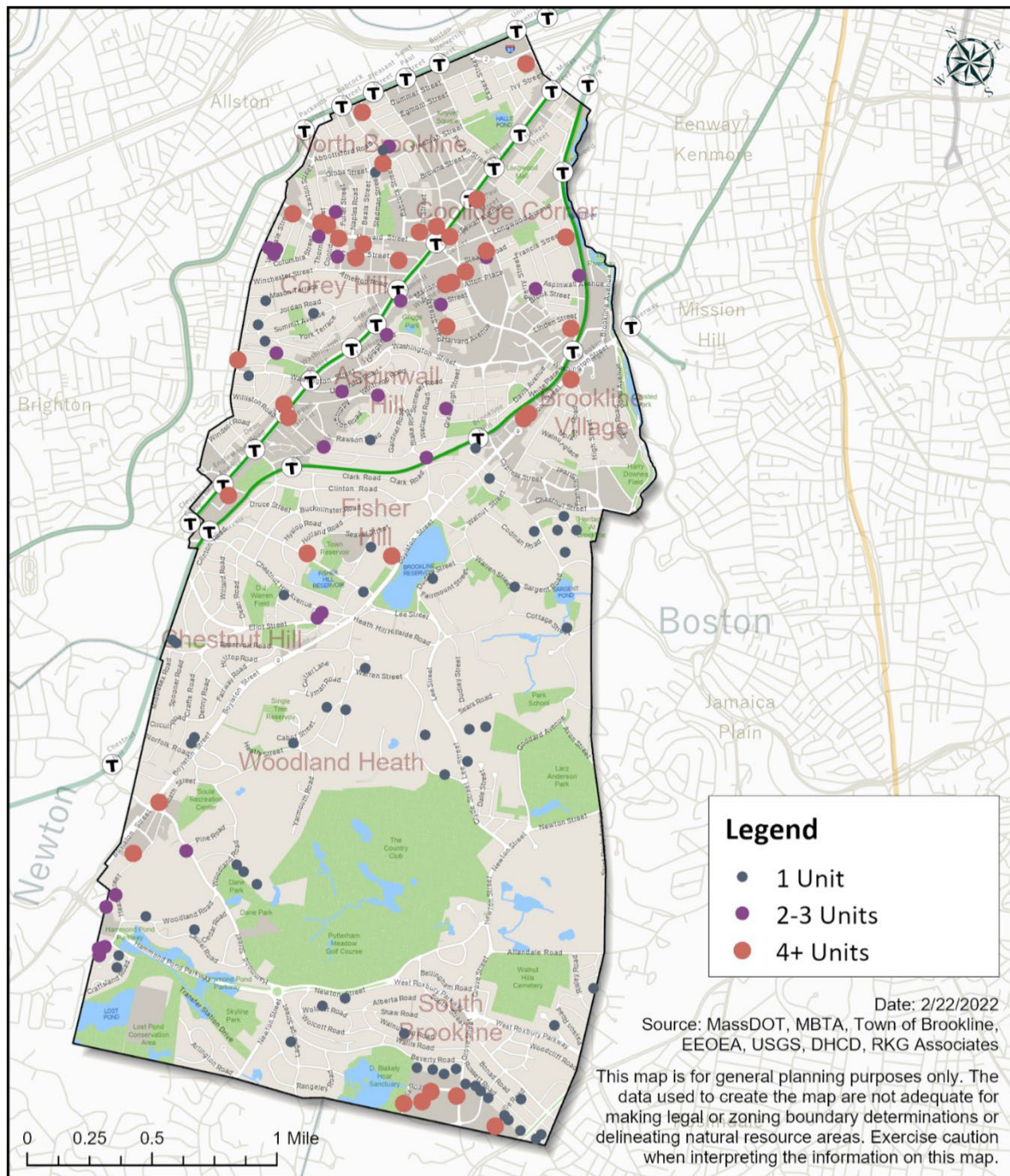


## Map 2.6 Single-Family Home Prices





## Map 2.7 New Construction Housing Projects

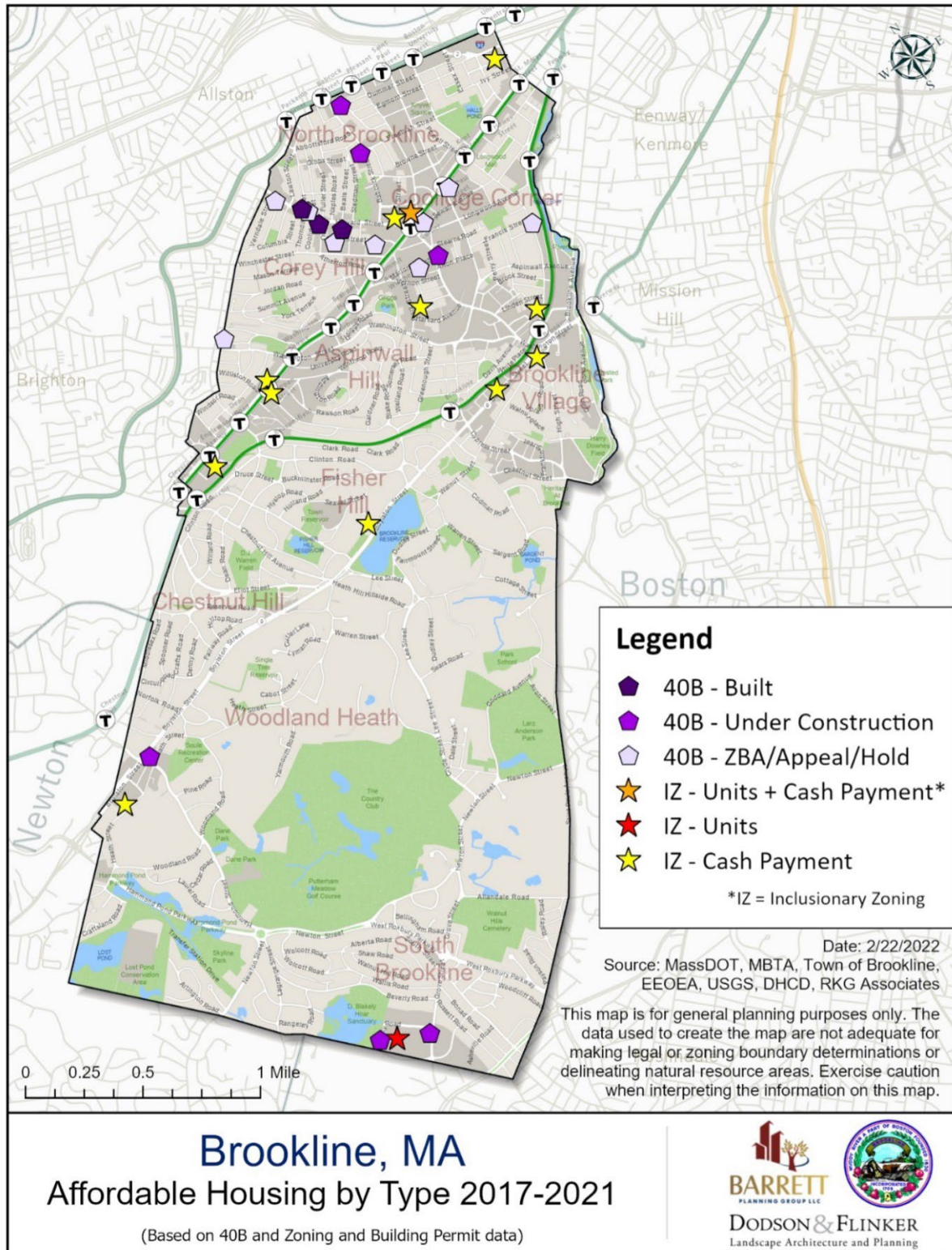


**Brookline, MA**  
**Housing Permits 2017-2021**  
 (Based on Brookline Zoning and Building Permit data)

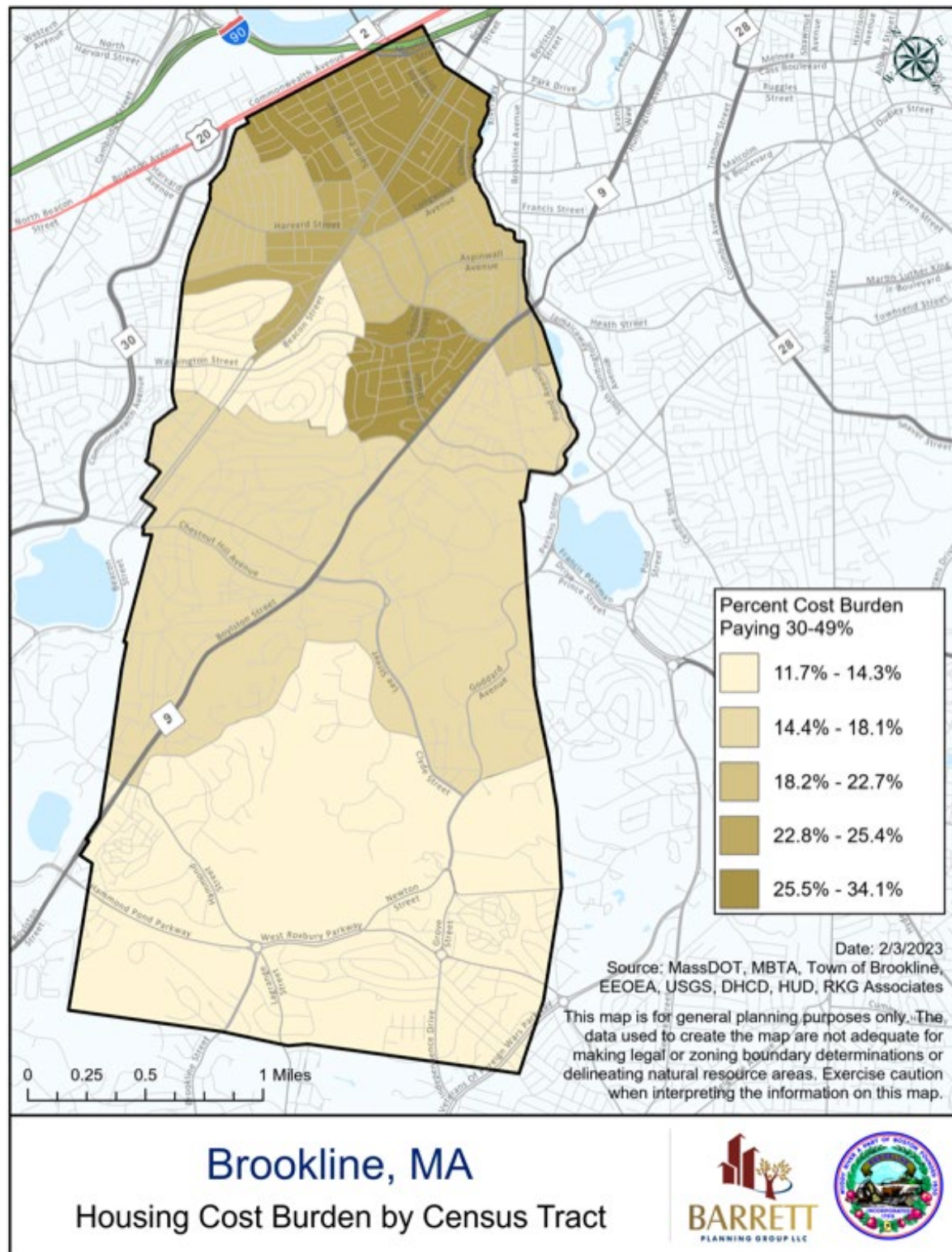




## Map 2.8 Affordable Units in New Construction



## Map 2.9 Housing Cost Burden by Census Tract





*“Brookline public housing is a Godsend.”*

*Community submission to the Six-Word Stories Project*

## 3. Regulatory Challenges and Opportunities

### MUNICIPAL INFRASTRUCTURE CAPACITY

The Town of Brookline Administrator’s Office updates the long-range financial plan every year, which includes a 5-year look ahead of needed capital infrastructure projects. This plan is drafted following Department interviews with a staff panel including the Deputy Town Administrator, Finance Director, Director of Planning & Community Development, and Director of Sustainability and Natural Resources. Infrastructure planning evaluates essential services and facilities, such as roads, water and sewer, public safety and schools. It also includes services that maintain the quality of life and improve community health, such as the senior center, public library, and recreational, cultural, and community health services. This annual planning process allows the Town to identify emerging trends and adjust the operating and capital budgets to address anticipated impacts.

While ongoing maintenance, rehabilitation, and replacement of roadways (and the stormwater, water, and sewer infrastructure beneath them) continue to be an ongoing budgetary challenge, these pressures are not significantly impacted by new housing growth, as undeveloped land is rare and of relatively small size (mostly five acres or less). Additionally, new development is responsible for upgrading any public water/ sewer/ stormwater mains as needed. As part of the Massachusetts Water Resources Authority system, constraints are planned for regionally. As roadways are reconstructed, the Town looks to add infrastructure for multiple modes of transportation as appropriate. Depending on the size of a single project, developers are often required to mitigate transportation impacts either by funding or constructing crosswalks, pedestrian signals, bike lanes, signal infrastructure, etc.

The amount of public recreation space continues to be insufficient for the Town’s population, and is below national benchmark standards, according to the 2018 Open Space and Recreation Plan. As noted in the 2020 Athletic Fields Needs Assessment and Master Plan, an additional 73 to 105 acres of land are needed to support the existing population with outdoor active and passive recreational purposes. The recent adoption of the Community Preservation Act means the Town now has a new source to raise funds to acquire additional properties, although competing with the market for residential development is recognized to be a significant hurdle in meeting this goal. Overprogramming due to high public demand and an inadequate number of athletic fields results in subpar conditions despite robust maintenance practices. As noted later in this report, one small way to help attenuate this significant issue might be to consider replacing percentage-based open space requirements with performance-based open space



requirements, for example, that there is adequate space for X number of children to play, or adequate space for a gathering of X people.

The Public Schools of Brookline (PSB) and the Department of Planning & Community Development work closely together and meet a couple times a year to update housing growth projects, which enables PSB to balance school enrollment between elementary schools, make policy adjustments (e.g., accepting non-resident students or classroom size), and plan for new capacity infrastructure. Including demographic and housing forecasts, the Cropper GIS 2023 Demographic study prepared for PSB predicts that the total district (K-12) enrollment is forecasted to decrease by 88 students, or -1.3%, between 2023-24 and 2028-29 and then increase by 511 students, or 7.7%, from 2028-29 to 2033-34, for a total of 7,188 students, which is lower than enrollment reported to the state in the 2013-2014 school year. Although PSB had been under extreme capacity stress, especially with regards to common spaces like cafeterias and gym space, recent and planned school renovation and reconstruction projects at the Ruffin Ridley, Driscoll, and Pierce Schools all increase classroom capacity. PSB and the Town will continue to update enrollment projections as future renovation and reconstruction projects are planned for.

## LAND USE REGULATIONS

Zoning bylaws regulate the type and location of development within a community under G.L. c. 40A. For the purposes of a Housing Production Plan, zoning can be considered a constraint if the ordinance or by-law significantly limits the diversity of housing stock or the expansion of housing supply to meet demand. At the same time, provisions of a zoning code can present opportunities to address housing in general and affordable housing in particular. Participants in group interviews for this needs assessment identified issues with Brookline's Zoning Bylaw and how it may present barriers to the creation of affordable housing in the town, but not everyone agrees. The problem is not necessarily that there is inadequate land zoned for multi-family. Other factors such as the economics of land costs and writing down market rate units in Brookline to Boston-area affordable levels are important factors as well. The Brookline Zoning Bylaw contains some provisions that could advance the production of affordable housing, but in their present form they may not be as effective as they can be.

## PROGRESS SINCE THE 2016 HOUSING PRODUCTION PLAN

Previous plans identified aspects of Brookline's Zoning Bylaw that make it challenging to meet the Town's demand for housing. Since the 2016 Housing Production Plan, Brookline has approved zoning amendments that address some of these issues. Key changes include allowing accessory dwelling units and reducing parking requirements and/or providing exceptions to them, expanding affordable housing requirements, removing restrictions on age restricted dwellings and micro units, and creating overlay districts that provide more housing options. These amendments are summarized in Table 3.1:





Table 3.1. Key zoning amendments since the 2016 Housing Production Plan

Topic & Sections in Zoning	Date of amendment	Summary of amendment
Accessory Dwelling Units  §2.01, 2.15, 4.04, 4.05, 4.07, & 5.22	2019 Fall Town Meeting	Allows additional units to be added to qualified owner-occupied property in all residential districts and in the Local (L) and General (G) Business districts, provided they cover no more than 30% of the existing habitable space or 750 square feet, whichever is less (up to 950 square feet with a Special Permit). Conditions include owner-occupancy of the property for five or more years, no new structures, and no increases to the existing building envelope without a special permit, provided that FAR remains at or below 120% of the existing requirements.
Affordable Housing Requirements  §4.08	2020 Fall Town Meeting	Lowers the threshold of applicability for projects from the creation or alteration of six units to the total outcome of four units, of which only one must be newly created or altered. The amendment also raises the threshold for qualifying low or moderate income from 100% to 120% of the median income for owner-occupied projects, provided that the subsidized housing inventory meets Chapter 40B requirements. Allows applicants to make a cash payment to the Housing Trust for projects with between 4 and 19 units and requires that they do if the number of required affordable units is less than 0.5 units.
Affordable Housing Requirements  §4.08	2021 Spring Town Meeting  and amendments at 2021 Fall Town Meeting and 2023 Spring Town Meeting	Modifies the definition of an affordable unit and eligible household. Allows applicants to provide affordable units to households that exceed 50% of area median income for rental units and 80% of area median income for ownership units if the applicant made a supplemental payment to the Housing Trust.  Lowers the maximum units that an applicant can choose to make cash payments in lieu of on-site affordable units from 19 to 10.
Age Restricted Dwellings and Micro Units  §2.04, 4.07, & 5.06.4	2021 Spring Town Meeting	Removes age restricted dwellings and micro units as restricted uses from the Table of Use Restrictions and further defines their use in the Emerald Island Special District.
Parking Requirements	2019 Fall Town Meeting	Eliminates minimum parking requirements and established maximum parking requirements for storefront uses in the Transit Parking Overlay District. This is relevant to mixed-use projects.
Parking	2021 Fall Town	Adds SC, and T districts to the list of districts where the Board of



Table 3.1. Key zoning amendments since the 2016 Housing Production Plan

Requirements	Meeting	
§6.01 & 6.02		<p>Appeals is allowed to issue a special permit to reduce or eliminate parking requirements when a structure is converted for additional dwelling units. This special permit was already allowed in F, M, L or G districts.</p> <p>Allows any residential development to reduce or eliminate minimum parking requirements (except handicapped accessible parking spaces) by special permit for applications that demonstrate a qualifying public benefit. Qualifying public benefits include the creation of additional housing units that would otherwise be infeasible because of parking requirements; excess affordable housing units beyond those required by §4.08; fossil fuel free buildings, preservation of historic or architecturally significant buildings, preservation of trees or landscaping, providing more landscaped or usable open space than is required, and providing support to “community services or facilities.”</p> <p>Removes a provision that doubled parking requirements for dwelling units occupied by three or more unrelated people</p> <p>Reduces minimum parking requirements in the Transit Parking Overlay District (TPOD) for projects that result in an increase in the number of housing units to .5 parking spaces per studio, and 1 parking space for dwelling units with 1 or more bedrooms, while also requiring that any development in the TPOD with 15 or more dwelling units shall provide handicap accessible parking spaces equal to 5% of the number of units.</p>
<p>New Residential Overlay Districts</p> <p>§3.01.4, 4.07, 5.01, 5.06.4, 6.02, 7.07</p>	<p>2019 Spring Town Meeting (Waldo-Durgin)</p> <p>2020 Spring Town Meeting (Fisher Hill)</p> <p>2016 &amp; 2023 Fall Town Meeting (Emerald Island)</p> <p>2023 Fall Town Meeting (MBTA-CA Multifamily Overlay)</p>	<p>The <b>Emerald Island Overlay</b> and three other overlay districts provide specific zoning conditions to meet goals in mixed-use development and housing.</p> <p><b>Waldo-Durgin Overlay District</b> – targets three parcels in the Coolidge Corner neighborhood to expand mixed-use development with flexible ground floor use</p> <p><b>Fisher Hill Special Overlay District</b> – encourages assisted living facilities for seniors on the former Newbury College campus, allowing greater density while preserving historic and natural features</p> <p>MBTA-CA Multifamily Overlay District - in compliance with the MBTA Communities Act, establishes an overlay zoning district over many M-1.5, M-2, and M-2.5 districts to permit multifamily use by right (without a discretionary permit such as special permit or variance).</p>



**Table 3.1. Key zoning amendments since the 2016 Housing Production Plan**

Short-term Rentals	2021 Spring Town Meeting	Establishes short-term rentals as an allowed use in all districts.
Harvard Street Form-Based Zoning	2023 Fall Town Meeting	Replaces Floor Area Ratio with a series of form-based code for most properties abutting Harvard Street, allowing four-story buildings in many cases by right.

Nevertheless, aspects of Brookline’s Zoning Bylaw continue to affect the Town’s ability to meet its housing production needs. The following sections summarize the existing zoning with the goal of identifying key regulatory barriers, which would benefit from location-based testing.

## ZONING DISTRICTS

Brookline has nine classes of zoning districts that divide the land into residential, business, and industrial uses. These include five classes of Residence districts, each of which has individual sub-districts. Districts for Single-Family and Two-Family districts are indicated by their minimum lot area in thousands of square feet. All other districts are indicated by their floor area ratio (FAR). Single-Family (S) districts range in minimum lot size from 4,000 to 40,000 square feet and make up 72 percent of the Town’s land.<sup>30</sup> A majority of the town’s housing is found in Apartment House (M) districts, making up 12 percent of land, and Two-Family (T) districts, making up 10 percent of land. Single-Family Converted for Two-Family (SC) districts make up another percent and half of land, and less than half a percent of land is zoned for Three-Family housing. These multi-family districts are clustered around the commercial areas of North Brookline and Coolidge Corner, Brookline Village, Washington Square, Route 9 East, Route 9 Reservoir, Chestnut Hill, and Hancock Village. The core of these areas is zoned for General (G) or Local (L) Business districts, accounting for much of the remaining 4 percent of land. Less than half a percent of land is in Business and Professional Office (O) districts, located at Route 9 Reservoir and Chestnut Hill. While G and L districts allow three-family housing by right, and housing for four or more units with affordable housing requirements, the O districts only allow single and two-family housing by right. Industrial (I) districts make up less than a fifth of a percent of land, mostly in South Brookline and along Route 9, and also allow multi-family housing with affordable housing requirements. **Map 3.1 depicts Brookline’s Zoning Map.**

The distribution of zoning districts in Brookline concentrates development around commercial areas in northern Brookline, many of which also have options for public transit through the Massachusetts Bay Transportation Authority (MBTA).<sup>31</sup> While this allows developers to take advantage of existing infrastructure and neighborhood amenities, it leaves large areas as Single-Family districts that are off-limits to 2-3 family housing, or multi-family housing.

<sup>30</sup> Sasaki & RKG, *Major Parcels Study*, (Town of Brookline, March 2018).

<sup>31</sup> MBTA bus service is also available in South Brookline.



The 2016 Housing Production Plan identifies limited zoning south of Route 9 as a central issue requiring resolution, and community workshop feedback on site suitability suggested a few approaches: identifying development sites in South Brookline that may grow as mixed-use commercial areas; pursuing opportunities to expand transit in these areas; and supporting housing options in South Brookline. Additionally, the 2018 Major Parcel Study notes large single-family parcels currently used for institutional purposes that could potentially be subdivided to create housing at greater density. The study suggests adopting institutional zoning districts that require master plans to prevent this process, citing Boston's Institutional Master Plan requirement as a model to gain community benefits, conservation restrictions, and rights of first refusal.

In northern Brookline, complex zoning patterns may make implementing a unified vision for neighborhood development more difficult. The 2016 Route 9 Action Plan, "Bringing Back Boylston," notes that the geographic division of districts seems "arbitrary" at times, such as along Cypress Street, and this can inhibit coordinating a cohesive mixed-use corridor along Boylston Street. While the many transitions between districts in the zoning often reflect the rich diversity of Brookline's existing built environment, they may also present challenges for designing future housing developments on parcels that fall in different districts with different standards and in contexts where the existing character is diverse. In some cases, Brookline's zoning has established relatively low-density commercial districts (L-.05, L-1.0, G-1.0) on commercial corridors, perhaps to limit impacts on adjacent residential properties from additional development and/or to maintain low-rise commercial structures. These locations, on the other hand, are a logical place for additional housing development because they are relatively undeveloped and located on significant corridors. Because many of the resulting districts are only one parcel deep and the parcels themselves are not deep, significantly increasing density on these parcels will inevitably have some impacts on adjacent residential parcels. Continuing to develop corridor plans for these areas will help Brookline determine where existing residential parcels adjacent to corridors need to be protected and where the benefits of additional development on the corridors outweigh harms.

## OVERLAY DISTRICTS AND SPECIAL DISTRICTS

Previous plans have noted the success of overlay and special districts in meeting local development goals without changing underlying zoning. The Route 9 Action Plan cites the Davis Path Special District, G-(DP), as a model approach to tailoring requirements for parking, height, FAR, and design to local constraints and needs, in this case, for a single parcel. The resulting development of the Hilton Homewood Suites used architectural elements to integrate with the surrounding community and dedicated additional public benefits, such as street trees and improvements to a local playground. Similarly, the 2016 Housing Production Plan calls the Fisher Hill Town-Owned Reservoir Mixed Income Housing Overlay District "a model for other similar overlay districts" because it encouraged a mix of two- and three-bedroom units and affordable and market rate housing, in part by using town-owned land on Olmsted Hill.

The 2018 zoning map includes six overlay districts and two special districts. Recent amendments introduced four more: the Waldo-Durgin Overlay District, the Emerald Island Special District, the Fisher Hill Overlay District, and the MBTA-CA Multifamily Overlay District. The Waldo-Durgin and Fisher Hill districts came about in response to specific developer proposals, and in both cases, they involved written agreements with the proponents as a condition of the rezoning. The Waldo-Durgin Overlay District is



notable because it encourages dense, mixed-use development in the Coolidge Corner General Business District (G-1.75 CC), by setting a maximum FAR of 6.0, maximum building heights between 125-160 feet, and requirements for parking to be underground. The district also responds to housing demand by providing flexibility to exceed the zoning's forty percent limit on residential ground floor frontage. Similarly, the Fisher Hill Special Overlay District allows greater density than the surrounding zoning. Located on the former Newbury College campus within Single Family districts S-15 and S-25, the district allows a maximum FAR of 1.15 and maximum heights ranging from 55 feet to 100 feet, with the goal of increasing senior housing options by expediting special permitting for assisted living facilities. By incorporating historic preservation and a public easement to preserve mature shade trees along Fisher Avenue, the district cites additional benefits to the community. Both of these districts also incorporate a Design Review process that requires developments to be designated as a Major Impact Project, triggering additional review, and to include a Transportation Access Plan Agreement ("TAPA").

Finally, the MBTA-CA Multifamily Overlay District did not change the allowable building dimensions, but does create a process to build multifamily in many existing multifamily districts without requiring a special permit or variance.

Overlay and special districts have proven to be a valuable tool for facilitating the creation of more housing in Brookline, but creating one is a resource intensive process that can take several years. §5.06 Special District Regulations lays out the framework for adopting new Special Districts. It says:

The establishment of Special District Regulations shall be based on one or more of the following:

- a. A study of land use, building, environmental, economic, architectural, design or other physical features of an area or district that defines the conditions and purposes supporting the establishment of Special District Regulations and the geographic area that will be subject to the regulations.
- b. The Comprehensive Plan, neighborhood or commercial area plan that defines an area where Special District Regulations should be applied.
- c. A conceptual or schematic design plan for one or more parcels of land or buildings within a district that will benefit from Special District Regulations.<sup>32</sup>

This opens the possibility that location-based testing produced for this plan could serve as the basis for overlay or special districts, jump-starting the process of adopting zoning changes.

## MIXED-USE DEVELOPMENT

The 2016 HPP noted that mixed-use development is not defined in the Zoning Bylaw or delineated in the Table of Use Regulations, and no amendments have updated this since then. The 2016 HPP and other

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<sup>32</sup> Town of Brookline Planning & Community Development Department, *Zoning Bylaw, Town of Brookline, Massachusetts* (Brookline: Town of Brookline, November 13, 2018).



plans have found community interest in mixed-use development to foster vibrant, walkable community centers and to facilitate transitions between neighborhoods. While residential development is an option for General and Local Business districts, provided that it occupies forty percent or less of a building's ground floor, other districts do not explicitly allow for mixed commercial and residential uses in a single building. The 2018 Commercial Areas study notes community interest in mixed-use development around Washington Square, North Brookline and Coolidge Corner, the junction of Cypress and Boylston Streets, and at Tully Street West in Chestnut Hill, the last of which is currently zoned for office use.<sup>33</sup>

## DIMENSIONAL REQUIREMENTS

Brookline's dimensional requirements, including maximum height, minimum lot size, maximum floor area ratio, and minimum landscape and usable open space requirements are one of the main drivers of - or constraints upon - the density of housing development in the town.

## DENSITY CONTROLS

The largest Single-Family districts, S-40, S-25, and S-15, account for nearly half of all Brookline's land. In these districts, minimum lot size requirements (combined with limitations on two-, three-, and multi-family development) is the main determinant of allowed density. In addition, the Zoning Bylaw provides a few exceptions to enable greater density of new construction. Cluster subdivisions allow minimum lot sizes in these districts to be reduced by half but require 2-5 acres of land, and the overall base density cannot exceed that allowed by a conventional subdivision. Density bonuses up to 25 percent more units can be allowed by special permit for additional open space, concealed parking, and/or superior site design. Similarly, in these districts a large older house (minimum 5,000 square feet constructed prior to July 27, 1962) can be converted into more than one dwelling unit, provided that the base density matches the existing lot size divided by the minimum required lot size for the district. Again, density bonuses are provided.

There are precedents for allowing additional dwelling types in S Districts via Overlay and Special Districts. As described above, the Fisher Hill Town-Owned Reservoir Site Mixed-Income Housing Overlay allowed multi-family dwellings. Multiple or attached dwelling of four or more units are allowed by special permit in two Special Districts S-0.5P (Longyear at Fisher Hill on Seaver Street) and S-0.75P (Olmsted Park Condominiums on Glen Road)—both are completed projects that converted of large estates into expensive condominium complexes.

To facilitate housing production in single-family districts, the Town could explore some or all of the following: reducing the minimum land required to qualify for a Cluster Subdivision, establishing a density bonus for affordable housing for cluster subdivisions or conversion or large older houses, increasing the number of units allowed by density bonuses, and/or allowing additional dwelling types within clusters (two-family, three-family, or multi-family). In addition, the town could explore expanding provisions for conversion of existing large and significant houses into multi-family dwellings, by reducing the minimum

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<sup>33</sup> Metropolitan Area Planning Council, *Perspectives and Opportunities for Brookline's Commercial Areas*, (Town of Brookline, March 2018).



size of dwellings that qualify for conversion and/or allowing conversion of more recently built structures.

Another avenue for increasing the allowable number of housing units some districts is provided by §5.05 of the Zoning Bylaw (§5.05) which allows a special permit to convert a single-family detached dwelling to a two-family dwelling in an SC or T District, or to add additional units in an F or M district. The Board of Appeals may waive dimensional requirements, other than lot size, if existing non-conformities are not expanded. Zoning amendments adopted at the Fall 2021 Town Meeting, also enabled the Board of Appeals to waive parking requirements associated with this type of conversion by special permit.

Except for the recently passed Harvard Street form-based zoning district, the Three family (F), Apartment house (M), General Business (G), Local Business (L), Business and Professional Offices (O), and Industrial Services (I) districts use maximum FAR, rather than minimum lot size, as the primary determinant of density. Apartment House (M) districts range in FAR from 0.5 to 2.5, while Local Business (L) districts range from 0.5 and 1.0 and Business and Professional Offices (O) and General Business (G) districts range from 1.0 to 2.0. Low FAR requirements in may be particularly constraining for mixed-use development. For example, the 2018 Commercial Areas study found that priority sites at Cypress Junction fell in the L-0.5 district and had already exceeded the allowed building area.

While the Zoning Bylaw offers FAR bonuses by special permit in exchange for public benefits in M, G, and O districts, as outlined in §5.21, these are only granted for districts with a FAR of 1.5 or greater and with lots larger than 20,000 square feet. The 2016 Route 9 Action Plan concluded that the criteria for meeting public benefit expectations can be unclear and suggested adopting clearer guidance for density bonuses. Another suggestion from the 2005 Comprehensive Plan is to implement a lot-coverage maximum, rather than a floor area ratio, to meet design goals, such as limiting the “mansionization” of buildings in Single-Family Districts.

The Zoning Bylaw’s height restrictions limit buildings to four stories or less in many locations. Height limits range from 35 to 50 feet in M districts, 40 feet in L districts, and 45 feet in G districts, with taller heights available in special or overlay districts. The Table of Dimensional Requirements, §5.31, and §5.32 establish mechanisms for additional height when certain public benefits are provided. The size of these height bonuses in M-1.5, M-2.0, M-2.5, G-1.75(CC), G-2.0 or O-2.0(CH) districts is limited by proximity to land in S, SC, T or F districts (see §5.31 3.). Meanwhile, in M-1.5, M-2.0, M-2.5, G-1.75, and O-2.0(CH), and on some streets in G-2.0 Districts the extra height must be set back from street lot lines. Extra height allowed through Public Benefit Incentives must also be set back 50 feet from any land not in a public way in an S, SC, T, F, or M District. According to the 2018 Commercial Areas study, the maximum heights limit development for priority projects along Commonwealth Ave in North Brookline, and around Washington Square, Route 9 East, and Coolidge Corner.<sup>34</sup>

Landscape and Useable Open Space requirements provide another limit to residential development. The dimensional table establishes required landscape and usable open space percentages for the residential

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<sup>34</sup> Metropolitan Area Planning Council, *Perspectives and Opportunities for Brookline’s Commercial Areas*, (Town of Brookline, March 2018).





districts (S, SC, T, F, and M). For residential development in business and industrial districts the required percentage of usable open space matches the percentage required for the M district of the same maximum FAR (see §5.07). The Board of Appeals may waive this requirement by special permit, when the waiver “would promote reasonable development of the site compatible with adjacent buildings and the surrounding area.” It is important to note that while open space standards present a development limitation, they can also provide an important community benefit, especially as maturely developed sites are cleared for redevelopment.

## **PARKING REQUIREMENTS**

Brookline requires a minimum of two off-street parking spaces per dwelling unit for residential developments, and as many as 2.3 spaces for dwelling units with more than two bedrooms. Previous plans have identified these high requirements as constraining residential and mixed-use development, due to the extensive space required to accommodate surface parking or the high expense of underground or structured parking. Until recently, these requirements could only be reduced by special permit for affordable housing and age-restricted units, in the Transit Parking Overlay District, or for Housing Authority units serving elderly persons.

However, as noted above, a November 2021 amendment allows any residential development to apply for a reduction or elimination of minimum parking requirements by special permit if the application demonstrates a public benefit, including the creation of additional housing. The amendment also reduces parking requirements for residential projects that increase the number of dwelling units in the Transit Parking Overlay District to .5 parking spaces per studio, and 1 parking spaces for dwelling units with 1 or more bedrooms, while requiring the provision of handicap accessible parking for projects that are 15 units or more. The increased flexibility for parking provided by recent zoning amendments responds to previous planning recommendations and will make housing development more feasible.

## **AFFORDABLE HOUSING REQUIREMENTS**

Brookline’s zoning establishes inclusionary housing provisions via §4.08, which was last amended at Town Meeting in Spring of 2023. The section applies to:

- Any new construction, or alteration, expansion, reconstruction, or change of a pre-existing residential or non-residential space project that will, upon completion, have four or more units with at least one new unit created. Some units within pre-existing buildings are not counted toward the requirement for 15 percent affordable housing units or cash payments.
- Any subdivision that will have four or more dwelling units
- Any life care facility that includes four or more assisted living units

These projects must apply for a special permit and must provide 15 percent of the units as affordable housing units. Units can be provided on site, off-site if they produce a more favorable outcome than on-site units, or through a cash payment to the Town’s Housing Trust (only if the project has between 4 and 10 units).



Units must be rented or sold to an eligible low- or moderate-income household. For rental units, the rent shall be set such that the target household will not pay more than 30 percent of their gross income on rent and tenant-paid utilities. The target household is sized at one person more than the number of bedrooms in the unit and at the applicable income limit. For sold units, the sales price is set so that a household with one person more than the number of bedrooms and “with an income set at 10 percentage points less than the applicable income limit, would be paying 30 percent of gross income towards a mortgage, mortgage insurance, condominium fee and property taxes for a standard thirty-year mortgage at 95 percent of the sales price.”

The section requires that units be dispersed throughout the project, look the same from the outside, and have the same mechanical systems and finishes as the market rate units, with some limited exceptions. The section sets minimum sizes for the affordable units. In addition, the section allows other options to fulfill the requirement that may continue to advance town housing goals, if approved by the Zoning Board of Appeals:

- Providing affordable units off-site;
- Conveyance of land and/or buildings suitable for housing;
- If the project contains between four and nineteen units, the developer may make a cash payment to the Town’s Housing Trust, which will be used to fund affordable housing projects in other Brookline locations.

A review of projects from 2017 to 2022 shows that of the thirteen projects with a Zoning permit that triggered the affordable housing requirements, eleven opted to make a cash payment, and only one met the requirement solely by building affordable units, while another combined a cash payment with affordable units. These numbers indicate a preference by developers to pay a fee rather than develop affordable housing. On one hand, this indicates the requirement’s success of providing options to meet affordable housing needs, producing funds that can be used in the future. On the other hand, the cash payment approach defers the actual production of much-needed affordable units. Still, payments to the housing trust fund have helped Brookline leverage many more affordable housing units than what the on-site unit option has produced.

## ACCESSORY DWELLING UNITS

The 2019 amendment permitting accessory dwelling units was created to make it easier to build cost-effective housing that retains the neighborhood character, and to provide flexibility for families with multiple generations or service needs (though they are not limited to these purposes). Though the use applies by right to qualified owner-occupied properties in every district except for Business and Professional Offices (O) and the Industrial Services (I), the conditions for approval of a building permit for accessory dwelling units have limited the effectiveness of the 2019 amendment. The conditions include: (i) owner-occupancy of the property, (ii) limiting the use to single-family structures, (iii) not allowing separate smaller structures (like redeveloped garages on a single-family lot); (iv) limiting the size of the ADU to 750 square feet without a special permit, (v) prohibits separate addresses, (vi) makes the ability to have separate utility meters difficult, and (vii) requires a five year gap between new construction and



the creation of an ADU. The Housing Advisory Board (HAB) plans to recommend additional changes to Town Meeting in 2024, which would address a number of the restrictive provisions (iv through viii of the preceding list) and encourage greater use of the Town's ADU bylaw.

## PERMITTING PROCESS

Brookline's permitting process is complex, involving multiple sources of review, discretionary design and historic review processes, and extensive public input. Previous plans and stakeholder interviews note that most projects larger than a single-family house require one or more special permits, triggering a process that is costly and unpredictable for applicants even while neighborhood residents perceive it as beneficial and necessary. In addition to being unpredictable, this extensive process adds work to the load of the review boards and staff. While Brookline's public hearings facilitate meaningful opportunities for public comments, developers note that the community response to development can feel reactive, political, and even hostile, working against multifamily housing projects. This impediment is common in New England, but a constraint, nonetheless. Additionally, DPCD staff note that it is unclear to what extent these extended special permit processes significantly alter the outcome. The Zoning Bylaw's extensive use of discretionary special permits may explain why, in recent years, developers have often turned to 40B for permitting instead of permitting through 40A zoning, with the result that 40B projects have far outpaced projects built through 40A zoning in the number of units created.

Brookline could explore eliminating some special permits to streamline permitting. For example, the Town could eliminate more special permit triggers common to affordable housing (e.g., parking reductions) and instead require site plan review without a special permit. An alternative approach would be to make special permit criteria more explicit and detailed and/or to adopt design guidelines on various topics. Both changes would make permitting processes more predictable for applicants, boards, and citizens of Brookline.

## MBTA COMMUNITIES LAW

Brookline is among the 175 Eastern Massachusetts communities that are subject to the new MBTA Communities Law, which requires cities and towns with transit, train, and other public transportation facilities to zone for multifamily housing. The law calls for as-of-right multifamily density of 15 units per acre, suitable for families and free of age restrictions. For communities that fail to comply, the law bars access to discretionary grants such as MassWorks as well as funds awarded to public housing authorities each year. Since the law provides a broad mandate with only basic details, responsibility for setting guidelines that determine whether a community complies has fallen to the Executive Office of Housing and Livable Communities (HLC). Following a positive Fall 2023 Town Meeting vote, the Town submitted its compliance package to HLC in December 2023. The vote included areas that helped the Town meet the state law (the MBTA-CA Multifamily District), as well as zoning incentives for a planned project that would increase the number of affordable units on Brookline Housing Authority's Walnut/High Street property, a broadening of housing types in the existing Emerald Island Overlay District, and new form-based zoning that will incentivize four story buildings along Harvard Street (with on-site affordable units required).

## CONCLUSION



Brookline has approved significant zoning amendments aimed at encouraging affordable housing since the 2016 HPP. Nevertheless, many areas of Brookline remain unwelcoming to denser development that would support a mix of unit types and incomes. This is primarily due to use and dimensional requirements as well as special permit requirements that apply to many projects. Allowing a greater range of development options with more straightforward permitting may help shift projects away from 40B and toward the Town's own zoning and help the Town meet its housing demand.

## **BROOKLINE'S ZONING AND AFFORDABLE HOUSING PRODUCTION: ISSUES AND OPPORTUNITIES**

Since the last Housing Production Plan was adopted in 2016, Brookline has adopted several zoning amendments that make housing production more feasible. Nevertheless, aspects of the zoning continue to create barriers to housing production. This section outlines key issues and opportunities for zoning and affordable housing production.

Brookline's zoning requires a special permit for any project over four units. In many circumstances additional special permits are required. It has a variety of provisions for relief from setback requirements and parking requirements, etc. The relief, however, is discretionary. In addition, many of the relief provisions are complex and may be difficult to find or understand for people who are exploring the potential for housing development in the community but are new to its zoning. Some developers interviewed for this plan say that the permitting process in Brookline is often contentious and that they lack clear guidance about what the Town wants.

For medium-sized multi-family developments (approximately 20 units or larger), it is likely that the combination of zoning that limits development below what developers would financially need to build, and discretionary permitting has led developers to pursue 40B projects. 40B has offered a clear pathway to approval paired with increased density compared with development under the Town's zoning. While the process is onerous, it appears many developers have decided it is more beneficial than development under the Town's zoning. This is evidenced by the fact that in recent years more multifamily projects have been permitted under 40B than under the Town's zoning.

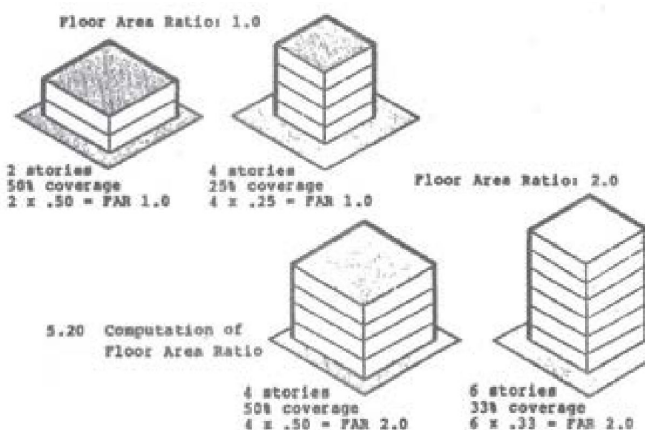
Brookline, however, is approaching a turning point. As the Town will more frequently remain above the 10 percent Subsidized Housing Inventory threshold in the future, it will be more difficult for developers to rely on Chapter 40B to build the kinds of projects Brookline has seen over the past several years. This leaves the Town with a challenge and an opportunity. The challenge is that Chapter 40B projects have resulted in affordable housing production in Brookline. If Chapter 40B development slows, it is likely that affordable housing production will slow as well. The opportunity is that with less threat from Chapter 40B projects, the Town can now utilize its zoning to facilitate the kinds of projects it wants. It also can plan for the continued use of Chapter 40B as a tool to create context-sensitive housing in areas that the community supports. The question, then, is what does Brookline want? Analysis of recent development projects, existing conditions, recent corridor studies, location-based tests, and public input for the Housing Production Plan point to some issues and opportunities.



**1. Recent zoning changes and 40B projects show that the Town is willing to be flexible about parking requirements.** One space per unit is seen as being adequate in many locations in Brookline and a lower ratio without a special permit may be warranted in some locations. This is a significant advancement for housing production and should be celebrated. That said, the location-based tests for this plan show that even with lower parking ratios, parking often needs to be located underground or on the first floor of a structure. The former approach is very expensive and may not be feasible in some cases. The latter reduces the available area for housing and commercial space and, in some districts, the percentage of ground floor space that can be used for parking is limited by the zoning.

**2. Recent 40B projects show that new five- or six- story buildings with affordable housing can be financially feasible in Brookline.** This height is also preferred by many developers because "five-over-one" construction provides a feasible return on investment.<sup>35</sup> Opening more opportunities for five- or six-story buildings in Brookline is likely the most viable way to get a significant amount of additional affordable housing in the town.

**3. Floor Area Ratio (FAR)<sup>36</sup> limitations appear to be generally similar to the existing condition of neighborhoods in north Brookline,** but the maximum FAR requirement often does not allow for significantly more dwelling units than existing development. In many cases, the FAR would not allow four-, five-, or six-story buildings.



**4. The zoning's height requirements limit the locations where taller mid-rise multifamily development of five or six stories are allowed.** By-right heights are limited to fifty feet in M Districts—a height that is often insufficient for a contemporary multi-family or mixed-use structure. Taller heights are allowed in G-

<sup>35</sup> Five-over-one construction is a type of construction allowed by the Building Code that is relatively inexpensive to build and has therefore become common in large urban and suburban buildings. Four or five stories of wood frame construction can be built over a concrete podium.

<sup>36</sup> Although Floor Area Ratio is a key dimensional criterion in Brookline's zoning it is not explicitly defined in the Zoning Bylaw. In common practice, Floor Area Ratio it is understood to be the ratio between Gross Floor Area and lot area. The closest thing to a definition of Floor Area Ratio in Brookline's zoning is found at §5.20 in the image below.



DP and G-1.75 (LSH), GMR-2.0, I-1.0, and Emerald Island Special District (EISD), the Brookline Housing Authority site at Walnut and High Street, and the Waldo Durgin overlay district, but several of these areas are intended for non-residential development. Meanwhile, taller heights are available in some areas through public benefit incentives. However, the incentive heights are sometimes not feasible to build due to setback requirements from adjacent residential districts and/or streets. If Brookline's zoning continues to restrict development of larger housing projects, primarily through FAR and height limits, the Town will be less able to meet the housing needs of current and future residents. It would be better to advance the production of new housing – and new affordable housing – by reforming the Town's existing zoning away from tools like floor area ratios and replace them with a form-based code approach. The Town has recognized this by adopting new zoning to comply with the MBTA Communities Law in November 2023.

**5. When one looks at Brookline's denser neighborhoods, there is both remarkable continuity of building types and development characteristics at the block level and remarkable diversity between blocks and among parts of the town.**

In North Brookline, blocks of three-story row houses sit next to blocks of two-story detached houses. Commercial corridors back up on large single-family houses on large lots. One-story commercial blocks are interspersed with blocks of three to five story or even taller apartment buildings. To facilitate housing production in these areas, some buildings that are larger than what exists currently will inevitably need to be built. Determining where additional height and bulk is appropriate, and which impacts on adjacent structures are acceptable, will require sensitive urban design analysis, far-reaching community input, and an approach such as form-based code. The location-based testing for this plan did find that allowing additional height and floor area ratio would be acceptable in some circumstances to a healthy portion of people who contributed public input for this plan. It is not clear whether they represent a majority of the community or the legislative body (Town Meeting). Brookline has initiated an update to its Comprehensive Plan that will rely heavily on community input to set a vision for Brookline's future land use, including housing development.

**6. Setback requirements are not consistent with existing conditions in some attractive and desirable neighborhoods,**

for example at the Babcock Street Parking Lot, especially when larger buildings are proposed. Recent permits have shown that boards are willing to modify dimensional requirements. If dimensional requirements were revised to reflect desired conditions across Brookline's diverse neighborhoods, it could result in better projects, eliminate the need for some waivers or other discretionary permits and increase predictability for applicants and abutters. There are several ways this could be achieved. Some form-based codes set dimensional requirements at a very fine grain—the block or even parcel level. This results in development that is fine-tuned to desired urban design characteristics. Determining the appropriate dimensions is, admittedly, a labor-intensive process. Another approach for addressing this challenge, while still providing by-right development, would be to reduce the dimensional requirements to the minimum appropriate for the zone, and then require site plan review for larger buildings with site plan approval provisions that specify when additional setbacks or open space may be required. For example, additional setbacks may be required to minimize shading on streets or adjacent properties, to prevent excessive enclosure of streets, or to provide space for pedestrian amenities. This approach would enable some special permits to be eliminated from the zoning, improving predictability for all involved and potentially increasing the production of housing. On the other hand, this change would reduce the power of Boards to review a project across many dimensions and would shift responsibility for





justifying the modification of dimensional standards from applicants to boards.

**7. Review boards and the public in Brookline are finely attuned to contextual design characteristics, for example the difference in shadows cast on abutting structures by buildings on the north side of a street versus the south.** Recently adopted and/or proposed special districts and overlay districts and the new Harvard Street form-based code have incorporated this kind of detail, but most of Brookline's existing zoning does not. Instead, the town largely utilizes discretionary approvals to negotiate for contextual design. That said, when and where the Town determines what it wants through the comprehensive planning process, design principles could be distilled into non-discretionary zoning requirements or design guidelines for other areas of Town, which would result in permitting that is streamlined for all involved.

**8. The previous Housing Production Plan identified "opportunity corridors" and adjacent "opportunity nodes" as priority areas for affordable housing in Brookline.** These areas have the advantage of being well served by transit. In many areas the corridors also have densities that are currently lower than that of adjacent neighborhoods, especially where one-story commercial corridors are adjacent to multi-story residential blocks. These locations, especially those with large amounts of surface parking or undesirable uses, are likely the most broadly acceptable opportunities for affordable housing development in Brookline. However, they also provide commercial space for rich and varied existing businesses that contribute to Brookline's economy and street life. Public input on location-based testing showed the strongest support for housing development in these locations—including the Stop & Shop, Washington Square and Commonwealth Avenue locations.

**9. Some recent projects permitted by the Town show that affordable housing can be attractive and can "fit into" a variety of neighborhood contexts.** The Beals Street project incorporated thirty small units with kitchenettes that also share common kitchen, dining, and laundry facilities, into two buildings on a block of large single-family houses. The Olmsted Hill project incorporated relatively small, highly detailed multifamily structures seamlessly into a new high-end single-family street. The Crowninshield Road condominium townhomes resulted in nicely detailed structures. These projects show that affordable housing can be reasonably added in multiple contexts in Brookline.

**10. Public input for this Housing Plan indicated that some Brookline residents are concerned about recent projects that demolished existing one, two- or three-family buildings and replaced them with larger structures that cover more of the lot but do not add units.** While Brookline's zoning does have provisions for conversions of existing houses and additions of units to existing structures, developers may not be aware of the special permit exemptions that would enable them to expand and convert existing structures rather than tear them down. Alternatively, developers may be choosing to maximize the developable area of the parcel to maximize sales or rental prices. Location-based tests for the T and F zones showed that based on prototypical lots it can be difficult to expand an existing structure to the maximum amount allowed under zoning while still providing off-street parking—parking that may be waivable by special permit but may still be desired by developers based on their read of the housing market.

**11. While previous planning has prioritized locating affordable housing near transit, outreach for this project indicated potentially shifting perspectives on this issue.** Some people who qualify for affordable





housing said that transit access is not a necessity for them, while other people said the town should work on expanding transit access to South Brookline, other than MBTA bus service, and with expanded transit allow additional housing types in South Brookline.

**12. The housing needs assessment shows the most significant need in Brookline continues to be housing for very low-income households of all types (older adults, families, single people, disability-accessible, and so on).** Households with children, in particular, are not well served by existing affordable housing, new or old. Deeply affordable housing in Brookline is likely to be proposed in larger projects (50 units or larger), like Brown Family House at 370 Harvard Street. There is also a need for moderately priced homeownership units (80 to 120 percent AMI). These units may be possible to deliver in smaller projects.





*“Let me grow old in Brookline.”*

*Community Submission to the Six-Word Stories Project*

## 4. Housing Goals

As long as Brookline remains at or over the 10 percent minimum under Chapter 40B, it will be in the enviable position of being able to make decisions about affordable housing development in locations and at a scale and design that align with the Town’s planning goals and policies. Both in this housing plan process and the previous one (2015-2016), preserving the character of Brookline’s residential neighborhoods remains a frequently cited concern from Brookline residents, yet today, there is a greater emphasis on affordability, displacement, equity, the location of housing choices, and problem housing conditions, especially for Brookline Housing Authority tenants. Based on input at the three community meetings hosted by the Housing Advisory Board, the community survey, and interviews conducted by the consultants with over 100 Brookline residents, the qualitative and quantitative goals outlined below should guide the Town’s housing initiatives over the next five years. The Housing Production Plan will likely be updated again following the Comprehensive Plan update.

### QUALITATIVE GOALS

- **Actually Affordable Homes.** Provide housing that is actually affordable to people with low or moderate incomes.
- **Housing Quality.** Provide financial assistance to the Brookline Housing Authority to address substandard housing conditions, principally in state-funded public housing. There are 425 state-funded public housing units that need a funding source for recapitalization.
- **Housing Types:** Encourage a variety of housing with services to support people with special needs and assist individuals and families experiencing housing instability and homelessness.
- **Affordability Across All Income Levels.** Although Table 2.4 documents the extraordinarily high percentage of households with less than 50% AMI, the community also asked the Town to investigate new policies and incentives that could stabilize housing affordability for households with incomes over the 80 percent AMI income limit.
- **Diversity:** Monitor the effectiveness of Brookline’s “local preference” policy in the affordable housing lotteries for affordable units. The Town recently reduced its local preference goal from 70 percent to 25 percent. That decision, while laudable, may not be sufficient to reduce barriers for minority access to affordable homes in Brookline. Monitoring the outcomes of affordable housing outreach and



marketing by tracking lease-up data may help the Town determine what additional steps, if any, should be considered. Additionally, the Town could explore the legality of adding other factors to its local preference policy, such as economic or physical displacement or to assist other protected classes such as people with disabilities.<sup>37</sup>

- **Racial Wealth Equity:** According to the May 2023 Boston Indicators Report, “Racial Wealth Equity Chartbook: National Trends and the Challenge of Local Data,” the wealth of Black and Latino households in the greater Boston area is uncertain, but a couple different data sets indicate they are less than ten percent of White households. Groups such as the Black Economic Council of Massachusetts, as well as many black residents in Brookline, have identified building generational wealth through homeownership as a critical housing strategy that would meaningfully improve housing stability for their families over time.
- **Local Housing Assistance Capacity:** Increase the Town’s capacity to address housing needs. Following a Town Meeting vote in Spring 2023, the Town is working to create a Housing Stability Office to assist with housing services, public education about housing problems and needs, and working with residents to find common ground about the Town’s responsibilities for affordable and fair housing.
- **Provide funding to the Brookline Housing Authority to improve substandard public housing units.**

## QUANTITATIVE GOALS

There are a few ways to set affordable housing production goals. The first, and probably most obvious, is that the Housing Plan needs to recognize the minimum target for plan certification, or one-half percent per year of the Town’s total housing inventory that are added to the state’s Subsidized Housing Index. Another way is to create a goal based on affordable housing needs.



### Setting Quantitative Goal for Regulatory Purposes

During the last housing plan process in 2015-2016, residents and Town staff identified over 100 properties as potentially suitable for multifamily or mixed-use development. If developed at a density reasonably consistent with established land use patterns, the identified sites could generate from 400 to as many as 1,000 housing units over time.

In recent years, Brookline had development capacity to support 131 new units per year – the “planned production” threshold for a temporary “safe harbor” period under the state’s Housing Production Plan regulations, based on a number equivalent to 0.5% of the 2010 Decennial Census year-round housing units. As a result, Brookline qualified twice in the past five years for a safe harbor stay from having to approve comprehensive permits, attesting to market demand, the incentivization by developers to move forward with 40B projects as the Town approached the 10% threshold, and diligent work by the Board of

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<sup>37</sup> Displacement occurs when residents have to move to a new location because the building they lived in was torn down to make way for a different use or for development of more expensive housing than they can afford.



## Appeals.

When Chapter 40B targets were reset to align with Census 2020 data (June 2023), Brookline's threshold for one-year Housing Plan certification shifted upward to 139 units (0.5% of 27,742 units). No matter what the numerical goal is, it is important to remember that the Subsidized Housing Inventory does not represent the inventory of actually affordable units. Many of the comprehensive permit developments approved by the ZBA since 2015 are owned by private for-profit developers who applied for permits with a Project Eligibility Letter (PEL) from MassHousing or MassDevelopment and only 25 percent of the units are affordable for low- or moderate-income households. Of all the units recently approved through comprehensive permits from the ZBA, approximately 39 percent are or will be affordable to low- or moderate-income households.<sup>38</sup>

**For regulatory purposes, one of the quantitative goals being set with this plan is to create 139 SHI-eligible units per year while the Town remains under the 10% threshold.** Once Brookline is over the 10 percent minimum, production of new affordable units could proceed at any pace deemed appropriate by Town officials.

### Setting Quantitative Goals for Affordability Purposes

**The Town of Brookline is setting a long-term goal that 10 percent of its year-round housing units be affordable units for households at or below 120% Area Median Income.** This 10% goal is irrespective of the state's Subsidized Housing Inventory, and would not include any market-rate units that are eligible to be counted in the state's Subsidized Housing Inventory (SHI). Although purchasing existing market rate units to convert into affordable units is one strategy, the financial feasibility of affordable housing is such that it is more likely these units will be constructed as new units.

As of January 1, 2024, approximately 7.7% of Brookline's year-round housing units are completed SHI affordable units.<sup>39</sup> The Census 2030 year-round housing count will likely be released in 2033. If by then all the 40B projects not yet completed have moved forward to completion, and assuming 342 of the approximate 994 units are deed-restricted affordable units, the Town would be at 7.8% affordable units.<sup>40</sup> This estimate does not include any other new housing units constructed during the same time.

Given the likelihood that BHA will move forward with an addition of 100 all-affordable units to their property at Walnut/High Streets, and with the goal that another 2-3 additional all-affordable projects might be developed on town-owned land (and/or with housing trust funds) to create an additional 100

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<sup>38</sup> Based on the breakdown of affordable and market-rate units in approved projects listed on the Brookline Planning Department's Chapter 40B web page.

<sup>39</sup> Based on approximately 2,198 occupied, affordable units as of January 1, 2024, according to Brookline Planning Department and 28,535 housing units according to the American Community Survey 2022 5-year estimate DP-05 table.

<sup>40</sup> 40 Centre Street, 1180 Boylston Street, 1299 Beacon Street, 445 Harvard Street, Puddingstone at Hancock Village, 1223 Beacon Street, 500 Harvard Street, 209 Harvard Street, 217 Kent Street, 83 Longwood Avenue, 32 Marion Street, 108 Centre Street, 45 Bartlett Crescent, 845 Boylston Street, Heath & Sheafe Streets.





affordable units by 2033, the Town would be at 9.2% affordable units (again, if no other housing construction occurred and if all 40B projects moved forward to completion).

#### Estimates of Different Affordable Housing Unit Growth Scenarios

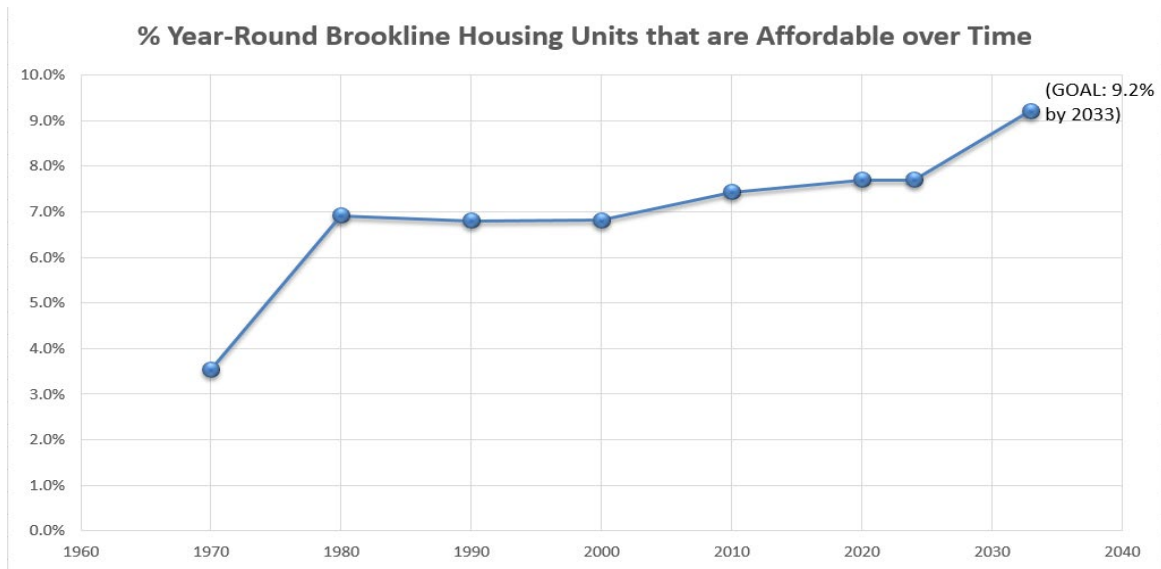
Year/Scenario	# Affordable Units (completed)	# Year-Round Housing Units	% of Affordable Units
<b>Jan 2024 (existing)</b>	2,198	28,535	7.7%
<b>2033 (if all 1,000-40B projects not yet completed are completed, with 20% of the units as affordable)</b>	2,198 + 342 = 2,540	28,535 + 994 = 29,529	8.6%
<b>2033 (adding 200 all-affordable units through BHA, other non-profit developers; likely sponsored or Town- or BHA-owned land)</b>	2,540 + 200 = 2,740	29,529 + 200 = 29,729	9.2%

**The second quantitative goal being set with this plan is to increase the percentage of constructed affordable units to 9.2% by 2033.**

If this goal were met, it would be a much faster increase in the percentage of affordable units than any time since 1980, but it is a reasonable aspirational goal given the current permitting queue, market forces, and land likely available to be donated by the Town or other non-profit entity for all-affordable units between now and 2033. The chart below includes data collected by DPCD, based on year of construction of affordable units that the Town tracks and federal census data for year-round housing units.







**Within** this goal, based on some of the Qualitative goals listed above, the Town will prioritize work that creates deed-restricted affordable units which: (i) serve the lowest income households, (ii) serve seniors or people with disabilities who need accessible units; and/or (iii) provide opportunities for homeownership.

**Finally, as a third quantitative goal, the Town is committed to have site control (e.g., Town or non-profit owned land, rights of first refusal) and conceptual planning completed for additional units that would be the equivalent of 10% by 2033.** If nothing else were to change, this would mean another 250 units in the pipeline so that the Town can reach its 10% goal over the following building cycle.



## 5. Housing Strategies

### REGULATORY STRATEGIES

Based on an analysis of Brookline's housing needs, GIS analysis of Brookline's existing development patterns, evaluation of recent development projects, analysis of the Town's zoning, location-based testing, and input gathered from the public, the following five-year actions are recommended.

- **Develop affordable housing on municipal owned sites.** Two town-owned sites were evaluated through location-based testing for this Housing Plan: the Babcock St parking lot and the Newbury West Site. Ultimately, Town Meeting will decide if one or both sites should be considered for affordable housing development. The final proposal will be the result of a public process; the timing of this process will consider the temporary use of the Newbury Academic Building during the renovation and reconstruction of the Pierce School. Special districts could be created for both sites consistent with the conceptual designs shown in Test 2 for the Newbury West site, or a conceptual design that uses only a part of the site, and Test 3 for the Babcock Street site. A special district for Newbury West could require modifications to setback and FAR requirements, could allow multiple units and buildings to be built on the property, and could establish design guidelines to create a campus type design with appropriately scaled and detailed buildings. The Special District for Babcock Street could modify existing setbacks, modestly increase the allowed FAR, and establish design standards that focus on creating an appealing streetscape along Babcock and John Streets, including requiring a step back above the fourth story, design massing that is similar to buildings in the immediate vicinity along Babcock Street, and providing ample sidewalks with preserved or new street trees and a small plaza or pocket park at the intersection of Babcock Street and John Street. Both of these sites, as well as the Kent/Station Street lot identified in the last Housing Production Plan, are under consideration for the Town to issue/ reissue a Request for Proposals to develop affordable housing on these sites.
- **Move toward form-based zoning.** Initial steps of developing a form-based code include documenting existing development patterns (setbacks, heights, etc.), determining the desired urban design parameters for future development, and developing appropriate building types for various contexts. With this in place, zoning can be calibrated to produce desirable fine-grained development patterns. Future form-based zoning should be based on well-illustrated typologies that ensure that the intended built results are understood by the general public and publicly supported. Recently piloted in the Harvard Street corridor, form-based zoning could help Brookline expand housing units while also addressing concerns residents have expressed about preservation and new development needing to be sensitive to neighborhood context.



- **Allow additional housing density at key transit nodes.** The Washington Square location based-test site was strongly supported by public input for this plan. Transit nodes that currently have low-rise buildings provide an opportunity to add housing to take advantage of Brookline’s rich transit system, reduce greenhouse gas emissions, add vitality, and support existing and new businesses. In this, and similar locations, allow buildings up to six stories with step backs beyond the fourth story. Allow a FAR of between 2.75 and 3.0.
- **Allow additional housing density in areas undergoing transition to higher density or where existing character is has been degraded by auto-oriented development.** Three location-based test sites explored this type of site: Emerald Island, Route 9 at Hammond/Sheafe, and the Sullivan Tire & Auto Service and Firestone Complete Auto Care sites on Commonwealth Avenue.
  - The Emerald Island site demonstrated that the current Emerald Island Special District accommodates a significant amount of housing production. Consider applying the level of density allowed by that special district and its form-based approach to zoning to other sites on major corridors in Brookline.
  - The location-based test for Route 9 at Hammond/Sheafe met with mixed reactions in public input. Some people supported the densest concept plan while other people were concerned about the impacts of larger buildings on existing houses across Sheafe Street. Meanwhile, public input about location-based test for the Commonwealth Avenue site was strongly supportive of concept plans showing high density mixed-use redevelopment, including concepts plans showing buildings of eight or ten stories that utilized stepbacks to minimize the visual impact on abutters. The takeaway is that context matters and that when considering increasing density, even in areas that are currently auto oriented or undergoing transition. Six, eight, or even ten story buildings may be acceptable in some locations with very wide corridors, and a solar orientation that will minimize shadows on adjacent structures, but in other locations, concerns about existing residential structures may continue to limit acceptance of increased building heights. It is recommended that Brookline move forward with either the creation of special districts for the Commonwealth Avenue and Route 9 at Hammond Street sites or exploration of base zoning changes for broader sections of these corridors. The Chestnut Hill Commercial Area Study will be looking at this area more closely.
- **Allow additional housing density in areas that are close to transit stops, but not directly on corridors.** This includes areas that were called “opportunity nodes” in the Site Suitability Analysis Map in the 2016 Housing Production Plan. The location-based test for 224-230 Cypress Street demonstrated that a new four-story building with a large stepback above the third story and an FAR of approximately 2.0 can be reasonably integrated into a neighborhood center context with adjacent triple-deckers. The Brookline Village CVS test site is located in the L-.5 zone which has a maximum FAR of .5 and a maximum height of 40 feet. Test 2 for the site showed that a three-story mixed-use building with a FAR of 1.5 is compatible with its context, while Test 3 showed a five-story mixed-use building with a FAR of 2.15 may also be acceptable in this context.



- Allow additional housing density on corridors where FAR is currently limited to 1 or less (including L-.5, L-1, and G-1).** The Stop & Shop site was used as a location-based test for this type of site. Stop & Shop was identified as a potential opportunity for housing production in several previous plans.<sup>41</sup> The location-based test for Stop & Shop showed several configurations for adding housing to the site including keeping the existing Stop & Shop building while adding housing along its frontage or rebuilding the Stop & Shop along the lot frontage with housing above. Both options were generally supported by public input for this project. Recommended zoning changes for this type of location include allowing up to four stories<sup>42</sup> and a FAR of 1.5 by-right. In addition, establish affordable housing incentives that allow an increase in maximum FAR to 2.0 or more and allow five or six stories with an upper story stepback above the fourth story along street frontages.
- Develop a 100 percent affordable housing overlay that allows increased density** Additional height, Floor Area Ratio, and non-discretionary by-right review with site plan approval is currently being studied by the Housing Advisory Board's Affordable Housing Overlay District Subcommittee, including using Affordable Housing Trust funds to hire a financial feasibility consultant. This overlay could be limited to certain locations (for example, opportunity corridors).
- Conduct additional location-based tests to evaluate the feasibility of using current public benefit incentives for FAR and height on actual sites.** The location-based tests for this plan were not able to evaluate enough example sites to determine whether incentives were generally feasible. The limited sample pointed toward the possibility that height incentives may not be feasible in some cases because buffer provisions may reduce floor plates below a viable size.
- In Brookline's most dense and urban areas, consider refocusing open space requirements on providing an attractive public realm with ample space for pedestrian and bicycle movement, healthy street trees, and gathering spaces.** Or consider replacing percentage-based open space requirements with performance-based open space requirements, for example, that there is adequate space for X number of children to play, or adequate space for a gathering of X people.
- Provide incentives for adding units to historic houses in T and F districts instead of demolishing them and building new larger structures.** For example, when the majority of historic residential structure is retained including its front façade, allow a bonus unit beyond what is currently allowed in the district and allow specific waivers of dimensional requirements and parking requirements by site plan approval.
- Eliminate FAR requirements for residential and mixed-use buildings (with upper story residential use) in Brookline's most dense areas.** FAR gives an overall sense of allowed development intensity,

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<sup>41</sup> Sasaki & RKG, *Major Parcels Study*, (Town of Brookline, March 2018) and Metropolitan Area Planning Council, *Perspectives and Opportunities for Brookline's Commercial Areas*, (Town of Brookline, March 2018).

<sup>42</sup> The maximum height in L-1.0 and G-1.0 districts is 40 feet. This may not be sufficient for four stories in a contemporary mixed-use building. It is recommended that heights be specified in stories, and/or that allowed height be increased to accommodate stories greater than 10 feet and varying site conditions.



but it may be unnecessary in high density areas where the build out is constrained by other dimensional requirements and by the functional constraints on building size. Dimensional requirements like setbacks, height and/or story limitations, and open space requirements have a direct impact on how buildings relate to streets or adjacent buildings and can set a reasonable building envelope without the need for FAR limitations. During location-based testing, Brookline’s multiple overlapping dimensional requirements sometimes made it more difficult to develop a context-based design for a site.

- **Reduce parking restrictions and increasing density where appropriate.** Participants in the planning process for this HPP recognize that zoning changes and regulatory strategies can have tangible and long-lasting effects. In Brookline, off-street parking regulations create a significant barrier to development.
- **Streamline the Town’s permitting procedures.** Brookline needs to reform its permitting rules and processes, identifying situations where cases may be sufficiently reviewed by the Planning Board, or in the case where permitting procedures don’t usually change the outcome, by staff.
- **Continue to periodically review inclusionary zoning policies,** including but not limited to, the range of units where cash buyout options may be permitted, the target household income levels for rental and ownership properties, etc.

## POLICY AND ADVOCACY STRATEGIES

Public education about affordable housing – policies, design, who benefits and how, and positive and negative impacts – is as important for neighbors, policymakers and leaders, residents and landlords in 2022 as it was five years ago. While Town staff, Housing Advisory Board members, and some community members have significant experience with affordable housing development, finance, and policy, knowledge gaps and resistance persist in Brookline, and they will continue to thwart the production of affordable units. To address these challenges, the town should consider the following strategies.

- **Educate Town Meeting members about affordable housing needs, policies, programs, initiatives, and financing, as well as the Town’s existing staff capacity and demands on staff time.** It is essential for leaders and decision-makers to have accurate information about the need for affordable housing and the impact of its development. The Housing Advisory Board has worked on developing affordable housing educational materials precisely for this purpose.
- **Ensure that the upcoming Comprehensive Plan process includes input from diverse stakeholders, including residents of affordable housing, affordable housing advocacy organizations, and people with disabilities and their advocates.**
- **Request that the recommendations of this Housing Plan be incorporated in the Town’s Community Preservation Plan.** There should be an annual allocation of CPA funding for the HAB to meet the Housing Plan’s affordable housing goals in a timely manner; many non-profit developers depend on commitments for pre-design funding from local sources to competitively compete with early state



and federal grant rounds. The HAB should directly apply for CPA funding to ensure adequate resources for projects and priorities.

- **Continue to pursue a Linkage Fee program, which if implemented, would require developers of commercial use properties to pay a fee to the Town's Affordable Housing Trust Fund.** The Town has hired a consultant to complete a Nexus Study and the initial analysis is underway. Following recommendations from relevant land use boards and the Select Board, such a program will require a home rule petition and Town Meeting votes.
- **Continue to work with the WestMetro Home Consortium** to advocate for funding towards affordable housing development and to implement regional recommendations, such as impediments to fair housing. This work also includes assisting developers in Brookline access this funding.
- **Continue to partner with the Metropolitan Mayors Coalition's Regional Housing Task Force** to further the region's housing production goal and identify strategies to achieve that goal, including data requests for regional reporting purposes.
- **Continue to nurture partnerships with mission-based development organizations to help foster affordable housing development.** Well-established CDCs and non-profit developers such as Hebrew Senior Life and 2Life Communities (formerly JCHE) have worked successfully in Brookline on "friendly" affordable developments, principally for older adults.
- **Increase the financial feasibility of creating or preserving affordable housing with local tax policies,** such as a tax increment financing (TIF) approach to encourage affordable developments close to transit. Brookline could consider a tax incentive policy similar to one the Town of Amherst voted to move forward as a home rule petition in 2015.
- **Strengthen local government and the public's understanding of the community benefits provided by affordable housing and multifamily development.** Brookline's existing fiscal impact and buildout model attempts to estimate the tax revenue outcomes of multifamily housing development. While housing is often fiscally beneficial in Brookline and many other cities and towns, developments that are deeply subsidized or designed for affordability for very-low-income residents may not generate excess revenue – yet that is the type of housing most needed in Brookline. The conversation about housing needs and housing development policy should be refocused on fair housing, inclusion, and basic social fairness.





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# Appendix



## Appendix A: Location-Based Tests, Methodology

### INTRODUCTION

A unique component of the Brookline Housing Production Plan was the development of “Location-Based Tests”—a process of evaluating the development potential for mixed-income and affordable housing on specific sites. This work was carried out by sub-consultant Dodson & Flinker Landscape Architecture & Planning with input from Town staff, the Working Group, and the public via two public forums, a “meeting-in-a-box” exercise, and public input at “Brookline Day” in 2022.

The purpose of the Location-Based Tests was to:

- Identify characteristics of development that would be preferred by the community within various neighborhood contexts
- Identify sites where the town would support and encourage friendly Chapter 40B and other affordable housing development
- Identify regulatory changes that could facilitate the production of affordable housing
- Inform discussions of how to maximize benefits of affordable housing
- Inform discussions of which housing production strategies would be most feasible and effective for meeting the Town’s housing production needs.

### IDENTIFYING SITES FOR LOCATION-BASED TESTING

The first step in the Location-Based Test process was to identify appropriate sites for testing.

#### Potential Housing Production Sites identified in Recent Planning Projects

The consultant team began by compiling a GIS database of potential sites for location-based testing from three sources: sites identified in the 2016 Housing Production plan, sites identified in the 2018 Major Parcel Study, and sites identified by the consultant team, town staff, or the Housing Production Plan Working Group.

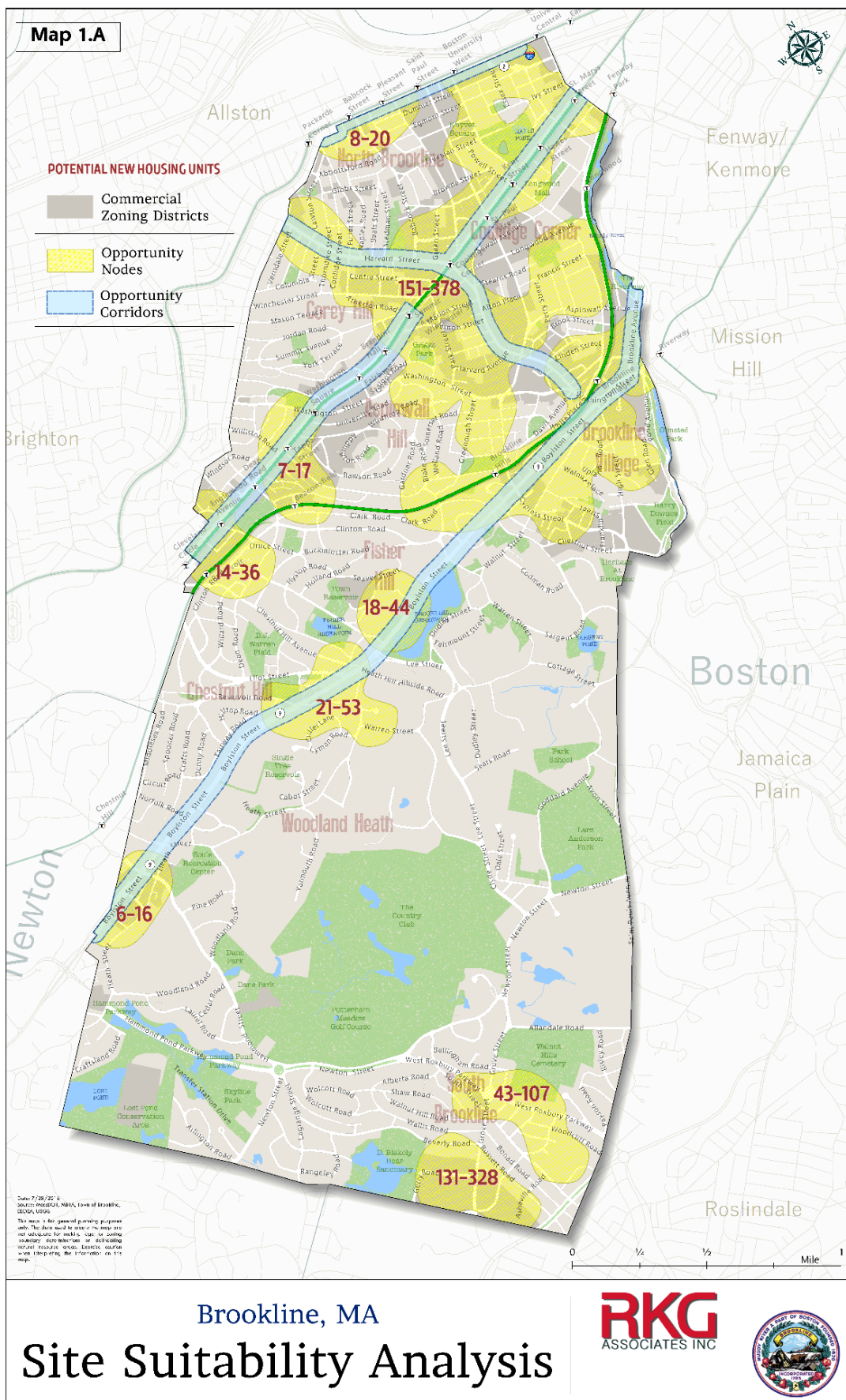
#### Sites from the 2016 Housing Production Plan

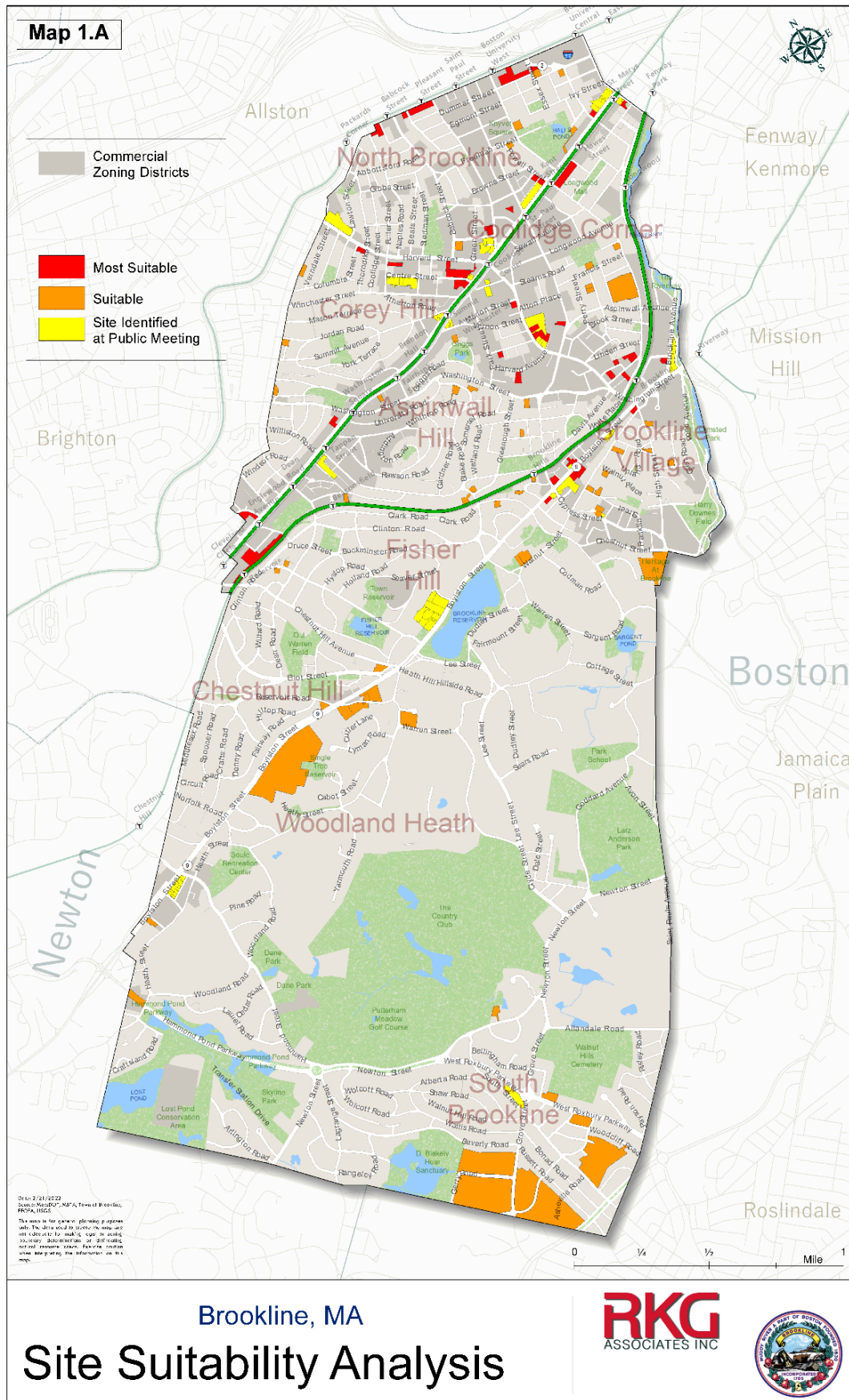
Brookline’s 2016 Housing Production Plan (2016 HPP) included a process for identifying suitable sites for housing production (see **Map 1.A, across next two pages in this Appendix**). GIS analysis and public input from three public forums resulted in a map showing parts of Brookline that are especially suitable for housing production. The map showed two categories of suitable land: Opportunity Corridors and Opportunity Nodes. Opportunity Corridors stretched along Boylston Street, and most of Commonwealth Avenue, Harvard Street, and Beacon Street. Opportunity Nodes include areas that are close to public transit, commercial areas, parks and open spaces, schools, and existing compatible development. Opportunity Nodes covered areas of land that are adjacent to Opportunity Corridors and two parts of south Brookline that are not along Opportunity Corridors: land along West Roxbury Parkway near the intersection with Grove Street and land around Hancock Village.



Although some parcels identified in Map 1.A have been developed or are under construction since the 2016 Housing Production Plan (e.g., Hancock Village where the “131-328” label is in South Brookline, assisted living at the eastern side of the previous Newbury College property and townhomes at 603-619 Boylston Street where the “18-44” label is near the Brookline Reservoir, and several 40B projects along the Harvard Street Corridor), all of these nodes and corridors except for Hancock Village remain to be sites considered as potential development areas for this Housing Production Period as well. Specifically, the Town intends to include these areas when issuing any Request for Proposals to develop deed-restricted affordable housing projects, including mixed-income developments that would be eligible to be included on the state’s Subsidized Housing Inventory.









While the 2016 HPP Site Suitability Map established valuable geographic policy priorities for housing production, the Location-Based Testing process required the identification of specific parcels for testing.

The consultant team used information from previous town planning efforts to establish a GIS database of potential location-based test sites. The first dataset that was added was an intermediate mapping product from the 2016 Housing Production Plan. This map shows specific sites identified by GIS analysis and public input, using the follow criteria:

- Proximity
  - Transit: Within 10-minute walk (1/2 mile) of public transit (including bus stops). VERY IMPORTANT.<sup>43</sup>
  - Services: Within 10-minute walk (1/2 mile) of shopping, restaurants, or services. VERY IMPORTANT.
  - Open Space: Within 10-minute walk (1/2 mile) of parks, playgrounds, or other public open space. SOMEWHAT IMPORTANT.
- Neighborhood Characteristics
  - Form: Comparable form (size and scale) of buildings in immediate neighborhood (1/4 mile). VERY IMPORTANT.
  - Use: Comparable use-multi-unit and/or mixed use- in immediate neighborhood (1/4 mile). SOMEWHAT IMPORTANT.
  - Zoning/Permitting: Multi-unit and/or mixed-use permitted by right or by special permit in current zoning district. SOMEWHAT IMPORTANT.
- Site Characteristics
  - Underutilized: Previously developed, underutilized sites, especially if it involves developing residential units above single-story commercial. VERY IMPORTANT.
  - Historic: Historic resources with opportunity for preservation and reuse (not demolition). SOMEWHAT IMPORTANT.
  - Parking lots: Surface parking lots (public or private ownership). VERY IMPORTANT.
  - Adaptive reuse: Larger houses with opportunity for rehab and reuse for multi-unit conversion (not demolition). SOMEWHAT IMPORTANT.

Sites from this map were added to a GIS database of potential location-based test sites.

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<sup>43</sup> The importance rating shown after each criterion is from public input from the 2016 HPP.



### Sites Identified in the 2018 Major Parcels Study

Brookline’s 2018 Major Parcels Study provided another source of potential location-based test sites. The Major Parcels Study investigated parcels in Brookline that met the following criteria:

- Any parcel over two acres in gross area (and any vacant parcels over one acre), excluding parcels with significant conservation restrictions
- Municipally owned properties adjacent to major public parcels
- Parcels identified in other recent planning reports
- Clusters of parcels under the same ownership that together comprise two acres or more of gross area<sup>44</sup>

Parcels that were designated by the Major Parcels Study as suitable for “cluster-residential” and “multi-family residential” were added to the GIS database of potential location-based test sites.

### Composite Map of Potential Location-Based Test Sites

The consultant team and Town staff evaluated the resulting sites and removed parcels that seem unlikely to be redeveloped for housing due to their current use, including schools, hospitals, existing large multi-family projects, Brookline Housing Authority properties, Chapter 61A land, parcels with charitable, religious, institutional or condominium ownership, and other parcels with uses that are unlikely to change.

In the final step of assembling potential sites for location-based testing, the consultant team, town staff, and the working group identified additional potential sites based on local knowledge. They added suitable sites that had been overlooked in previous studies and/or that had become more viable for housing production since the 2016 HPP. For example, the town-owned Newbury West parcels were added at this stage. The resulting map is visible in Map 1.2.

Having identified potential parcels for location-based testing, the next step was to narrow the list of Location-based Test Sites to the ones that would provide the most useful information for the Housing Production Plan.

### RECENT DEVELOPMENT AND PROJECTS IN PIPELINE

The final selection of Location-Based Test Sites was informed by an analysis of housing projects that were permitted since adoption of the last Housing Production Plan. Building permit and Chapter 40B permit data was collected for the 2017-2021 period. The analysis is described in the Existing Conditions section of the Housing Production Plan. The results indicated that 40B has been the preferred method of permitting for larger housing projects since 2017. As the Town has now passed the ten percent threshold for units on the state’s subsidized housing inventory, 40B development may be more limited in the future.

A key question, then, for the location-based testing process is what opportunities and constraints does

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<sup>44</sup> Sasaki & RKG, *Major Parcels Study*, (Town of Brookline, March 2018), 12.



the Town's zoning present for larger projects? What changes can be made to the zoning to continue affordable housing production while decreasing reliance on 40B projects.

## ZONING ANALYSIS

The analysis of Brookline's existing Zoning Bylaw is presented in the section "Barriers to Affordable Housing-Zoning." This analysis pointed toward the value of location-based testing for evaluating the current dimensional requirements in the zoning, in particular allowed heights, floor area ratio, setbacks and landscape and usable open space requirements.

## LOCATION-BASED TESTING—SELECTED SITES

The following categories and sites were selected to represent a variety of built and zoning contexts in Brookline, while focusing on sites located within "Opportunity Corridors" and "Opportunity Nodes" identified in the 2016 Housing Production Plan. The final list includes 9 actual sites and 2 prototypical sites. The existing zoning district for each site is listed after the name in parentheses.

Municipal Sites, which would include a rezoning and a Request for Proposal process to redevelop the land:

- Babcock Street Parking Lot (M2.0)
- Newbury West (S-15 and S-25)

Corridor Sites where Zoning Limits FAR to 1 or less

- Stop and Shop (L-1)

Transit Nodes

- Washington Square (G1.75WS)

Area in Transition to higher density and/or with existing auto oriented uses

- River Road (I-1.0 with Emerald Isle Special District Overlay).
- Commonwealth Ave, Sullivan Tire & Auto Service and Firestone Complete Auto Care sites (G 2.0CA).
- Rt. 9 @Hammond St/Sheafe St (G1.0, M1.0)

Sites in "Opportunity Nodes" from 2016 HPP

- 224-230 Cypress Street (L-1)
- CVS in Brookline Village (L 0.5)

T, F Zoning Districts Prototypes

- T Zone Prototype—exploring potential for adding units to a prototypical site in a T-zone
- F Zone Prototype—exploring potential for adding units to a prototypical site in an F-zone



## Appendix B. Community Survey Summary

### SPRING 2022

The Community Survey for the Brookline Housing Plan was available online to Brookline residents from January 31- February 18, 2022. The Planning and Community Development Department made the survey available on the Town’s website and promoted it through social media, flyers, community newsletters, and announcements in meetings of several Town Boards and Commissions. The consulting team also provided the survey link via email to all participants in the Housing Plan’s community engagement process and attendees at the first Community Forum. Language Connections interpreters translated the survey into Spanish, Russian, and Chinese (Simplified). The survey received a total of 831 responses.

The survey helped to gather community input and ideas through an accessible engagement tool that required a minimal time investment from participants (approximately ten minutes). The survey results that follow reflect the survey responses received, and they do not represent a vote or constitute a formal policy decision on the part of the Town of Brookline. These results inform the needs, goals, and recommendations that will be discussed and considered throughout the Housing Plan process.

### AT A GLANCE

- The 2022 HPP Community Survey reached more people in more ages groups that the 2016 survey reached. The age distribution among 2022 respondents is particularly concentrated in the 60-74 age cohort.
- What respondents think of as ideal community characteristics have not changed much since 2016: convenient access to transit, shops and services, and quality schools continue to be important to Brookline residents
  - Of the “ideal community” characteristics that respondents were least likely to prioritize, four of five were related to places with age-of-household qualities such as a place that attracts young professionals, a place with lots of young children, or a place of lots of older adults, and so on.
- Priority housing initiatives have not changed much since 2016: encouraging creation of homes with a mix of price ranges and helping people stay in the community as they age continue to be high-priority issues
- More than one in five respondents indicated affordable housing is suitable “everywhere” in or “throughout” Brookline. Residents of Brookline Village were most likely to specifically name their own neighborhood as a suitable location for affordable housing

### WHO TOOK THE SURVEY?

Of 817 respondents who indicated where they live, 781 (95.6 percent) are Brookline residents and 173 (21.2 percent) work in Brookline. There were 12 respondents who live in Boston and 21 respondents who live in neighboring and nearby communities with connections to Brookline or who wish to live in Brookline

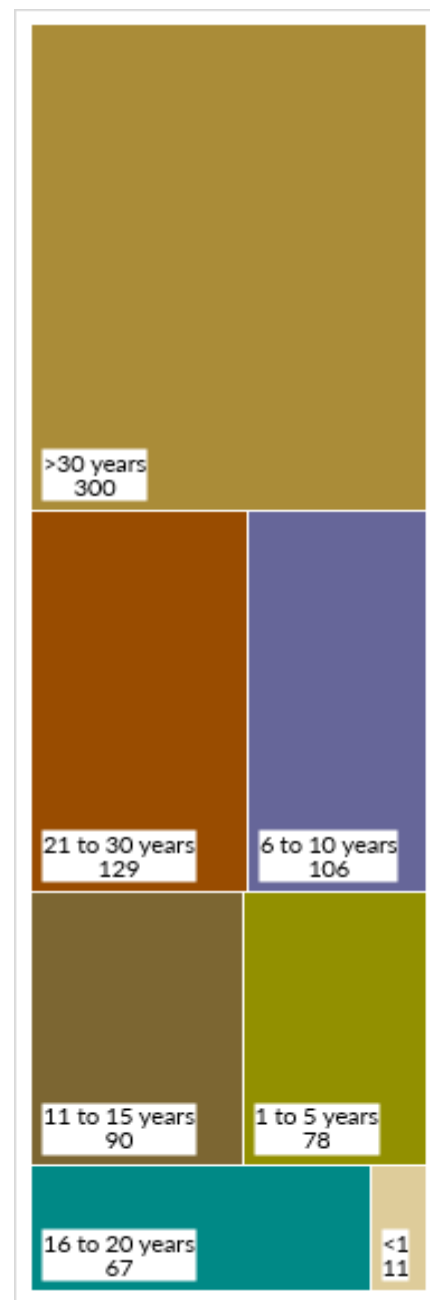


in the future. Of 175 respondents who work in Brookline, 165 were Brookline residents. Two responses came from people who said they live outside the Commonwealth (although one took the survey while physically located in Brookline), and one answered “other” without specifying the location of their residence.

Most of the respondents living in Brookline have lived in the Town for more than twenty years (429 out of 781, or 54.9 percent). Figure 1 on the page that follows provides a graphical representation of the amount of time resident-respondents have spent living in Brookline.

Of 625 respondents (76.5 percent) who own property in Brookline and indicated how long they have lived in Town, 388 (62.1 percent) have lived in Brookline for more than 20 years and 275 (44 percent) have lived in Brookline for more than 30 years. The proportions of Brookline homeowners—specifically of homes without deed restrictions—who have lived in Brookline for up to 5 years is very small relative to respondents who reported other types of tenure.<sup>45</sup> There are certainly many factors that contribute to this trend. However, the increasing unaffordability of homeownership in Eastern Massachusetts has reached crisis levels in recent years, and this has a role in the relationship between tenure (rental, ownership, etc.) and duration of residence.<sup>46</sup>

One hundred forty-four Brookline- renters, including renters of market-rate and income-restricted units, made up 17.6 percent of respondents who indicated where they live. The largest proportion of these residents have lived in Brookline between 1 and 5 years (40 out of 144, or 27.8 percent), followed by residents of more than 30 years (29 out of 144, or 20.1 percent). Two-thirds of the tenants of Brookline’s private or non-profit affordable housing units who said how long they have lived in Brookline have been residents for longer than 15 years (6 out of 9). Of the Brookline Housing Authority tenants who responded, half (8 out of 16) have lived in Brookline for more than 15 years. Holders of Section 8 vouchers (total of 6) were represented in five of the seven length-of-residence intervals, and ranged in their durations of residence in Brookline from less than one year to more than 30 years.



<sup>45</sup> This finding is statistically significant within the context of this survey’s respondents, but further study would be required to determine whether this trend is representative across the Town of Brookline. Data limitations will be explored further later in this summary.

<sup>46</sup> As a reader would expect, age is also strongly related to both tenure and duration of residence.





Table 1 shows that most survey respondents for the 2022 HPP Community Survey are over 60 (438 out of 811, 54.0 percent). The best-represented age group was 60-74 with 293 respondents (36.1 percent), followed by 145 respondents over 75 (17.9 percent). The median age among respondents was also the 60-74 group, which demonstrates the overrepresentation of older

**Table 1: Ages of HPP Community Survey Respondents**

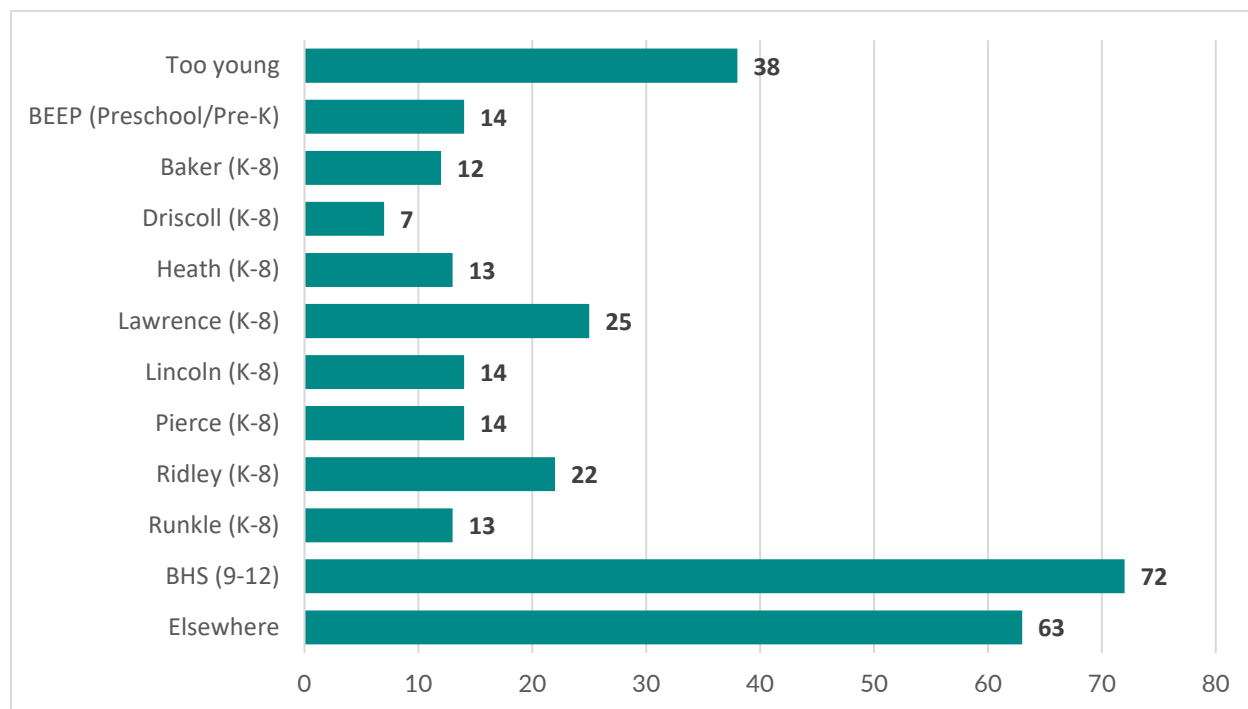
Age	2022 Survey		2016 Survey	
	Number	Percent	Number	Percent
17 or younger	10	1.2%	0	0.0%
18-20	2	0.2%	0	0.0%
21-29	19	2.3%	35	6.0%
30-39	99	12.2%	99	17.0%
40-49	106	13.1%	132	22.6%
50-59	137	16.9%	118	20.2%
60-74	293	36.1%	165	28.3%
75 or older	145	17.9%	34	5.8%
Total	811	100.0%	583	100.0%

adults among survey respondents because the median age group in Brookline is 30-39 according to the US Census Bureau's American Community Survey (ACS) Five-Year Estimates for 2016-2020 (the most recently available data, released March 17, 2022).<sup>47</sup> The strong level of response from older adults is not unexpected in the context of municipal planning, but it is an important part of understanding what populations our community engagement efforts reached and which groups we didn't reach as successfully. Fewer than 4 percent of our survey respondents were under 30 years old, and 16 percent were under 40 years old. The slightly different age groups reached by the 2016 and 2022 surveys may also lend insight into what housing barriers and challenges were common issues around the time of each HPP update.

More than one third of 670 respondents said they have children in their households. Among these households, all of the Brookline Public Schools were represented, with the most commonly selected school being Brookline High School (BHS). Following BHS, the most common selections were other schools outside the Brookline Public School system (most of these were private schools) and unenrolled (too young for school). Figure 2 shows that families of students in each of the neighborhood elementary schools participated in the survey, and they were represented by between 7 (Driscoll) and 25 (Lawrence) households.

<sup>47</sup> The age groups reported by the ACS are much smaller (more specific) than those used in this survey, but for the purpose of this comparison, we grouped ACS data into the same categories. The ACS 2016-2020 reports the median age in Brookline is 34.8 years.



**Figure 1: School Enrollment in Surveyed Households (243 respondents)**

### FUTURE CONSIDERATIONS

When asked how likely they are to move out of Brookline in the next five years, 419 of 778 respondents (53.9 percent) indicated that they are not at all likely to leave (Figure 3). Another 198 (25.4 percent) said they are slightly likely to move out of Brookline, which brings the proportion of survey takers who report they are unlikely to leave Brookline to about four out of five. Only 8.7 percent of respondents indicated that they are “very likely” or “extremely likely” to move out of Town in the next five years (68 out of 778). Of those who anticipate leaving Brookline, the most common reason is the cost of housing/living (included among answers from 39 out of 67 respondents, 58.2 percent). Figure 4 illustrates the prevalence of this selection. Twelve respondents cited proximity to family/friends as a reason for leaving Brookline in the relatively near term, and ten indicated that they plan to leave because their children finished school. Nineteen respondents wrote in (an)other reason(s), which included politics and governance, school and career changes, and accessibility concerns, among others. All other options were selected by fewer than ten survey participants.



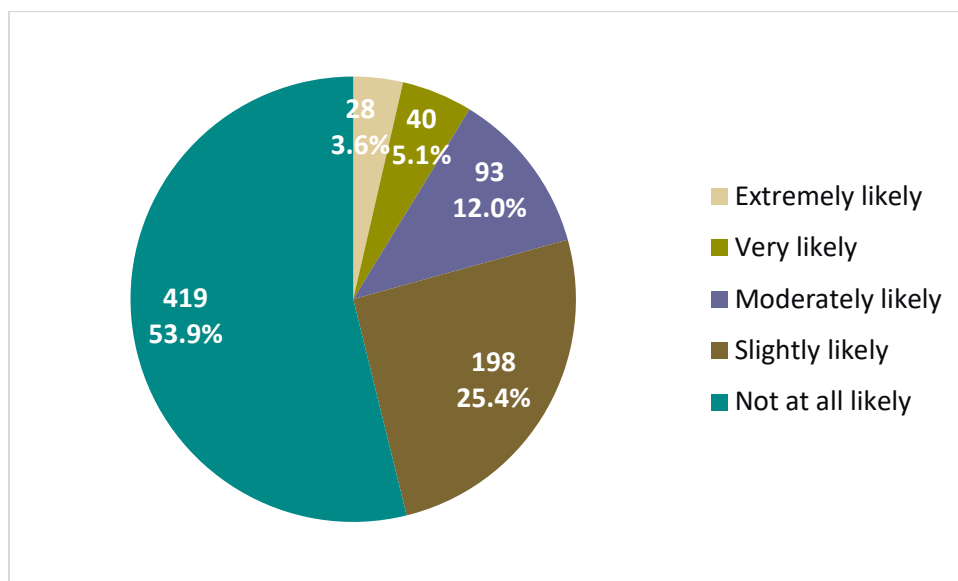
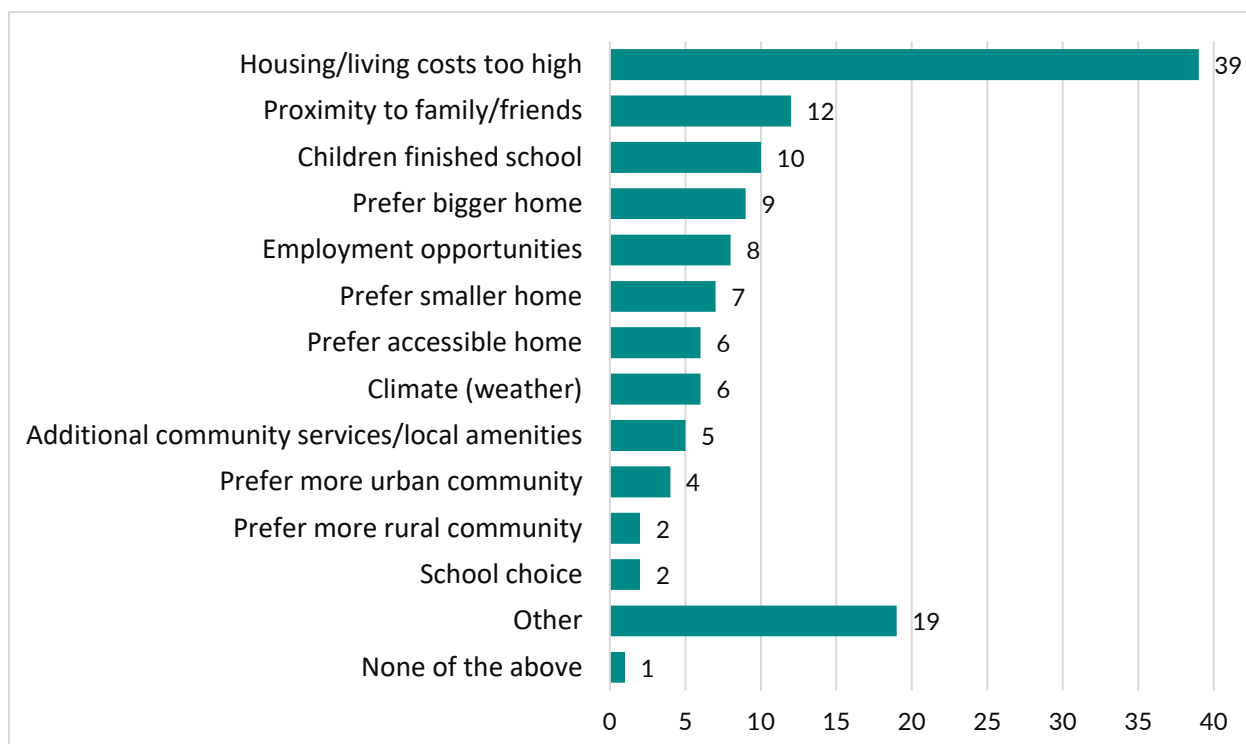
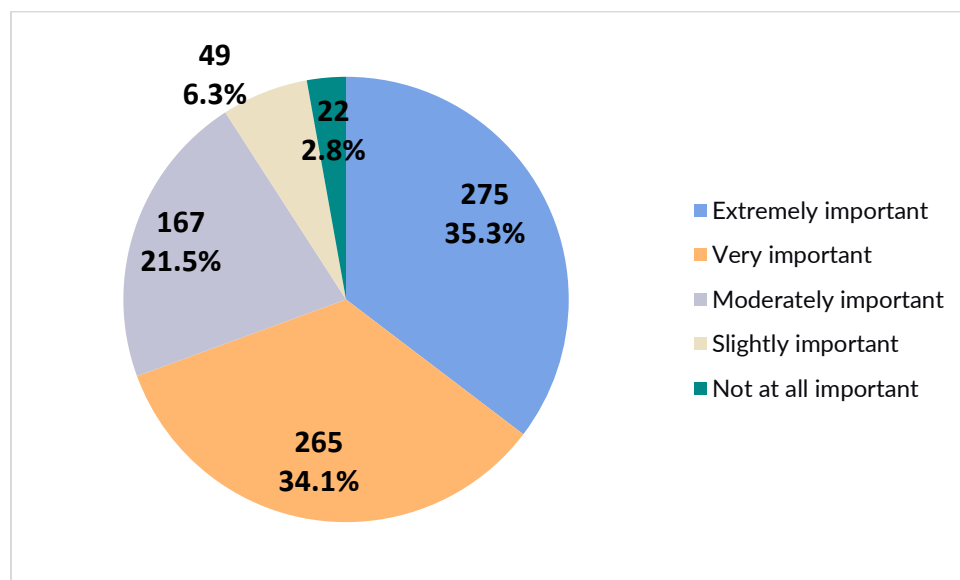
**Figure 2: Likelihood of Moving Out of Brookline in the Next Five Years (778 respondents)****Figure 3: Influencing Factors for Respondents Likely to Leave Brookline in the Next Five Years (67 respondents)**

Figure 5 shows that for most survey respondents (540 out of 778, 69.4 percent), it is either “extremely important” or “very important” to stay in Brookline as they age. These 540 respondents were asked “what factors need to change/improve to enable you to stay in the community as you age?”, and were able to

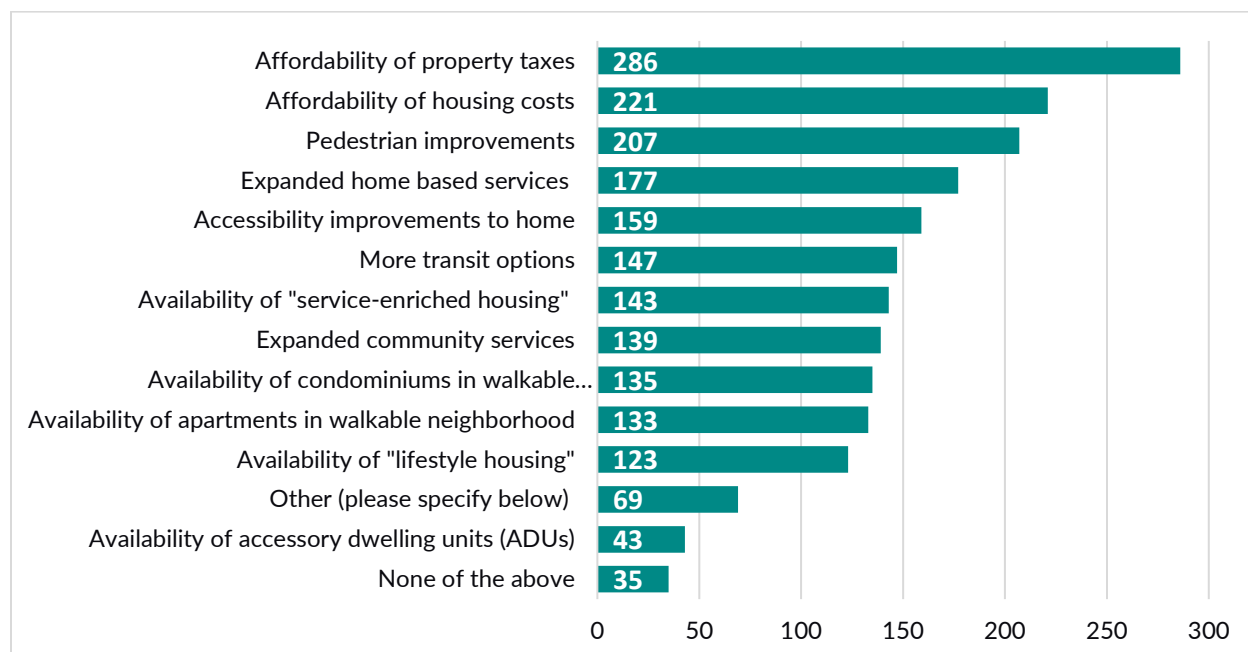


select any number of barriers from a list and write in their own answers. Figure 6 shows that the two options most often most selected were affordability of property taxes (286 out of 540, 53.0 percent) and affordability of housing costs (221 out of 540, 40.9 percent). Pedestrian improvements, expanded home-based services, and accessibility improvements to home were also selected more than 150 times each (207, 177, and 159 respectively). "None of the above," which indicates that the respondent does not anticipate barriers to aging in Brookline, was the least-selected option (35 out of 540, 6.5 percent).

**Figure 4: Importance of Aging in Brookline (778 respondents)**



**Figure 5: Improvements or Changes to Enable Respondents to Age in Brookline (540 respondents)**



## LOCAL COMMUNITY IDEALS

The survey asked participants to indicate the importance of thirteen characteristics in an “ideal community” on a scale from “extremely important” to “not at all important.”

### Top five priorities (by percent selection of extremely/very important):

1. A place where I will feel safe – 94.0%
2. A place with access to parks, recreational facilities, and opportunities for community gathering – 84.8%
3. A place with housing options close to services/shops – 75.3%
4. A place with housing options close to public transit – 75.2%
5. A place with quality public schools – 73.5%

### Least prioritized (by percent selection of slightly/not at all important):

1. A place with lots of older adults – 33.8%
2. A place with lots of young children – 25.8%
3. A place that attracts young professionals to live – 23.1%
4. A place with a mix of housing costs – 18.6%
5. A place that supports multi-generational living – 18.5%

These takeaways lend insights into the community priorities in Brookline. Figure 7 provides the number of respondents who characterized each community trait as either “extremely” or “very important.”

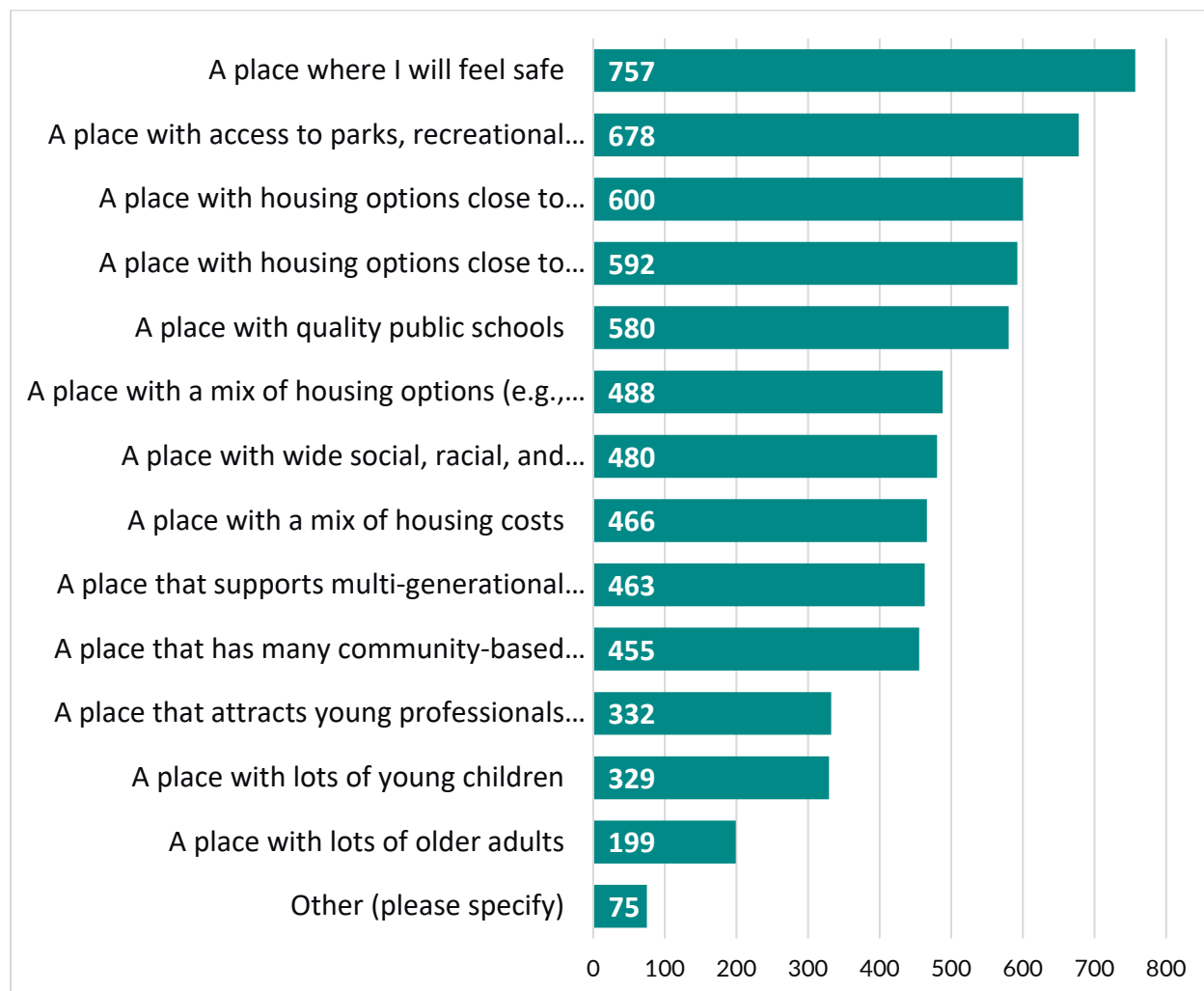
Not every respondent rated every factor, so number of responses for each characteristic ranged between 805 and 778 for the thirteen listed characteristics. There was also a write-in “other” option, selected at each priority level by a total of 100 participants.<sup>48</sup> Among these write-ins, the most common themes included community programs and offerings as provided by the libraries and the senior center, governance (either as a city or a town), political tolerance, public health and safety (particularly related to policing and drugs), sustainability and climate resilience, accessibility for seniors and people with disabilities, affordability of housing/living costs and property taxes, attractive and welcoming neighborhoods, and considerations of density (including single-family zoning).

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<sup>48</sup> Respondents rated “other” 100 times: “extremely important” 68 times; “very important” 7 times; “moderately important” 10 times; “slightly important” 2 times; and “not at all important” 13 times. Respondents who wrote in answers selected exclusively “extremely” or “very” important if they rated their response, but there were more than 50 write-ins without ratings.

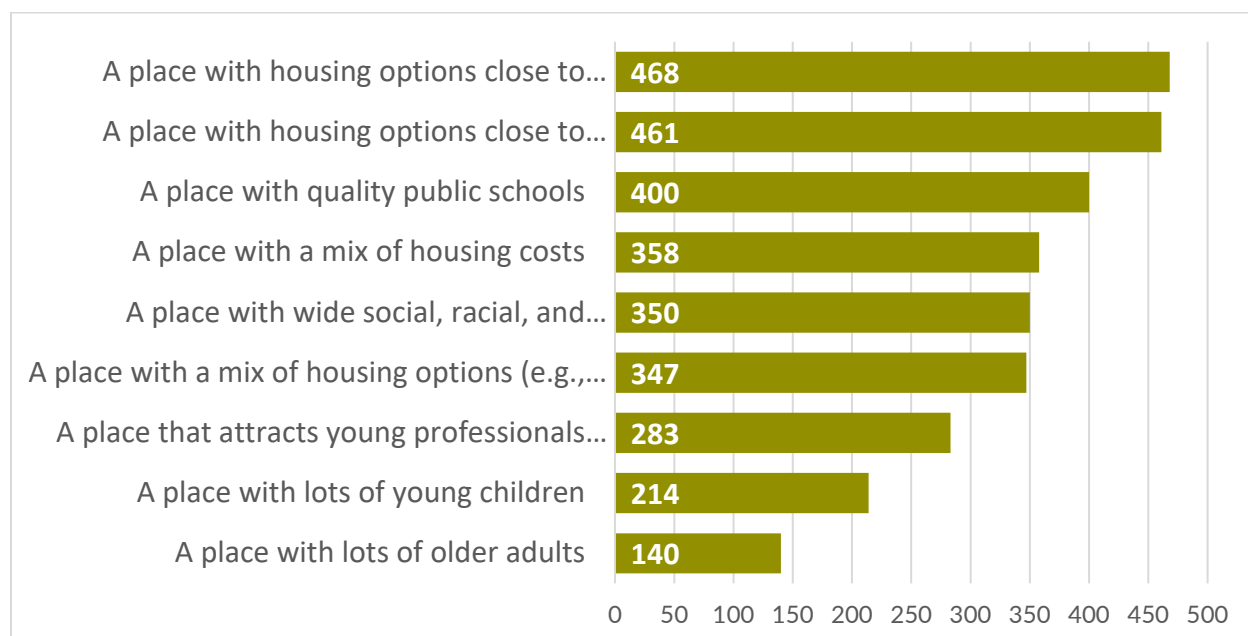




**Figure 6: 2022 High-Priority Characteristics of an "Ideal Community" (805 respondents)**

The Community Survey conducted as part of the community engagement and outreach for Brookline's 2016 Housing Production Plan also asked for respondents' priorities in an ideal community. The nine characteristics that respondents evaluated in the 2016 survey were also assessed in the 2022 survey, and the recent version included four additional factors based on the input received in this community engagement process and feedback from the working group. Figure 8 reproduces results from the 2016 HPP for comparison.



**Figure 7: 2016 High-Priority Characteristics of an "Ideal Community" (542 respondents)**

In 2016, the top priorities (by percent selection of extremely/very important) were:

1. A place with housing options close to public transit – 87.5%
2. A place with housing options close to services/shops – 87.0%
3. A place with quality public schools – 75.6%

In 2016, three characteristics were prioritized at rates within two percentage points of one another:

1. A place with a mix of housing costs – 67.4%
2. A place with wide social, racial, and economic diversity – 65.9%
3. A place with a mix of housing options – 65.6%

In 2016, the least prioritized (by percent selection of slightly/not at all important) were:

1. A place with lots of older adults – 26.9%
2. A place with lots of young children – 41.0%
3. A place that attracts young professionals to live – 54.2%

Figures 7 and 8 together show that while more community characteristics were introduced for assessment, Brookline survey respondents' priorities seem to have changed very little since 2016.



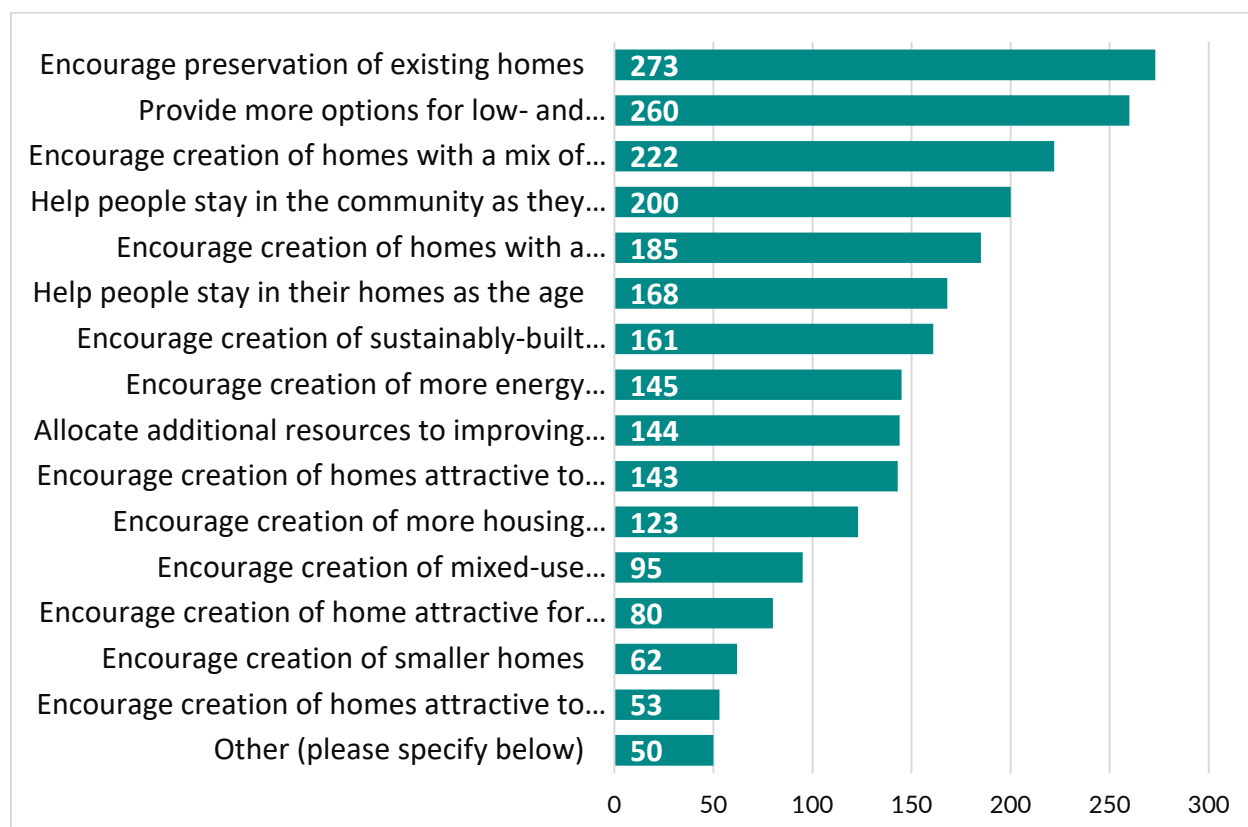
## HOUSING INITIATIVES

The survey asked respondents to select up to three priority housing initiatives, shown in Figure 9. As opposed to the more theoretical question about characteristics of an ideal community, this question was structured to understand what policies survey respondents might support in Brookline. The most popular answers were:

- Encourage preservation of existing homes
- Provide more options for low- and moderate- income people/families
- Encourage creation of homes with a mix of price ranges
- Help people stay in the community as they age

These priorities illustrate the rising challenge of housing affordability that Brookline residents and survey respondents face while each representing unique needs and desires in the community.

**Figure 8: Priority Housing Initiatives (817 respondents)**



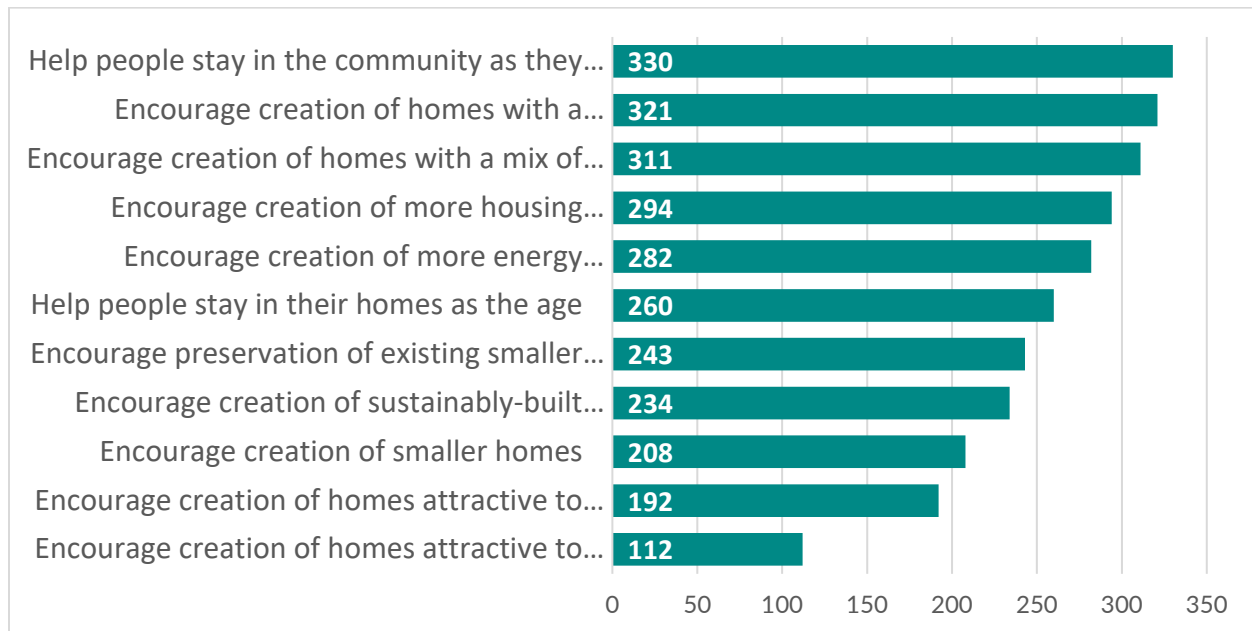
In 2016, this question was structured somewhat differently and allowed respondents to assign high-, medium-, or low-priority to initiatives. Figure 10 illustrates high-priority housing initiatives identified in 2016. The most popular high-priority selections are similar to today's:

- Help people stay in the community as they age



- Encourage creation of homes with a convenient walk to business/services
- Encourage creation of homes with a mix of price ranges
- Encourage creation of more housing options/choices

**Figure 9: Priority Housing Initiatives (532 respondents)**

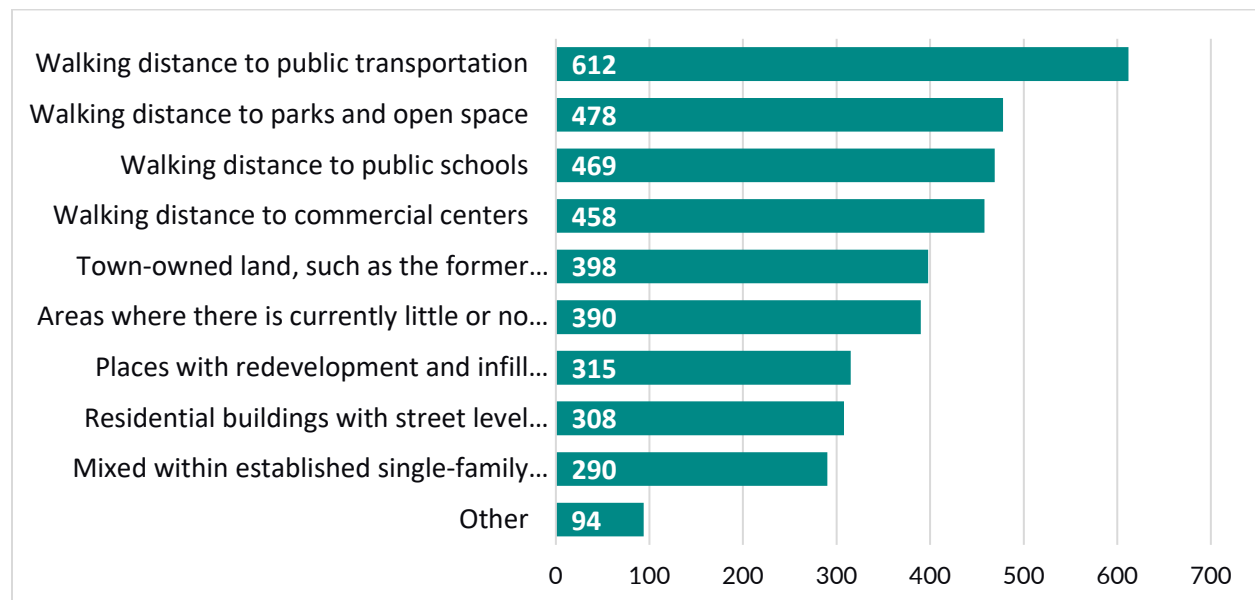


The most notable change is the increased support for “encourage the preservation of existing homes” between 2016 and 2022.

## AFFORDABLE HOUSING

Since the last update of Brookline’s Housing Production Plan in 2016, affordable housing has been a hot topic before the Brookline Zoning Board of Appeals, the body that hears 40B Comprehensive Permit applications. Since that plan was adopted, the Town has hit the Commonwealth’s 10%-minimum threshold of housing units eligible for the Subsidized Housing Inventory (SHI). The affordable housing landscape looks different now than it did then, and the Town is able to exert more control in future affordable housing development. Survey-takers were asked about criteria that make a location suitable for affordable housing development, and they were able to select as many options as they wished. Figure 11 shows that walkability is a critical factor for many survey respondents.



**Figure 10: Appropriate for Affordable Housing Development (792 responses)**

The consultants also asked respondents to write in their own answers. Figure 12 is a visual representation of words and phrases that were most commonly included in these write-in answers. Selected quotes on some of the most popular themes are included in the last section of this summary. The consulting team also searched for keywords to group answers together, and then analyzed these answers individually. This “sentiment analysis” served to separate answers that used similar key phrases, but the comments expressed different or opposing ideas. For most common topics (e.g. access to public transportation, access to shops and services, access to parks and green space, etc) this sentiment analysis did not illustrate divided opinions. This was not as true for locations, however: more than half of the mentions of “North Brookline” (not specific neighborhoods in North Brookline, however) expressed that North Brookline was not a suitable location. Many mentions of “South Brookline” specified that access to public transit would need to be improved.<sup>49</sup> There is considerable nuance to these answers, but most responses fit within: for, against, mix, or neutral. Figure 13 visually represents the sentiments of respondents who included “North Brookline,” “Coolidge Corner,” and “South Brookline” in their answers. These were not the only answers that included mixed sentiments, but they are the most illustrative of popular topics where consensus did not exist.

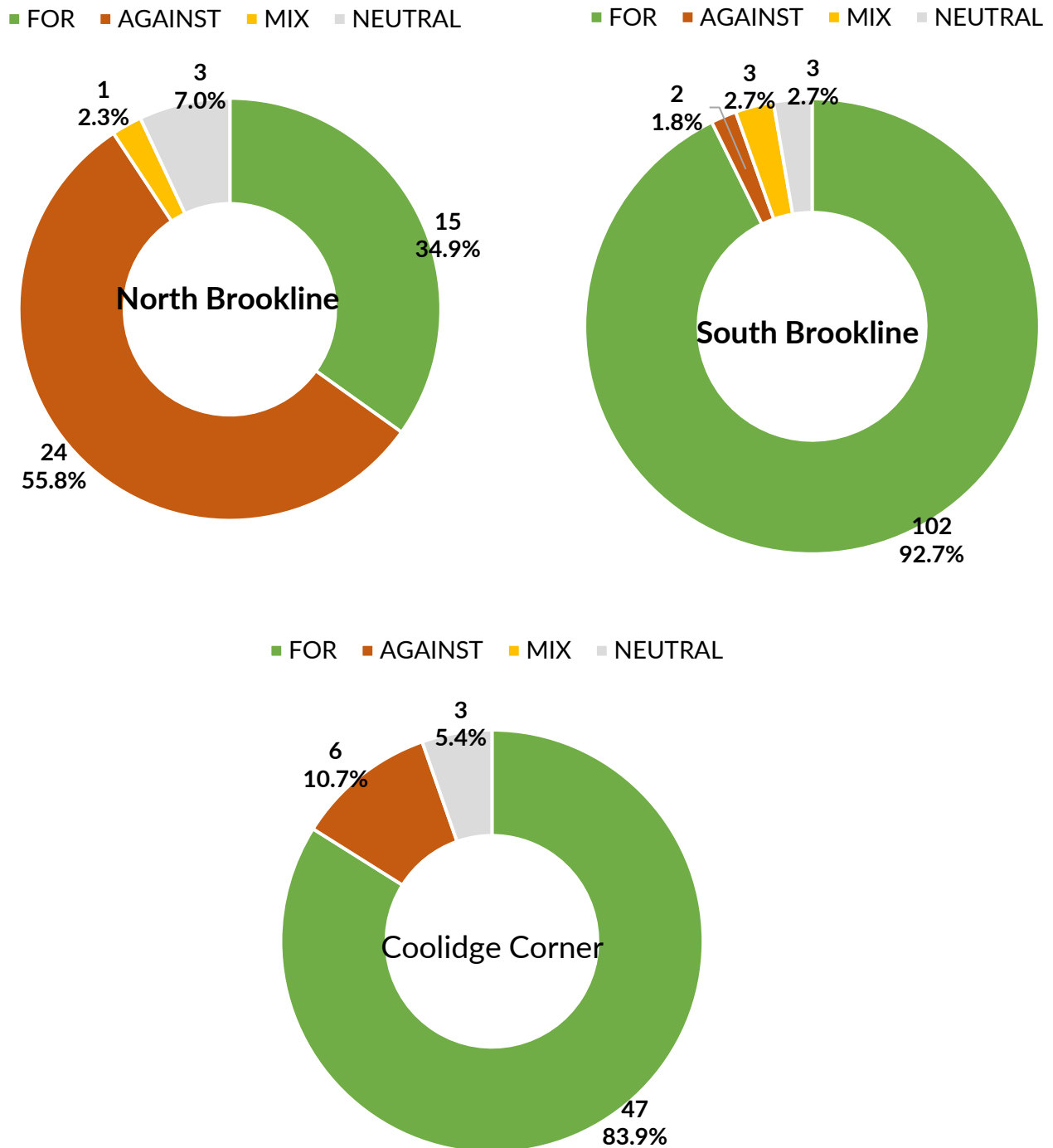
<sup>49</sup> Some respondents seemed to imply that public transportation in South Brookline was an addressable barrier, while others implied that it was insurmountable. The team’s sentiment analysis sought to honor the intent of these comments.







Figure 12: Sentiment Analysis



## DATA LIMITATIONS AND ACCESSIBILITY

The survey conducted for this HPP update received more than 800 responses, but respondents do not necessarily reflect a representative sample of Brookline residents (respondents self-select to participate in this planning process and do not represent a random sample). Accordingly, this statistical analysis is limited to proportions of respondents. While the trends identified in the survey provide considerable community insight and are useful in understanding needs and priorities in Brookline, the survey analysis is not intended to replicate, replace, or otherwise represent voting or decision-making processes in the Town of Brookline's policies or governance.

Of 831 responses, 682 came from unique devices. The 149 responses that came from shared devices were screened individually to identify potential duplicates. The largest number of responses to come from a single IP address was four. There were about ten survey responses which may have been repeated submissions by individuals who had already participated in the survey, but the consulting team did not exclude these responses in its analysis for several reasons:

- The team could not identify any objective rule to exclude potential duplicate responses that would not have also excluded responses that appeared to be unique submissions.
- These few responses flagged as potential duplicates represent an extremely small proportion of responses (1.2 percent of the gross total of responses, and less than 1.3 percent of the average number of responses to questions that were asked of all survey-takers) and do not significantly alter the trends or overview presented in this summary. These responses did not appear to advance any consistent position or agenda.
- Had the team selectively excluded answers, the people most likely to have been affected or wrongfully excluded are those who may have required assistance from someone else in submitting their answers, those who discussed their answers or opinions with other members of their household, and those who took the survey on public computers.
- The consulting team's responsibility to the Town of Brookline is to report the aggregate results of the survey as accurately as possible. The team believes that the integrity of this work depends on providing a faithful representation of this data, which includes the input of all respondents who chose to spend their time engaging with this process.

## LANGUAGE ACCESS

Language Connections translated the survey into Spanish, Russian, and Chinese (simplified), and these translated versions were available from the same link as the English survey. The consulting team made efforts to reach speakers of limited English through outreach to community leaders and institutions. Despite these efforts, only two respondents took the survey in a language other than English (Spanish). This extremely limited response indicates that additional outreach was necessary to reach these populations, despite significant and concerted efforts. The low utilization of survey translation may also be partially attributable to the feature's visual similarity to Google Translate and other automated translation services, which are considerably less accurate and nuanced than translations by professional interpreters.



The survey platform is designed to be accessible to screen readers for respondents with low vision, and the survey employed only question types that are compliant with accessibility standards. Data was not collected on whether responses came from or utilized accessibility devices.

## ANONYMOUS SURVEY QUOTES

There were 614 open response answers to the question, “Where in Brookline should more affordable housing be developed?”. These responses were reviewed individually and then grouped by keywords and phrases. The consultants analyzed the sentiment of each comment on some of the most popular topics according to four classifications: for, against, mixed, or neutral.

The following are a selection of some of these answers.<sup>50</sup> For this section, the consulting selected quotes that tended to provide additional details or information about respondents’ rationale or perspective about common themes. They are not necessarily representative of average length of responses.

### Everywhere (176 comments):

Everywhere. We need to integrate it in all our neighborhoods. Affordable housing is something that helps the whole community.

Everywhere, especially in neighborhoods full of only single family homes. We have failed to build enough housing for people in all income brackets. It’s a failure if our community to provide ample housing options for all.

On every property that was subject to a race-based restrictive covenant at some point in history.

I think this is the greatest need in Brookline, and affordable housing should be developed everywhere. I don't see any need to restrict the locations where affordable housing should be explored, and I think affordable housing should include both apartment buildings and single/two family homes.

Affordable housing should be allowed everywhere and developed everywhere. If I had to choose, near T and bus lines. And near North Brookline with close access to Commonwealth Ave.

I don't want house affordable housing to be gathered in one place, which will be a sign of poverty and result in discrimination. I hope that it can be mixed with other types of houses, which is more conducive to social stability.

Open land, can’t imagine anywhere that it should not be built. Brookline has large expanses of land with few houses. Most existing, more urbanized areas, where more affordable rentals had existed, have become condominiums without any increase in quality. The destruction of rent control transformed our

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<sup>50</sup> The number of comments provided in parentheses refers to comments of similar sentiment for common keywords, not number of keyword occurrences or usage of related phrases. This approach aims to honor and faithfully represent comments’ intent.



town drastically into a far more exclusive enclave. No stone should be left unturned, no part of Brookline should be excluded

**Nowhere (28 comments):**

I don't think that this is a good idea to create affordable housing in Brookline in general. It changes the atmosphere, the safety and the small town spirit we all love. Inhabitants of housing structures are always temporary, and they would not care about this town. I would much prefer single family houses where existing Brookline renters (no less than 3 years) would get subsidized mortgages to afford buying properties here. Only people who invest their own money will care about the neighborhood.

There is enough development in Brookline.

We already have enough affordable housing. If you cannot afford to live in Brookline than maybe you need to move further out.

In areas where there is room in the existing schools. Adding more housing without increasing school space doesn't make sense. The town does not seem to want to increase school capacity so probably shouldn't be increasing the housing stock.

Nowhere. Leave it to the market. Relax zoning restrictions. We pay too much property tax; if you start spending more on affordable housing projects, our taxes will almost certainly increase. You should not be involved in real estate development. You should not choose what to develop and where. Real estate developers are the experts. Just get out of their way. The project at 249 Corey Rd is down the street from us. It is unpleasant, but it would be wrong of me to try to stop it from happening.

We should not encourage development of more housing in Brookline. Brookline is dense enough. Quality of life suffers with increased densification.

**Access to transit (124 comments):**

Affordable housing should be developed where there are a variety of Town resources - shops, transit, parks, schools, and it should be seamlessly integrated into the neighborhood. It should reflect a sense of place and belonging, a sense of being part of a community.

In areas that have access to services, open space and public transportation. In walkable neighborhoods. This is true for much of Brookline although public transportation in South Brookline can be challenging whereas North Brookline has excellent public transportation, walkability and access to downtown Boston.

Anywhere that it can feasibly be created! My preference would be in areas close to public transit so that lower income families won't be required to also have a car; close enough to schools that such families won't have difficulty or stigma getting their children to school; mixed into neighborhoods and mixed income areas, enough that it won't be an obvious "poor folks' neighborhood."

Close to the Green line so residents have easy T access. Close to schools so children may walk to school. Develop a combo affordable housing/senior living so folks in affordable housing may work next door at senior living.





Throughout where there is easy access to public transportation. The housing I would like to see if mixed income. We have and are losing too many of our middle income residents.

In our single family neighborhoods near public transit (we shouldn't have single-family only zones near transit at all); affordable housing in the Baker, Heath, and Runkle school districts; within .25 miles of EVERY T stop, especially the in the many under-built neighborhoods along the D line.

Newbury College, around the Reservoir T stop in Chestnut Hill, near the Beaconsfield train stop, meaning more in South Brookline near transit lines there. I am aware that more density is needed in suburbs, but North Brookline is not what is meant by that critique. North Brookline is already dense like a city. If Brookline is serious about this, and not just working to help developers, which is what everyone suspects, it would plan to build around those other transit stops.

I think it is important to say that while affordable housing is a serious issue in Greater Boston, Brookline has done a lot to contribute to solutions. We in Brookline should continue to do our part to help families and individuals in need but that does not mean destroying what makes Brookline a desirable place to live. It is important for affordable housing be near public transportation and other amenities while recognizing our limited land resources and community needs beyond housing.

Try Salisbury Road on the North side of Beacon Street - within 1 block of Beacon and the C line, much of it in the Washington Square commercial district, and yet it's zoned for single family. Try parts of Griggs Road and Griggs Terrace - same concept. All within 3/10 of mile from the T and commercial areas but low density zoning.

Near transit. But, frankly, anywhere. Be creative. Develop the golf course.

#### **South Brookline (102 comments):**

Affordable housing should be developed in SOUTH BROOKLINE - to create those diverse, interesting and inviting communities throughout the town (not just North Brookline).

South Brookline has very little. I support zoning changes to allow more affordable housing for families to be developed in single family zoned areas.

More in South Brookline so we are not so divided in terms of density. Get better public transport there.

South Brookline, with an infrastructural transportation improvement. North Brookline is bearing all the brunt.

#### **Not in North Brookline (24 comments):**

Some locations in north Brookline are already congested and have little green space. Yes, access to transportation is important, but don't assume moderate income people do not drive. Therefore, attention should be given to pockets throughout Brookline and if there needs to be tradeoffs involving spaces that are green that is the purpose of having a plan. The current approach to tear down and grant zoning permission cannot be continued



Anywhere but North Brookline which is already one of the most densely populated area in Massachusetts

Everywhere, especially where there is not any now. EXCEPT COOLIDGE CORNER AND MUCH OF NORTH BROOKLINE, which is already completely built out. Almost all the affordable housing in Town is in my neighborhood, and that is just not fair.

**Other ideas:**

Th town of Brookline should let the market dictate this. It should be private decisions by private developers to determine whether "affordable housing" (however they wish to define it) makes sense in Brookline and where within Brookline it makes sense.

Opportunities should be evaluated when they come up although we do have inclusionary zoning which will help provide some affordable housing units.



## Appendix C. Glossary

**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 Housing Plan, "affordable housing" is synonymous with low- or moderate-income housing, i.e., housing available to households earning no more than 80 percent of area median income 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.

**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. For Nantucket, AMI is based on the Nantucket County Median Income. See Appendix D for 2022 Income Limits.

**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 in order 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 40R.** G.L. c. 40R (2004 Mass. Acts 149, s. 92), a state law that provides for overlay districts with variable densities for residential development and multi-family housing by right (subject to site plan review). At least 25 percent of the units in a Chapter 40R district have to be affordable to low- or moderate-income people.

**Community Development Block Grant (CDBG).** Under the Housing and Community Development Act of 1974, as amended (42 U.S.C. 5300 et seq.), the U.S. Department of Housing and Urban Development (HUD) makes funds available each year for large cities ("entitlement communities") and each of the fifty



states (the Small Cities or "non-entitlement" program). CDBG can be used to support a variety of housing and community development activities provided they meet one of three "national objectives" established by Congress. Housing activities are usually designed to meet the national objective of providing benefits to low- or moderate-income people. Funds may be used for housing rehabilitation, redevelopment of existing properties for residential purposes (in some cases), making site improvements to publicly owned land in order to support the construction of new housing, interest rate and mortgage principal subsidies, and downpayment and closing cost assistance. As an entitlement community, Brookline receives an annual allocation of CDBG funds from HUD. These funds are programmed annually through Brookline's One-Year Action Plan, which in turn is the mechanism Brookline uses to implement its Five-Year Consolidated Plan.

**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.** See Very Low Income; and see Appendix D for 2022 income limits.

**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,** 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:

*A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or*

*A group of persons residing together, and such group includes, but is not limited to:*

*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);*

*An elderly family;*

*A near-elderly family;*

*A disabled family;*

*A displaced family; and*

*The remaining members of a tenant family.*

**Gross Rent.** Gross rent is the sum of the rent paid to the owner 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 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. Brookline requires developments with six or more residential units to provide affordable housing. Projects of sixteen or more units must provide the affordable units on site (within the development), whereas smaller projects have the option to include actual units or pay fees to the housing





trust fund.

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

**Jobs-to-Housing Ratio.** An indicator of the adequacy of employment and housing in a given community or area.

**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.** As used in this report, low income means a household income at or below 50 percent of AMI. It includes the household income subset known as very low income. See Appendix D for 2022 income limits.

**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.

**MassDevelopment.** A quasi-public agency that provides financing for subsidized rental housing developments.

**MassHousing.** The quasi-public state agency that provides financing for subsidized rental and for-sale 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.** As used in this report, moderate income means a household income between 51 and 80 percent of AMI. See Appendix D for 2022 income limits.



**Municipal Affordable Housing Trust.** An entity created under G.L. c. 44, § 55C to provide for the creation and preservation of affordable housing in municipalities for the benefit of low- and moderate-income households. Any community can establish a municipal housing trust following acceptance of G.L. c. 44, § 55C by simple majority vote of the local legislative body.

**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.

**Shared Equity Homeownership.** Owner-occupied affordable housing units that remain affordable over time due to a deed restriction that controls resale prices, thereby retaining the benefits of the initial subsidy for future moderate-income homebuyers.

**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.

**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.** As used in this report, very low income is 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 extremely low income.



## Appendix D. HUD Section 8 Income Limits 2023

Household Size	50% AMI	30% AMI	80% AMI
<b>1</b>	\$51,950	\$31,150	\$82,950
<b>2</b>	\$59,400	\$35,600	\$94,800
<b>3</b>	\$66,800	\$40,050	\$106,650
<b>4</b>	\$74,200	\$44,500	\$118,450
<b>5</b>	\$80,150	\$48,100	\$127,950



## Appendix E. Subsidized Housing Inventory

As estimated by Brookline DPCD staff, January 1, 2024 (not official state inventory)

<b>Subsidized Housing Inventory (SHI)-Eligible Units Estimated as of 1/24/24</b>	<b>UNITS</b>
3/1/2022 DHCD Certification of SHI Units	2,910
<b>Units that should be off next SHI Certificate to correct older project unit counts</b>	
Arthur O'Shea House (61 Park St.) & Theresa J. Morse Apartments (90 Longwood Ave.) each have one less unit than the state had listed	-2
<b>Units that previous to 3/1/2022 came off SHI, have now finished construction (have a Certificate of Occupancy), &amp; will be added in next SHI Certificate Issuance</b>	
21 Crowninshield Road condo	2
<b>Permitted by Zoning Board of Appeals since 3/1/2022 SHI Certification &amp; will be added in next SHI Certificate issuance</b>	
845 Boylston Street	40
<b>Additional Units that will be added in next SHI Certificate since building permit is issued</b>	
45 Bartlett Crescent	6
40 Centre St	40
<b>Additional Units that will be added in next SHI Certificate since construction is completed and Certificate of Occupancy is issued</b>	
Hancock Village - Res. of So. Brkln	170
Gerry Road (not 40B)	4
<b>Units that should be off next SHI Certificate and will stay off until Building Permit is issued</b>	
209 Harvard Street	-44
500 Harvard Street	-25
83 Longwood Avenue	-64
<b>Units that should be off next SHI Certificate and will stay off until construction is completed and a Certificate of Occupancy is issued</b>	
1180 Boylston	-50
Hancock Village - Puddingstone	-250
<b>Total SHI-eligible as of 1/24/24</b>	<b>2,737</b>
<b>2020 Census Year-Round Housing Count (released in May 2023)</b>	<b>27,742</b>
<b>Current SHI percentage as of 1/24/2024 (not certified)</b>	<b>9.87%</b>

\*Note 5 of the townhomes were already on the SHI.

\*Note only 24 will be returned to SHI once building permit is filed.



## Appendix F. Subsidized Housing Inventory

As of March 2022 (most recent official list)



# DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT CH40B SUBSIDIZED HOUSING INVENTORY

## Brookline

DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
474	Arthur O'Shea House	61 Park St.	Rental	100	Perp	No	HUD
475	Kickham Apartments	190 Harvard St.	Rental	39	Perp	No	HUD
476	Sussman House	50 Pleasant St.	Rental	100	Perp	No	HUD
477	Theresa J. Morse Apts	90 Longwood. Ave.	Rental	99	Perp	No	HUD
478	Walnut Street Apts	22 High St./ 16 Walnut	Rental	100	Perp	No	HUD
479	Egmont St. Veterans	338-348 St. Paul/51-85 Egmont/209-221 Pleasant	Rental	114	Perp	No	DHCD
480	Egmont St. Veterans	44-79 Egmont Street	Rental	6	Perp	Yes	DHCD
481	High St. Veterans	176-224 High/6-30 New Terrace/186-218 Chestnut	Rental	177	Perp	No	DHCD
482	High St. Veterans	New Terrace Road and High Street	Rental	9	Perp	Yes	DHCD
483	Col. Floyd	32-40 Marion/19-36 Foster St	Rental	60	Perp	No	DHCD
484	Condos	Browne & St.Paul Streets	Rental	2	Perp	No	DHCD
485	McCormack House	151-153 Kent St.	Rental	10	Perp	No	DHCD
486	Benjamin Trustman	337-347 St. Paul/144-156 Armory/7-33 Egmont	Rental	86	Perp	No	DHCD
487	100 Center Plaza	Centre & Williams	Rental	211	2042	No	MassHousing
488	1027 Beacon St	1027 Beacon St	Rental	9	2030	No	DHCD
							FHLBB
489	1045 Beacon St	1043-1045 Beacon St.	Rental	28	2033*	No	DHCD
							HUD

3/1/2022

Brookline  
Page 1 of 5

This data is derived from information provided to the Department of Housing and Community Development (DHCD) by individual communities and is subject to change as new information is obtained and use restrictions expire.



# DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT CH40B SUBSIDIZED HOUSING INVENTORY

## Brookline

DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
490	120 Centre Court	120 Centre Court	Rental	125	2042	No	HUD MassHousing
491	1550 Beacon Plaza	1550 Beacon St.	Rental	180	2042	No	MassHousing
492	Beacon Park	1371 Beacon Street	Rental	80	12/31/2028	No	MassHousing
493	10 Juniper St	10 Juniper St	Ownership	32	perp	No	DHCD
494	Village at Brookline	55 Village Way/72 Pearl St	Rental	307	09/15/2028	No	DHCD DHCD MassHousing
495	Kilgallon House	11 Harris Street	Rental	8	Perp	No	DHCD
496	Sara Wallace House	1017 Beacon Street	Rental	16	2036	No	HUD
497	Connelly House	1057 Beacon Street	Rental	13	Perp	No	DHCD
498	Goddard House	165 Chestnut Street	Rental	13	perp	No	DHCD
499	1162-1164 Boylston Street	1162-1164 Boylston Street	Ownership	6	perp	No	DHCD
500	1470 Beacon Street	1470 Beacon Street	Rental	4	perp	No	DHCD
501	Kendall Crescent	243, 245, 275 Cypress Street	Ownership	4	perp	No	DHCD
502	The Lofts at Brookline Village	77 Linden Street Unit, 74 Kent Street	Rental	2	perp	No	DHCD
3751	1754 Beacon St	1754 Beacon St	Rental	14	10/17/2032	No	DHCD DHCD DHCD

3/1/2022

Brookline  
Page 2 of 5

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# DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT CH40B SUBSIDIZED HOUSING INVENTORY

## Brookline

DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
3752	1876 Beacon St	1876 Beacon St	Rental	15	2023	No	MHP MassHousing
3753	77 Marion St/ 1405 Beacon St	77 Marion St/ 1405 Beacon St	Rental	4	perp	No	DHCD
3951	St. Aidan's	Crowninshield, Pleasant & Freeman Streets	Mix	35	Perp	Yes	DHCD DHCD
4228	DDS Group Homes	Confidential	Rental	42	N/A	No	DDS
4549	DMH Group Homes	Confidential	Rental	37	N/A	No	DMH
7126	St. Paul Crossing	St. Paul Street	Ownership	3	perp	No	DHCD
7127	Cypress Lofts	110 Cypress Street	Rental	5	Perp	No	DHCD
8154	154-156 Bolyston St	154-156 Bolyston St	Rental	6	2035	NO	HUD MHP
9050	Scattered Sites	Park Street, Boylston Street	Ownership	6	Perp	NO	DHCD
9068	1600 Beacon Street	1600 Beacon Street	Ownership	6	Perp	NO	HUD
9740	Hammond Pond Place	321 Hammond Pond Parkway	Ownership	3	Perp	NO	DHCD
9741	Englewood Residences	20 Englewood Avenue	Rental	2	Perp	NO	DHCD
9742	109 Sewall Avenue	109 Sewall Avenue	Ownership	2	Perp	NO	DHCD
9832	The Residences of South Brookline	Independence Drive	Rental	5	Perp	YES	MassDevelopment
9868	86 Dummer Street	86 Dummer Street	Rental	32	Perpetuity	NO	HUD

3/1/2022

Brookline  
Page 3 of 5

This data is derived from information provided to the Department of Housing and Community Development (DHCD) by individual communities and is subject to change as new information is obtained and use restrictions expire.

# DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT CH40B SUBSIDIZED HOUSING INVENTORY

## Brookline

DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
9868	86 Dummer Street	86 Dummer Street	Rental	32	Perpetuity	NO	DHCD
9869	51-57 Beals Street	51-57 Beals Street	Rental	31	Perpetuity	NO	HUD
9870	45 Marion Street	45 Marion Street	Rental	64	2045	YES	MassHousing
9871	Olmsted Hill	2-8 Olmsted Road	Ownership	12	Perpetuity	NO	DHCD
9924	21 Crown	0-21 Crowninshield Road	Ownership	0	Perp	YES	MassHousing
10002	JFK Crossing	420 Harvard St & 49 Coolidge St	Rental	25	Perp	YES	MHP
10003	40 Centre Street	40 Centre Street	Rental	0	Perp	YES	MassHousing
10024	1180 Boylston Street	1180 Boylston Street	Rental	50	Perp	YES	MassHousing
10025	370-384 Harvard Street	370-384 Harvard Street	Rental	62	Perp	YES	DHCD
10218	Babcock Place	134-138 Babcock Drive	Rental	0	Perp	YES	MassHousing
10245	455 Harvard Street	455 Harvard St	Rental	17	Perp	YES	MassHousing
10255	Puddingstone at Chestnut Hill	265-299 Gerry Road	Rental	250	Perp	YES	MassDevelopment
10364	1299 Beacon Street	1299 Beacon St	Rental	0	Perp	YES	MassHousing
10365	445 Harvard Street	445 Harvard St	Rental	0	Perp	YES	MHP
10644	209 Harvard	209 Harvard Street	Rental	44	perp	YES	MassHousing

# DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT CH40B SUBSIDIZED HOUSING INVENTORY

## Brookline

DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
10650	32-40 Marion St	32-40 Marion St	Rental	55	Perp	YES	DHCD
10652	500 Harvard St	500 Harvard St	Rental	25	Perp	YES	MassHousing
10668	108 Centre St	108 Centre St	Rental	54	Perp	YES	DHCD
10669	83 Longwood Ave	83 Longwood Ave	Rental	64	Perp	YES	MassHousing
<b>Brookline Totals</b>				2,910	<b>Census 2010 Year Round Housing Units</b>		26,201
					<b>Percent Subsidized</b>		11.11%