

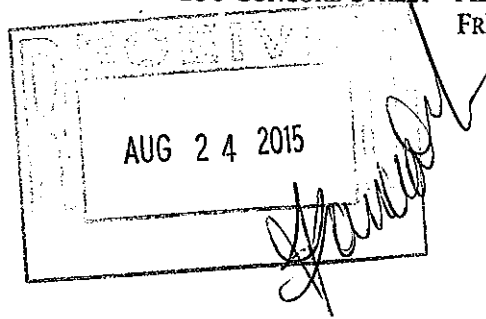


FRAMINGHAM COMMUNITY & ECONOMIC DEVELOPMENT

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August 21, 2015

Lauren Vitale
Office of the Chief Counsel
Massachusetts Department of Housing & Community Development
100 Cambridge Street, Suite 300
Boston, MA 02114



Re: Urban Center Housing Tax Increment Financing (UCH-TIF) Regulation, 760 CMR 58.00

Dear Ms. Vitale:

I am writing to share comments regarding this regulation and its relevance to the Town of Framingham. We see UCH-TIF program is important tool to support the revitalization of our downtown.

DHCD should allow communities to provide TIF support to projects with an affordability component of 10 percent, or at a level consistent with a local inclusionary zoning bylaw, without demonstrating a project's financial project necessity. This change will allow communities to make decisions in support of local development goals, with local resources.

Today, Framingham's top goal is to attract new investment and disposable income to our downtown. Through extensive market research and deep engagement with our community and developers, we learned that high-density, transit-oriented development (TOD) offers a promising path forward. We seek to encourage more market-rate rental units in our downtown area, following a successful development path followed by other Massachusetts communities. Framingham needs new housing stock, and TIF support, through the UCH-TIF program, can encourage early TOD projects.

Framingham remains committed to providing affordable housing opportunities for our residents. We exceed the Chapter 40B 10 percent affordability threshold. And, through our inclusionary zoning bylaw, Framingham ensures new housing projects also generate new affordable units.

Our proposed change is consistent with changes to the Economic Development Incentive Program (EDIP). Formerly, through the EDIP, only communities in designated Economic Target Areas (ETAs) could execute TIF agreements with projects generating economic benefits. Now, any community in Massachusetts can execute a TIF agreement with a qualifying project.

Through EDIP reform, the state allowed more local decision-making for local development incentives, under the context of state administrative standards. DHCD should apply a similar policy approach to the UCH-TIF program.

Please accept my thanks for your time and consideration. Please let me know of any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur P. Robert". The signature is written in a cursive style with a large initial "A".

Arthur P. Robert
Director