



Town of Agawam

HOUSING PRODUCTION PLAN

PREPARED by THE TOWN of AGAWAM
with assistance from the
PIONEER VALLEY PLANNING COMMISSION

ACKNOWLEDGEMENTS

This Housing Production Plan was prepared in 2023.



The Town of
AGAWAM
Massachusetts

Thank you to the following members of the Housing Production Plan Committee:

Pamela Kerr, Director, Office of Planning and Community Development

Rosemary Sandlin, City Councilor and Housing Committee Chair

Corinne Wingard, Housing Committee Member



This plan was prepared by the Pioneer Valley Planning Commission:

Ken Comia, Deputy Director, Land Use and Environment Department

Lori Tanner, Senior Planner II - Special Projects

Jakob X. Tilsch, Data Analyst

Jacob Dolinger, GIS Specialist

Table of Contents

Chapter 1: Introduction	4
1.1 Purpose.....	4
1.2 What is Affordable Housing and Why is it Important?.....	4
1.3 Housing Production Plans and MGL Chapter 40B	5
1.4 Fair Housing and Housing Discrimination	7
1.5 Housing Discrimination in Massachusetts and the Pioneer Valley	9
1.7 Plan Process	10
1.8 Sources	10
Chapter 2: Housing Needs Assessment	12
2.1 Community Overview.....	12
2.2 Population Characteristics	12
2.3 Housing Supply Characteristics.....	19
2.4 Housing Needs Assessment.....	30
Chapter 3: Housing Development Constraints	33
3.1 Environmental Constraints.....	33
3.2 Zoning Regulations	37
3.3 Infrastructure Conditions and Capacity.....	40
Chapter 4: Housing Production Goals and Implementation	43
4.1 Affordable Housing Goals.....	43
4.2 Funding Opportunities	49
4.3 Key Players for Affordable Housing Initiatives.....	51

Chapter 1: Introduction

1.1 Purpose

A Housing Production Plan (HPP) is a valuable community document that provides municipalities in Massachusetts with the opportunity to present an approach to addressing their needs for affordable housing. While communities may address housing through other plan documents such as a Comprehensive Plan or Open Space and Recreation Plan, the HPP serves the clear purpose of addressing strategies and initiatives that will enable the community to meet its current and future housing needs in a way that aligns with the community's values and is consistent with Massachusetts General Law Chapter 40B and other related state and federal regulations. The Housing Production Plan is intended to address a five-year timeline and is effective for that period after it is approved by the Executive Office of Housing and Livable Communities (EOHLC).

1.2 What is Affordable Housing and Why is it Important?

For the purpose of this plan, affordable housing is identified as housing that is available to seniors or families that earn below 80% of the local Area Median Income (AMI)¹ and that is protected as affordable through long-term affordability restrictions.

In most contexts, housing is considered "affordable" if the individual or family (hereinafter known as "household") that occupies, or wishes to occupy, the home pays no more than 30% of their gross income on "housing," which includes mortgage or rent, utilities, and any property taxes. Households that pay more than 30% of their gross income on housing are considered "cost-burdened" and may have difficulty affording necessities such as food, clothing, transportation, and medical care, as well as saving for their future. A moderately cost-burdened household pays 30% to 50% of its gross income for housing. Households that pay more than 50% of their gross income are considered to be severely cost-burdened.

This is also the generally accepted definition of housing affordability used by the U.S. Department of Housing and Urban Development (HUD) and the Massachusetts Executive Office of Housing and Livable Communities (EOHLC) in the calculation of the Area Median Income (AMI) and promotion of income-restricted housing. The AMI is the median family gross income for a given area, in this case the Springfield HUD Metro Fair Market Rent Area, which includes Agawam. HUD calculates the AMI annually, based on the U.S. Census Bureau's American Community Survey's (ACS) estimated median family gross income for the area. The Springfield area AMI was \$91,200 in 2022, which is based on a 4-person family.

Affordable housing is needed by a large diversity of people ranging from young families to seniors, the local work force to retirees. There is no singular type of affordable housing; it can take on many types, sizes, and forms. It can be rented or owned.

¹ This refers to gross income.

Town of Agawam Housing Production Plan

Below are the guidelines for who may qualify for affordable housing in the Greater Springfield area:

FY 2023 Income Limits Summary

FY 2023 Income Limit Area	Median Family Income Click for More Detail	FY 2023 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Springfield, MA HUD Metro FMR Area	\$93,700	Very Low (50%) Income Limits (\$) Click for More Detail	34,900	39,850	44,850	49,800	53,800	57,800	61,800	65,750
		Extremely Low Income Limits (\$)* Click for More Detail	20,950	23,950	26,950	30,000	35,140	40,280	45,420	50,560
		Low (80%) Income Limits (\$) Click for More Detail	55,800	63,800	71,750	79,700	86,100	92,500	98,850	105,250

Source: HUD, 2023 Income Limits

Affordable housing provides many benefits to a community. Growing the number of affordable housing units would allow those with roots in the community to continue living there, regardless of their economic status. Affordable and diverse housing choices would allow young adults to move back to the community in which they grew up. Seniors would be able to remain in the community after they retire and have opportunities to downsize, should they choose. Households that experience a loss of income due to economic circumstances, disability, divorce, or loss of a spouse will not be displaced from the community due to the inability to pay for housing. Workers in essential jobs such as teachers, grocery store workers, home health aides, childcare workers, restaurant workers, and first responders would have an opportunity to live where they work. Affordable housing can also support businesses by providing housing choices for entry level and lower wage workers at major employers.

1.3 Housing Production Plans and MGL Chapter 40B

In Massachusetts, state laws and regulations apply to local housing production plans. **Under Massachusetts General Law Chapter 40B, municipalities are encouraged to ensure that at least 10% of their total housing stock qualifies as affordable to individuals and families who earn up to 80% of their region’s Area Median Income (AMI).** These housing units must be listed on the state’s Subsidized Housing Inventory (SHI) in order to contribute to the 10%. Chapter 40B provides communities that have not yet reached this 10% goal with an incentive to do so: in these municipalities, a developer who proposes a housing project containing a portion of affordable units is allowed to override most local zoning and wetlands regulations by applying for what is known as a “comprehensive permit,” which the board is obligated by state law to issue under most circumstances.

Town of Agawam Housing Production Plan

Municipalities that attain 10% affordable housing stock are exempt from 40B projects. Any decisions by the local Zoning Board of Appeals to deny a comprehensive permit will be deemed consistent with local needs under Chapter 40B by the Massachusetts Housing Appeals Court, and the local zoning board of appeal's denial of a comprehensive permit application will be upheld, provided that the board complies with the requirements of 760 CMR 56.03(8). A developer may still appeal the denial of a comprehensive permit in such cases, first to EOHLC and then to an interlocutory appeal with the Massachusetts Housing Appeals Committee, on an expedited basis. Additional information about the HPP program, including information on compliance, is provided on the EOHLC website: www.mass.gov/hed/community/40b-plan/housing-production-plan.html.

A Housing Production Plan (HPP) is a proactive approach to help communities make progress toward reaching the 10% goal, after which they are no longer required to issue comprehensive permits and can retain local control over housing development. The Massachusetts Executive Office of Housing and Livable Communities (EOHLC) encourages local governments to prepare and submit a Housing Production Plan (HPP) for their approval, with two incentives for doing so. First, communities with approved and certified HPPs are given preference over non-HPP communities for certain state grant funds. Second, a municipality can avoid the Chapter 40B comprehensive permit process for as long as the municipality has an approved and certified HPP in place and is making progress toward the 10% goal at a rate of at least 0.5% per year.

Under EOHLC, the HPP program requires communities to:

- Complete a comprehensive housing needs assessment that takes into consideration local and regional housing needs and identifies opportunities and constraints to meeting those needs.
- Develop strategies to enable the community to meet its affordable housing needs, including an explanation of how constraints will be mitigated. Specifically, the HPP must show how the community will meet its annual affordable housing production goal of 0.5% of existing housing units.
- Receive approval of the HPP by the local planning board, local governing body, and the EOHLC.

This HPP was prepared according to the requirements of the HPP program. Upon approval of the form and content of this HPP by the Agawam City Council, Planning Board, and EOHLC, the Town of Agawam will be eligible to seek certification. EOHLC certification of the plan temporarily allows the community to reject unwanted and inappropriately located Chapter 40B comprehensive permit developments and become "appeal-proof" for one year, so long as **new affordable housing units equal to at least 0.5% of the town's existing 12,313 housing units (62 units) are created during the calendar year prior to certification**.

1.4 Fair Housing and Housing Discrimination

This HPP, as well as Chapter 40B itself, are rooted in society's broader efforts to assure fair housing and combat housing discrimination for all. This section summarizes key federal and state statutes and regulations applicable to these topics.

Title VIII of the Civil Rights Act of 1968, commonly referred to as the Fair Housing Act, was enacted with the primary purpose of prohibiting discrimination in transactions involving the rental, sale or financing of a home based on race, color, national origin, religion, sex, familial status and mental or physical handicap. Massachusetts law includes additional protected classes: marital status, sexual orientation, age, gender identity and expression, military or veteran status, ancestry, genetic information, and receipt of public assistance or rental subsidies (complete list follows at the end of this section).

Under Federal law, state and local governments that receive federal housing funds are not only required to refrain from discriminatory practices, but they must also take steps to advance the goals of fair housing and use their policies and programs to help promote open and inclusive patterns of housing (also referred to as "affirmatively furthering fair housing.") HUD defines "affirmatively furthering fair housing" to include the following:

- Analyze and eliminate housing discrimination in the jurisdiction.
- Promote fair housing choice for all persons.
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin.
- Promote housing that is structurally accessible to, and usable by all persons, particularly persons with disabilities.
- Foster compliance with the nondiscrimination provision of the Fair Housing Act.

The key federal fair housing statutes informing housing affordability are:

- Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended)
- Title VI of the Civil Rights Act of 1964, as amended
- Section 504 of the Rehabilitation Act of 1973, as amended
- Americans with Disabilities Act of 1990, as amended

The key state fair housing statutes in Massachusetts are:

- Massachusetts Fair Housing Law (M.G.L. Chapter 151B)
- Massachusetts Public Accommodation Law (M.G.L. Chapter 272, section 98)
- Massachusetts Lead Paint Law (Chapter 111, section 199A)

Under both groups of laws and regulations, the "protected classes," legally protected characteristics with which people identify, are:

Town of Agawam Housing Production Plan

- Race
- Color
- National Origin
- Religion
- Sex
- Disability/Handicap
- Familial Status; Children
- Marital Status
- Age
- Sexual Orientation
- Gender Identity
- Military Status (veteran or member of the armed forces)
- Public Assistance/Housing Subsidy Recipient
- Genetic Information
- Ancestry

Massachusetts Executive Order 526 (2011), an "Order Regarding Non-Discrimination, Diversity, Equal Opportunity, and Affirmative Action," provides that "Equal opportunity and diversity shall be protected and affirmatively promoted in all state, state-assisted, and state-regulated programs, activities, and services." All state funded programs, including Community Preservation Act funds, fall under this Executive Order.

Under federal and state law, municipalities must also ensure that municipal policies and programs do not have a disparate (negative) impact on members of a protected class compared to the general population. "Disparate impact" is an important legal concept in which liability based upon a finding of discrimination may be incurred even when the discrimination was not purposeful or intentional. The municipality should consider if the policy or practice at hand is necessary to achieve substantial, legitimate, non-discriminatory interests and if there is a less discriminatory alternative that would meet the same interest.

Examples of municipal policies and programs that could have a disparate impact include:

- Municipal plans or zoning ordinances that prioritize one-bedroom units or strictly limit the number of bedrooms by unit rather than by development or lot.
- Single-family or large lot size requirements.
- Requirements for unlimited local residency preferences in communities with limited racial/ethnic diversity.

- Plans to fund affordable housing for elderly people only.
- Planning or zoning approval processes that mandate or prioritize townhouses.

1.5 Housing Discrimination in Massachusetts and the Pioneer Valley

Sources of housing discrimination can be landlords, realtors, or other entities associated with housing related transactions, programs, or policies, such as municipalities, lenders, and insurance companies.

Unfortunately, local research, studies, audits, and input from the Massachusetts Fair Housing Center (MFHC), Way Finders, and the Massachusetts Commission Against Discrimination (MCAD) show that illegal discrimination continues to persist throughout the Pioneer Valley and limits housing choice.

Interviews conducted with staff at the MFHC, Way Finders and MCAD during development of the Pioneer Valley Regional Housing Plan in 2014 found that housing discrimination occurs in every community in the region. Following are the most prevalent examples of discrimination that affect housing siting, access to housing, or access to housing services in the region:

- Predatory lending, redlining, and active steering of home buyers of color towards certain areas of a community based on race/ethnicity, economic characteristics, and familial status.
- Rental discrimination against families with children and particularly against families with young children due to the presence or potential presence of lead-based hazards.
- Municipal zoning that restricts housing choice and mobility in the region by prohibiting or restricting uses that favor more affordably priced homes and rents, particularly prohibitions on multi-family housing. While such regulations are not in violation of housing laws and can be well-intentioned, they potentially also have the effect of disproportionately reducing housing choice for people with specific demographics, such race, color, religion, sex, familial status, disability, and national origin.
- Linguistic profiling in both the rental and homeownership markets, especially against persons of Latino origin.
- Landlords who refuse to make reasonable accommodations or changes in rules or policies to allow an equal opportunity to use and enjoy housing, or reasonable modifications or structural changes to allow an equal opportunity to use and enjoy housing for individuals with disabilities.
- Landlords who refuse to accept housing subsidies, such as a Section 8 housing choice rental voucher, as a source of rental payment.

1.7 Plan Process

The Pioneer Valley Planning Commission (PVPC) worked with the Town of Agawam to develop this Housing Production Plan in accordance with the requirements of 760 CMR 56.03(4) (Housing Production Plans). Members of the Agawam Housing Committee were the reviewers for this plan, working cooperatively with the City Council and Planning Board over the course of the process. PVPC staff met with the committee to review chapter drafts; identify and prioritize recommendations; prepare public presentations; and other related tasks.

An in-depth Housing Survey was distributed widely throughout town via the town website, public notices, social media, and hard copies at various locations. The survey generated 87 responses during April and May of 2023. The results of the survey were presented at committee meetings and public forums and were utilized during preparation of the plan.

An overview of the purpose and content of the Housing Production Plan was given to the Agawam City Council on November 8, 2023. A community forum was held on November 15, 2023 and included a presentation of the planning process and a public comment period to receive input on the draft plan. The plan was again presented to the Planning Board on November 30, 2023. Comments and input received at the public meetings have been incorporated into the goals and strategies.

Finally, the Agawam Planning Board voted to approve the Housing Production Plan on November 30, 2023, and the City Council voted to approve it on December 18, 2023.

1.8 Sources

Data about Agawam for this report was obtained from the following sources:

Agawam Assessor's Office

Agawam Building Department

Pioneer Valley Planning Commission (PVPC)

Citizens Housing and Planning Association (CHAPA)

The Warren Group

University of Massachusetts Donahue Institute

Massachusetts Housing Partnership (MHP)

Massachusetts Department of Employment and Training

Massachusetts Department of Revenue

Massachusetts Department of Education

Massachusetts Executive Office of Housing and Livable Communities (MA EOHLIC)

Town of Agawam Housing Production Plan

U.S. Census American Community Survey, Five-Year Estimates 2016-2021

U.S. Decennial Census, 2020

U.S. Department of Housing and Urban Development (HUD)

The following documents were consulted frequently during the development of this HPP:

Agawam Zoning Bylaw

Agawam Municipal Vulnerability Preparedness (MVP) Community Resilience Building Workshop Report, 2020

Agawam Open Space and Recreation Plan (2019)

Agawam Housing Production Plan FY18-22

Pioneer Valley Regional Housing Plan (2014)

Chapter 2: Housing Needs Assessment

2.1 Community Overview

Agawam is the southernmost community in Massachusetts, located on the west bank of the Connecticut River and within a short distance from many major metropolitan areas: 94 miles southwest of Boston; 21 miles north of Hartford, Connecticut; and 131 miles from New York City. Agawam is about two miles from Springfield and is included in the Springfield-Holyoke-Chicopee Standard Metropolitan Statistical Area (SMSA).

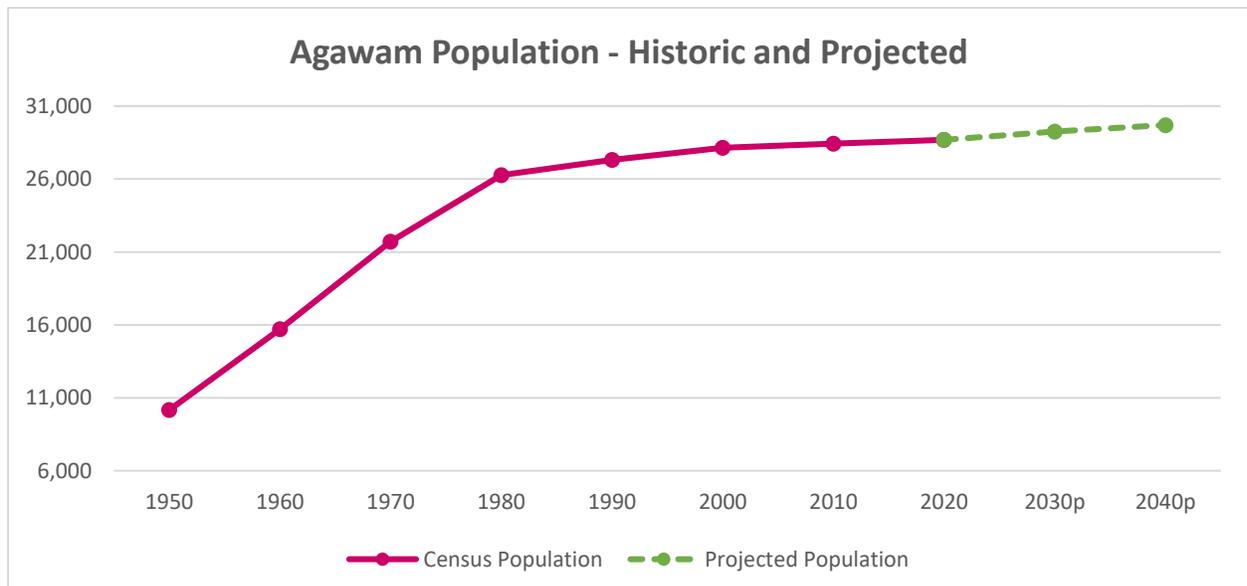
Agawam is at the hub of major north-south and east-west transportation corridors including Interstate Route 91, 391, U.S. Route 5, Interstate 90, 291, State Route 20, and Route 57. Also, Agawam is about 10 miles from Bradley International Airport.

Agawam’s geographic boundaries are distinct. The Connecticut River to the east provides the community with five miles of river frontage on New England’s largest river. To the north, the Westfield River forms an eight-mile boundary, most of which is located adjacent to Robinson State Park, Agawam’s largest park. To the west, Agawam is separated from its neighbor, the town of Southwick, by Provin Mountain – the highest point in town at 640 feet. To the south, Agawam is bordered by the State of Connecticut.

2.2 Population Characteristics

Population Change

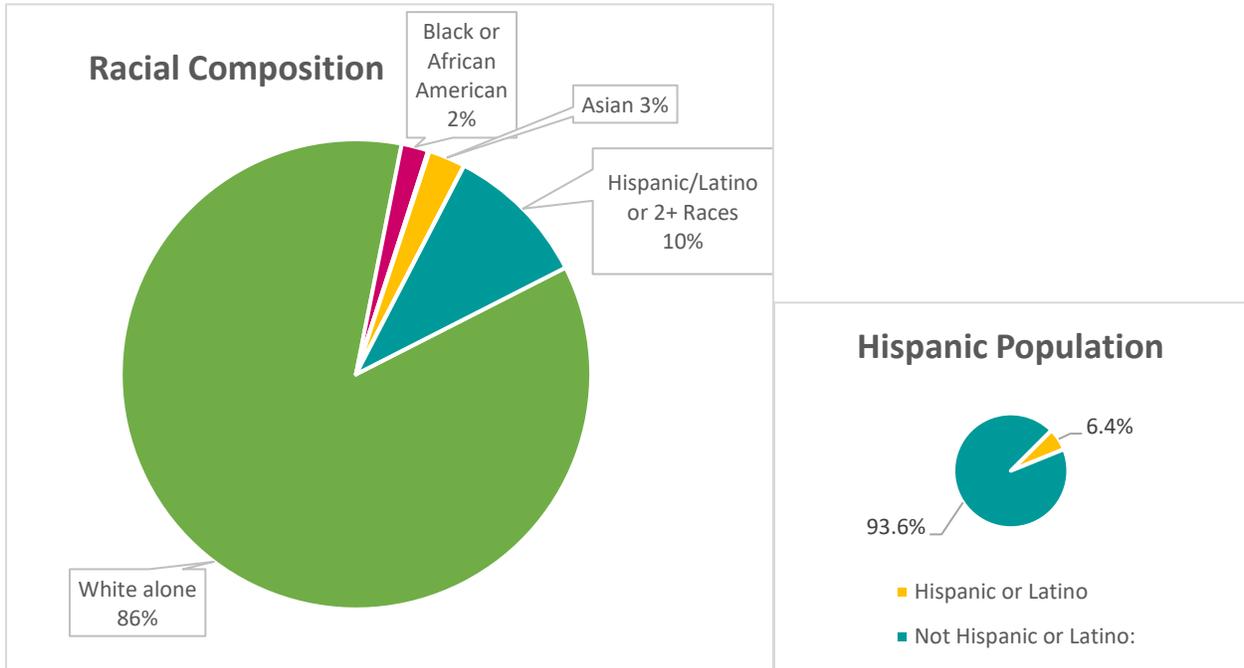
Agawam’s population grew quickly in the mid-20th century but has slowed since 1980 and remained stable. It is projected to grow slightly over the next two decades.



Source: 2020 Decennial Census, UMass Donahue Institute projections

Racial Composition

Many residents of Agawam are White, with 86% of the population identifying as such. The Latino population makes up just over 6% of the town’s population.



Source: Decennial Census 2020, Table DPI

Age

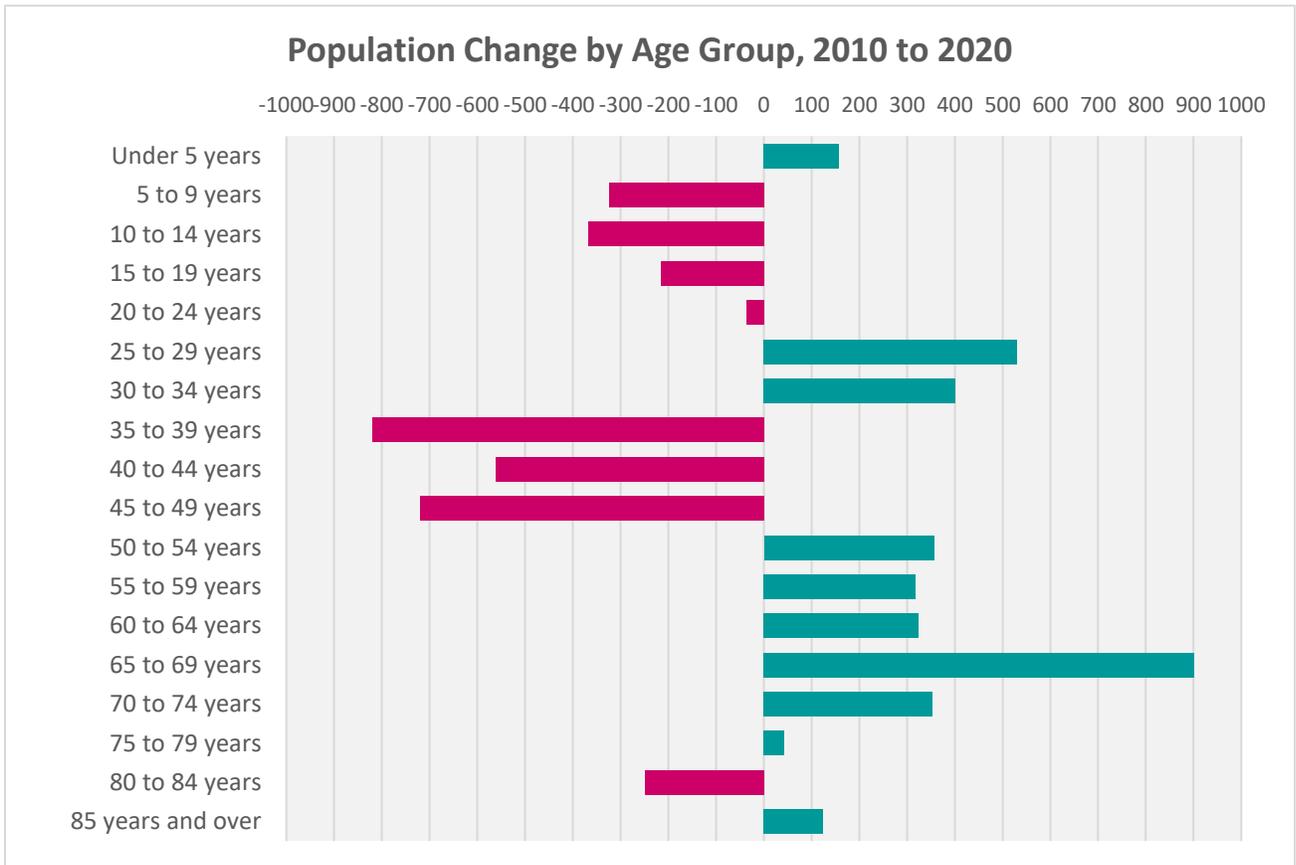
The median age of Agawam residents is 46.5 years old. This is a higher median than that of Hampden County (39.4 years) and the Commonwealth of Massachusetts (39.6 years) in 2020.

Consistent with trends nationwide, the age of Agawam residents is increasing overall as members of the Baby Boomer generation are reaching retirement age and beyond. In 2020, 20.8% of Agawam residents were over age 65, an increase from 16.9% in 2010.

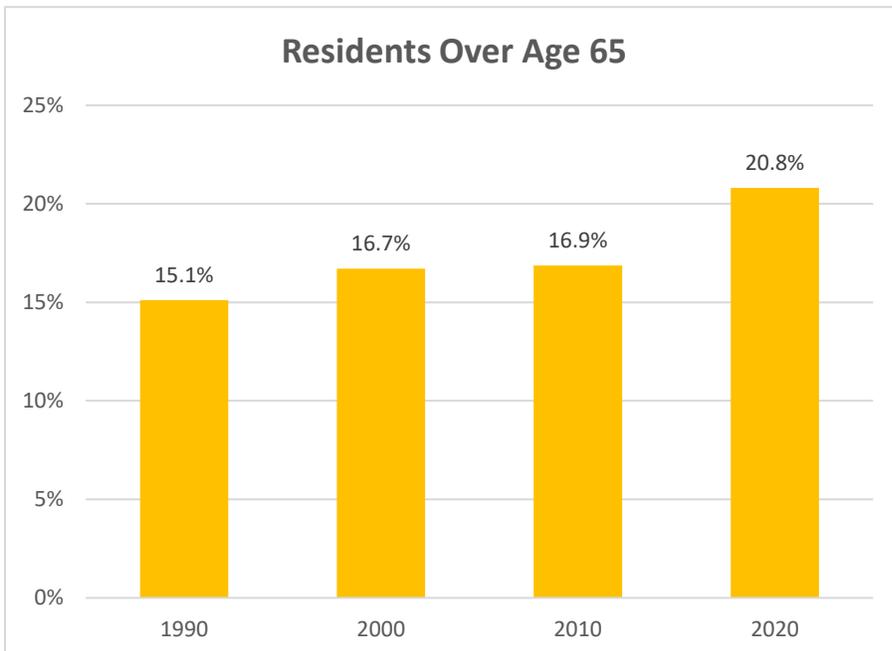
Between 2010 and 2020, Agawam saw increases in every age cohort between 50 and 79 years old (see chart below). Conversely, all age cohorts between 35 and 49 years old saw decreases during the same period along with a decrease in school-age children. This could indicate that the number of young families overall has decreased in Agawam.

The types of housing units available as well as their cost play a large role in determining what types of residents a community can retain and attract. With a growing senior population, a community needs housing options for those who would like to “age in place” – they may be downsizing their homes or looking for assisted living facilities. Young families are often looking for smaller “starter homes” and first-time home ownership opportunities. Young singles or recent graduates may be interested in returning to their hometowns if there are living options such as affordable rental apartments.

Town of Agawam Housing Production Plan



Source: ACS 2021 5-Year Estimates, Table C11016



Source: ACS 2021 5-Year Estimates, Table C11016 14

For older adults who wish to age in place, or to continue to live in their own homes as they age, support services may be needed. While not everyone loses their ability to drive at the age of 80, people are more likely to have physical or cognitive limitations as they age, making driving less safe. Home modifications may also be necessary for people with mobility or visual impairments, as well as assistance with basic tasks such as shoveling snow, cooking, or cleaning.

Population and School Enrollment

The same demographic trends that have led to an older population have also reduced the school population in Agawam. According to the Massachusetts Department of Elementary and Secondary Education, the Agawam School District enrolled 3,457 students during the 2022-23 school year, a decrease of 7.7% from 2018-19 (3,747).² This trend is occurring across Massachusetts, particularly in rural and suburban areas, and is happening despite moderate increases in overall population.

Housing Units and Households

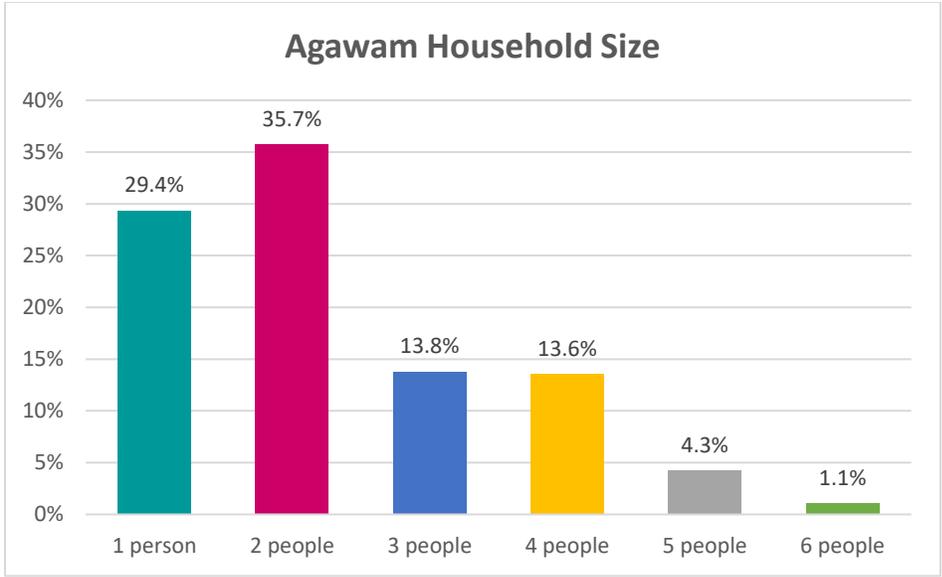
Agawam has 11,522 total households, according to the U.S. Census.³ A household is defined as all the people who occupy a housing unit, regardless of their relationship, including individuals alone. Of Agawam's households, half are comprised of married couple families. About 29% of all households are single-person households. About 36% of households contain two people, 14% contain three people and about 19% contain four or more people. About 7% of households in Agawam are made up of non-related people living together.

This breakdown of households shows that almost two-thirds - 65% - of all households are made up of only one or two people. The aging population, families choosing not to have children or delaying having children, and people living alone are all trends that lead to smaller household sizes. This shifting trend can result in a mismatch of housing options, as large single-family homes are often too large for these small households. A lack of smaller options, such as studios and one- or two-bedroom apartments, can leave small households without housing options for the type of house best-suited and most affordable to them.

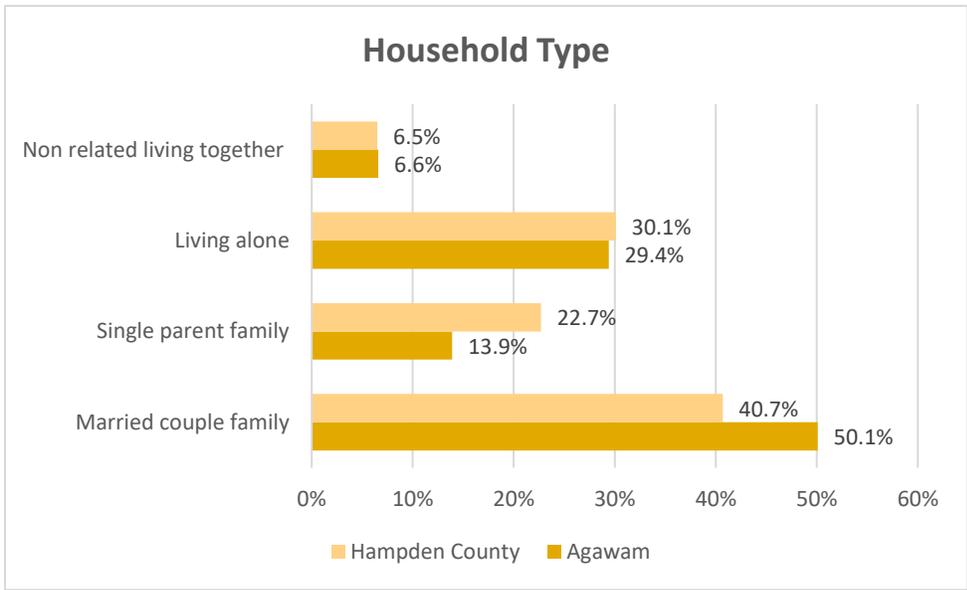
² Source: Massachusetts Department of Elementary and Secondary Education (2021) School and District Profiles.

³ U.S. Census estimates, American Community Survey, 2017-2021

Town of Agawam Housing Production Plan



Source: ACS 2021 5-Year Estimates, Table C11016

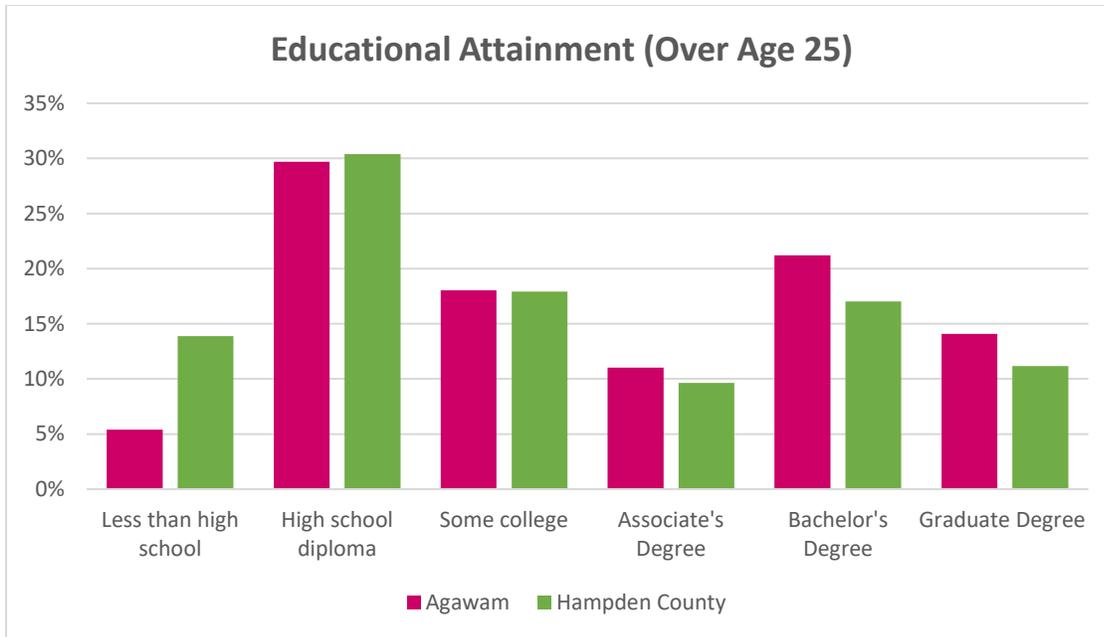


Source: ACS 2021 5-Year Estimates, Table C11016

Education

Over 95% of Agawam residents over the age of 25 are high school graduates. This percentage is well above the rate for both Hampden County (86%) and Massachusetts overall (91.2%). Over one-third (35%) of Agawam’s residents have earned a bachelor’s degree, and 14% have a graduate or professional degree as well.

Town of Agawam Housing Production Plan



Source: 2021 ACS 5-Year Estimates Table S1501

Labor Force and Employment

The three largest employers within the Town of Agawam are OMG Inc. (1,000-4,999 employees), Agawam Public Schools (500-999 employees) and Six Flags New England (500-999 employees).

Of all workers employed in Agawam, 20% also reside in Agawam. For those that commute to Agawam from other communities, 17% commute from Springfield, 7% from Westfield, and 6% from West Springfield. The remaining workers commute from elsewhere in Hampden, Hampshire and Worcester Counties as well as more distant locations.

Disability

Disability is a protected class under federal law. The U.S. Census Bureau defines a disability as a long-lasting physical, mental, or emotional condition that may make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. Disability can impact a person's ability to leave their home or be employed. Many residents with disabilities face housing challenges due to a lack of housing that is affordable and physically accessible to them.

An estimated 13% of Agawam's total population is considered disabled. An estimated 30% of residents over the age of 65 have one or more disabilities. Agawam's elderly population is expected to continue to increase, which will likely raise demand for affordable and barrier-free housing.

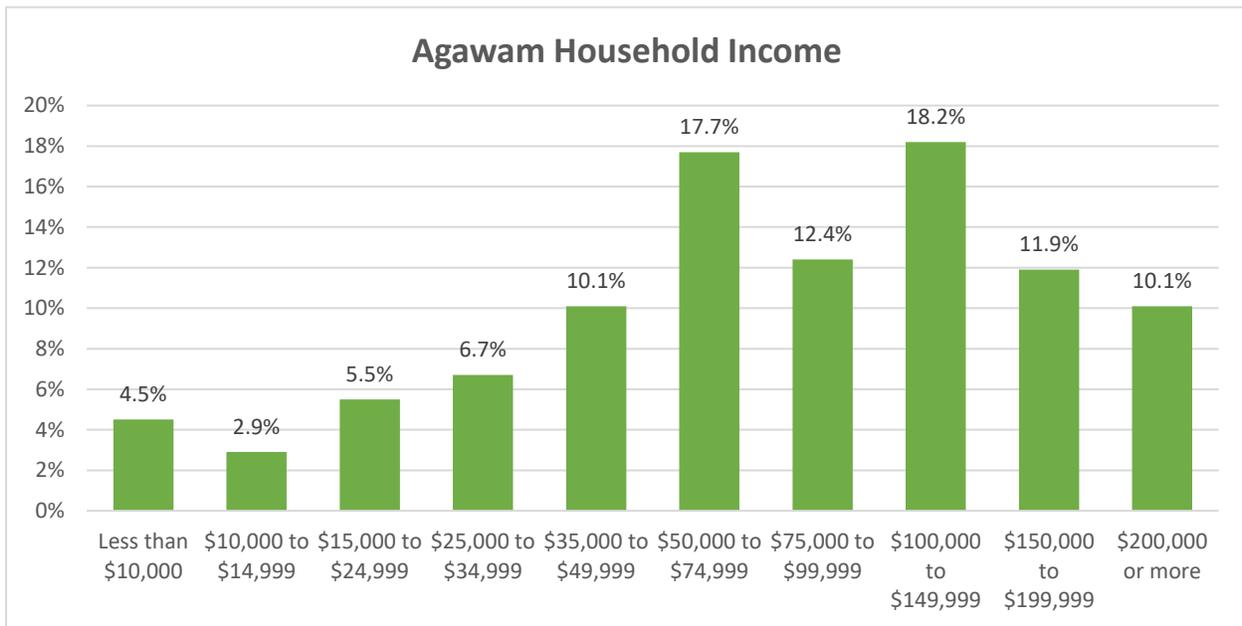
Town of Agawam Housing Production Plan

The 2014 Pioneer Valley Regional Housing Plan notes that there is a critical need for more accessible housing to meet an existing and growing demand in our region. The plan notes the following:

- The range of disabilities present in our region requires different types of accessible housing to serve the needs of person with disabilities.
- The need for more concerted efforts to integrate accessible housing and housing with supportive services into our planning for market-rate and affordable housing development.
- Many existing units with accessibility features are often rented to people who do not need them or do not need all of the features that are included in the unit.

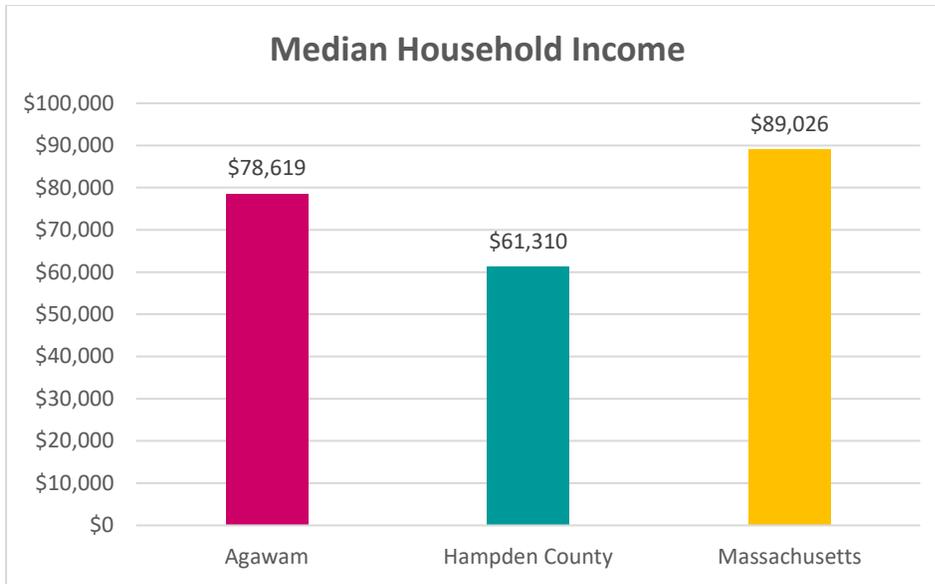
Income

The ability to exercise housing choice bears a strong relationship to the amount of money a household can afford to spend on housing. Housing that is affordable to lower income households is critical to creating household stability and economic self-sufficiency. Housing that is affordable to working class and middle-class households is critical to building and retaining talent and for improving the region and the state's overall economic competitiveness.



Source: 2021 ACS 5-Year Estimates, Table S1901

Agawam overall is a moderate-income community. Agawam's median gross income is \$78,619 which is higher than that of Hampden County as a whole (\$61,310) but significantly lower than that of Massachusetts (\$89,026).



Source: ACS 2021 5-Year Estimates, Table C11016

2.3 Housing Supply Characteristics

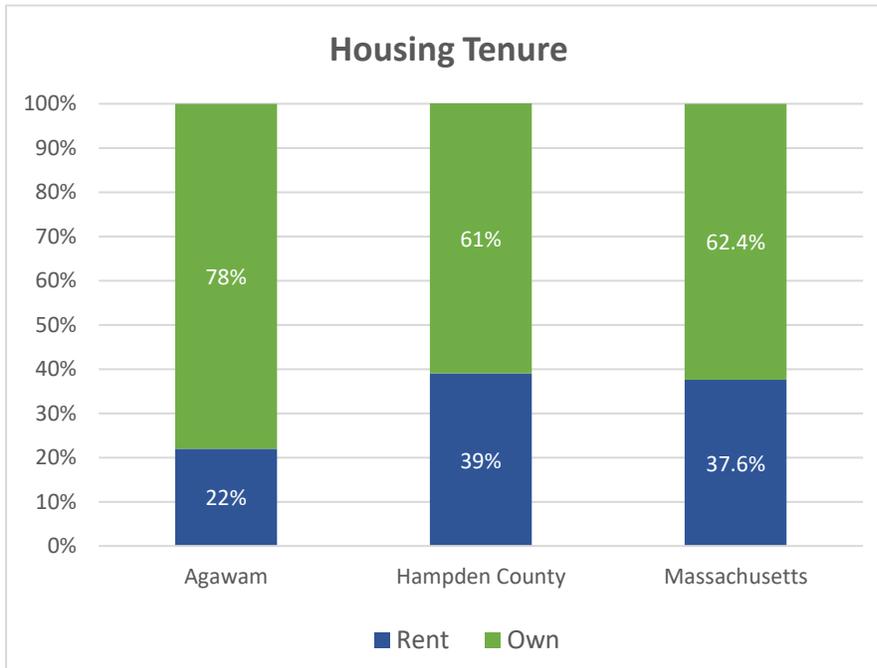
The purpose of this section is to review the characteristics and types of housing in Agawam to assess how the town’s housing stock is responding to changing demographics, affordability pressures and market conditions. As of 2020, there are 12,313 housing units in Agawam. The current housing landscape reflects existing land use policies, the strength or weakness of the housing market, mortgage lending practices, housing discrimination, transportation networks, topography, and public infrastructure, some of which are discussed in this chapter as well as the next chapter on housing development conditions. Settlement patterns and the built environment are also a reflection of structural issues that were discussed in the first section of this chapter such as economic security and educational attainment, which taken together, can encourage self-sufficiency, mobility, and residents' abilities to obtain and maintain housing.

The Town needs a full range of housing opportunities that are affordable to households of all sizes, compositions, racial and ethnic backgrounds, abilities, and income ranges to ensure that the town and region remain economically competitive.

Tenure

Analysis of homeownership levels and rental opportunities is an important feature of a housing assessment. Data on owner-occupancy and renter-occupancy is used to aid in the distribution of funds for government programs, including mortgage insurance and public housing programs. It

Town of Agawam Housing Production Plan



also allows planners to evaluate the overall viability of housing markets, to assess the stability of neighborhoods and to aid in the planning of housing programs and services.

Agawam has a higher percentage of homeowners than the county and the state and fewer renters. 78% of residents own their homes and 22% rent. This

lower number of rental opportunities could result in lower-income households struggling to find attainable housing in Agawam.

Occupied vs Vacant

The vacancy rate of homes in Agawam is 3.7%; 457 units were counted as vacant in the 2020 census.⁴ There are five reasons that a house is categorized as vacant by the US Census Bureau: the house is:

1. For seasonal, recreational, or occasional use
2. For rent
3. For sale
4. Rented or sold, but not occupied
5. Considered to be an "other" vacant unit.

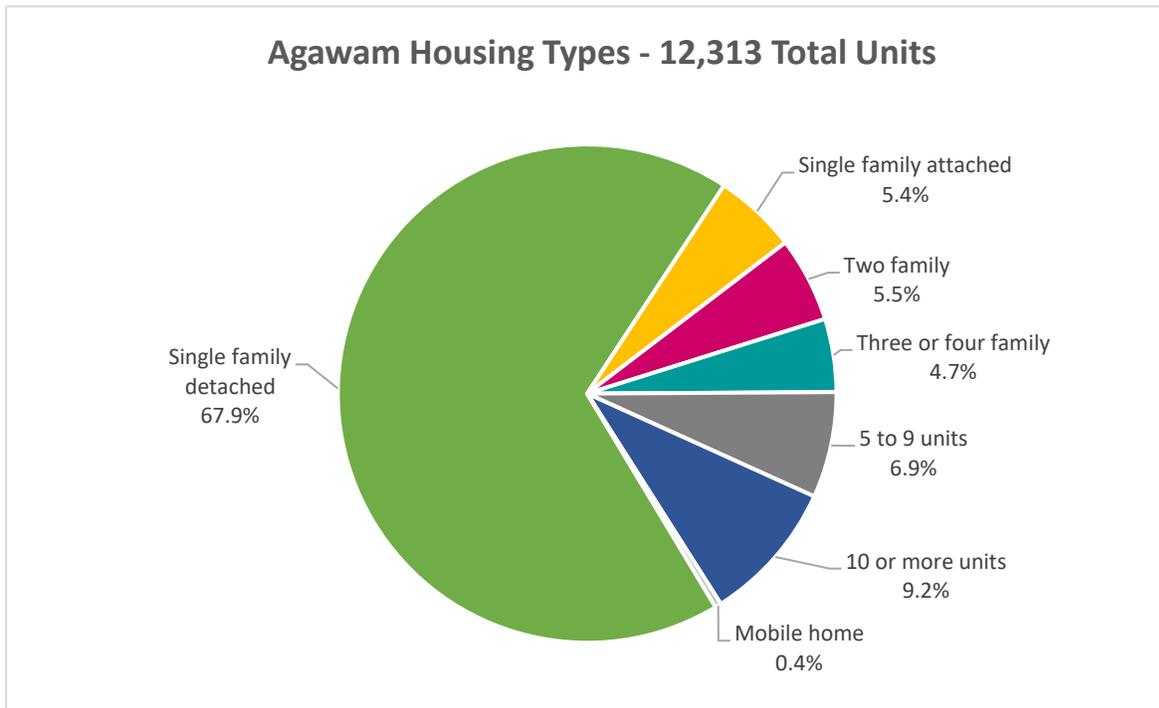
Housing Structure Type

Housing affordability is closely related to the housing structure type. Multi-family housing, two-family housing, and smaller single-family homes on smaller lots tend to be more affordable to a wider range of households (such as singles, young families or seniors living alone) than larger single-family homes on large lots. While the majority of housing units in Agawam are single-family detached homes, there are some multi-family options in town. As shown on the graph below,

⁴ 2020 U.S. Census, Table DP04 Selected Housing Characteristics

Town of Agawam Housing Production Plan

two-, three-, and four-family units make up about 10% of the housing stock, with other larger multi-family unit structures comprising over 16%. Mobile homes make up 0.4% of all units.



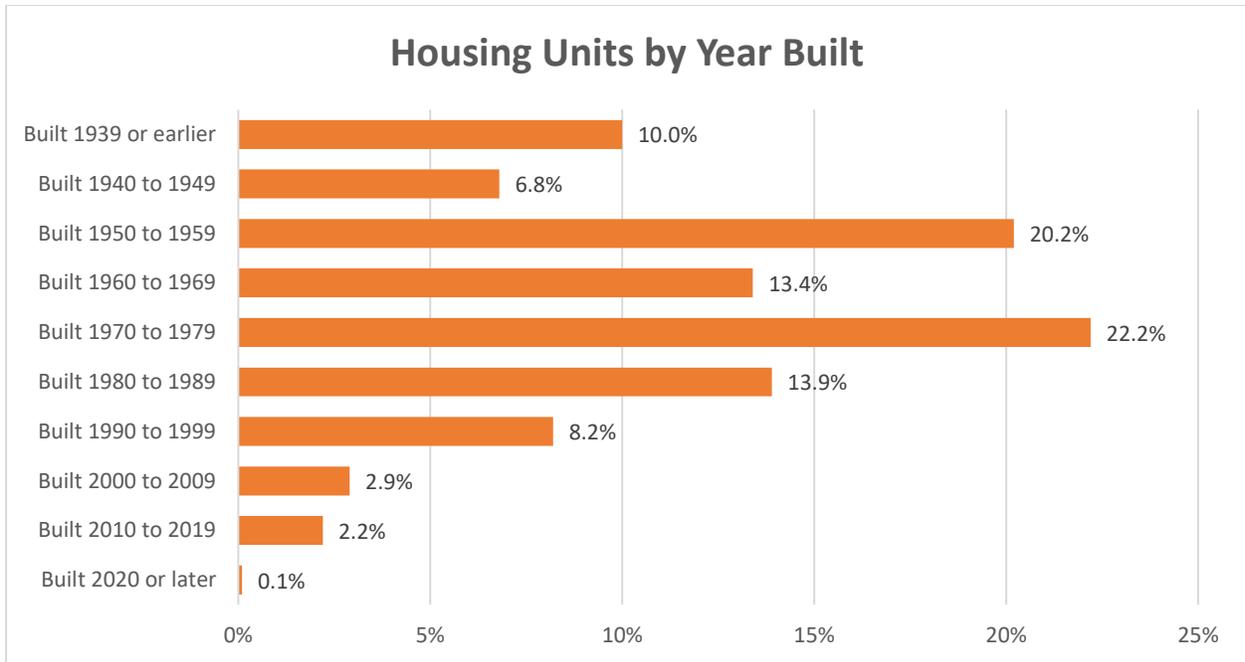
Source: ACS 2021 5-Year Estimates, Table B25034

Note that single-family attached units are similar to duplexes, except the units would be side-by-side only and would generally include several units in a row. Duplexes are attached dwelling units that may be side-by-side or above and below, but only include two units.

Age of Housing

The age of a town's housing stock and areas with concentrated numbers of older housing are important elements to consider when developing a housing production plan, as certain public monies may be available to improve the housing condition of substandard housing. Agawam's housing stock is relatively older, with half of all homes built before 1970. The 1970s saw a boom in construction, but since that time, new housing has been very limited.

Town of Agawam Housing Production Plan



Source: 2021 ACS Table DP04

Challenges of Older Housing Stock

Well-maintained older homes are an important part of a community's local history and help preserve historic character. However, older homes can have many challenges. These can include:

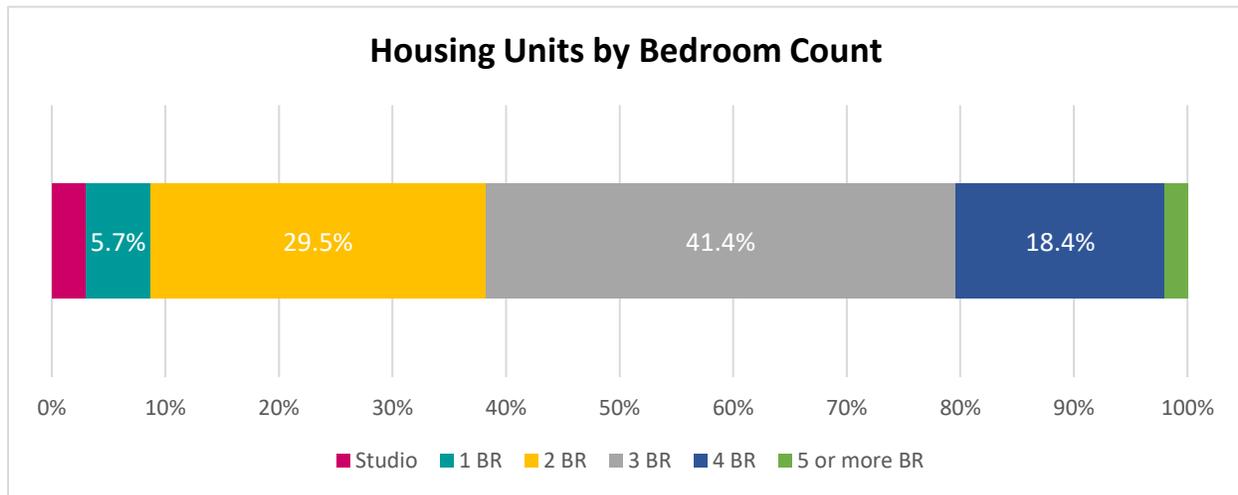
- Increased need for maintenance and repairs
- Poor past maintenance and repair history
- Design not well-suited for people with mobility impairments (particularly relevant with an aging population)
- Outdated and inefficient heating, cooling, and insulation systems
- Lead paint, asbestos, and lead pipes that present health risks (particularly true in housing built before 1978).
- Less efficient in terms of heating and cooling.

Since the cost to rehabilitate and achieve code compliance in older houses can be extremely high, some landlords and homeowners may not be able to afford to make these improvements. Some may not invest in their properties because they fear that a low home value does not justify the cost of capital or maintenance improvements. Yet, deferred maintenance and repairs can result in unsafe or poor-quality housing for renters. The age of the housing can also create impediments to fair housing. Rehabilitation or modification costs can result in deferred maintenance or upgrades, which may limit the supply and availability of accessible and affordable housing. Some landlords have tried to avoid renting to families with young children because of the presence—or

perceived presence—of lead paint in their units and the associated expense of lead abatement, even though doing so is prohibited by law. This has the effect of limiting the supply and availability of housing, especially for families with young children.

Bedroom Count

The bedroom count of housing units can serve as an indicator of how matched existing unit sizes are to existing household sizes. As described above, older homes were traditionally built with



Source: ACS 2021 5-Year Estimates, Table B25041

larger numbers of bedrooms for larger family sizes during the mid-20th century.

As discussed previously, the most prevalent household sizes in Agawam are single- or two-person households. Yet, the breakdown of units by bedroom size below shows that more than 60% of all houses have three or more bedrooms. This could indicate a mismatch between the housing stock and housing need. Nearly 30% of units in Agawam are two-bedroom units, but only a small percentage are one-bedroom or studio units. This could indicate a lack of supply for individuals living alone or couples living without children. Additionally, smaller units (particularly rentals) tend to be the most affordable housing type for lower income households.

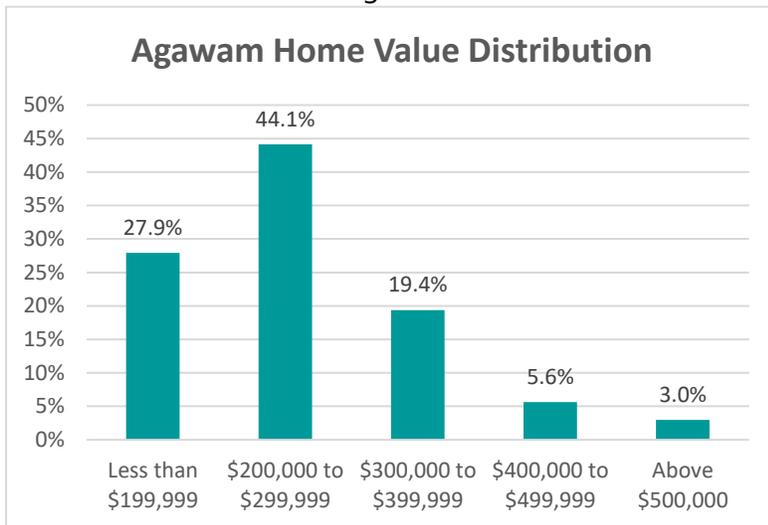
At the other end of the spectrum is the need for affordable units for large families – often those that have multi-generational family members living together. Rental units don’t typically have enough bedrooms to accommodate these types of households, leaving certain families without options for housing with three or more bedrooms. The Executive Office of Housing and Livable Communities (EOHLC), Massachusetts Housing Partnership (MHP), MassHousing, MassDevelopment and Community Economic Development Assistance Corporation (CEDAC) now require that at least 10% of new affordable units funded, assisted, or approved by a State Housing Agency have three or more bedrooms.

Housing Cost

Housing is a basic human need and is often the largest expenditure for a household, and Massachusetts is a particularly expensive place to live. According to the Council for Community and Economic Research (C2ER), Massachusetts has the 5th highest cost of living in the nation both as an index and with the cost of housing, trailing behind only Hawaii, District of Columbia, New York, and California. While single-family homes prices and rents are more affordable in the western half of Massachusetts than the eastern part of the state, prices in the Pioneer Valley and in Agawam are still more expensive than in many places across the country.

Home Values

About 72% of homes in Agawam were valued under \$299,999 in 2021, according to census



estimates. However, dramatic changes in the housing market during and since the COVID-19 pandemic have raised these values. The section on sales prices below addresses this issue.

Homeownership continues to be a challenge, particularly for lower income households. Factors driving this inability to access homeownership opportunities include:

Source: ACS 2021 5-Year Estimates, Table B25075

- Tighter lending requirements instituted in response to the housing crisis of the late 2000s.
- Household income has not kept pace with increasing housing costs.
- Households made up of younger individuals are increasingly saddled with large amounts of college debt.
- Purchasing a home typically requires a large upfront payment due to more stringent mortgage financing terms and conditions. For example, many mortgage lenders require down payments equaling 20% of the purchase price—much higher than the 5-10% down payment that used to be common.

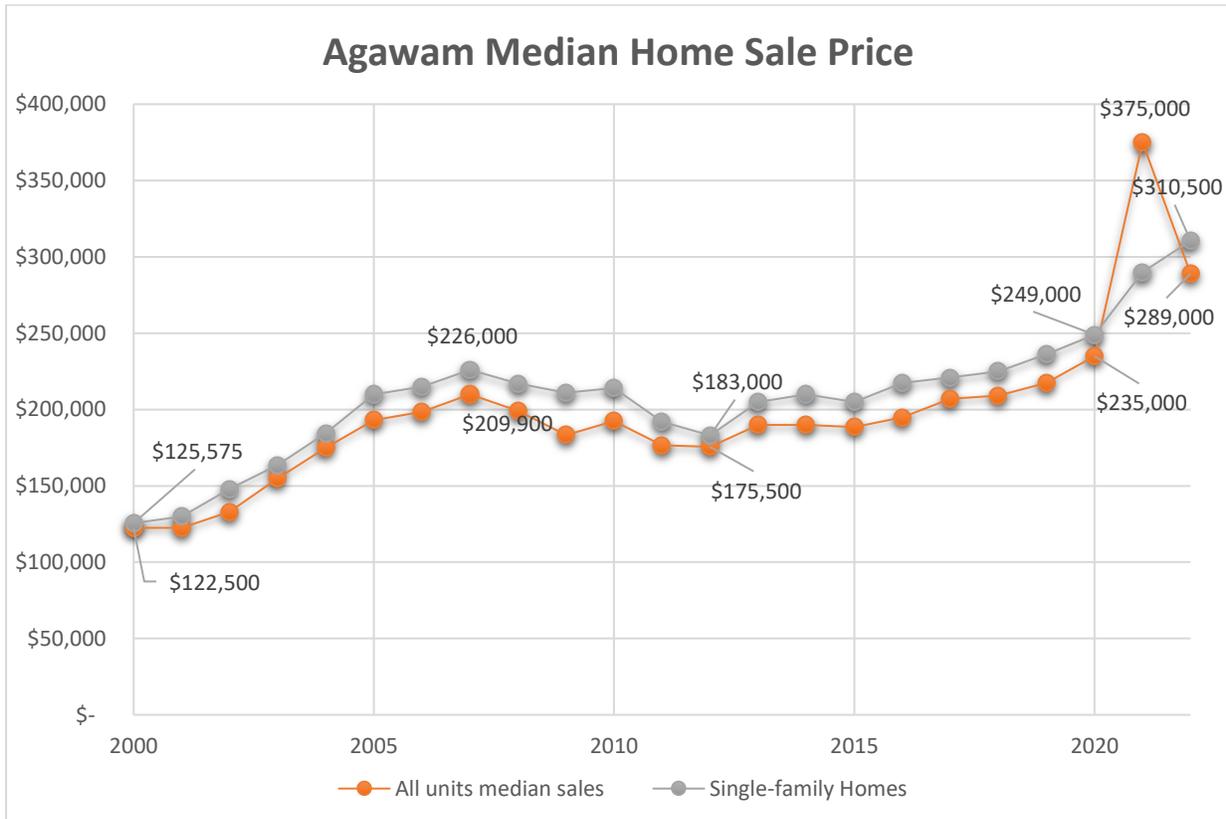
Sale Prices

As of 2022, the median price of a single-family home in Agawam was \$310,500. This is a significant increase over the 2020 median (\$249,000) and corresponded with a national increase in housing

Town of Agawam Housing Production Plan

costs during the latter half of the COVID-19 pandemic. By comparison, in 2022 the median sales price of a single-family home in Hampden County was \$290,000.⁵

A recent search of home prices on three real estate sites indicate even higher figures: an October 2023 average value of \$321,000 and median sale price of \$330,000.⁶ This has made homeownership a more distant prospect for many residents.



Source: The Warren Group, 2023

Mortgage costs are spread widely, but primarily in the range of \$1,000 to \$2,500. Mortgage costs over \$2,000 a month can be a sign of a housing cost burden, particularly for lower- to moderate-income residents.

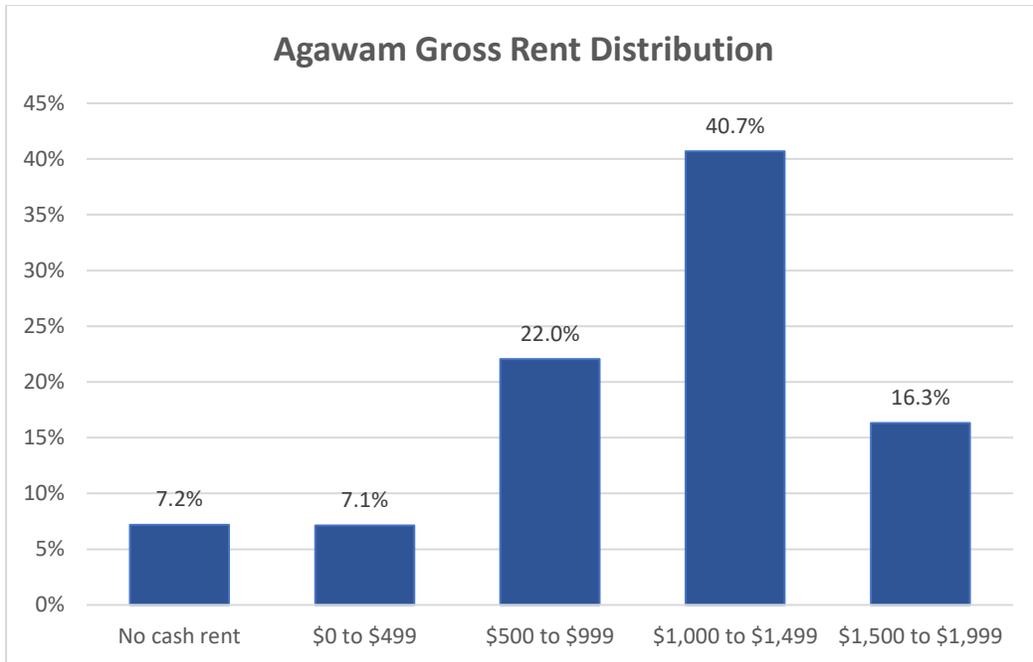
Rents

According to U.S. Census estimates, in 2021 the majority of rental units in Agawam were available for under \$1,499. The data indicate that over a third (36%) were renting for less than \$999. However, a 2023 search for rental apartments in Agawam found only two one-bedroom apartments (500-536 square feet) available for \$1,030-\$1275.

⁵ Source: [2022-09 Counties.pdf \(mards.wpenginepowered.com\)](#)

⁶ Realtor.com: October 2023 median sale price of \$330,000; Zillow.com: October 2023 average home value of \$321,027; Rockethomes.com: Median sale price of \$300,000 in last 12 months.

Town of Agawam Housing Production Plan



Source: ACS 2021 5-Year Estimates, Table B25063

The initial costs of renting an apartment – first and last month’s rent, security deposit, and for some, broker’s fees – can be an expensive outlay and can preclude some lower income households from obtaining a home. Rents have risen in the region, despite the economic downturn and the recovering economy, because of the increased demand for rental housing and little to no growth in the rental stock. Reasons for an increased demand in the rental market include:

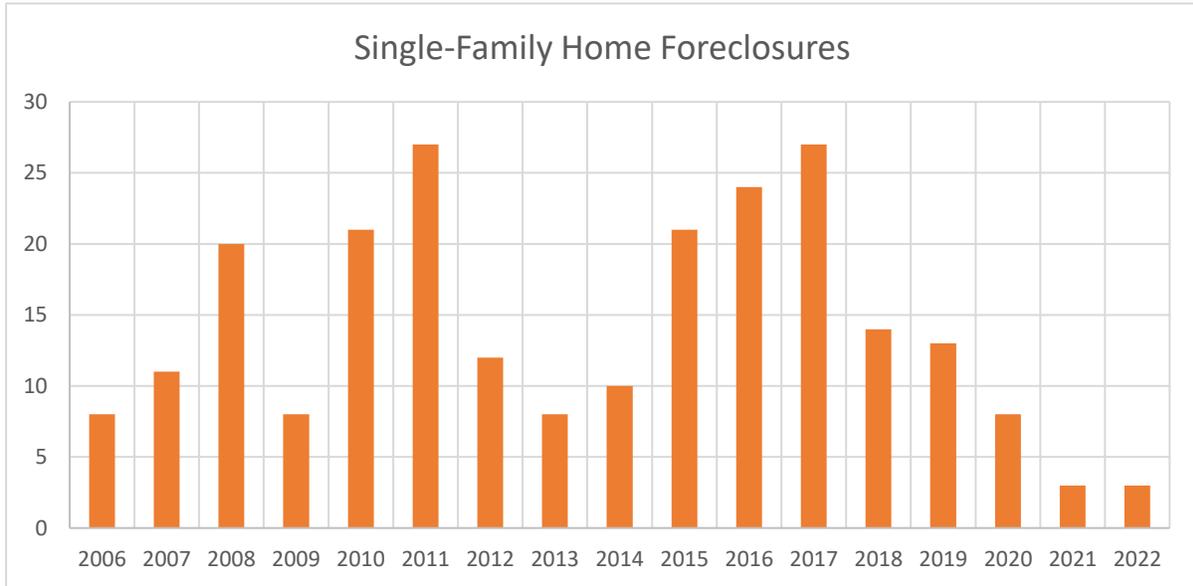
- Desire to remain a renter because of the financial uncertainty of owning a home (as shown by the foreclosure crisis).
- Inability to afford to buy a home because of the initial expense to enter the homeownership market, which requires a 20% down payment, higher credit scores and tighter lending requirements.
- Significant individual debt, which prevents entrance into the homeownership market and in many cases the rental market. Many young adults trying to get into the housing market are currently facing this challenge having recently graduated with high amounts of student loan debt.
- Loss of one’s home as result of the foreclosure crisis, which drove homeowners back into the rental market.

Foreclosures

In the lead-up to and aftermath of the real estate crisis of 2008, foreclosures became a major concern across the nation. Foreclosures in Agawam reached a high of 27 in the year 2011 and

Town of Agawam Housing Production Plan

again in 2017. Since that time, foreclosures have decreased, dipping to only four per year in 2021 and 2022.

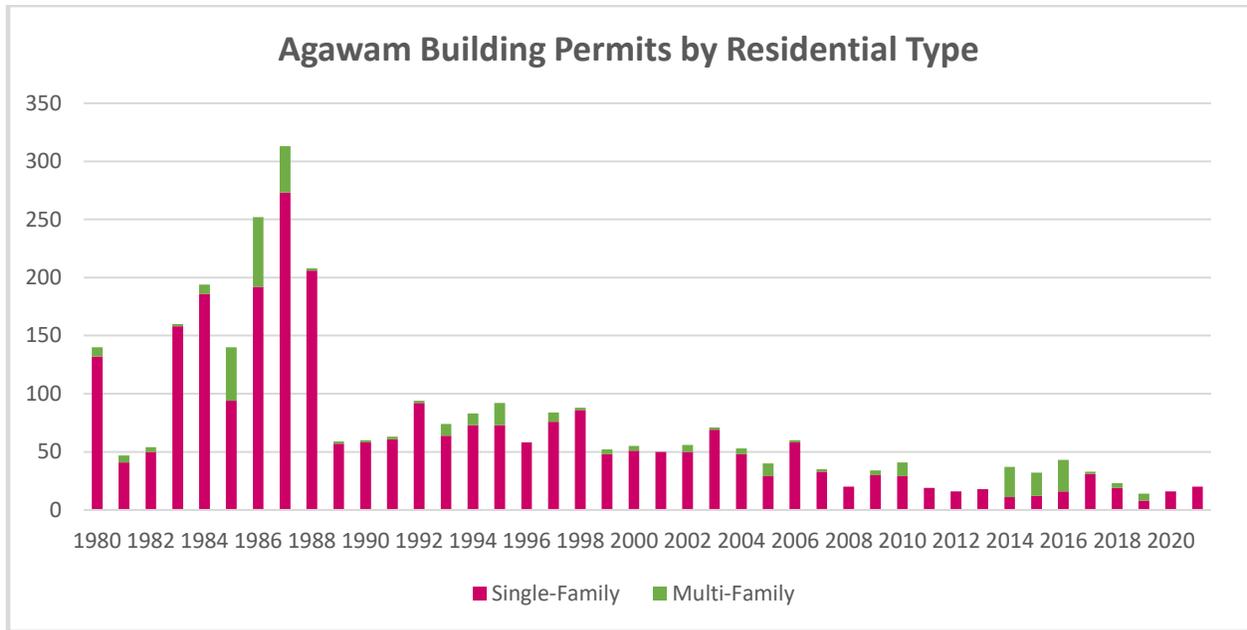


Source: Warren Group, 2023

Building Activity

Home building in Agawam peaked in the mid-1980s and has declined ever since. At that time, a significant proportion of new units were multi-family, but overall a majority of new units in the past 30 years have been single-family homes. In 2014-2016, there was a boost in the number of new multi-family units, but in the last several years for which there is data, there have been only 20 units or fewer of any new housing.

Town of Agawam Housing Production Plan



Source: HUD Residential Permits, 2021

Affordable Housing Inventory (SHI)

As of 2023, Agawam has 558 units on the state’s Subsidized Housing Inventory (SHI), which amounts to 4.53% of the town’s 2020 total year-round housing stock of 12,313 units.⁷ Through Chapter 40B, Massachusetts municipalities are encouraged to increase their overall percentage of affordable units to 10% or more. This indicates that Agawam has almost half the amount of desired affordable housing units. The SHI list represents those units in a municipality that are available to residents earning less than 80% of the Area Median Income (AMI). While a community may contain units that are naturally affordable, only those that are legally protected long-term or in perpetuity are eligible for listing on the SHI.

⁷ Subject to the finalization of the housing production goals based on the 2020 census by EOHLIC.

Town of Agawam Housing Production Plan

EXECUTIVE OFFICE OF HOUSING AND LIVABLE COMMUNITIES CH40B SUBSIDIZED HOUSING INVENTORY							
Agawam							
DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
40	J.J. Brady Village	775 Springfield St.	Rental	32	Perp	No	EOHLC
41	J.J. Brady Village Phase II	775 Springfield St.	Rental	12	Perp	No	EOHLC
42	Colonial Haven	888 Main St.	Rental	52	Perp	No	EOHLC
43	Country View	95 N. Westfield St.	Rental	40	Perp	No	EOHLC
44	Meadowbrook Manor	88 Meadowbrook Manor	Rental	64	Perp	No	EOHLC
45	The Danahy School House	51 Maple St.	Rental	35	Perp	Yes	EOHLC
46	Wade Park Village	24-36 Franklin St.	Rental	7	Perp	No	EOHLC
47	Hale Meekins Residence	203 School St.	Rental	15	2036	No	HUD
48	Pheasant Hill Village	25 Pheasant Hill Dr.	Rental	200	2037	Yes	MassHousing
4187	DDS Group Homes	Confidential	Rental	50	N/A	No	DDS
10033	702 South Westfield Street/Soldier On	702 South Westfield Street	Rental	51	Perp	YES	MassHousing
							EOHLC
10358	Rosewood Way Townhomes	588 Mill St	Rental	0	2118	YES	EOHLC
Agawam Totals				558	Census 2020 Year Round Housing Units		12,313
					Percent Subsidized		4.53%

8/10/2023

Agawam
Page 1 of 1

This data is derived from information provided to the Executive Office of Housing and Livable Communities (EOHLC) by individual communities and is subject to change as new information is obtained and use restrictions expire.

Housing Authority

The state Congregate Elderly/Handicapped housing program (Chapter 667) provides housing for qualified low-income elderly and handicapped people, as defined in Massachusetts General Law Chapter 121B. Net income and age are the basis for eligibility, and income limits are set at 80% of the median income for the area in which the community is located. Tenants who live in state-aided Chapter 667 elderly/handicapped housing pay 30% of their income for rent. Heat and electricity are included.

The Agawam Housing Authority owns, operates, and maintains six public housing developments, comprising 242 units. The Massachusetts Executive Office of Housing and Livable Communities (EOHLC) is the funding source for all of these units. There are 191 units designated for elderly and handicapped residents along with 51 designated family units, ranging in size from two to three bedroom units. There is currently a waiting list.

Group Home Units

Fifty (50) units on the town's SHI are listed as group homes. A group home is a state-licensed facility intended for occupancy by elderly persons and/or persons with disabilities. Except for live-in aides, all persons living in a group home, whether assisted or not, must be elderly persons or persons with disabilities who do not require continuous medical or nursing care.

Rental Assistance for Low Income Households

Low-income households can also get rental assistance in the form of a housing voucher to afford housing. With a voucher, the subsidy is used by the tenant to find housing in the private market and is paid to a private landlord. Unlike subsidies to development units, the subsidy associated with vouchers stays with the tenant. There are two rental voucher programs available in Massachusetts:

1. Federal Section 8 Housing Choice Voucher. This program is administered by the US Department of Housing and Urban Development. The program was enacted in 1974 to promote economic and racial integration and to shift public assistance to the private market.
2. Massachusetts Rental Voucher Program (MRVP). This program is operated by the Massachusetts Executive Office of Housing and Livable Communities. Created in 1990, the MRVP has a similar purpose to the Federal Section 8 Housing Choice Voucher Program.

2.4 Housing Needs Assessment

Housing Affordability

The below table shows the breakdown of Agawam residents by HUD Area Median Family Income (HAMFI). Out of a total of an estimated 11,670 households in Agawam (American Community Survey 2016-2020), these figures show how many earn less than 80% HAMFI (low-income), less than 50% HAMFI (very low-income) and less than 30% HAMFI (extremely low-income). In total, 4,105 Agawam households, or about 35%, qualify as low-income under one of these categories.⁸ The largest percentage of these households fall under the 50 to 80% of HAMFI range.

Income Distribution	Owner	Renter	Total	% of all households
Household Income <= 30% HAMFI	390	770	1,160	9.9%
Household Income >30% to <=50% HAMFI	795	320	1,115	9.6%
Household Income >50% to <=80% HAMFI	1,180	650	1,830	15.7%
Household Income >80% to <=100% HAMFI	1,080	230	1,310	11.2%
Household Income >100% HAMFI	5,390	860	6,250	53.6%
Total	8,835	2,835	11,670	100.0%

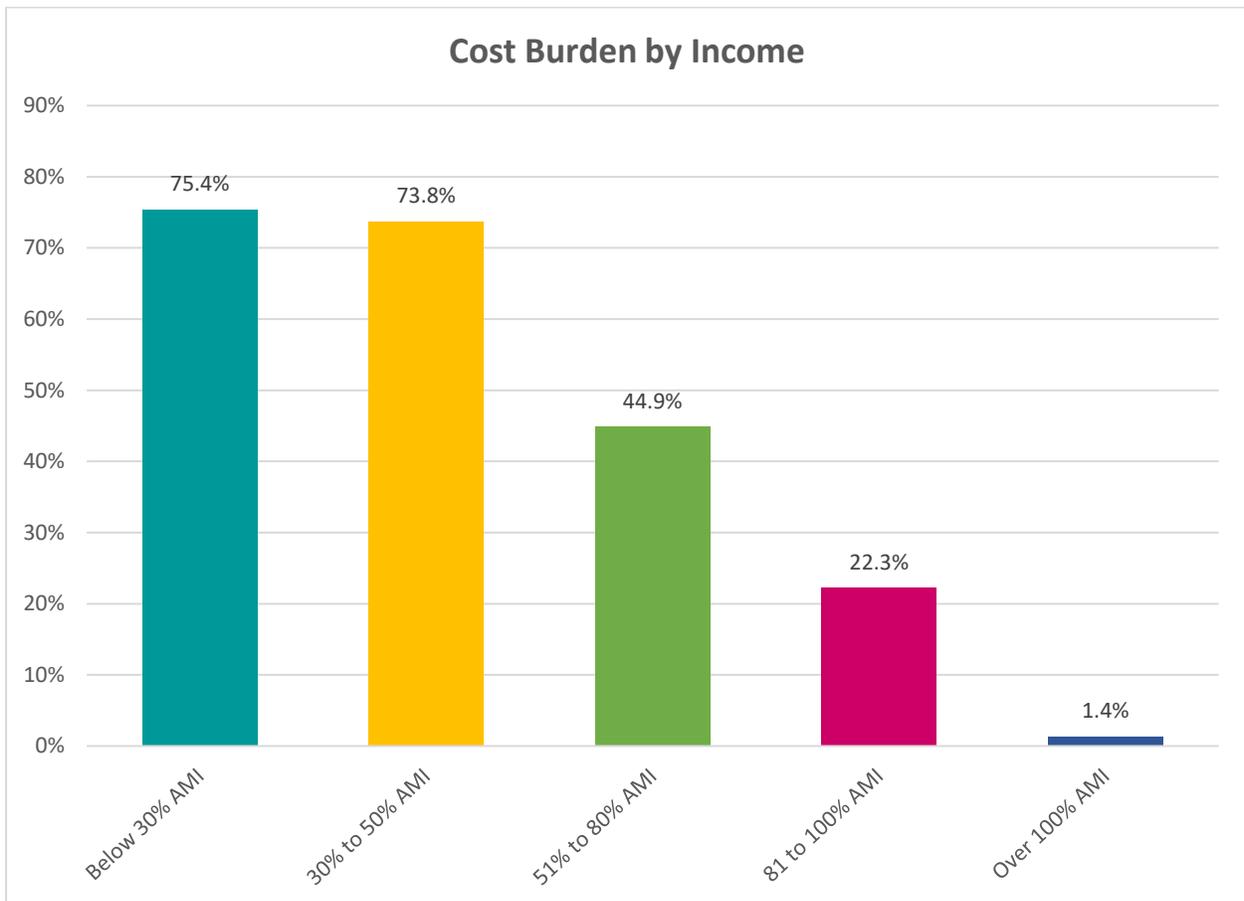
Source: *Comprehensive Housing Affordability Strategy (CHAS) Database, U.S. Census Bureau, 2020*

⁸ This is a decrease: in the FY18-22 HPP, the proportion of low-income households was 39%.

Housing Cost Burden

Although Agawam, Hampden County and the Pioneer Valley have historically been more affordable places to live in than the eastern part of the state, the cost of housing has increased rapidly in the past few years and is a strain on many households. The general rule of thumb is that for housing to be 'affordable', the household must pay no more than 30% of its annual gross income on housing, including mortgage, rent, HOA fees, taxes, insurance, and maintenance. Households who pay more than this suggested 30% are considered "cost-burdened" and may have difficulty affording necessities such as food, medical costs, transportation, and childcare. Although any household, regardless of income level, can be considered cost-burdened if they are paying too much of their overall income on housing, a primary concern is for low-income households who have the most severe challenge in affording necessities.

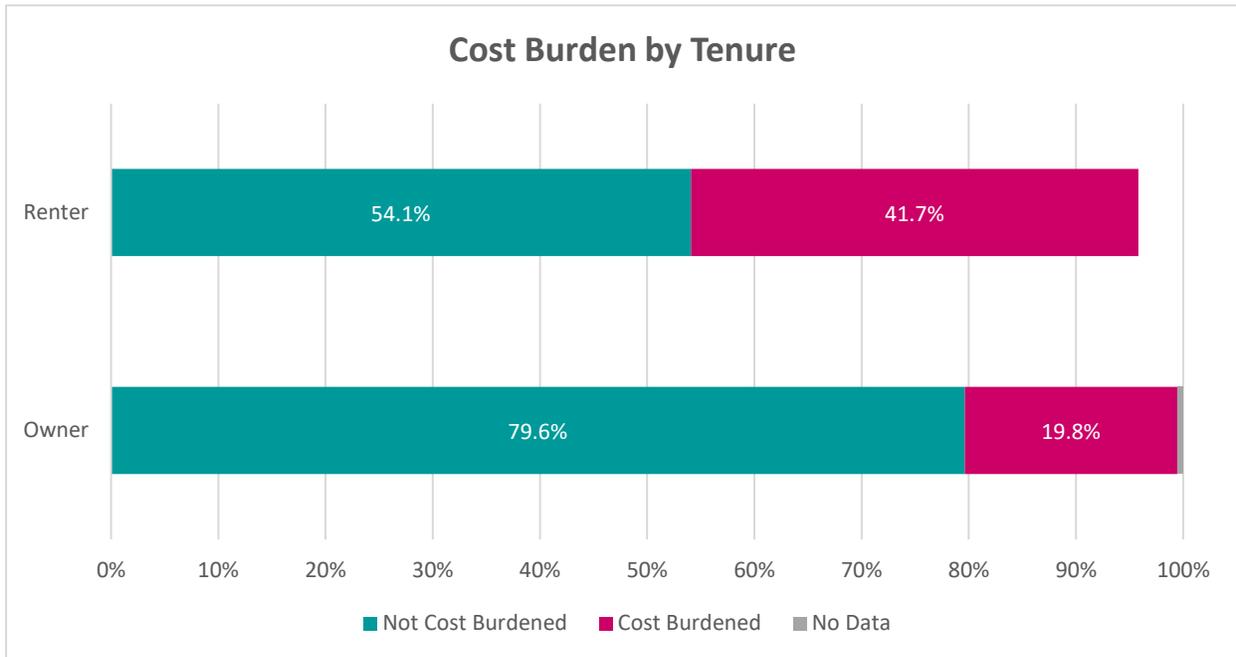
In Agawam, approximately **25% (2,970) of all households are financially burdened by their housing costs**. The following chart shows how much more housing cost-burdened those with lower incomes are in relation to higher-income residents (AMI = Area Median Income).



Source: Comprehensive Housing Affordability Strategy (CHAS) Database, U.S. Census Bureau, 2020

Town of Agawam Housing Production Plan

When looking at rental households alone, nearly 42% of households in Agawam are paying more than 30% of their gross income for housing costs, while 20% of homeowners are also cost-burdened.



Source: HUD Comprehensive Housing Affordability Strategy, 2020

Additionally, 1,410 owners and renters in Agawam are spending more than 50% of their gross incomes on housing costs, making them severely cost-burdened and at risk of losing their homes or apartments. That is 12% of all households. Thus, it is clear that both owner-occupied and rental housing options need to be expanded, particularly for lower-income residents of Agawam who are just beginning their careers, hold lower-paying jobs, may have faced foreclosure in the past, or are retired and on a lower fixed income. These options should address the need for smaller dwellings to accommodate the town's smaller household sizes, but there should also be options for families and extended families needing affordable units with three or more bedrooms.

Chapter 3: Housing Development Constraints

Local housing development is influenced by a variety of conditions including both natural and man-made constraints that can determine where housing can and cannot be developed. These characteristics include the availability of land, presence of roads and infrastructure, environmental constraints, proximity to jobs and accessibility to desirable amenities. Other conditions that impact development are regulatory. This includes zoning and subdivision regulations, permitting processes, building codes and environmental regulations. Other factors including the economy and availability of housing financing can determine if development is feasible or likely in a community.

This chapter will look at the various conditions impacting development in Agawam. Additionally, existing land use, zoning, and constraints will be utilized to assess possible future sites for housing.

3.1 Environmental Constraints

This section addresses the environmental constraints that affect development in certain areas of Agawam, specifically flood-prone areas, steep slopes, and poor soils. There is also a significant agricultural sector that the town wishes to preserve. These constraints certainly limit the areas available for housing and other types of development; however, town residents value their open space and natural areas that complement the more highly developed sections of town.

Flood Plains and Flood Hazard Areas

Agawam is located at the confluence of two rivers, the Connecticut and the Westfield, and much of the eastern portion of the community is the floodplain of these two rivers – a total of about 1,600 acres. This area has a history of flooding year-round. Most of flooding results from storm surges in drainage swales, runoff and brooks and streams. This is primarily caused by poor drainage designs, soil saturation in and around certain developments, and development in wetlands and along river floodplains and stream floodways. There is also seasonal flooding along the Connecticut River and occasionally along the Westfield River.

The Town has adopted the Federal Emergency Management Agency's (FEMA) updated Flood Insurance Rate Maps (FIRM) effective July 16, 2013. Dwellings existing prior to adoption of the floodplain zone are permitted; however, substantial improvements require a special permit. The district prohibits installation of septic tanks, leaching fields, and on-site waste-disposal systems. In addition, the district prohibits any development of any building, other than minor buildings incidental to permitted flood control, recreation, or agricultural uses.

"The Meadows" are part of an extensive floodplain area in the northeast corner of Town, near the mouth of the Westfield River. A portion of this area is in agricultural production, while the remainder is wetlands. The largest section of the Meadows is subject to flooding which is invaluable to the agricultural uses of the Meadows and contributes to the overall natural diversity in the Meadows.

Steep Slopes

Elevations in Agawam range from 45 feet above sea level at the town's eastern border on the Connecticut River to 640 feet at the summit of Provin Mountain. Most of the town's land lies between the 100-foot and 250-foot elevation contours and is relatively flat or gently rolling. As such, a great percentage of the town is physically suitable for development.

Generally, any slope zero to fifteen (15) percent is considerable suitable for development. Slopes greater than 15 percent are considered "excessive" or "steep" for residential uses. It is generally preferred to leave steep slopes undeveloped due to the high potential for erosion.

Only the Provin Mountain area includes steeper slopes that are prohibitive for most development. These lands are still primarily vacant or in agricultural or forestry use, and they are zoned Agricultural (AG). This zone does not allow any higher density than a single-family home.

Soils

Agawam's wealth of rich, level, and well-drained soils served as the basis of its early growth as an agrarian community, and later to attract the varied urban and suburban uses it now hosts. The town contains a sizeable proportion of poorly drained wetland soils in some low-lying areas and some stony glacial till soils in the Provin Mountain area. These are not suitable for development or most types of agriculture without expensive engineering modifications.

The type and intensity of development which a piece of land can support without negative impacts, such as severe erosion or septic system failure, is based in large part upon the characteristics of the soil. Soil information gives developers some indication of expense involved in developing their properties. It also alerts town boards and residents to those areas which, due to soil characteristics, face development limitations. Generally, soil constraints in Agawam exist where there are also other constraints, such as steep slopes (shallow soils) and floodplains (saturated soils).

Open Space and Agricultural Land

Agawam's rapid urbanization over the past few decades has resulted in an appreciable loss of agricultural lands as those areas best suited to agriculture are also best suited to development. The town has addressed this by preserving an Agricultural zone (AG) that allows only single-family homes but has a relatively small minimum lot size of 20,000 square feet. The town also encourages Open Space Residential Developments in these areas, allowing clustering of units.

Agawam's farmlands face continued development pressure. They represent a large proportion of the remaining undeveloped, buildable land left in town. Most other areas not yet developed are either publicly owned, or have slope, soil, or flood hazard constraints. As such, farmlands are far more vulnerable than the town's other open spaces. The forces that turn farms into subdivisions have resulted in the loss of a great deal of open space and have changed the overall character of

Town of Agawam Housing Production Plan

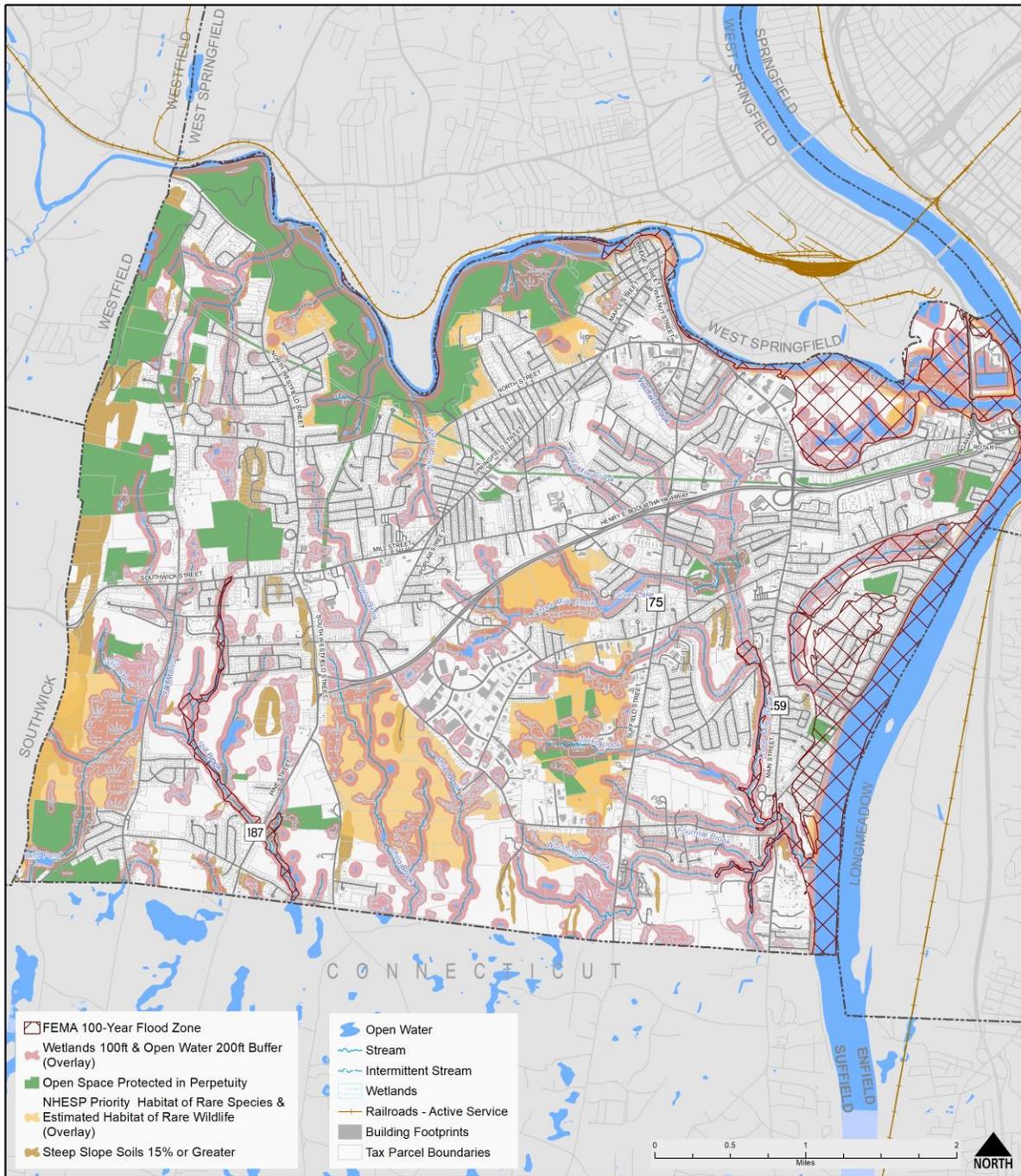
the town. The fertile lands which originally brought settlers to Agawam almost 350 years ago could be lost forever.

In addition to purchasing farmland and undeveloped land, the town adopted an Open Space Residential Development Ordinance in 2006 to encourage the clustering of residential homes. It is allowed by right in three residential districts. It is encouraged by the Planning Board in areas containing wetlands, sensitive species, and agricultural lands.

To balance the need to continue to supply adequate housing and services for Agawam's residents, the Town has proactively identified in its Open Space and Recreation Plans those parcels which are most valuable and most threatened. The purchase of the Agawam Municipal Golf Course, Tuckahoe Turf Farm, and the former Hampden County Prison Farm have protected 450 acres of prime developable land. Almost the entire northern and eastern borders of town, those that are formed by the Westfield and Connecticut Rivers, are permanently protected. Robinson State Park, consisting of 800 acres of forested uplands and floodplains, is located on the town's northern border, and approximately half of Agawam's easterly boundary is protected by the linear, multi-use trail known as the Connecticut Riverwalk.

The following map illustrates environmental constraints in the Town of Agawam.

Environmental Constraints to Development in Agawam



ENVIRONMENTAL CONSTRAINTS TO DEVELOPMENT
2023 Housing Production Plan

AGAWAM, MA

DATA SOURCES:
Bristol, Pioneer Valley Planning Commission
This map is based on the best available data.
All information is subject to field verification.



3.2 Zoning Regulations

Zoning is a powerful regulatory tool that allows communities to exercise a level of local control over how land is put to productive use within town borders. Agawam has designated 12 zoning districts, including seven residential districts, two business districts, two industrial districts, and an agricultural district.

The zoning districts are as follows:

- Residence A-1
- Residence A-2
- Residence A-3
- Residence A-4
- Residence A-5
- Residence A-6
- Residence B
- Agricultural
- Business A
- Business B
- Mixed Use Business C (overlay in a specific area – Walnut Street Extension)
- Industrial A
- Industrial B

There are also three other overlay districts: Wireless Telecommunications, Historic Preservation, and Open Space Residential District.

Single-Family Residential Development

Most of the zoning districts allow new single-family homes, except the two Industrial Districts, which only allow changes to existing residential development.

Open Space Residential District

The Open Space Residential District bylaw works as an overlay zone in the Residence A-1, A-2, and Agricultural Districts, with a minimum lot size of five acres. It allows for clustered housing on 50% of the site (or less), thus preserving the other 50% in open space. These provisions allow for greater flexibility and creativity in the design of residential developments and encourage the permanent preservation of agricultural lands, woodlands, and other open space.

As of fall 2023, no Open Space developments have been built under this bylaw.

Multi-family Development

Multi-unit residential buildings are allowed by right in several zoning districts, and by right in BB if the subdivision or building lot was created prior to the establishment of the district. There are

six districts (Residence A-3, A-4, A-5, A-6, Residence B, and Mixed Use Business C) that allow or have a special focus on multifamily housing. Below are brief descriptions of what is allowed in each of these districts.

- Residence A-3 is exclusively for multi-family housing. Apartment houses and garden-type apartments can be built on a minimum lot of two acres and with a maximum density of eight units per acre. The building coverage cannot exceed 40% of the lot area. Buildings are also limited to two stories and eight units per building. There are many small areas designated for Residence A-3, including several which are already built out, two that are being developed, and one that is still vacant.
- Residence A-4 is for higher density elderly housing overseen by the Agawam Housing Authority. The minimum lot size is seven acres, and the maximum density is 16 units per acre. No more than 12 units are allowed in each building, and the buildings are limited to two stories. There is one A-4 district, which already contains Housing Authority buildings.
- Residence A-5 is designated for age-restricted housing. Specifically, it allows an “active adult community” for 55+ residents, with a minimum lot size of 10 acres. The maximum density is an average of four units per acre, and the units can only be single-family or two-family dwellings. No more than three people are allowed to occupy a single dwelling unit. There is one A-5 district, created for The Villas at Pine Crossing, near the intersection of Route 57 and Pine Street.
- Residence A-6 is intended for “low-density multifamily” communities. It is very similar to A-5 in its requirements, with a 10-acre minimum parcel, four unit per acre maximum density, and restriction to one- or two-family dwellings. However, it is not age-restricted. There is one vacant lot in the southeastern section of town that is designated for this zone.
- Residence B (RB) allows two-family dwellings and multifamily dwellings with not more than four dwelling units (with a minimum lot of one acre for a four-family building).
- Mixed Use Business C District
This mixed-use district is an overlay zone that has been applied to 22 properties along the Walnut Street Extension in northeastern Agawam. The intent is to create a livable, walkable neighborhood with retail, services, and professional offices as well as residential units. A variety of residential types are allowed, including multifamily, townhouses, live/work units, assisted living, and senior housing; however, in any new development, no more than 75% of the total square footage can be used for residential uses. Development is regulated through performance standards: the maximum lot coverage is 75%, and the maximum height is three stories.

The Mixed Use Business C District provides a density bonus for affordable housing. To obtain this bonus, at least 10% of the total dwelling units in a mixed-use development must be affordable in perpetuity. The affordable units may be located in an existing structure if their construction constitutes a net increase in the number of dwelling units in the development. The Planning Board determines the density bonus, which may consist of both of the following:

- An increase in building height to a maximum of four stories;
- An increase in lot coverage to a maximum of 95%.

Lodging House

Lodging Houses are allowed in Residence B. These are defined as a building containing more than five lodging units for semipermanent residence (longer than one week) for compensation and which meals may also be supplied as part of the fee. This shall not include bed-and-breakfast home uses, congregate housing, motels, hotels, multifamily dwellings, or nursing homes.

Accessory Apartments

A "second housekeeping unit" is allowed in a few districts (RB, BA, and BB) and allowed in two others if "grandfathered in" (IA and IB) but has stringent requirements for the approval and consent of neighbors.

3.3 Infrastructure Conditions and Capacity

This section addresses the town's infrastructure that supports residential development. The town's water and sewer services are robust and have room for expansion. Agawam is also a participant in Springfield Materials Recycling Facility, also located on Bondi's Island and with sufficient capacity. The town's transportation system and school system are both adequate and able to accommodate some growth, but the town's stormwater infrastructure is in need of upgrades.

Water Supply

The Agawam Water Department purchases water from the Springfield Water and Sewer Commission (SWSC), and it primarily comes from the Cobble Mountain Reservoir. SWSC withdrawal from the reservoir is permitted by the Department of Environmental Protection, Division of Water Supply. Old and deteriorating distribution mains occasionally cause discoloration of the water. This has been remedied in the past by flushing out the water lines or replacing them with new cement-lined ductile iron water mains. In 2016, the City of Springfield finished the multiyear effort to replace the large water main from Provin Mountain to the Connecticut River.

All water purchased from the SWSC is treated by coagulation, filtration, and chlorination prior to delivery. There are no contract limitations on the amount of water Agawam may draw from the SWSC; and there is sufficient supply for new development for the foreseeable future.

Stormwater

Stormwater has been a significant concern for Agawam, as the infrastructure has aged and development, with its attendant increase in impervious surfaces, has increased rapidly over the past couple of decades. Sedimentation within drainage structures is a problem throughout Agawam as developments encroach upon wetlands, streams and areas subject to flooding. The problem may be made worse when drainage structures are not kept clear. The adoption of the drainage ordinance has helped to alleviate problems with sedimentation, and recently, the Town utilized American Rescue Plan Act (ARPA) funds to replace culverts at North Street (Deep Gutter) and North Westfield Street (May Hollow).

Wastewater Disposal

Much of the existing sanitary sewer system in the Town of Agawam was constructed many years ago and has been extended as the demand arose. The Town expanded the system into the southwestern section of town in 2010, where there are several large vacant sites that are zoned for higher density development. Future phases of sewer expansion into the southwestern part of town, if funded, will provide relief to properties with failing septic systems and will also allow further development of the area. Development has been difficult to date because the in-situ soils are not very favorable to septic systems.

Town of Agawam Housing Production Plan

The sewage treatment plant is owned by the Springfield Water and Sewer Commission (SWSC) and is located on Bondi's Island in the extreme northeast section of Agawam, where the sewage receives primary and secondary treatment, and the effluent is discharged in the Connecticut River. The Town of Agawam pays its share of the operation and maintenance costs of the sewage treatment plant based on the volume of the sewage received from Agawam. At this point, there is capacity for additional residential development in Agawam.

Trash and Recycling Facilities

Agawam is a participant in the Springfield Materials Recycling Facility on Bondi's Island. In conjunction with state and federal regulation of that facility, the Agawam Conservation Commission has limited jurisdiction over its operation and design, as it lies within the Town of Agawam and within a floodplain of the Connecticut River. The southerly side of the facility is separated from the Westfield River by a flood control structure.

The Springfield Materials Recycling Facility accepts solid waste on a contractual basis from many communities in Hampden, Hampshire, and Franklin Counties, and it is the disposal site of all solid waste formerly going to the Springfield Municipal Landfill. Coupled with state-mandated recycling, the operation of the trash incinerator has extended the life of the municipal landfill. Each of these facilities is permitted and regulated by the Commonwealth of Massachusetts and the United States Environmental Protection Agency.

There is sufficient capacity in the current system to accommodate residential growth in Agawam.

Transportation Infrastructure

Agawam is served and accessed by a variety of roads ranging from high volume expressways (Route 5 and Route 57) to quiet local streets. Due to the town's growing population, many roads and intersections in town have undergone widening in recent years. Others may undergo similar expansion in the years ahead.

Agawam began a program to construct bicycle- and pedestrian-related facilities in the 1990s, and in 2004 the Connecticut Riverwalk and Bikeway was opened. It consists of a 1.7-mile off-road multi-use trail. Agawam is part of the Pioneer Valley Transit Authority, which provides bus service to most locations in the Pioneer Valley; however, service is extremely limited in Agawam, and most residents must rely on private vehicles. Amtrak passenger rail service is available at Union Station in downtown Springfield.

School System

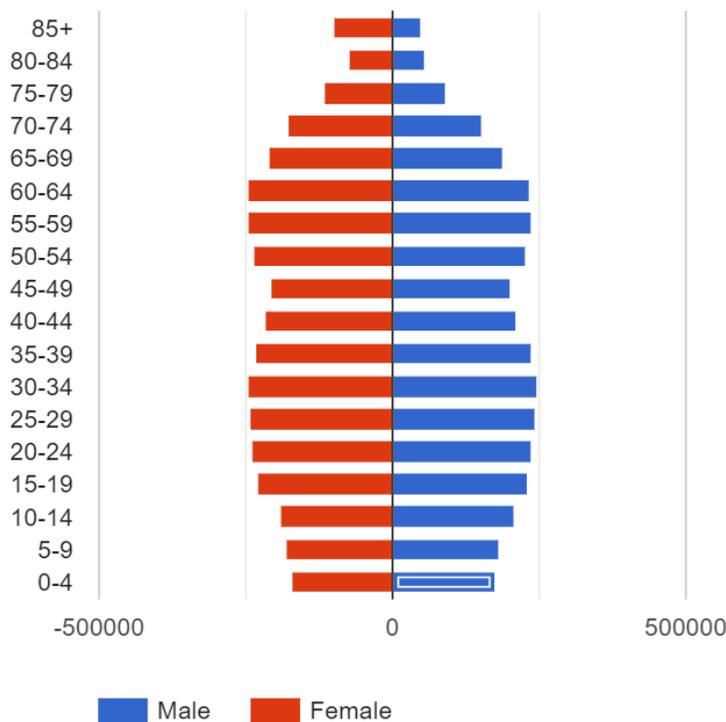
The Agawam Public School System includes eight schools, providing educational services from Pre-school through 12th grade. These include an Early Education Center, four K-4 elementary schools, a middle school for 5th and 6th grades, a junior high school for 7th and 8th grades, and a high school. Total enrollment was 3,457 in 2022-23. As discussed previously in this report, enrollment has declined over the past several years, a trend occurring in many parts of the

Town of Agawam Housing Production Plan

Commonwealth. This trend is expected to continue for several years at least, as birth rates have been low statewide.

The following chart shows the number and proportion of Massachusetts residents in each age cohort. All age groups under 30 are smaller than those preceding them. The school-age groups are much smaller than those of high school graduation age, and the preschool group is the smallest of all. This means that school enrollment will most likely not increase and will probably decrease in the next ten years.

**Population Pyramid of Massachusetts as per 2021
US Census estimates**



Source: [2021 US Census Estimates: Population In Five Year Age-Group](#)

Another factor to consider regarding the school system is the upcoming construction of either a new high school or major renovations to the existing school, most likely starting in late 2024. This will increase local taxes, which may be an additional burden on some households and those with fixed incomes.

Chapter 4: Housing Production Goals and Implementation

The Town of Agawam has identified the following housing goals and objectives that comply with EOHLC guidelines for Housing Production Plans. Working to achieve these goals will help to ensure that Agawam is a community where housing affordability, housing choice and fair access to housing is ensured for all community members.

4.1 Affordable Housing Goals

4.1.1 *Agawam's 10% Affordable Housing Goal (Chapter 40B)*

The Town of Agawam will seek to produce 62 units of affordable housing per year.⁹ Agawam has 558 units of affordable housing listed on the town's Subsidized Housing Inventory (SHI), which is 4.53% of the town's year-round housing stock (12,313) as defined by the 2020 Census. The town needs to add 673 additional subsidized housing units to meet its 10% affordable housing goal. All of the units on the SHI are rental housing, and most are affordable in perpetuity. Two developments (with 215 units) will reach expiration of affordability in the 2030s, and one expires in 2118 (47 affordable units as part of a mixed-income development, currently under construction).

⁹ Subject to the finalization of the housing production goals based on the 2020 census by EOHLC.

Town of Agawam Housing Production Plan

EXECUTIVE OFFICE OF HOUSING AND LIVABLE COMMUNITIES CH40B SUBSIDIZED HOUSING INVENTORY

Agawam							
DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
40	J.J. Brady Village	775 Springfield St.	Rental	32	Perp	No	EOHLC
41	J.J. Brady Village Phase II	775 Springfield St.	Rental	12	Perp	No	EOHLC
42	Colonial Haven	886 Main St.	Rental	52	Perp	No	EOHLC
43	Country View	95 N. Westfield St.	Rental	40	Perp	No	EOHLC
44	Meadowbrook Manor	66 Meadowbrook Manor	Rental	64	Perp	No	EOHLC
45	The Danahy School House	51 Maple St.	Rental	35	Perp	Yes	EOHLC
46	Wade Park Village	24-36 Franklin St.	Rental	7	Perp	No	EOHLC
47	Hale Meekins Residence	203 School St.	Rental	15	2036	No	HUD
48	Pheasant Hill Village	25 Pheasant Hill Dr.	Rental	200	2037	Yes	MassHousing
4187	DDS Group Homes	Confidential	Rental	50	N/A	No	DDS
10033	702 South Westfield Street/Soldier On	702 South Westfield Street	Rental	51	Perp	YES	MassHousing
10358	Rosewood Way Townhomes	586 Mill St	Rental	0	2118	YES	EOHLC
Agawam Totals				558	Census 2020 Year Round Housing Units		12,313
					Percent Subsidized		4.53%

9/10/2023

Agawam
Page 1 of 1

This data is derived from information provided to the Executive Office of Housing and Livable Communities (EOHLC) by individual communities and is subject to change as new information is obtained and use restrictions expire.

The state sets housing unit production goals for each municipality for the purpose of providing municipalities with numbers to work toward. The annual housing target numbers reflect 0.5% of a community’s housing stock as determined by the latest decennial census. Agawam contained 12,313 housing units in the year 2020; therefore, Agawam’s annual affordable housing unit production target is anticipated to be 62 affordable housing units per year. The new Rosewood Way townhouse development by Way Finders will create exactly 62 new units in 2024, fortuitously, and the town will meet its initial goal the first year. This new development will also be 70% local preference.

4.1.2 Participation in regional collaborations addressing housing development

The Town will continue to participate in the Pioneer Valley Regional Housing Committee, convened by the Pioneer Valley Planning Commission. The Regional Housing Committee oversees progress and implementation under several regional housing plans. These include Valley Vision 2: Regional Land Use Plan, the Pioneer Valley Comprehensive Economic Development Strategy (CEDS), and the Pioneer Valley Regional Housing Plan (all by the Pioneer Valley Planning Commission), and the Greater Springfield Regional Housing Analysis (Phase I)

and Springfield and Pioneer Valley Housing Report (Phase II), by the University of Massachusetts Donahue Institute.

Time frame: Ongoing.

4.1.3 *Identify characteristics of proposed residential or mixed-use developments that would be preferred by the municipality.*

The types of housing and mixed-use developments that would be preferred by Agawam residents and local officials include the following:

- Fully accessible alternatives to single-family homes for seniors looking to downsize, such as courtyard apartments or small single-story homes.
- Small “starter” homes – particularly for young people who grew up in Agawam or any resident who is a first-time homebuyer.
- Condominiums – for young people and others who seek reasonably priced housing where they can build equity.
- Family housing
- Clustered and cottage-style developments
- Accessory apartments, allowed with fewer restrictions than at present.
- Mixed use developments with apartments above retail and services
- Senior housing, including 55+
- Housing for those with disabilities

Time frame: Ongoing

4.1.4 *Identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purpose of creating SHI Eligible Housing units to meet its housing production goal.*

Over time, the Town of Agawam will investigate and seek to implement some or all of the following changes in local regulations:

- Increase areas zoned for multi-family units and garden apartments (Residence A-3). This could involve expanding current sites to include contiguous areas or creating additional nodes for affordable and mixed-use housing.

Town of Agawam Housing Production Plan

- Designate additional areas that allow mixed-use development, such as the Business C District at the Walnut Street Extension.
- Consider allowing Accessory Apartments with fewer restrictions and barriers.
- Consider adopting 40R Smart Growth Overlay District, which would create affordable housing as well as “missing middle” housing that meets the needs of a wider range of Agawam residents. These districts provide a financial benefit for the Town, as well.
- Allow infill on undersized lots that don’t meet current minimum area requirements, with appropriate density modifications.
- Consider adopting inclusionary zoning; explore Massachusetts Housing Partnership resources for this purpose.

Timeline: These changes can be addressed over the next several years (2024-2028).

Milestones:

- Conduct public outreach and education to address potential questions/concerns (2024-2025)
- Possibly begin with alternations to the Accessory Apartments provisions (2024)
- Prepare additional bylaws and rezoning proposals (2024-26)
- Present explanation of proposed measures at City Council meetings (2025-26)
- Adopt bylaws/zoning amendments (2025-2028)

4.1.5 *Identification of specific sites for which the municipality will encourage the filing of Comprehensive Permit applications.*

The Town has identified the following sites where it will encourage 40B applications, as follows:

- A 2.3-acre property at 346 Walnut Street Extension is highly suitable for affordable housing. The site is less than ¼ mile from a bus stop, and is zoned Mixed-Use Business C, intended to be a vibrant, walkable “Main Street” area.
- Town-owned property on Franklin Street comprising about six acres. The land is located behind the Brady Village Apartments, which is a Housing Authority property. Although the Housing Authority deed-restricted the property for conservation or recreation, the Town will look into ways to develop a portion of this parcel for affordable senior housing or other affordable housing.
- Other privately-owned properties in the Walnut Street Extension Mixed-Use Business C District.

Town of Agawam Housing Production Plan

- Existing and future properties zoned Residential A-3, which is exclusively for multi-family housing and allows up to 8 units per acre. This is not sufficient density to allow large numbers of SHI-eligible housing but could be viable as mixed income developments.
- Existing properties zoned Residential A-6, which is for low density multifamily at four units per acre and could satisfy some of the demand for small single-family homes, small accessible dwellings for seniors, and cottage-style developments. These would not contribute to the SHI but would provide options for local residents.
- State-owned properties and any other town-owned properties.

Time frame: This process could take several years from 2024-2028.

Milestones:

- Discuss potential opportunities with Agawam Housing Committee, Town officials, and local residents (2024).
- For Town-owned properties, conduct feasibility studies and/or site planning efforts (2024-2025).
- Market one or more properties as a 40B opportunity or rezone areas to indicate desired future use (2024-2026).
- Work with potential housing developers to develop a mix of market rate and subsidized housing (2025-2027).
- Potential new construction (2026-2028).

4.1.6 Identification of municipally owned or Housing Authority-owned parcels for which the municipality or Housing Authority commits to issue requests for proposals (RFP) to develop SHI Eligible Housing.

The Town has one property that has already been determined to be suitable for a new affordable housing development and will work to identify others.

- 681 Springfield Street - The Agawam Police Station is currently located at 681 Springfield Street and will be moving to a new location later in 2024. This two-acre parcel with a 15,000+ sq. ft. building is suitable for an affordable housing development. The Town commits to issuing an RFP for SHI-eligible housing for this property.
- The Town will review all other town-owned properties for affordable residential development viability.

- The Town will seek to identify tax title properties that might be suitable.

Time frame: This is a medium-term goal, ideally completed in the next 3-5 years (2024-2028)

Milestones:

- Discuss potential affordable housing type and configuration options with the Agawam Housing Committee, Agawam Housing Authority, and Town officials (2024).
- Conduct feasibility studies and/or site planning efforts (2024-2026).
- Develop an RFP and market one or more properties to potential housing developers, for a mix of market rate and subsidized housing (2025-2026).
- Potential new construction (2026-2028).

4.1.7 Additional Strategies

The Town would also like to pursue the following strategies to increase affordable housing and the variety of all types of available housing, and to assist residents with their housing needs:

- Assist local residents to stay in their homes, if they choose, by providing information about available housing assistance resources.
- Understand the barriers to and incentivize the creative re-use of older, underutilized properties – for example, converting unused commercial space into housing or converting older single-family homes into multifamily buildings. Look into what regulatory changes may be required to facilitate these types of adaptive reuse projects and identify potential parcels and structures that may be well suited to such redevelopment.
- Investigate using the EOHLC Local Initiative Program (LIP), a state program that encourages the creation of affordable housing by providing technical assistance to communities and developers who are working together to create affordable rental opportunities. Unlike conventional housing subsidy programs, in which a state or federal agency must approve every aspect of financing, design and construction, LIP allows most of these decisions to be made by the municipality.
- Explore the formation of a Municipal Housing Trust, which would allow Agawam to collect and segregate funds for local affordable housing initiatives.

Town of Agawam Housing Production Plan

- Potentially establish a contract with a Housing Coordinator to assist with implementing the identified goals and strategies in this plan. If a Housing Trust Fund is created, this contractor could also assist the Housing Trust Board in accomplishing these goals. The contract could potentially be funded with CPA funds.

Time frame: The first of these items is ongoing, and the others will take several years.

Milestones:

- Working with Agawam Housing Committee, Agawam Housing Authority, and Town officials, begin outreach efforts to inform local residents of housing resources (2024 and ongoing).
- Pursue an Affordable Housing Trust via Agawam Housing Committee (2024).
- Explore adaptive reuse possibilities and opportunities and consider changes in regulations as needed. (2024-2026).
- Work with the Executive Office of Housing and Livable Communities to pursue a Local Initiative Program project (2025-2028).
- Work towards development of an Affordable Housing Trust, utilizing Community Preservation funds as a foundation.

4.2 Funding Opportunities

Agawam's Community Preservation Act Funds

Agawam adopted the Community Preservation Act in 2001 at a rate of 1%. Once adopted, the Act requires towns to dedicate at least 10% of the monies raised to each of the following three categories: open space, historic preservation, and affordable housing. The remaining 70% can be spent on one or all of these three uses, however the community sees fit. The state matches the CPA monies collected with funds from the Community Preservation Trust Fund.

CPA funds can be used for numerous affordable housing initiatives, including rehabilitation or modification programs, predevelopment costs related to property purchases, purchases of property, assistance to private affordable housing developer, or subsidizing one or more units that are existing or under construction for affordable housing. Funds can also be used to develop outreach materials related to affordable housing and to hire staff or a consultant for planning and administrative purposes.

Town of Agawam Housing Production Plan

Most pertinent to this Housing Production Plan, CPA funds can be used for the “acquisition, creation, preservation and support of community housing; and for the rehabilitation or restoration of...community housing that is acquired or created [with CPA funds].” Many CPA communities allocate funds to physically preserve existing aging affordable housing units, such as at a local housing authority property. However, rehabilitation or restoration of community housing is only eligible if the property was acquired or created with CPA funds. The Act specifically states that “funds expended pursuant to this chapter shall not be used for maintenance.” (Chapter 44B, Section 5(b)(2)).

In addition to the eligible activities described in Section 5(b)(2), the law allows the municipality to appropriate CPA funds to an affordable housing trust fund per Section 5(f) and to fund regional projects.

Affordable Housing Trust Fund

Under Section 5(f) of the CPA statute, CPA funds may be allocated to a Municipal Affordable Housing Trust, and CPC members may be represented on the trust board to create overlap and integrate communications between the two municipal entities. Communities may establish the housing trust fund under the Municipal Affordable Housing Trust Fund Law (MGL c.44 s.55C), allowing them to collect funds for affordable housing from various sources, segregate them out of the general municipal budget, and use the funds for local initiatives to create and preserve affordable housing.

Since the law passed in 2005, at least 70 communities in Massachusetts have established municipal affordable housing trust funds, raising the overall total of communities with local housing trusts to approximately 80 (only cities were previously able to do this). Communities use a variety of funding sources to establish the trusts, including general funds, CPA funds, tax title funds, cell tower lease payments, negotiated developer fees, and others. In most communities with housing trusts, CPA funds are the most common source of funds. In fact, many CPA communities appropriate CPA funds to their trusts in excess of the 10 percent minimum annual expenditure for community housing required by the CPA statute.

Historic Tax Credits: Federal & State

Owners of properties listed on the National Register are automatically eligible for a 20 percent investment tax credit for the certified rehabilitation of income-producing certified historic structures such as commercial, industrial, or rental residential buildings.

The state also offers tax credits through the Massachusetts Historic Rehabilitation Tax Credit program. These tax credits are not automatic and are awarded competitively to projects that provide the most public benefit. Almost all of the residential projects that have been awarded state historic tax credits resulted in the development of over fifty units.

Neither historic tax credit program requires that the units be made affordable to income eligible households. However, affordable housing developers commonly use these historic tax credit programs as a funding source for affordable housing developments.

Community Development Block Grant Funding

Community Development Block Grant (CDBG) funds are federal dollars that are distributed annually by the state to complete housing and economic development projects. Agawam has benefitted from CDBG funding in the past, including awards for housing rehabilitation programs.

Other Funding Sources

State and federal funding and financing sources to assist with the development of affordable housing do exist, and experienced affordable housing developers know these funding sources well. Affordable housing developers often coordinate several funding sources in order to move such projects forward. Some of those funding sources include Low Income Housing Tax Credit (LIHTC), Local Initiative Program (LIP), HOME investments Partnership Program, and Capital Improvement and Preservation Fund (CIPF).

4.3 Key Players for Affordable Housing Initiatives

The key players in town that can work together to address housing need are the Mayor of Agawam, Agawam City Council, Agawam Housing Committee, Agawam Planning Board, Agawam Housing Authority, Agawam Commission on Disabilities, Agawam Council on Aging & Senior Center, Agawam Town Planner, regional housing partnerships, and regional community development corporations.

Agawam is one of thirteen Massachusetts municipalities that have applied for, and been granted, city forms of government but wish to retain "The town of" in their official names. The mayor is the elected leader of the city. The current city council consists of eleven members elected at large by the voters and is the legislative branch of the town government.

Local Partners

Mayor of Agawam: The Mayor is the Chief Executive Officer for Agawam. According to the Charter, the Mayor is responsible for exercising general supervision and direction over all town departments and agencies.

Agawam City Council: Legislative powers of the city are vested in the Agawam City Council which consists of 11 members who are elected citywide. The City Council holds public hearings, passes ordinances, financial orders and resolutions, oversees and approves all financial appropriations and the adoption of the annual Operating Budget.

Agawam Housing Committee: Considers the town's housing needs, with particular attention to housing opportunities that are affordable to households of all income levels and abilities. The Housing Committee may make recommendations to the Mayor and City Council on steps the town may take to support the creation of new housing options to address those needs and to help maintain existing affordable housing in Agawam.

Town Residents: Elect mayor and city council members. Extensive public outreach should occur on proposed affordable housing initiatives or projects to ensure that town residents are adequately informed.

Agawam Housing Authority: Provides local affordable housing to low-income elderly and disabled residents. Has legal authority to purchase and hold property in accordance with M.G.L. Chapter 121B, Section 11. There may be potential to collaborate with the Housing Authority on new affordable units or redevelopment of existing buildings for affordable housing.

Agawam Commission on Disabilities: Advises and assists municipal officials in ensuring compliance with federal and state disability laws. Reviews policies and activities of municipal departments and boards as they affect persons with disabilities. Coordinates the activities of other local groups organized to meet the needs of persons with disabilities. Provides information, referral, advocacy and technical assistance to individuals, businesses and organizations in all matters pertaining to disability.

Agawam Planning Board: Guides development as specified by the Agawam Zoning Bylaw and Massachusetts General Law. The Planning Board makes recommendations for zoning bylaw changes to the City Council. The Planning Board reviews and approves all subdivisions.

Town of Agawam Housing Production Plan

Agawam Council on Aging and Senior Center: The Council on Aging runs the senior center and provides nutrition, transportation, and social services for the increasing population of older adults in town. Staff are in tune with elderly housing needs.

Agawam Community Preservation Committee: Administers the town's Community Preservation Act Program and allocates revenues generated from the Community Preservation Act Fund.

Regional Resources

Wayfinders: This agency is a non-profit regional housing agency serving western and central Massachusetts. Wayfinders administers a large percentage of Section 8 vouchers for the region on behalf of the state, including the Housing Choice Voucher Program in Northbridge. It also plans, builds and manages affordable housing projects. [Welcome to Way Finders | Way Finders](#)

Valley Community Development (Valley)

Valley Community Development is a nonprofit formed in 1988 to address the growing needs of low-and moderate-income people through developing and preserving affordable rental and ownership housing, cultivating economic self-sufficiency, and fostering community leadership. The Valley Community Development service area is comprised primarily of Northampton, Easthampton, Amherst, and Hadley though they serve all of Hampshire and Franklin counties for homeownership and small business services. [Valley Community Development, Northampton, Hampshire County \(valleycdc.org\)](#)

Pioneer Valley Planning Commission (PVPC):

The PVPC provides municipal planning assistance to communities in its service area and beyond, including master planning, zoning, and housing planning. The PVPC also convenes the Regional Housing Committee.

The Agawam Housing Production Plan was prepared according to the requirements of the HPP program. Once this HPP is adopted by the Agawam City Council and Planning Board, it may be submitted to EOHLIC for approval. EOHLIC will conduct an initial 30-day completeness review and may suggest edits or additions. After that time, EOHLIC will approve the plan within 90 days, and once approved, it is valid for five years.