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Town of Tewksbury Housing Production Plan for 2023-27

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Table of Contents

Executive Summary.....	i
A. How was the Tewksbury Community Involved in the Plan’s Creation?	ii
B. Housing Demand and Housing Supply: Comprehensive Needs Assessment.....	iii
C. What Tewksbury Wants to Achieve: Affordable Housing Goals.....	vi
D. How Tewksbury Plans to Meet its Goals: Implementation Strategies	viii
Introduction	1
A. Why Plan for Housing?.....	2
B. Overview of the Tewksbury Housing Production Plan.....	4
C. How Do we Define Affordable Housing and Income Categories?	5
1. Defining Affordability through Housing Cost Burden	5
2. Defining Income Categories through Percentage of AMI	5
3. Defining Affordable Housing through the Subsidized Housing Inventory	5
4. Number of Bedrooms and Age Restrictions	6
D. Our Methodology, Data Sources, and Demographic Definitions.....	7
1. Data Sources	7
2. Methodology of Selecting Data Sources	8
3. Definitions of Demographic Terms	8
Comprehensive Needs Assessment.....	10
A. Demographic Analysis.....	11
1. Household and Population Growth	11
2. Household Size.....	13
3. Head of Household Age and Characteristics.....	14
4. Age Cohorts.....	17
5. People with Disabilities.....	20
6. Income Analysis	22
7. Race and Ethnicity.....	29
B. Housing Inventory Analysis.....	35
1. Housing Units and Type	35

2.	Housing Tenure	37
3.	Recent Residential Development.....	38
4.	Projected Housing Development	41
5.	Housing Market Conditions	42
6.	Affordable Housing Development	50
C.	Housing Cost Burden Analysis.....	58
1.	Housing Cost Burden by Tenure	58
2.	Housing Cost Burden by Household Income.....	60
3.	Housing Burden by Household Type.....	61
4.	Affordability Gap for Ownership Units	62
5.	Affordability Gap for Rental Units.....	63
D.	Housing Issues.....	65
1.	Fair Housing	65
2.	Tax Rate.....	67
3.	Other Housing Issues	68
E.	Affordable Housing Efforts.....	70
1.	Tewksbury Master Plan.....	70
2.	Implementation of the 2017-2021 Affordable Housing Production Plan.....	73
3.	Tewksbury Housing Authority.....	74
4.	Affordable Housing Trust Fund	75
5.	Community Preservation Committee	75
6.	Habitat for Humanity of Greater Lowell	76
7.	Tewksbury Home Build	76
8.	Tewksbury Local Housing Partnership	76
9.	Tewksbury Department of Community Development.....	76
F.	Development Constraints and Limitations	78
1.	Land Use Development Patterns and Potential.....	78
2.	Zoning.....	79
3.	Infrastructure and Service Limitations.....	84
G.	Comprehensive Needs Assessment Conclusions	89
	Housing Goals	95
A.	Tewksbury's Housing Vision.....	96

B. Affordable Housing Production Goal	96
C. Qualitative Goals.....	98
Implementation Strategies.....	102
A. Implementation Strategies	103
1. Affordable Housing Policy Strategies.....	103
2. Zoning Strategies.....	106
3. Transportation, Water, Sewer, and Open Space Strategies	110
4. Public Education, Communication, and Engagement Strategies.....	111
5. Other Strategies	115
B. Action Plan	117
C. Attributes of Proposed Residential or Mixed-Use Developments.....	122
1. Type.....	122
2. Location.....	123
3. Design.....	123
4. Re-use	124
5. Density and Scale	124
6. Affordability Performance Standards	124
D. Proposed Modifications to Zoning Districts to Create SHI Units	124
E. Land with Potential for Affordable Housing	126
1. Privately-Owned Land.....	126
2. Publicly Owned Land.....	127
F. Regional Collaborations	127
Maps	Appendix 1
Acronyms	Appendix 2
Subsidized Housing Inventory Report	Appendix 3

List of Tables

Table 1: Total Number of Households, Greater Lowell and Tewksbury (2000-2040)	12
Table 2: Average Household Size in Tewksbury and Greater Lowell (2000, 2010, and 2020)	13
Table 3: Household Size - Family and Nonfamily (2010, 2011-15, and 2016-20)	14
Table 4: Head of Household Age Distribution (2000, 2010, 2011-2015, and 2016-2020)	15
Table 5: Household Characteristics (2000, 2010, 2011-2015, and 2016-2020)	16
Table 6: Age Distribution of Tewksbury Residents (2010, 2011-2015, and 2016-2020)	18
Table 7: Projected Age Distribution of Tewksbury Residents (2020-2040)	19
Table 8: Projected Age Distribution of Tewksbury Residents Change Over Time (2020-2040)	20
Table 9: Characteristics of the Community with Disabilities in Tewksbury (2016-2020)	21
Table 10: Median Household Income (1999, 2011-2015, and 2016-2020)	22
Table 11: Household Income Distribution (1999, 2011-2015, and 2016-2020)	24
Table 12: Tenure by Income Category, Tewksbury Households, 2016-2020	25
Table 13: Adjusted Income Limits by Household Size, Lowell Metro FMR Area, FY 2022	26
Table 14: CHAS Income Distribution Overview, Tewksbury, 2015-2019	26
Table 15: 2022 Poverty Guidelines for the 48 Contiguous States and the District of Columbia	27
Table 16: Characteristics of the Population Living under Poverty (2016-2020)	28
Table 17: Racial and Ethnic Diversity of Residents, Tewksbury, 2000, 2010, and 2020	30
Table 18: Households by Race and Ethnicity and Income Category, Tewksbury, 2015-19	31
Table 19: Population by Poverty Status and Race and Ethnicity, Selected Geographies, 2016-2020	32
Table 20: Occupied Households by Tenure and Race and Ethnicity, Selected Geographies, 2016-20	33
Table 21: Number of Housing Units by Size of Structure, Tewksbury, 2000, 2011-15, and 2016-20	36
Table 22: Occupied Households by Tenure, Tewksbury, 2000, 2011-15, and 2016-20	37
Table 23: Occupied Households by Tenure, Selected Geographies, 2016-20	37
Table 24: New Residential Building Units Permitted (2012 - 2021)	39
Table 25: New Family Suites Permitted (2012-2021)	41
Table 26: Home Sales in Tewksbury and Greater Lowell (2011-2021)	43
Table 27: Median Home Sales Price in Tewksbury and Massachusetts (2012-2021)	44
Table 28: Comparison of Median Sales Prices in Tewksbury and the Greater Lowell region (2021)	45
Table 29: Home Value, Homeowner Occupied Units (2011-2015 and 2016-2020)	45
Table 30: Petitions to Foreclosure, Town of Tewksbury, 2012-2022	46
Table 31: Fair Market Rent for Lowell, MA HUD Metro FMR Area (FY 2022)	47
Table 32: Median Gross Rent in the Greater Lowell region (2011-2015 and 2016-2020)	47
Table 33: Gross Rent (2011-2015 and 2016-2020)	48
Table 34: Ownership Units by Vacancy Status, Tewksbury, 2012-16 through 2016-20	49
Table 35: Ownership Units by Vacancy Status, Selected Geographies, 2016-20	49
Table 36: Rental Units by Vacancy Status, Tewksbury, 2012-16 through 2016-20	50
Table 37: Rental Units by Vacancy Status, Selected Geographies 2016-20	50
Table 38: Changes in Tewksbury's Subsidized Housing Inventory (2011-2022)	51

Table 39: Subsidized Housing Inventories in the Greater Lowell region (January 2014-May 2022)	53
Table 40: Tewksbury Subsidized Housing Inventory (SHI) (August 11, 2023)	54
Table 41: Pipeline of Subsidized Housing Inventory Projects as of July 2022	56
Table 42: Housing Costs as a Percentage of Household Income (2011-2015 and 2016-2020)	59
Table 43: Tewksbury Cost-burdened Households by Categories of HAMFI, 2015-19	60
Table 44: Tewksbury Cost-burdened Households by Household Type, 2015-19	61
Table 45: Estimated Gap between Owner-Occupied Housing Supply and Demand	63
Table 46: Estimated Gap between Renter-Occupied Housing Supply and Demand	64
Table 47: Purpose of Loan, Mortgage Applicants in Tewksbury, 2021.....	67
Table 48: 2016 Tewksbury Master Plan Housing Recommendations.....	72
Table 49: 2017 HPP Goals and Progress Toward Goal	73
Table 50: Affordable Housing Trust Fund Expenditures (2018-2022)	75
Table 51: Community Preservation Committee Affordable Housing Appropriations (2018-2022)	76
Table 52: Tewksbury Land Use by Acreage, 2022.....	78
Table 53: Housing Types by Zoning Districts.....	80
Table 54: Allowed Residential Uses by Zoning District: 2022	82
Table 55: Public Water Delivered, Town of Tewksbury	86
Table 56: SHI-Eligible Housing Production Goal in Scenario A and Scenario B.....	98
Table 57: Action Plan	117
Table 58: Strategies that Include Zoning Changes.....	125
Table 59: Privately-Owned Land with Potential for Affordable Housing.....	127
Table 60: Publicly-Owned Land with Potential for Affordable Housing	127
Table 61: Strategies that Include Regional Collaborations	128

List of Figures

Figure 1: Total Number of Households, Greater Lowell and Tewksbury (2000-2040)	12
Figure 2: Head of Household Age Distribution, All Households (2000, 2010, 2011-2015, 2016-2020)	15
Figure 3: Household Characteristics, 2000-2020	16
Figure 4: Age Distribution of Tewksbury Residents (2010 and 2016-2020)	18
Figure 5: 2016-2020 ACS and 2040 Projected Age Distribution of Tewksbury Residents	19
Figure 6: Median Household Income (1999, 2011-2015 and 2016-2020)	23
Figure 7: Household Income Distribution (1999 and 2016-2020)	24
Figure 8: CHAS Income Distribution, 2015-2019, Town of Tewksbury	26
Figure 9: Age of Tewksbury Population Living under Poverty: 2016-2000	28
Figure 10: Households by Race and Ethnicity and Income Category, Tewksbury, 2015-19	31
Figure 11: Percent Renter-Occupied Households by Race and Ethnicity, Selected Geographies, 2016-20	33
Figure 12: Number of Housing Units by Type of Structure (2000, 2011-2015, and 2016-2020)	36
Figure 13: Occupied Households by Tenure, Selected Geographies, 2016-2020	37
Figure 14: Total Units Permitted (Not all Permitted Units are Constructed)	38
Figure 15: Residential Building Units Permitted by Type of Structure (2012-2021)	40
Figure 16: Home Sales in Tewksbury (2012-2021)	43
Figure 17: Median Home Sales Prices in Tewksbury and Massachusetts (2012-2021)	44
Figure 18: Home Value, Homeowner Occupied Units (2011-2015 and 2016-2020)	46
Figure 19: Gross Rent (2011-2015 and 2016-2020)	48
Figure 20: Tewksbury's SHI Compared to 10% Goal based on 2010 and 2020 Census	52
Figure 21: Housing Costs as Percentage of Households Income (2011-2015 and 2016-2020)	59
Figure 22: Tewksbury Cost-burdened Households by Categories of HAMFI, 2015-19	60
Figure 23: Tewksbury Cost-burdened Households by Household Type, 2015-19	62
Figure 24: Mortgage Applications for Purchase of Home in Tewksbury by Race and Ethnicity, 2021	66
Figure 25: Proportion of Applicants who had a Mortgage Application Withdrawn or Denied by Race and Ethnicity, Tewksbury, 2021	66
Figure 26: Tewksbury Land Use, 2022	78

Executive Summary

The Town of Tewksbury requested the assistance of the Northern Middlesex Council of Governments (NMCOG) in developing a Housing Production Plan (HPP) that meets the requirements of **760 CMR 56.03, Methods to Measure Progress Toward Local Affordable Housing Goals**, part of the Executive Office of Housing and Livable Communities (EOHLC) regulations implementing the Massachusetts General Law (M.G.L.) Chapter 40B, sections 20 through 23, also known as the *Comprehensive Permit Statute*. Through funding provided by the EOHLC under the District Local Technical Assistance (DLTA) program, NMCOG staff worked closely with Town staff, the Planning Board, the Select Board, and the public during 2022 and 2023 to complete this plan.

In meeting the Chapter 40B statute and regulation for affordable housing production, EOHLC requires that each municipality develop a five-year plan consisting of a Comprehensive Housing Needs Assessment, Affordable Housing Goals, and Implementation Strategies. This HPP must have a goal of maintaining 10% of the Town's total year-round housing units on its Subsidized Housing Inventory (SHI). As of 2020, the Town had 12,098 year-round housing units, meaning it has a goal of 1,210 SHI units at the time of writing.

The Town's latest (August 2023) Subsidized Housing Inventory (SHI) count was 1,088 units, or 8.99% of the 2020 year-round housing units. Because Tewksbury has not exceeded the 10% statutory minima, the state's Housing Appeals Committee (HAC) is not required to uphold decisions by the Zoning Board of Appeals on Comprehensive Permit projects as "consistent with local needs." That said, even above the statutory minima, the Town may continue to add affordable housing by the Local Incentive Program (LIP), by approving Comprehensive Permit projects, or through other means. Critically, the Town is striving to ensure to fill gaps between the affordable housing supply and housing demand that still exists, providing accessible and affordable housing to community members with a range of incomes, household characteristics, and demographic qualities.

The *Tewksbury Housing Production Plan for 2023-2027* outlines a housing production schedule that addresses the community's local housing needs, while also meeting the state's requirements as outlined under Chapter 40B and 760 CMR 56.03. With the adoption by the Tewksbury Planning Board and Select Board, this document is being submitted to EOHLC for their final approval.

A. How was the Tewksbury Community Involved in the Plan's Creation?

This is a plan driven by community input. The planning process started in mid-2022 with a literature review of other plans that included public input, such as the *Tewksbury Master Plan*, in addition to the creation of a draft Comprehensive Needs Assessment through collection and analysis of demographic and housing data. Initial findings were presented to the Tewksbury Select Board on August 4, 2022 as a kick-off to the public process.

NMCOG and Tewksbury Staff then organized an Affordable Housing Workshop on November 9, 2022. The Town advertised the workshop through its social media accounts, on the Town website, through press releases that were picked up by several local publications, and through a flyer posted at the Library. NMCOG staff shared key findings from the Community Needs Assessment and fielded questions about the data from attendees both verbally and through written notecards. Participants asked a

number of questions about the data and MGL Chapter 40B regulations (the guiding law for housing production planning in Massachusetts). Participants also expressed interest in understanding the needs of particular populations, expressed both quantitatively (such as the number of homes and level of affordability) and qualitatively (such as characteristics of homes). Populations that were mentioned by participants included a range of household and family types and incomes. Participants also discussed a desire to know the needs of people who can't currently afford to live in Tewksbury, but may wish to because of family connections or other reasons.

After the Q&A, NMCOG and Town staff facilitated a discussion around key questions:

- Is anything missing from the data we presented?
- What other housing issues and problems in Tewksbury do you know about?
- Who is missing tonight?
- What housing options are missing and what goals should be prioritized?
- What is your vision for housing, in a sentence?

In addition to the Workshop, the community was engaged through a Tewksbury Housing Survey. This survey was open from December 1, 2022 to January 9, 2023 and received 115 responses. The survey was advertised via the Town social media, Planning Board meetings, and via a press released picked up by the Tewksbury Patch, Tewksbury Carnation, and Town Crier. It was also advertised on flyers with displayed at several locations such as the Town Library. Paper surveys could be requested at Town Hall.

The results of this survey were shared at a second Housing Workshop on March 16, 2023. This workshop was advertised through similar methods to the first workshop and took place online via Microsoft Teams software. After initial public outreach results were shared, NMCOG and Town Staff facilitated two breakout groups to discuss potential goals in depth.

The results of all three outreach opportunities have been integrated into the plan.

B. Housing Demand and Housing Supply: Comprehensive Needs Assessment

The Comprehensive Housing Needs Assessment is meant to analyze existing and projected housing demand against existing and projected housing supply, including the resources available to the town and the constraints facing the town. It guided the creation of the rest of the plan. Eight major findings came from the Comprehensive Housing Needs Assessment, summarized below:

There are a significant number of residents who make very low incomes and extremely low incomes, and their housing needs aren't being met.

Tewksbury defied projections and grew 8.2% between 2010 and 2020. At roughly the same time, the income distribution was increasingly concentrated among those earning more than \$100,000. That said, as of 2014-2018, there were 1,315 Extremely Low Income (30% or less AMI) and 870 Very Low Income households (making between 30% and 50% AMI, see Table 14). At the most extreme end of the income spectrum, many families fall under the poverty threshold. There is not enough housing in Tewksbury

that is affordable to this population. In 2014-18, 70% of Extremely Low Income households in Tewksbury were severely cost burdened, paying more than 50% of their income on housing costs. 41% of Very Low Income were severely cost burdened (see **Table 43**).

Homeownership is increasingly out of reach for the median income earner.

Even looking beyond the lowest income levels, the number of households that have housing costs that are cost burdened is a problem in Tewksbury. In 2016-20, an estimated 2,870 households (28.3% of total owner-occupied households) in Tewksbury, were considered at least “moderately burdened”, paying more than 30% of their income on their housing costs (see **Table 42**). This situation is anticipated to worsen as houses turn over: with a 2021 median single-family sales price of \$560,000, a household would need to earn at least \$142,000 a year to not be considered “burdened” (see **3.C.4 Affordability Gap for Ownership Units**). Although not many households in the Moderate Income (between 80% and 100% AMI) category are severely cost burdened, 41% are moderately cost burdened. This may indicate a need to bring down market rate housing costs or additional affordable housing targeted at that income category.

Renters fare significantly worse than owners on access to and cost of housing.

According to the 2011-2015 ACS, the percentage of “moderately burdened” rental households was 41.1% or 653 rental households. By the 2016-20 ACS, this number had increased to 770 households, or 43.3% of total renter households. Worse yet, the 2016-20 ACS estimated that 410 households, or 23.1% of rental households, were “severely burdened” (see **Table 42**). Tewksbury’s current median gross rent is \$1,938, second-highest in the region. This is more than HUD’s Fair Market Rent for a 2-Bedroom in the Greater Lowell region (\$1,773, see **Table 31** and **Table 32**), and unaffordable for at least 57.2% of the rental households living in town (**3.C.4 Affordability Gap for Ownership Units**). Even though Tewksbury has made great strides in providing rental housing, it still lags behind its peer Greater Lowell suburbs (see **Table 23**). In fact, the ACS has estimated that Tewksbury has had a rental vacancy rate of 0.0% (See **Table 37**). In other words, units are rented the moment they come on the market. This may be a large factor in the affordability gap for rental units.

Higher income levels often pay less than 20% of their income on housing and occupy housing that might be affordable to those who earn less.

A possibly counter-intuitive finding of the Comprehensive Needs Analysis is that 42.3% of owners and 25.5% of renters pay less than 20% of their income on housing (see **Table 42**). This lines up with the findings that there are more people who could afford homes on the high end of the cost spectrum (more than \$500,000 for sale or \$2,500 or more per month) than the supply in those categories (see **Table 45** and **Table 46**). Although this does not mean homes are too inexpensive in Tewksbury, it does indicate that homes that might be affordable to some groups are being occupied by higher-income households. This is often the result of situations in which the prices of homes were “bid up” by higher-income households until they were just out of reach of lower income households.

Tewksbury has a growing population that will need accessible housing, especially seniors in non-family households.

As the demographic analysis section of this plan illustrates, the Town has experienced population growth among its aging and special needs populations. Between 2010 and 2016-20, the number of residents between 60 and 74 years of age increased by 49% and the population of residents 75 and older increased by 16%. Residents 70 and older are projected to further increase by 101%, more than doubling between 2020 and 2040. Residents aged 60+ are anticipated to comprise 37.4% of the total Tewksbury population in 2040 (see Table 6 and Table 8). This population will require special resources and housing from the community. Despite elders being a growing proportion of Tewksbury, seniors—especially seniors who live in non-family households which may include living alone—are disproportionately cost burdened. As of 2014-18, an estimated 60% of this type of household, or 1,005 households, were at least moderately burdened. They are also the most often type of household severely burdened, at 520 households or 31% of elderly non-family households (see **Table 44**).

Tewksbury has a growing need for smaller units suitable for individuals or small but growing families.

According to the U.S. Decennial Census and the 2016-20 ACS, the average household size in Tewksbury has been shrinking since 2000. In 2000, the average household size in Tewksbury was 2.81 persons (3.24 for average Tewksbury family). In 2010, it was 2.7 persons (3.18 for average Tewksbury family). In 2016-20, it had declined to 2.56 persons. Potentially responding to this shift, during the period from 2000 to 2020, Tewksbury diversified the types of housing units that are available. There should be a continued emphasis on housing for single people living alone and small families (1- and 2-bedroom units) to address the needs of these households and to ensure that everyone who wants to live in Tewksbury can find housing that meets their specific needs in terms of unit size and price. That said, Tewksbury should not limit larger units, as there is evidence that the school-age population will reverse its previous decline as these young Tewksbury families establish themselves and grow.

There are racial disparities in income in both Tewksbury and the Greater Lowell region and less racial and ethnic diversity in Tewksbury than other Lowell suburbs.

Of 11,022 households identified as White alone, not Hispanic or Latino/Latina, income was roughly distributed evenly: 11.2% earned less than \$25,000 and 11.6% earned \$200,000 or more. This was not the case for Black or African American alone, Asian alone, or some other race or two or more races, of which, 22.0%, 57.6%, and 53.5% earned less than \$25,000 respectively (see **Table 18**). This mirrors regional and national trends. The poverty rate among these groups was similarly higher than White alone, not Hispanic or Latino/Latina. Perhaps unsurprisingly, these groups were also more likely than White alone, not Hispanic or Latino/Latina to rent their home (see **Table 20**). Perhaps because Tewksbury has a lower number of rental homes proportionately than other communities in the region, as of the 2020 U.S. Decennial Census, it had the third-lowest proportion of people who identify as a race other than White alone: 3.6% compared to 5.1% average for communities in the region besides Lowell.

New and existing housing should provide a high quality of life, and there are conflicting visions on how to maintain this quality of life.

A recurring theme heard during public outreach was the importance of quality of life; complete neighborhoods; and equitable, multimodal access to jobs, amenities, and greenspace, which should include transit whenever possible. This suggests a need to prioritize transportation improvements that support and improve multimodal access, including busses and active transportation, to areas with housing development and encourage developers to promote multimodal transportation with amenities such as bicycle parking, bus stops, carpooling boards, or other demand management strategies. Quality of life considerations may also include ensuring units are well-maintained, making sure there is adequate public park and greenspace that is accessible, and maintaining vibrant commercial zones that also have good multimodal access. This may require building consensus among citizens, developers, and town officials on achieving these complimentary goals.

Infrastructure capacity varies across the town.

Although water, wastewater, and transportation capacity overall does not currently seem to limit the production of affordable housing in Tewksbury, the capacity is not evenly distributed across the town. In some areas, sewer pump stations or water mains are at capacity. In addition, there is traffic congestion at key intersections along Main Street. With that in mind, the Town may consider different approaches to mitigate these capacity issues to ensure their housing goals may be met. That may include the promotion of water conservation efforts, green infrastructure that focuses on the absorption of stormwater on-site even with limited open space, the targeting of development where there is existing capacity, or making targeted capacity upgrades that would allow the town to meet its housing goals. It also suggests promoting development patterns that most efficiently and fully make use of existing or planned infrastructure.

C. What Tewksbury Wants to Achieve: Affordable Housing Goals

Based on the above findings and public outreach, NMCOG and Town staff developed an Affordable Housing Vision and a set of 15 goals. The vision is as follows:

Tewksbury is a community that supports a full life cycle: children can choose to start their own households in Tewksbury and older adults can age in Tewksbury. Its housing will be inclusive, with options for all, regardless of race, age, origin, disability status, or income. The community will have a mix of housing types focused on providing high quality of life that is affordable to residents, including but not limited to underrepresented housing types: small single-family structures on small lots, duplexes, triplexes, and adaptively reused structures. Tewksbury neighborhoods will have multimodal connections, with good access to jobs and services including active transportation options and transit whenever possible.

The goals are as follows:

- Goal 1:** Produce an average of at least 25 SHI units each year.
- Goal 2:** Continue increasing the number of safe, comfortable, affordable units through new construction, conversion, or adaptive reuse, especially those that are targeted to incomes at 60% AMI or lower.
- Goal 3:** Monitor existing income-restricted units, maintain these units as affordable, and ensure that these units are meeting all the requirements of their deed restrictions.
- Goal 4:** Create more diverse types and sizes of ownership units, including types such as smaller single-family detached, duplexes, and townhouses at affordable prices that could serve as “starter homes”
- Goal 5:** Develop ladders to home ownership in Tewksbury both for Tewksbury residents and those who may wish to settle in Tewksbury.
- Goal 6:** Increase suitable rental housing options for extremely low- to middle-income households through new construction of or conversion of existing units to affordably-priced market-rate rental units and subsidized, income-restricted rental units.
- Goal 7:** Increase the proportion of fully-accessible units that meet the needs of people with mobility or other impairments through new construction or conversion.
- Goal 8:** Provide equitable access to affordable homeownership and rental homes suitable for a variety of household types, including single bedroom apartments and smaller homes with multiple bedrooms suitable for families with children.
- Goal 9:** Actively address racial and other disparities by including people of diverse races, ethnicities, ages, and backgrounds in housing decision-making processes.
- Goal 10:** Monitor for discrimination in mortgages or leases and ensure Tewksbury housing is welcoming and accessible to all.
- Goal 11:** Build awareness of Tewksbury’s role in breaking down housing inequities in the region and the state.
- Goal 12:** In new development or redevelopment, build complete neighborhoods with a variety of housing types which may include multifamily, townhouses, duplexes, and smaller single-family detached homes and equitable, safe, multimodal access to green spaces, jobs, services, and amenities.
- Goal 13:** Build awareness about affordable housing needs and create opportunities to build consensus on how to meet those needs.
- Goal 14:** Increase infrastructure capacity in areas targeted for development or redevelopment.
- Goal 15:** Encourage development patterns that make wise use of existing resources while increasing the amount of affordable and market-rate housing, and promote water and energy conservation and other sustainable practices for existing and new development.

Each of the above goals have tracking indicators described in Chapter 4: Housing Goals.

D. How Tewksbury Plans to Meet its Goals: Implementation Strategies

The final chapter of the plan details the following:

- A. **Implementation Strategies**, which are specific actions the town or other agencies will undertake to meet the goals articulated in the previous section;
- B. **Attributes of Proposed Residential or Mixed-Use Developments**, which is a list of attributes such as performance standards and location to guide siting and features of housing development;
- C. **Proposed Modifications to Zoning Districts**, which is a list of Implementation Strategies that modify zoning;
- D. **Land with Potential for Affordable Housing**, which are lists of specific parcels chosen based on the attributes described in Subsection B that the town will encourage Comprehensive Permit (40B) developments or will pursue issuing Requests for Proposals (RFPs); and
- E. **Regional Collaborations**, which is a list of Implementation Strategies that will require or would benefit from regional collaborations.

These include 41 specific, actionable strategies the Town or its partners may undertake over the next five years organized into an action plan. High priority actions include the following:

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
1.1	Encourage Comprehensive Permit (40B) Developments that meet the attributes described in Section 5.C.	1, 2, 4, 6, 7, 8, 12, 15	Planning Dept, ZBA	High	Ongoing Starting Now
1.2	Work with regional nonprofit organizations to identify sites and barriers for homes that are affordable to 60% AMI or less.	1, 2	Planning Dept., Nonprofits	High	2024
1.3	Update the Zoning Board of Appeals (ZBA) Regulations to align with EOHLC guidelines and reference the current Housing Production Plan (HPP) for desired attributes of affordable housing.	2, 4, 7, 8, 12	ZBA, Planning Dept.	High	2024
1.8	Maintain SHI by continuing to monitor expiring units, pursuing right of first refusal opportunities, and maintaining funding to act on opportunities to extend deed restriction terms.	3	Planning Dept.	High	Ongoing
2.1	Develop an inclusive outreach process with assistance from Citizens' Housing and Planning Association (CHAPA) for evaluating and developing zoning complaint with M.G.L. c. 40A § 3A, the Multi-Family Zoning Requirement for	4, 6, 8, 13	Planning Dept, Planning Board, Select Board	High	2023-24

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
	MBTA Communities, then update zoning accordingly.				
2.2	Strengthen the Family Suite bylaw through as-of-right Accessory Dwelling Units (ADUs) and expanding and removing barriers to ADU development.	4, 6, 8	Planning Dept.	High	2024-25
2.5	Evaluate the possibility of creating subdistricts near multifamily zoning or new MBTA zoning that allow smaller multifamily developments, duplexes, or smaller lot minimums to encourage creation of "missing middle" housing within walking/cycling distance of major transit stops, services, or schools.	4, 8, 12, 15	Planning Dept.	High	2023-24
2.7	Evaluate opportunities for adaptive reuse to residential, identify possible barriers to conversion, and propose amendments to zoning or other Town policy.	1, 2, 4, 6, 7, 8, 12, 15	Planning Dept.	High	Ongoing
3.1	Identify areas in which Sewer Pump Stations are at or near capacity and determine whether additional growth is possible or desired in areas those stations serve. Target funding to improve desired-growth areas and explore limitations or conservation efforts in areas in which growth is not desired.	14	DPW, Planning Dept.	High	Ongoing
3.3	Identify and dedicate conservation land, including an evaluation of ecological value, value to quality of life for residents, and recreational open space value, especially near neighborhoods that have limited opportunity for on-site open space.	12	Planning Dept., Conservation Commission	High	Ongoing
4.1	Incorporate community engagement into discussions about and decision-making for affordable housing.	9, 11, 13	Planning Dept.	High	Ongoing
4.6	Engage regional and state organizations to identify opportunities for Tewksbury to host or publicize educational opportunities for the public, including discussions on housing affordability and on programs to help individuals and families who are suffering from housing insecurity, which may include online or public access television channels.	11, 13	Planning Dept., NMCOC	High	Ongoing

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
4.7	Identify state and regional training and educational opportunities on affordable housing and make these available for Town Board and Committee members and staff.	11, 13	Select Board, Planning Board, ZBA	High	Ongoing
5.2	Research additional alternative funding sources to subsidize new affordable housing units and to continue funding the Affordable Housing Trust Fund.	1, 2	Planning Dept.	High	Ongoing

A full listing of all strategies, including the desired attributes of proposed residential and mixed-use developments and land with potential for affordable housing, is in the final chapter of this plan.

CHAPTER 1

Introduction

A. Why Plan for Housing?

The development of housing that is accessible and affordable to community members with a range of incomes, household characteristics, and demographic qualities is critical to successful and sustainable community planning. Accordingly, the Town of Tewksbury aspires to continue its strong record of proactively planning for housing options. The *Tewksbury Housing Production Plan for 2023-2027* aims to advance that goal, complimenting and building upon the *Tewksbury Master Plan 2016*. It serves as a framework for considering Comprehensive Permit projects, zoning changes, Affordable Housing Trust Fund (AHTF) expenditures, Community Preservation Act (CPA) fund expenditures, and other actions the Town and its partners can undertake to increase the supply of affordable housing.

The format of a Housing Production Plan (HPP) is rooted in the Massachusetts Regional Planning Law (Chapter 774 of the Acts of 1969, also known as Chapter 40B of the Massachusetts General Laws), enacted in 1969. This law is designed to “increase the supply and improve the regional distribution of low- or moderate-income housing by allowing a limited override of local requirements and regulations which are inconsistent with local and regional affordable housing needs”.¹ The law allows a Zoning Board of Appeals to grant a “**Comprehensive Permit**” which integrates all local approvals into a single permit, typically permitting additional density than the zoning would normally allow. In some cases, the state has the power to override a local decision on a Comprehensive Permit project.

While many residents understand the critical need for more affordable housing options in Tewksbury and across the region, housing developments proposed via the Comprehensive Permitting process are sometimes controversial. Consequently, this HPP seeks to build consensus and create an agreed-upon strategy adopted by the local Planning Board and Select Board for promoting affordable and accessible housing in areas and forms that will enhance the community.

The HPP also serves an important regulatory function: the development and approval of a local HPP is an integral component of achieving “**safe harbor**” status. Safe harbor refers to conditions under which a Zoning Board of Appeals (ZBA) has greater power in controlling future Comprehensive Permit projects because a decision by the ZBA to deny an application will be considered “consistent with local need,” and upheld by EOHLC’s Housing Appeals Committee (HAC). Safe Harbor status includes both *statutory minima* and *regulatory safe harbors*.

HOW DOES EOHLC DEFINE AN HPP?

The Massachusetts Executive Office of Housing and Livable Communities (EOHLC) defines an HPP as “a proactive strategy for planning and developing affordable housing”. According to EOHLC, “the community should: (1) develop a strategy which will be used to meet its affordable housing needs in a manner consistent with the Chapter 40B statute and implementation requirements; and (2) produce housing units in accordance with its HPP.” Once approved by EOHLC, an HPP is valid for five years.

¹ Department of Housing and Community Development (DHCD) (Now Executive Office of Housing and Livable Communities (EOHLC)), 2016

Statutory Minima

Safe Harbor status includes three statutory minima:

- **Housing Unit Minimum:** more than 10% of a community's total housing units are on the Subsidized Housing Inventory (SHI)
- **General Land Area Minimum:** Sites of SHI-eligible units (pro-rated for partial sites) comprise more than 1.5% of the total land area zoned for residential or commercial or industrial use
- **Annual Land Area Minimum:** Project would result in Low- or Moderate-Income Housing on sites comprising more than 0.3% of the town's land area or ten acres, whichever is larger, being constructed in one calendar year

There are rare instances of the land area minimum thresholds being met. Seventy-six cities and towns have met the housing unit minimum, including Tewksbury, and 14 municipalities have certified Housing Production Plans (as explained in the next section). The Town of Tewksbury's goal of 10% of the 12,098 year-round housing units recorded in the 2020 U.S. Decennial Census is 1,210 affordable units.

The Town's latest (August 2023) SHI count was 1,088 affordable units, or 8.99% of the 2020 year-round housing units. Because Dunstable has not exceeded the 10% statutory minima, the state's Housing Appeals Committee may overturn decisions by the Zoning Board of Appeals on Comprehensive Permit projects. Every ten years, this goal will be revised upward as the town adds more market rate year-round housing units. That said, even though Tewksbury is above the statutory minima, the town may continue to add affordable housing by the Local Incentive Program (LIP), by approving Comprehensive Permit projects, or through other means.

Regulatory Safe Harbors

Tewksbury may also achieve Safe Harbor through having a "**Certified HPP.**" Communities may apply to have their HPP certified by EOHLIC. A community will be certified in compliance with an approved HPP if, during a single calendar year, it has increased its number of low- and moderate-income year-round housing units by a certain amount. Certification lasts for one year if the community has increased its SHI units by 0.5% of year-round housing units and two years if it has increased its number of SHI units by 1.0%. The 0.5% goal for Tewksbury is anticipated to be 61 units in a single calendar year, and the 1.0% goal is anticipated to be 121 units in a single calendar year. These goals are integrated into this HPP.

If Tewksbury has achieved a safe harbor provision within 15 days of the opening of the local hearing for a Comprehensive Permit, the ZBA must provide written notice and supporting materials to the Applicant (with a copy to EOHLIC) that it believes it can deny the comprehensive permit because Tewksbury has met a statutory minimum or qualifies under another safe harbor provision. If the Applicant wishes to challenge the ZBA's assertion, it must do so by providing written notice and supportive documentation to EOHLIC (with a copy to the ZBA). EOHLIC shall thereupon review the materials provided by both parties and issue a decision which may be appealed by either party to the HAC. These steps all have strict

TEWKSBURY'S SUBSIDIZED HOUSING

**2020 Year-round
Housing Units: 12,098**

SHI Goal:
1,210 Units

Current Number:
1,088 SHI Units
8.99% of total 2020
units

deadlines and the ZBA should make sure to fully understand Chapter 40B and the EOHLC 40B Guidelines. Massachusetts Housing Partnership (MHP) developed a guidebook for this purpose in 2017.²

B. Overview of the Tewksbury Housing Production Plan

To qualify for approval from EOHLC, an HPP must contain three main components: 1) a Comprehensive Housing Needs Assessment; 2) Affordable Housing Goals; and 3) Implementation Strategies.

1.

The purpose of the **Comprehensive Housing Needs Assessment** is to determine the community context, which relies on demographic, economic, and community development (affordable housing entities, zoning, and infrastructure) data to assess the extent to which the existing housing stock meets the housing needs of a community and the capacity of the community's infrastructure to serve the housing need.

2.

The **Affordable Housing Goals** section identifies the community's broad objectives for housing, paying special attention to local and regional needs. This section also sets the minimum affordable housing production goal, as determined by the total number of year-round housing units in the most recent Decennial Census. According to the recent revisions to the Chapter 40B requirements, the minimum annual affordable housing production goal is greater than or equal to 0.5% of the year-round housing stock.³

3.

Finally, the **Implementation Strategies** section of the plan builds upon the Affordable Housing Goals section by identifying the desired characteristics of affordable housing, specific sites for the development of affordable housing, municipally owned land which the community has targeted for mixed-income housing, potential zoning changes to support housing production, and regional housing development collaborations.

² Chapter 40B Handbook for Zoning Boards of Appeals, Massachusetts Housing Partnership, March 2017

³ DHCD Guidelines for MGL 40B Comprehensive Permit Projects, Subsidized Housing Inventory, DHCD (now EOHLC), updated December 2014, and based upon Regulatory Authority 760 CMR 56.00.

C. How Do we Define Affordable Housing and Income Categories?

There are several definitions of affordable housing in the United States depending on whether one uses Federal or State criteria.

1. Defining Affordability through Housing Cost Burden

The United States Department of Housing and Urban Development (HUD) considers housing “affordable” if housing costs do not exceed 30% of a household’s annual income.⁴ When a household pays more than 30% of its income on housing-related costs, HUD considers it “**moderately burdened**” by housing; households spending 50% or more of their income on housing are considered “**severely burdened**”.

2. Defining Income Categories through Percentage of AMI

An important measure in affordable housing is **Area Median Income (AMI)**. AMI calculations are the most common way of prioritizing households for affordable housing opportunities. HUD has a formula for determining income thresholds based on a special measure of AMI it takes called the HUD Area Median Family Income (HAMFI). This HPP will use the terms HAMFI and AMI interchangeably unless otherwise noted. HUD uses these thresholds for Section 8 and other programs, and EOHLC has adopted these thresholds for many of its programs. According to HUD:

- “**Extremely low income**” households earn 30% or less AMI;⁵
- “**Very low income**” households earn between 31% and 50% AMI;
- “**Low income**” households earn between 51% and 80% AMI; and
- “**Moderate income**” households earn between 81% and 100% AMI.

3. Defining Affordable Housing through the Subsidized Housing Inventory

In assessing a community’s progress toward the Commonwealth’s 10% affordability goal, EOHLC counts a housing unit as affordable if it is subsidized by state or federal programs that support low- and moderate- income households at or below 80% AMI. Under Chapter 40B, subsidized unit(s) are considered “affordable” and eligible for the SHI if they meet the following criteria:

1. The unit is administered by an approved housing program listed in the *Department of Housing and Community Development (DHCD) [now EOHLC] M.G.L. Chapter 40B Guidelines*⁶ or receive Local Initiative Program “LIP” approval;
2. The unit is restricted to households with income not exceeding 80% of the AMI and subject to certain asset limitations;

⁴ Rental units housing costs are gross rent plus associated utilities. Owner-occupied housing costs are cost of mortgage, property taxes, and insurance. Source: US Department of Housing and Urban Development.

⁵ Defined as the greater of 30/50ths (60%) of the Section 8 very low-income limit (in other words, 30% AMI) or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the 50% very low-income limit. (FY 2014 Consolidated Appropriations Act).

⁶ DHCD became EOLHC in 2023. This report will use whichever name is printed on the cover page of any publication for clarity.

HOW DOES THIS HPP DEFINE AFFORDABLE UNITS?

For the purposes of this HPP, “**affordable units**” or “**affordable housing**” will refer to any units that are income-restricted and restricted to cost not more than 30% of the residents’ income. “**SHI units**” will refer to units that meet all the requirements to be listed on the SHI.

3. The unit cost, inclusive of utilities, must not exceed 30% of monthly income for households not exceeding 80% AMI adjusted for household size for rental units, and housing costs inclusive of principal, interest, property taxes, and other selected costs must not exceed 38% of monthly income for homeownership units (subject to other restrictions);
4. The unit includes a use restriction that runs with the land for 15-30 years minimum and has several minimum standards; and
5. The unit meets fair housing laws and EOHLC requirements through an approved Affirmative Fair Housing Marketing Plan.

In addition, in a rental development, if at least 25% of units are to be occupied by Income Eligible Households earning 80% AMI or less, or alternatively, if at least 20% of units are to be occupied by households earning 50% AMI or less, then all of the units in the rental development are eligible for the SHI. This provision is intended to promote rental units, which are under-provided in many towns.⁷

4. Number of Bedrooms and Age Restrictions

The state’s subsidizing agencies have entered into an Interagency Agreement that provides more guidance to localities concerning housing opportunities for families with children. The agreement requires that at least 10% of the units in affordable production developments that are funded, assisted, or approved by a state housing agency have three or more bedrooms, with some exceptions (e.g., age-restricted housing, assisted living, supportive housing for individuals, single room occupancy (SRO), etc.).

Furthermore, EOHLC will not add any units that do not allow persons 18 years of age or younger to the SHI. DHCD (now EOHLC) has stated, “It has long been DHCD [now EOLHC]’s policy and practice not to approve affordable units under the Local Initiative Program (“LIP”), including Local Action Units (“LAUs”), in age-restricted housing for persons 55 years of age or older (“55+ housing”) if selection or occupancy policies, special permits or other zoning approvals, or underlying zoning would exclude persons 18 years of age or younger from occupying those affordable units.”⁸

According to the Comprehensive Permit Guidelines, “At the discretion of DHCD [now EOLHC], such approval may be withheld (i) if other age-restricted housing units in the community, which have been issued a Determination of Project Eligibility or which have been otherwise approved by the community remain unbuilt or unsold, or (ii) if the proposed age-restricted units, in context with the municipality’s other recent housing efforts, are unresponsive to needs for family housing.”⁹

⁷ DHCD Guidelines for MGL 40B Comprehensive Permit Projects, Subsidized Housing Inventory, DHCD (now EOLHC), updated December 2014, and based upon Regulatory Authority 760 CMR 56.00.

⁸ Local Initiative Program Policy Regarding Restrictions on Children in Age-Restricted 55+ Housing, DHCD memo, 2018.

⁹ DHCD Guidelines for MGL 40B Comprehensive Permit Projects, Subsidized Housing Inventory, DHCD (now EOLHC), updated December 2014, and based upon Regulatory Authority 760 CMR 56.00.

D. Our Methodology, Data Sources, and Demographic Definitions.

1. Data Sources

The *Tewksbury Housing Production Plan for 2023-2027* relies on a variety of data sources, such as:

- the U.S. Census Bureau,
- the U.S. Department of Housing and Urban Development (HUD),
- the U.S. Department of Health and Human Services (HHS),
- the Massachusetts Department of Transportation (MassDOT),
- the Executive Office of Housing and Livable Communities (EOHLC), and
- the Northern Middlesex Council of Governments (NMCOG).

The two main surveys referenced are the **U.S. Decennial Census** and the **American Community Survey (ACS)** from the U.S. Census Bureau. It is important to note that differences in sampling methodology, terminology, and timeframe can make it difficult to compare one source to another. For instance, one key difference between the U.S. Decennial Census and the ACS is that the Decennial Census surveys every individual in a community, whereas the ACS samples a subset of the community. This is because the Decennial Census strives to provide precise counts of people for the purpose of Congressional apportionment, whereas the ACS is designed to estimate social and economic characteristics.

These differences in sampling methodology mean that some values, such as the number of households in a community, are reported differently in the ACS versus the Decennial Census. More accurate household numbers are available through the Decennial Census, because it samples everyone in a community. However, ACS numbers still have value because the survey asks a wider variety of questions. Information on household income, for instance, is only available in the ACS, and was not included as part of the 2010 or 2020 Decennial Census.

Another key difference between the Decennial Census and the ACS is that the Decennial Census collects data once every ten years, whereas ACS data are collected continuously. Typically, data from the Decennial Census are collected between March and August in a single year, whereas data from the ACS are collected each month and reflect conditions throughout the year. This report uses “five-year” ACS

WHAT IS GREATER LOWELL?

It is important to compare Tewksbury to and analyze the larger region, but different agencies define the “Greater Lowell” region differently, and therefore Greater Lowell statistics will differ depending on the agency producing those statistics.

For the purposes of this HPP, “**Greater Lowell**” will refer to the 9-community region of the Towns of Billerica, Chelmsford, Dracut, Dunstable, Pepperell, Tewksbury, Tyngsborough, Westford, and the City of Lowell. The “**Lowell Metro FMR Area**” is a region delineated by the U.S. Department of Housing and Urban Development (HUD) and includes Greater Lowell as defined above plus the Town of Groton.

data, which are essentially averages of conditions over five years. Although this doesn't provide as precise a snapshot as "one-year" data, it has lower margins of error because the sample size is larger.

Furthermore, there are differences in questions and terminology across Decennial Censuses and ACS Questionnaires. For example, the Census Bureau introduced a new set of disability questions in the 2008 ACS Questionnaire, which makes comparisons of disability data from 2008 or later with prior years difficult. Within the HPP, there will be an attempt to minimize any confusion about these data sources and to note where two different data sources are being used.

2. Methodology of Selecting Data Sources

In general, the *Tewksbury Housing Production Plan for 2023-2027* uses Decennial Census data whenever possible. However, at the time of drafting this plan, only the redistricting dataset from the 2020 Decennial Census was available, which includes total population, household occupancy status, race, ethnicity, and group quarters population by census tract. In cases in which relevant data was not included in the redistricting dataset from the 2020 Decennial Census, 2016-20 data is used instead.

The HPP utilizes population and household projections prepared by the Massachusetts Department of Transportation (MassDOT) and the UMass Donahue Institute with input from NMCOG. MassDOT developed these population and household projections for the Greater Lowell region (see sidebar above for definition) for 2020, 2030, and 2040. These projections are based upon a statewide model that assigns a specific share of population to each Metropolitan Planning Organization (MPO) region and then to the individual communities. NMCOG staff provided comments on the draft projections and the final projections were adjusted in response to those comments. This report utilizes projections made before the 2020 U.S. Census because the updated projections are not anticipated until later in 2022.

3. Definitions of Demographic Terms

It is important to clarify the definitions for terms, such as *housing unit*, *household*, and *family*. The HPP will use the U.S. Census Bureau definitions for each:¹⁰

Housing Unit – A housing unit may be a house, an apartment, a mobile home, a group of rooms or a single room that is occupied (or, if vacant, intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building, and which have direct access from outside the building or through a common hall. For vacant units, the criteria of separateness and direct access are applied to the intended occupants whenever possible. If that information cannot be obtained, the criteria are applied to the previous occupants.

Household – A household includes all the persons who occupy a housing unit as their usual place of residence. [...] The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements. (People not living in households are classified as living in group quarters.)

¹⁰ "American Community Survey and Puerto Rico Community Survey 2019 Subject Definitions," U.S. Census Bureau, 2019.

Family – A family consists of a householder and one or more other people living in the same household who are related to the householder by birth, marriage, or adoption. All people in a household who are related to the householder are regarded as members of his or her family. A family household may contain people not related to the householder, but those people are not included as part of the householder's family in tabulations.

To simplify these definitions, "**housing units**" refers to all residential structures in the community. "**Households**" are all the people who occupy a housing unit, including all family or nonfamily groups. "**Families**" are defined as a group who reside together and are related, whereas "**nonfamily households**" are unrelated, for example, roommates, unmarried couples, or people living alone. For other definitions, consult the U.S. Census Bureau web page at www.census.gov.

CHAPTER 2

Comprehensive Needs Assessment

The Comprehensive Housing Needs Assessment is meant to analyze existing and projected housing demand against existing and projected housing supply, including the resources available to the town and the constraints facing the town. It guides the creation of the rest of the plan and includes the following:

- A. The **Demographic Analysis** illuminates the current and projected housing needs of the population taking into account regional growth factors and includes information on household type and size, age of the population, income, and other demographic factors.
- B. A description of the amount, type, and cost of the **Existing Housing Inventory** includes the existing and projected market-rate and affordable housing.
- C. The **Housing Cost Burden Analysis** compares the income of residents and the cost of housing to determine the affordability gap of the community—in other words, analyzing whether the supply meets the demand.
- D. The section on **Housing Issues** includes other housing challenges as identified by the community such as the physical condition of housing.
- E. The description of existing **Affordable Housing Efforts** includes a list of resources that may be called upon for housing development, setting a baseline for improvement if necessary.
- F. The **Development Constraints and Limitations** section analyzes what may limit housing production in order to identify issues that can and should be mitigated.
- G. Finally, the **Comprehensive Needs Assessment Conclusions** section ties everything together, summarizing the challenges and opportunities the HPP should address.

A. Demographic Analysis

This section provides an overview of the demographic changes that have occurred in Tewksbury since the publication of the *Tewksbury Housing Production Plan for 2017-2021*. It includes analyses of population, households, age cohorts, race and ethnicity, disability status, and income. The purpose of these analyses is to understand how the population characteristics have changed over the past decade and project future growth rates. The data creates a foundation for the goals contained within the HPP.

1. Household and Population Growth

The Massachusetts Department of Transportation (MassDOT) in cooperation with the University of Massachusetts Lowell Donahue Institute with input from NMCOG created household and population projections for the 2020-2040 period prior to the 2020 Decennial Census. Updated projections will not be available until spring 2023, so this analysis will use the existing MassDOT projections.

FAST FACTS: DEMOGRAPHIC ANALYSIS

- Defying projections, Tewksbury grew by 8.2% in population (or 2,381 people) between 2010 and 2020
- A quickly-growing number of households are people 65 years or older and living alone
- The number of people aged 20-35 years in Tewksbury is growing, and may need larger housing to accommodate household growth
- 2-person households are quickly becoming more common, representing both new families and empty nesters
- Tewksbury's population is projected to decline in 2030 and 2040 with older cohorts growing as a proportion of the population

During the past 60 years, the population of the Town of Tewksbury has grown faster than the region. According to the Regional Strategic Plan for Greater Lowell (2011), the population in the Greater Lowell region grew by 70% between 1960 and 2010 from 169,403 to 286,901. During the same period, Tewksbury's population increased from 15,902 residents in 1960 to 28,961 residents in 2010, or by 82.1%. More recently, between 2010 and 2020, Tewksbury grew by 8.2%, close to the region's growth rate of 8.1%. Notably, Tewksbury and the region grew in population more during this time than MassDOT projected.

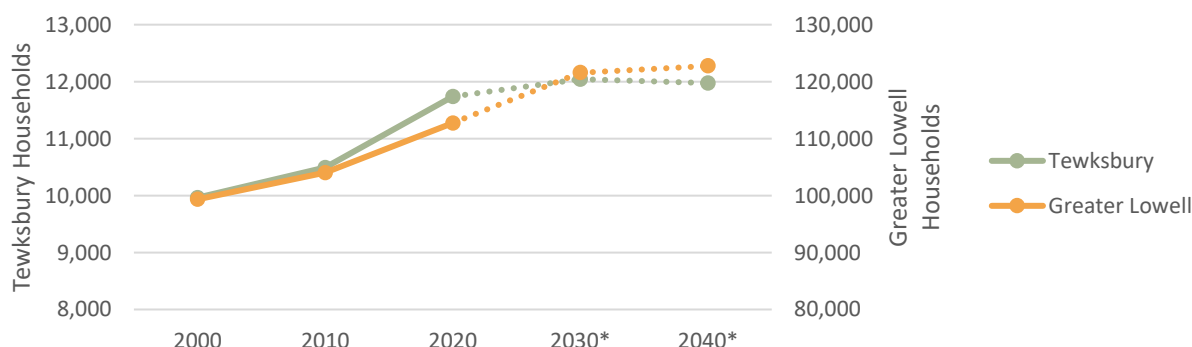
Perhaps more important to Housing Production Plans are the growth in the number of households. The number of households in Tewksbury grew by 528 households between 2000 and 2010, or 5.3%. This growth increased to 1,247 households between 2010 and 2020, or 11.9%. Resultantly, the 2020 Decennial Census counted 11,739 households in Tewksbury. This growth was consistently larger than region, resulting in Tewksbury's proportion of all households in the region growing from 10.0% to 10.4%. Tewksbury's household growth was somewhat greater than the projections in the previous Housing Production Plan.

The 2030 and 2040 MassDOT household projections predict that growth in both Tewksbury and the region will taper, with Tewksbury losing households between 2030 and 2040. Tewksbury's share of the region's households is projected to decrease from 10.4% in 2010 to 9.8% in 2040. It is important to note that projections can be influenced by many local, state, and national factors including economic factors, federal immigration policy, and local housing policy.

Table 1: Total Number of Households, Greater Lowell and Tewksbury (2000-2040)

Year	Tewksbury	Growth Rate	Greater Lowell region	Growth Rate	Tewksbury Households as a Percent of the Region
2000	9,964	14.0%	99,342	10.5%	10.0%
2010	10,492	5.3%	104,022	4.7%	10.1%
2020	11,739	11.9%	112,764	8.4%	10.4%
2030*	12,043	2.6%	121,559	7.8%	9.9%
2040*	11,975	-0.6%	122,740	1.0%	9.8%

Figure 1: Total Number of Households, Greater Lowell and Tewksbury (2000-2040)



Source: U.S. Census Bureau, 2000, 2010, and 2020 Decennial Census.

* Indicates projections developed by MassDOT and UMass Donahue Institute with input from NMCOG.

2. Household Size

Projected number of households suggest how many housing units a community may need to create if current conditions continue. Analyzing household types and sizes suggests what types of housing units may be needed. Households are divided into two “types:” family and nonfamily. In a family household, those who occupy a housing unit are related by birth, marriage or adoption, whereas in a nonfamily household, those who occupy a housing unit are not related (e.g., roommates). As the 2020 Decennial Census Demographic Profile has not yet been released, 2016-20 ACS data is compared to the 2010 Decennial Census. According to the U.S. Decennial Census, the average household size has been shrinking since 2000. In 2000, the average household size in Tewksbury was 2.81 persons (3.24 for average Tewksbury family). In 2010, it was 2.7 persons (3.18 for average Tewksbury family). In 2020, it had declined to 2.67 persons, identical to Greater Lowell.

Table 2: Average Household Size in Tewksbury and Greater Lowell (2000, 2010, and 2020)

Year	Tewksbury	Greater Lowell
2000	2.81	2.77
2010	2.70	2.70
2020	2.67	2.67

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census SF1, and 2020 Decennial Census PL 94-171.

Table 3 further outlines the household sizes of family and nonfamily households, according to the 2010 U.S. Census, the 2011-15 ACS, and the 2016-20 ACS. In 2016-20, family households comprised 68.6% (8,186) of total households, while nonfamily households comprised the remaining 31.4% (3,739) of total households. Among family households, two-person households were the most prevalent representing 46.0% of total family households. Four-person family households were the second largest household size and type, representing 20.4% of total family households. Moving to nonfamily households, single-person households were the most prevalent, comprising 82.7% of the total nonfamily household category (3,093 households). In general, the absolute number of one-person and two-person households are growing; the number of four-person households are shrinking; and other sizes are consistent. The single largest change has been the growth of two-person households from 3,672 in 2011-15 to 4,327 in 2016-20. This may point toward a need for an emphasis on smaller units if trends continue.

Table 3: Household Size - Family and Nonfamily (2010, 2011-15, and 2016-20)

Household Type	Household Size by Number of People: 2010							Total
	1	2	3	4	5	6	7 +	
Family Household	0	2,968	1,817	1,802	756	265	136	7,744
Percentage	0%	38.3%	23.5%	23.3%	9.8%	3.4%	1.8%	73.8%
Nonfamily Household	2,256	437	25	19	7	2	2	2,637
Percentage	82.1%	15.9%	0.9%	0.7%	0.3%	0.1%	0.1%	26.2%
TOTAL	2,256	3,405	1,842	1,821	763	267	138	10,492

Household Type	Household Size by Number of People: 2011-2015							Total
	1	2	3	4	5	6	7 +	
Family Household	0	3,340	1,695	2,114	635	186	88	8,058
Percentage	0.0%	41.4%	21.0%	26.2%	7.9%	2.3%	1.1%	72.0%
Nonfamily Household	2,798	332	11	0	0	0	0	3,141
Percentage	89.1%	10.6%	0.4%	0.0%	0.0%	0.0%	0.0%	28.0%
TOTAL	2,798	3,672	1,706	2,114	635	186	88	11,199

Household Type	Household Size by Number of People: 2016-2020							Total
	1	2	3	4	5	6	7 +	
Family Household	0	3,769	1,617	1,673	738	210	179	8,186
Percentage	0%	46.0%	19.8%	20.4%	9.0%	2.6%	2.2%	68.6%
Nonfamily Household	3,093	558	63	25	0	0	0	3,739
Percentage	82.7%	14.9%	1.7%	0.7%	0.0%	0.0%	0.0%	31.4%
TOTAL	3,093	4,327	1,680	1,698	738	210	179	11,925

Source: U.S. Census Bureau, 2010 Decennial Census Summary File 1 Table P28 and 2011-2015 and 2016-2020 American Community Survey Table B11016.

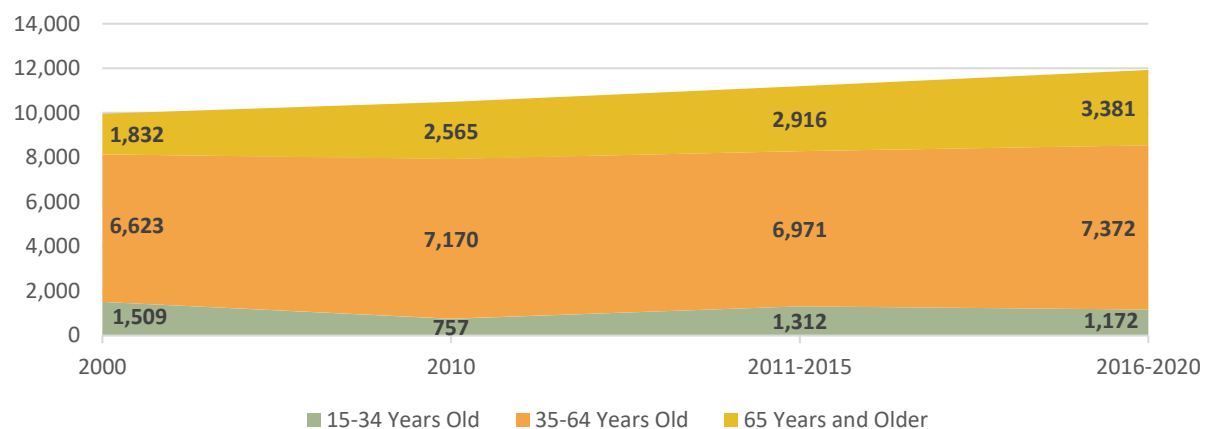
3. Head of Household Age and Characteristics

The age of head of household and household characteristics are the final lenses through which this HPP will evaluate the changing nature of Tewksbury Households. The U.S. Census breaks the distribution of the age of heads of households into three categories: 34 years and under, 35-64 years old, and 65 years and older. **Table 4** and Figure 2 contain information on how many households fall under these categories. According to the 2000 and 2010 U.S. Decennial Census and the 2011-15 and 2016-20 ACS, the plurality of heads of households in both family and nonfamily households have consistently been between 35 and 64 years of age. However, the proportion of that age category has been shrinking, albeit not steadily. 70.9% of heads of households in family households and 51.5% of heads of households in nonfamily households were 35-64 years of age in 2000. This remained mostly consistent in 2010, with households with heads between 35 and 64 years of age consisting of 74.7% and 50.4% of family and nonfamily households, respectively. By the 2011-15 ACS, 70.0% and 42.2% of all family and nonfamily households respectively had heads of households aged 35-64, and as of the 2016-20 ACS, 69.5% and 45.1% of all family and nonfamily households respectively were in that category.

Table 4: Head of Household Age Distribution (2000, 2010, 2011-2015, and 2016-2020)

Household Type	2000		2010		2011-2015		2016-2020	
	Number	%	Number	%	Number	%	Number	%
Family households								
15-34 Years Old	1,165	15.1%	441	5.7%	934	11.6%	740	9.0%
35-64 Years Old	5,454	70.9%	5,785	74.7%	5,644	70.0%	5,686	69.5%
65 Years and Older	1,076	14.0%	1,518	19.6%	1,480	18.4%	1,760	21.5%
Total Family	7,695	100.0%	7,744	100.0%	8,058	100.0%	8,186	100.0%
Nonfamily households								
15-34 Years Old	344	15.2%	316	11.5%	378	12.0%	432	11.6%
35-64 Years Old	1,169	51.5%	1,385	50.4%	1,327	42.2%	1,686	45.1%
65 Years and Older	756	33.3%	1,047	38.1%	1,436	45.7%	1,621	43.4%
Total Nonfamily	2,269	100.0%	2,748	100.0%	3,141	99.9%	3,739	100.1%
Total Households	9,964	100.0%	10,492	100.0%	11,199	100.0%	11,925	100.0%

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census and 2011-2015 and 2016-2020 American Community Survey. Due to rounding, the total may not equal 100%.

Figure 2: Head of Household Age Distribution, All Households (2000, 2010, 2011-2015, 2016-2020)

Source: U.S. Census Bureau, 2000 and 2010 Decennial Census and 2011-2015 and 2016-2020 American Community Survey.

Over this time, heads of households aged 65 and older somewhat consistently grew as a share of households. This age category increased from 14.0% and 33.3% for family and nonfamily households, respectively, in 2000 to 19.6% and 38.1% in 2010. Households with heads aged 65 and older were 18.4% and 45.7% of all family and nonfamily households, respectively, as reported by the 2011-15 ACS and 21.5% and 43.4% as reported by the 2016-20 ACS. The trend in category of households with heads aged 15-34 years old was less clear and fluctuated during this time but was smaller as a proportion of the overall number of households in 2016-2020 than in 2000.

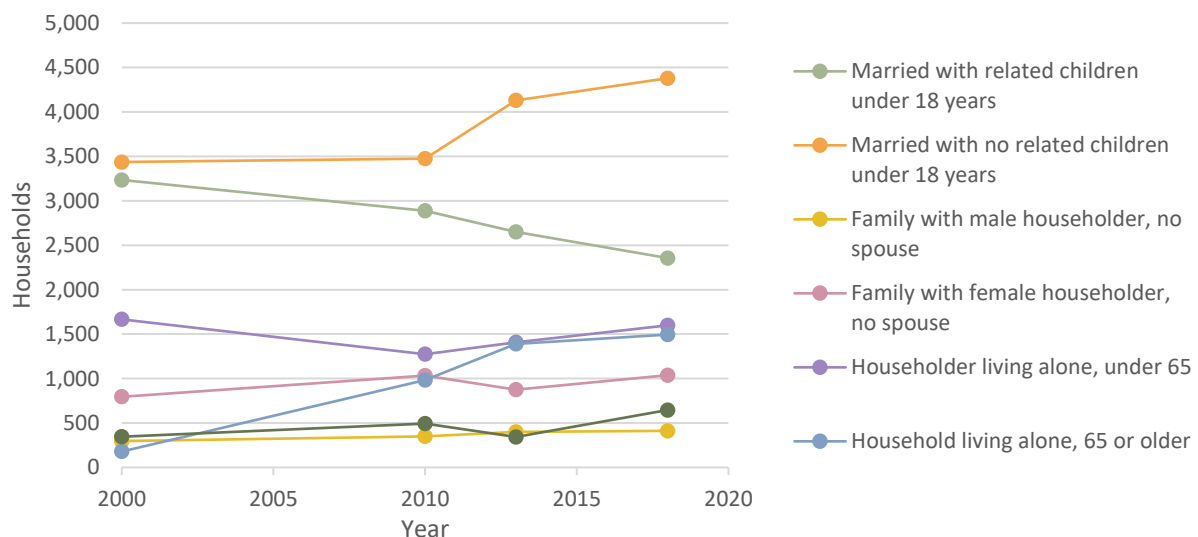
Breaking households further down into subtypes provides insight into the diversity of households in a community. Data from the U.S. Decennial Census and the ACS reflect the changes that have taken place in Tewksbury. Household types have become increasingly diverse over the past 20 years, with the

largest changes being the increase in householders living alone—particularly those 65 and older living alone. **Table 5** shows the various household types in Tewksbury in 2000, 2010, 2011-15, and 2016-2020.

Table 5: Household Characteristics (2000, 2010, 2011-2015, and 2016-2020)

Household Type	2000*		2010		2011-2015		2016-2020	
	Number	%	Number	%	Number	%	Number	%
Family Households								
Married - couple	6,672	85.9%	6,361	82.1%	6,784	84.2%	6,736	82.3%
With related children under 18 years	3,235	41.7%	2,887	37.3%	2,652	32.9%	2,356	28.8%
No related children under 18 years	3,437	44.3%	3,474	44.9%	4,132	51.3%	4,380	53.5%
Male householder, no spouse	297	3.8%	349	4.5%	398	4.9%	412	5.0%
Female householder, no spouse	795	10.2%	1,034	13.4%	876	10.9%	1,038	12.7%
Total Family Households	7,764	78.0%	7,744	73.8%	8,058	72.0%	8,186	68.6%
Nonfamily Households								
Householder living alone	1,845	84.2%	2,256	82.1%	2,798	89.1%	3,093	82.7%
Householders 65 and older living alone	179	8.2%	982	35.7%	1,390	44.3%	1,495	40.0%
Householder living with others	346	15.8%	492	17.9%	343	10.9%	646	17.3%
Total Nonfamily Households	2,191	22.0%	2,748	26.2%	3,141	28.0%	3,739	31.4%
Total Households	9,955	100.0%	10,492	100.0%	11,199	100.0%	11,925	100.0%

Figure 3: Household Characteristics, 2000-2020



Source: U.S. Census Bureau, 2000 Decennial Census Summary File 3 Table 012, 2010 Decennial Census Summary File 1 Table P21, and 2011-2015 and 2016-2020 American Community Survey Table B25010. *2000 SF3 data is based on a sample and may vary from 2000 SF1 data elsewhere. Line chart graphs ACS results in their middle year, i.e., 2011-15 ACS is charted at 2013.

Although households with married couples have remained the most common household type since 2000 (6,736 households, 82.7% of total family households, or 56.5% of total households), the proportion of those married couples living with related children under 18 years has dropped from roughly half (48.5%) of married couples to just over a third (35.0%) of married couples. In fact, married couples with related children under 18 is the only type that decreased in absolute terms. This could represent an aging population, as children move out of the house leaving empty-nesters, especially when paired with information about aging families in **Table 4** and the recent increase in two-member households described in Table 3. There have also been increases in family households without a spouse.

Of total households, 31.4% (3,739) were nonfamily households in 2016-20, with the majority of those being a single householder living alone (82.7% of nonfamily households or 25.9% of total households). Of these households composed of a single person living alone, 1,495 are residents 65 and over. This was a 735% increase since 2000, the quickest-growing household type.

Please note that 2016-2020 American Community Survey data are estimates averaged over a five-year period. To make a true comparison, detailed 2020 Decennial Census data should be used when it is released later in 2022. That said, it is clear there has been an overall increase in nontraditional households (empty nesters, nonfamily households, and people over 65 living alone) that needs to be factored in with any housing strategy. Thus, in addition to a diverse supply of housing in terms of size and structure, a range of affordability options are needed for households and families who cannot afford to pay market-rate prices.

4. Age Cohorts

To determine how best to meet future housing demand in Tewksbury, it is important to examine the age of the population beyond the head of household, both currently and over time. Changes in the age composition of a community have significant implications for housing planning. For example, households with young children have different housing needs than empty nest households, and empty nest households may have different needs than those with someone over 65 living alone. The size of cohorts can also be used to predict future housing needs, as children or young adults will grow older and may wish to form households of their own in Tewksbury, while older adults may need to downsize as they retire, and their accessibility needs changes. Table 6 below illustrates the breakdown of Tewksbury's population by age cohort in 2010, 2011-2015, and 2016-2020.

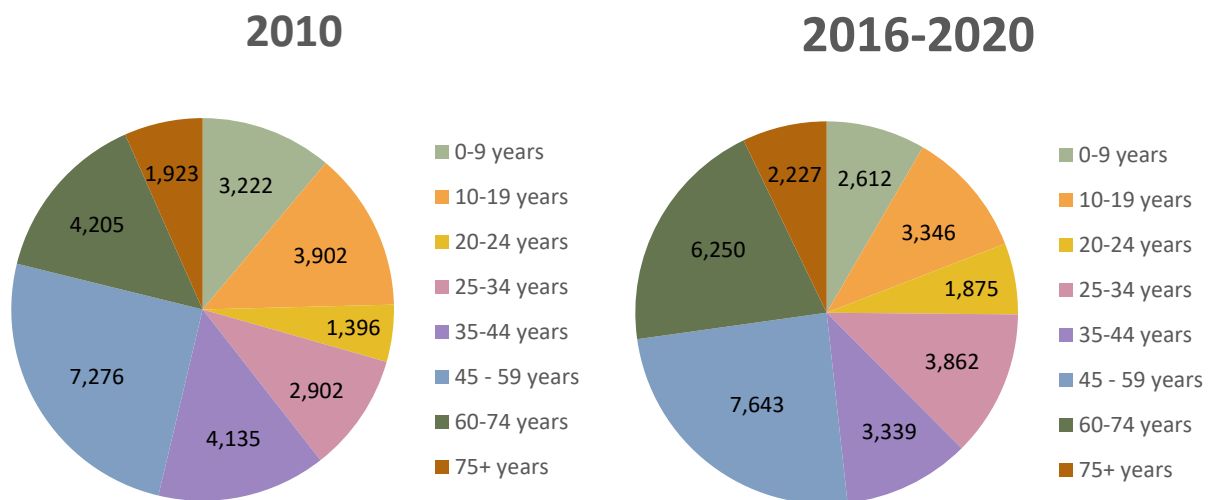
This data shows a decrease in absolute terms between 2010 and 2016-20 among the 0-9 year cohort (610 people or 19% decrease), the 10-19 year cohort (556 people or 14% decrease) and the 35-44 year cohort (796 people or 19% decrease). All other cohorts increased, with the 60-74 year cohort increasing most dramatically by 2,405 people (a 49% increase), the most in both absolute and relative terms. Notably, there is not a major increase in the 45-59 year range that would mirror the decrease in the 35-44 year range, indicating that many of these individuals left Tewksbury rather than aging into the next category. **Figure 4** provides two pie charts comparing the age distribution of Tewksbury residents in 2010 and 2016-20.

Table 6: Age Distribution of Tewksbury Residents (2010, 2011-2015, and 2016-2020)

	2010		2011-2015		2016-2020		Percent Change 2010- 2016/20
	Number	Percent	Number	Percent	Number	Percent	
0-9 years	3,222	11.1%	2,898	9.6%	2,612	8%	-19%
10-19 years	3,902	13.5%	3,990	13.2%	3,346	11%	-14%
20-24 years	1,396	4.8%	1,583	5.3%	1,875	6%	34%
25-34 years	2,902	10.0%	3,671	12.2%	3,862	12%	33%
35-44 years	4,135	14.3%	3,547	11.8%	3,339	11%	-19%
45 - 59 years	7,276	25.1%	7,650	25.4%	7,643	25%	5%
60-74 years	4,205	14.5%	4,697	15.6%	6,250	20%	49%
75+ years	1,923	6.6%	2,079	6.9%	2,227	7%	16%
Total Population	28,961	99.9%	30,115	100.0%	31,154	100%	8%

Source: U.S. Census Bureau, 2010 Decennial Census and 2011-2015 and 2016-2020 American Community Survey.

The overall growth trends among the age cohorts can be analyzed to determine the need for specific types of housing in the future. With the decline in the cohorts under 20 years and the increase in the cohorts over age 60, particular attention needs to be paid to additional senior and accessible housing. However, it is also apparent that Tewksbury has had a growing number of people in the 20-34 year range, and those needs must also be addressed as those households mature.

Figure 4: Age Distribution of Tewksbury Residents (2010 and 2016-2020)

Source: U.S. Census Bureau, 2010 Decennial Census and 2016-2020 American Community Survey.

In 2018, as part of the 2020 Regional Transportation Planning process, MassDOT and UMass Donahue Institute updated age cohort population projections for each Massachusetts municipality for five-year increments through 2040, shown in **Table 7**. This data provides a useful indication of the future age distribution of Tewksbury residents.

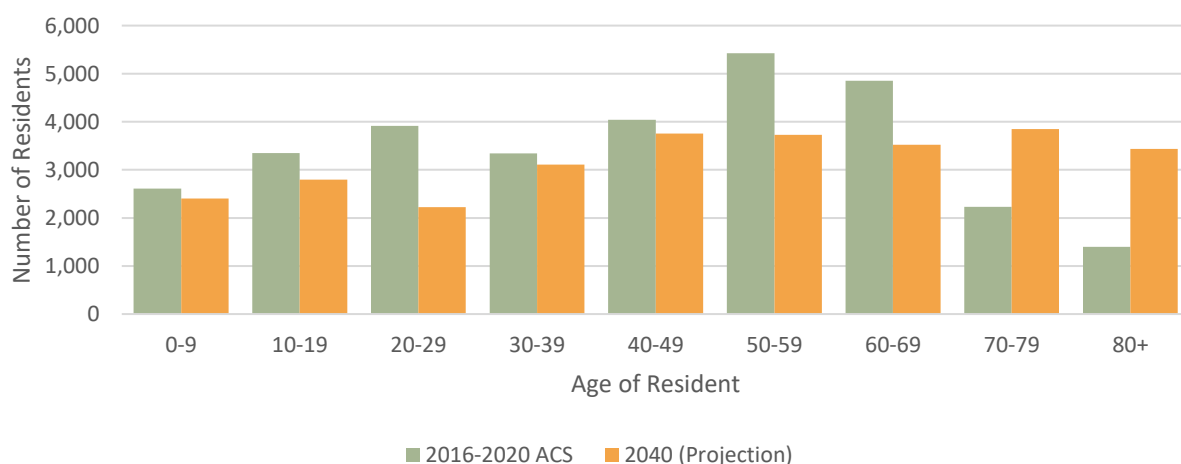
Table 7: Projected Age Distribution of Tewksbury Residents (2020-2040)

Age Groups	2020	2020 %	2025	2025 %	2030	2030 %	2035	2035 %	2040	2040 %
0-9	2,862	9.5%	2,837	9.5%	2,832	9.6%	2,634	9.0%	2,402	8.3%
10-19	3,115	10.4%	2,819	9.5%	2,717	9.2%	2,770	9.5%	2,794	9.7%
20-29	3,118	10.4%	2,848	9.6%	2,449	8.3%	2,245	7.7%	2,221	7.7%
30-39	3,539	11.8%	3,558	12.0%	3,613	12.2%	3,478	11.9%	3,112	10.8%
40-49	3,561	11.9%	3,448	11.6%	3,591	12.1%	3,669	12.5%	3,755	13.0%
50-59	5,062	16.9%	4,217	14.2%	3,588	12.1%	3,548	12.1%	3,727	12.9%
60-69	4,361	14.5%	4,841	16.3%	4,769	16.1%	4,075	13.9%	3,521	12.2%
70-79	2,635	8.8%	3,149	10.6%	3,471	11.7%	3,879	13.2%	3,846	13.3%
80+	1,727	5.8%	2,006	6.7%	2,543	8.6%	3,000	10.2%	3,437	11.9%
Total	29,980	100%	29,723	100%	29,573	100%	29,298	100%	28,815	100%

Source: UMass Lowell Donahue Institute UMDI-DOT Vintage 2018 data, <http://www.pep.donahue-institute.org/>.

As with the other projections in this HPP, the data has not yet been updated with results from the 2020 Decennial Census. In addition, the 2020 Decennial Census age distribution has not yet been released as of the drafting of this HPP, and it should be noted the 2020 Decennial Census population count for Tewksbury was lower than 2016-20 ACS estimates. Notwithstanding these caveats, Figure 5 and Table 8 compare the 2016-20 ACS data with projections. Table 8 notes the change in absolute and relative terms of each 10-year age cohort. This can indicate general trends anticipated in the population. However, a revised analysis should be undertaken when new age cohort projections are created.

Figure 5: 2016-2020 ACS and 2040 Projected Age Distribution of Tewksbury Residents



Source: UMass Lowell Donahue Institute UMDI-DOT Vintage 2018 data, <http://www.pep.donahue-institute.org/> and U.S. Census Bureau, 2016-2020 American Community Survey, Table B01001.

Table 8: Projected Age Distribution of Tewksbury Residents Change Over Time (2020-2040)

Age Groups	2016-2020 ACS	2016-20 ACS %	Projection 2020	2020 %	Projection 2040	2040 %	Change 2016-20 - 2040	Change %
0-9	2,612	8.4%	2,862	9.5%	2,402	8.3%	-210	-8.0%
10-19	3,346	10.7%	3,115	10.4%	2,794	9.7%	-552	-16.5%
20-29	3,915	12.6%	3,118	10.4%	2,221	7.7%	-1,694	-43.3%
30-39	3,343	10.7%	3,539	11.8%	3,112	10.8%	-231	-6.9%
40-49	4,039	13.0%	3,561	11.9%	3,755	13.0%	-284	-7.0%
50-59	5,422	17.4%	5,062	16.9%	3,727	12.9%	-1,695	-31.3%
60-69	4,852	15.6%	4,361	14.5%	3,521	12.2%	-1,331	-27.4%
70-79	2,227	7.1%	2,635	8.8%	3,846	13.3%	1,619	72.7%
80+	1,398	4.5%	1,727	5.8%	3,437	11.9%	2,039	145.9%
Total	31,154	100%	29,980	100.0%	28,815	100.0%	-2,339	-7.5%

Source: UMass Lowell Donahue Institute UMDI-DOT Vintage 2018 data, <http://www.pep.donahue-institute.org/>.

The projected age distribution of Tewksbury residents shows a large decline in almost all age categories. The largest decline in absolute terms is the cohort aged 50-59 years, at a decline of 1,695 people or 31.3%. The largest in relative terms is the cohort aged 20-29 years, at a decline of 1,694 or 43.3%. Other cohorts below age 70 have a decline of between 210 and 1,331 people (6.9% to 27.4% proportionately). The 70-79 age cohort is projected to increase by 1,619 or 72.7%, and the over 80 age cohort is projected to increase by 2,039 or 145.9%. This would result in a projected 37.4% of all Tewksbury residents being over the age of 60 and 11.9% being over age 80 in 2040. In addition to a general need for more housing units to accommodate new and established families, special attention will need to be paid to the housing needs of seniors. This needn't mean senior-restricted housing; it may mean a focus on accessible units to allow aging in place, smaller units that may be appropriate for small families or empty-nesters, and developments that have age-friendly features such as accessible sidewalks. This Housing Production Plan considers these unique needs as it lays out a guiding framework for housing production in Tewksbury over the next five years.

5. People with Disabilities

Table 9 provides information about the community with disabilities in Tewksbury as of 2016-20. An estimated 3,181 residents, approximately 10.4% of total estimated population at that time, were reported to have a disability. Approximately 44% of these individuals were between the ages of 18 and 64, and 47% were 65 or older. Ambulatory difficulty was the most prevalent disability (1,405 or 4.6% of total residents). People with disabilities grew in absolute numbers since 2011-15, when 3,131 residents were reported with at least one disability status (an increase of 1.6% or 50 residents). This number stayed roughly proportional to the total Tewksbury population, at about 10.4%. It is important to note that some people experience more than one disability, which is reflected in the table.

Residents with disabilities often have unique housing needs in terms of the physical design and/or accessibility of their homes, access to services, and the cost relative to a fixed or limited income. For

these reasons, a comprehensive affordable housing plan should be sensitive to the specific needs of the community with disabilities and incorporate their needs into the goals and strategies for future affordable housing production.

Table 9: Characteristics of the Community with Disabilities in Tewksbury (2016-2020)

Age Group and Disability Status	Number	Percent of Total Residents
Under 5 years old	0	0.0%
5-17 years old	279	0.9%
18-64 years old	1,396	4.5%
65+ years old	1,506	4.9%
Total Number of Residents with a Disability	3,181	10.4%
With a hearing difficulty (all ages)	1,371	4.5%
With a vision difficulty (all ages)	584	1.9%
With a cognitive difficulty (all ages)	1,269	4.1%
With an ambulatory difficulty (all ages)	1,405	4.6%
With a self-care difficulty (all ages)	547	1.8%
With an independent living difficulty (all ages)	926	3.0%

Source: U.S. Census Bureau, 2016-2020 American Community Survey. Residents may report more than one disability.

6. Income Analysis

a. Median Household Income

The U.S. Census Bureau calculates median household income based on the income of the householder and all other individuals 15 years old and over in the household. Table 10 shows the change in median household income between 1999 and 2016-20 for Tewksbury, the Commonwealth of Massachusetts, and the United States.

Tewksbury's median household income increased by 52.0% between 1999 and 2016-20, which is lower growth than Massachusetts (67.1%), and the United States (55.0%). However, the median household income in Tewksbury started significantly higher than the other two geographies, and Tewksbury's increase in median household income in absolute terms (\$35,810) was more than those geographies.

It is important to adjust these values for inflation so a more accurate comparison can be made. According to the Bureau of Labor Statistics (BLS) Inflation Rate Calculator, one dollar in April 1999 has the same buying power as \$1.54 in April 2020 dollars (chosen because the amounts reported in the 2016-20 ACS are inflated to this level). The Inflation Rate Calculator uses the average Consumer Price Index (CPI) for a given calendar year, and the data represents changes in the prices of all goods and services purchased for consumption by urban households.

FAST FACTS: INCOME ANALYSIS

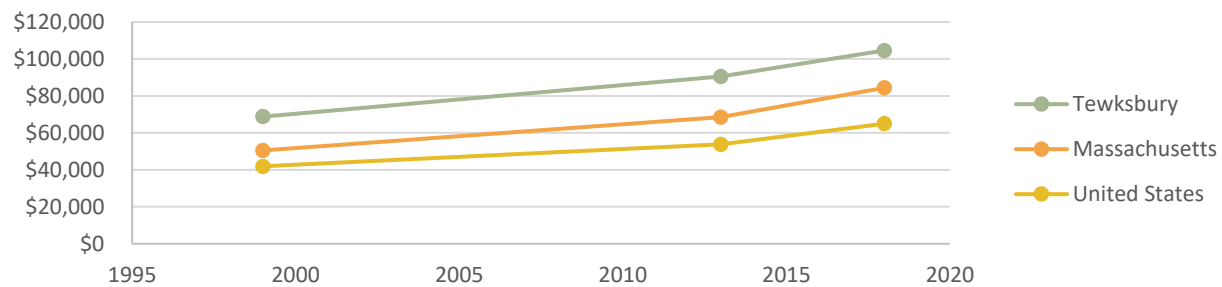
- The region's 2022 AMI is \$126,500 and a family of 3 making \$80,500 would be eligible for a SHI unit (80% AMI)
- Tewksbury's inflation-adjusted median household income stayed mostly steady between 1999 and 2016-20.
- Despite inflation reducing the buying power of a dollar, the number of households that earned less than \$35,000 in 2016-20 has nearly doubled over the past 20 years.
- Nearly 1/3 of renter households are Extremely Low Income (under 30% AMI).
- 4.0% of residents lived under poverty, a slight decline from 2010-15.

Table 10: Median Household Income (1999, 2011-2015, and 2016-2020)

Geographic Area	1999	2011-2015	2016-2020	Percentage Change 1999-2016/2020	% Inflation Adjusted Change 1999-2016/2020
Tewksbury	\$68,800	\$90,484	\$104,610	52.0%	-1.4%
Massachusetts	\$50,502	\$68,563	\$84,385	67.1%	8.3%
United States	\$41,944	\$53,889	\$64,994	55.0%	0.4%

Source: U.S. Census Bureau, 2000 Decennial Census and 2011-2015 and 2016-2020 American Community Survey. Line chart graphs ACS results in their middle year, i.e., 2011-15 ACS is charted in 2013.

Figure 6: Median Household Income (1999, 2011-2015 and 2016-2020)



Source: U.S. Census Bureau, 2000 Decennial Census and 2011-2015 and 2016-2020 American Community Survey. Line chart graphs ACS results in their middle year, i.e., 2011-15 ACS is charted in 2013.

Adjusting the 1999 median household incomes for inflation, Tewksbury's median household income did not keep pace with inflation, shrinking by 1.4%. However, this is a significant change from the previous HPP, in which an inflation-adjusted decline of 7.4% was noted between 1999 and 2010-14 when Tewksbury and the nation were recovering from the Great Recession.

b. Income Distribution

While median household income is a valuable indicator, it does not account for the distribution of household incomes in a community. Table 11 describes the changes in household income distribution in Tewksbury between 1999 and 2016-20. In 1999, an estimated 3,193 households, or 32.1% of all households, earned less than \$50,000 per year. Of the households earning more than the median household income, 23.4% earned between \$100,000 and \$199,999, and 1.5% of all households earned \$200,000 or more per year. Between 1999 and 2011-15, Tewksbury saw an increase in the number of households in the income categories below \$25,000 and above \$100,000. The number of households in all other categories declined both in absolute numbers and as a share of the population. This indicated Tewksbury was bifurcating into lower-income and upper-income groups.

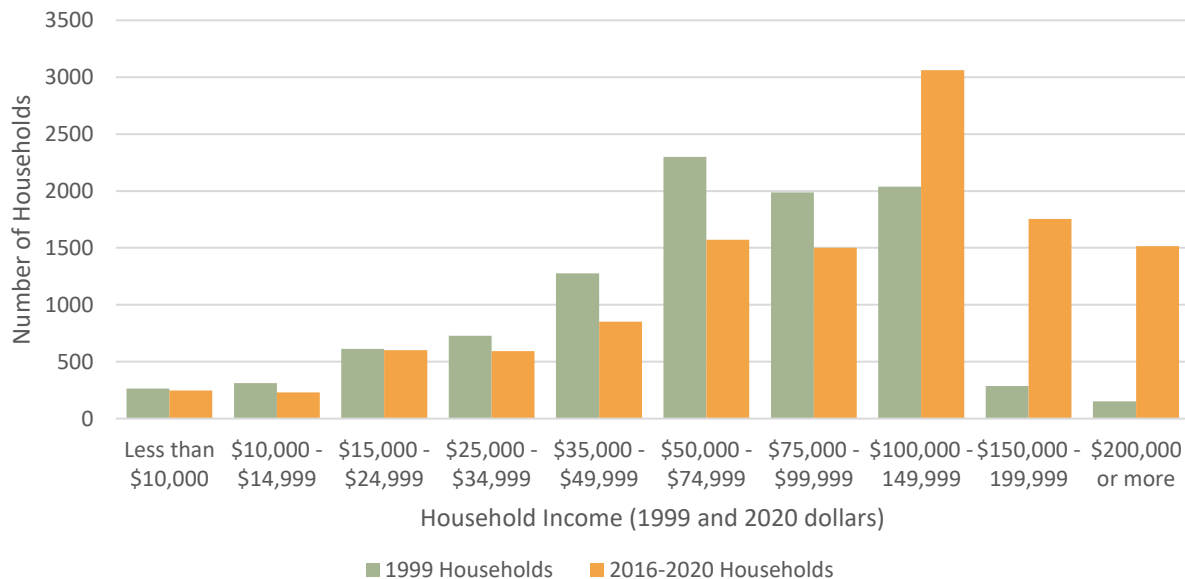
Between 2011-15 and 2016-20, the number of households in the categories above \$100,000 continued to increase both in absolute terms and as a share of the population. However, the trend of lower-income categories growing as a share of the population reversed. This may represent growing incomes of those who made less than \$25,000 in 2011-15, or it may represent those people being priced out of or otherwise leaving Tewksbury and being replaced by households in higher income categories.

The largest change in both percent and absolute terms between 1999 and 2016-20 was the number of households in the \$150,000-199,999 category (511% or 1,467 households.) The largest category is still \$100,000-\$149,999 at 25.7% of households (3,063 households). An estimated 475 households make less than \$15,000, (4.0% of households). This is notable, because inflation has reduced the buying power of dollars, disproportionately impacting those at the lower end of the income distribution.

Table 11: Household Income Distribution (1999, 2011-2015, and 2016-2020)

	1999 Households		2011-2015 Households		2016-2020 Households		Percent Change 1999- 2016/20
	Number	Percent	Number	Percent	Number	Percent	
Less than \$10,000	263	2.6%	331	3.0%	246	2.1%	-6.5%
\$10,000 - \$14,999	313	3.1%	371	3.3%	229	1.9%	-26.8%
\$15,000 - \$24,999	613	6.2%	744	6.6%	601	5.0%	-2.0%
\$25,000 - \$34,999	728	7.3%	589	5.3%	593	5.0%	-18.5%
\$35,000 - \$49,999	1276	12.8%	769	6.9%	852	7.1%	-33.2%
\$50,000 - \$74,999	2,299	23.1%	1,679	15.0%	1,572	13.2%	-31.6%
\$75,000 - \$99,999	1,987	20.0%	1,781	15.9%	1,500	12.6%	-24.5%
\$100,000 - 149,999	2,037	20.5%	2,766	24.7%	3,063	25.7%	50.4%
\$150,000 - 199,999	287	2.9%	1,273	11.4%	1,754	14.7%	511.1%
\$200,000 or more	152	1.5%	896	8.0%	1,515	12.7%	896.7%
Total	9,955	100.0%	11,199	100.0%	11,925	100.0%	19.8%

Source: U.S. Census Bureau, 2000 Decennial Census and 2011-2015 and 2016-2020 American Community Survey Table B19001

Figure 7: Household Income Distribution (1999 and 2016-2020)

Source: U.S. Census Bureau, 2000 Decennial Census and 2011-2015 and 2016-2020 American Community Survey Table B19001

The U.S. Census Bureau also provides tabulations based on tenure (rental occupied vs. owner occupied.) This shows that as of 2016-2020, more than half (56.5%, or 5,737 households) of homeowner households who owned their housing unit made more than \$100,000, while only about a third (33.5%, or 595 households) of rental occupied households fell into that income category. In fact, rental occupied households are somewhat evenly distributed amongst the income categories provided by the ACS, while owner occupied households are weighted toward the top of the income distribution.

Table 12: Tenure by Income Category, Tewksbury Households, 2016-2020

	Owner Occupied		Renter Occupied	
	Number	Percent	Number	Percent
Less than \$5,000	56	0.6%	29	1.6%
\$5,000 to \$9,999	28	0.3%	133	7.5%
\$10,000 to \$14,999	173	1.7%	56	3.1%
\$15,000 to \$19,999	123	1.2%	240	13.5%
\$20,000 to \$24,999	208	2.0%	30	1.7%
\$25,000 to \$34,999	535	5.3%	58	3.3%
\$35,000 to \$49,999	591	5.8%	261	14.7%
\$50,000 to \$74,999	1,362	13.4%	210	11.8%
\$75,000 to \$99,999	1,334	13.1%	166	9.3%
\$100,000 to \$149,999	2,714	26.7%	349	19.6%
\$150,000 or more	3,023	29.8%	246	13.8%
Total	10,147	100.0%	1,778	100.0%

Source: U.S. Census Bureau, 2016-2020 American Community Survey Table B25118

c. HUD Area Median Family Income (HAMFI)

As discussed in the HPP’s introduction, the U.S. Department of Housing and Urban Development (HUD) bases a household’s eligibility for affordable units on a series of income thresholds. HUD defines these thresholds via a formula based on the HUD Area Median Family Income (HAMFI), which is the median family income calculated by HUD for each Fair Market Rent (FMR) Area. HUD includes Tewksbury in the Lowell Metro FMR Area, a ten-community region including the NMCOG region plus the Town of Groton. The Executive Office of Housing and Livable Communities (EOHLC) uses these measures as well. As shown in Table 13, the HAMFI for the Lowell Metro FMR Area for FY 2022 was \$126,500.

HUD and EOHLC categorize households earning 80%-100% of HAMFI as “moderate income”, households earning 51%-80% as “low income”, 31-50% as “very low income,” and at or below 30% as “extremely low income¹¹”. HUD uses a special formula to adjust these based on the number of individuals in the household, which is reflected in **Table 13**. HUD and EOHLC use these adjusted thresholds to determine eligibility for income-restricted units, including Chapter 40B, Section 8, and Low-Income Housing Tax Credit units.

¹¹ The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the 50% very low-income limit.

Table 13: Adjusted Income Limits by Household Size, Lowell Metro FMR Area, FY 2022

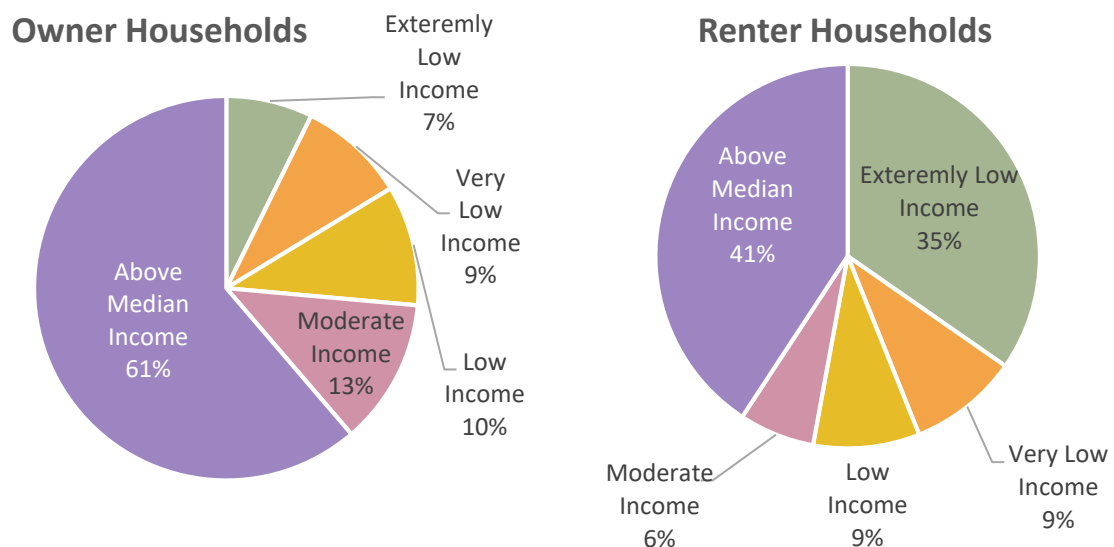
Area Median Income	FY 2022 Income Limit Category	Household Size (Number of People)							
		1	2	3	4	5	6	7	8
\$126,500	Extremely Low	\$26,550	\$30,350	\$34,150	\$37,900	\$40,950	\$44,000	\$47,000	\$50,050
	50% - Very Low	\$44,250	\$50,550	\$56,850	\$63,150	\$68,250	\$73,300	\$78,350	\$83,400
	80% - Low	\$62,600	\$71,550	\$80,500	\$89,400	\$96,600	\$103,750	\$110,900	\$118,050

Source: U.S. Department of Housing and Urban Development, May 2022. Tewksbury is included in the Lowell Metropolitan Fair Market Rent (FMR) region.

The ACS does not report income by household size at HAMFI thresholds, so this HPP uses Comprehensive Housing Affordability Strategy (CHAS) Data. HUD provides CHAS data for planning purposes. The most recent CHAS data utilizes the 2015-19 ACS. CHAS estimates that 1,315 households (11.3% of total households) had incomes at 30% HAMFI or less, 870 households (7.5%) had incomes at 31%-50% HAMFI, and 1,020 households (8.8%) had incomes at 50%-80% HAMFI.

Table 14: CHAS Income Distribution Overview, Tewksbury, 2015-2019

Income Category	Owner Households	Renter Households	Total
Household Income <= 30% HAMFI (Extremely Low Income)	735	600	1,335
Household Income >30% to <=50% HAMFI (Very Low Income)	910	160	1,070
Household Income >50% to <=80% HAMFI (Low Income)	1,020	155	1,175
Household Income >80% to <=100% HAMFI (Moderate Income)	1,240	110	1,350
Household Income >100% HAMFI	6,180	705	6,885
Total	10,090	1,730	11,820

Figure 8: CHAS Income Distribution, 2015-2019, Town of Tewksbury

Source: U.S Department of Housing and Urban Development, 2015-2019 CHAS Data.

d. Poverty Indicators in Tewksbury

Every year, the U.S. Census Bureau establishes a set of “Poverty Thresholds” to estimate the population’s poverty levels. They use a complex formula varying by family size and composition to determine who is living in poverty as part of the ACS. The U.S. Department of Health and Human Services (HHS) uses a simplified version of these census thresholds called the “Federal Poverty Guidelines” to determine eligibility for programs such as food assistance.

For the ACS, if a family’s total income is less than the threshold, then that family and every individual in it is living under poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using the Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food assistance).

Table 15 displays the 2022 poverty guidelines, but the ACS data displayed in **Table 16** on the next page and **Figure 9** uses the more complex “Poverty Threshold” calculation. According to the 2016-20 ACS, 1,235 Tewksbury residents (approximately 4.0% of total population) were classified as living under poverty. This is a smaller number than the 2010-14 ACS (1,426 residents or 4.7% of the Town’s population).

As shown on Table 16, residents under age 18 represented roughly 16.5% of the population living in poverty in Tewksbury. Individuals aged 65 and older represented 25.9% of the residents living under poverty. Women comprised 55.8% of the population living under poverty, while men comprised the remaining 44.2%. The largest age groups were those aged those over 75 years (20.4%) and those aged 55 to 64 years (17.8%). Other age groups were distributed relatively evenly between 2.7% to 13.6%. It will be important to recognize these particularly large age cohorts living in poverty that will continue to age—alongside younger people and families—when prioritizing housing types that will meet the diverse needs of an aging population.

Table 15: 2022 Poverty Guidelines for the 48 Contiguous States and the District of Columbia

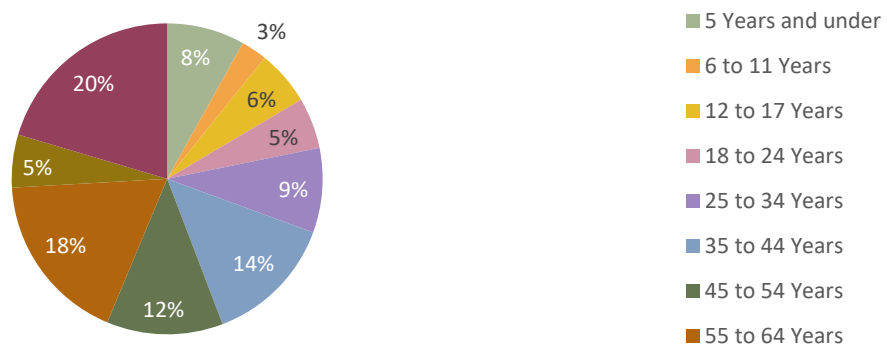
Number of Persons in Family	Poverty Guideline
1	\$13,590
2	\$18,310
3	\$23,030
4	\$27,750
5	\$32,470
6	\$37,190
7	\$41,910
8	\$46,630
For each additional person	\$4,720

Source: Poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2), <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Table 16: Characteristics of the Population Living under Poverty (2016-2020)

	Number Below Poverty Level	Percent of those in poverty
Age		
5 Years and under	100	8.1%
6 to 11 Years	33	2.7%
12 to 17 Years	70	5.7%
18 to 24 Years	66	5.3%
25 to 34 Years	109	8.8%
35 to 44 Years	168	13.6%
45 to 54 Years	149	12.1%
55 to 64 Years	220	17.8%
65 to 74 Years	68	5.5%
75 Years and Over	252	20.4%
Total Individuals Living in Poverty	1,235	4.0%
Sex		
Male	546	44.2%
Female	689	55.8%
Totals	Population	Percent of Total Tewksbury Population
Total Individuals Living in Poverty	1,235	4.0%
Total Tewksbury Population of which Poverty Status is Known	30,685	98.5%

Source: U.S. Census Bureau, 2016-2020 American Community Survey.

Figure 9: Age of Tewksbury Population Living under Poverty: 2016-2020

Source: U.S. Census Bureau, 2016-2020 American Community Survey.

School statistics are also an excellent source of information about the poverty level and distress level of families. There were 3,180 students enrolled in the Tewksbury school district including Pre-K through 12th Grade in the 2021-2022 school year. Of these, 8.9% had a first language other than English. 3.4% were English Language Learners. 23.0% were considered low-income, and 19.4% were Students with Disabilities. The most recent data for students qualifying for free or reduced lunch was from the 2014-15 school year, when 22% qualified for that program.

7. Race and Ethnicity

Examining race and ethnicity is very important not only because of Tewksbury's goal of providing affordable, appropriate housing fairly for people of all backgrounds and types, but also because there is not an equitable distribution of income across race and ethnicity in Tewksbury, the region, or the United States. This shows the impact housing policy has on equitable access for all people.

a. Racial and Ethnic Diversity

Table 17 breaks down the Town's population by race and ethnicity for 2000, 2010, and 2020. According to the 2020 U.S. Decennial Census, the population identifying as white decreased by 2% over the last 20 years, while nearly every other racial/ethnic category increased significantly. The population identifying as African American nearly tripled (285%); the population identifying as some other race alone more than tripled (322%); and the population identifying as two or more races increased sixfold (592%). The population identified as two or more races was the largest increase in absolute terms as well, at 1,284 individuals. The population identifying as Hispanic or Latino/Latina increased by 255%. These nonwhite or Hispanic or Latino/Latina populations make up a minority of the population—13%—but are growing rapidly. These changes could be driven by a combination of changes in the way existing residents self-identify, small changes in the way Census and ACS questions are asked to prompt more detailed answers and the way those answers coded to more accurately capture responses, and actual diversification of race and ethnicity in Tewksbury.

FAST FACTS: RACE AND ETHNICITY

- Nonwhite or Hispanic or Latino/Latina populations make up a minority of the population—13%—but are growing rapidly.
- Echoing the region and the state, people identifying as White, Non-Hispanic or Latino/Latina have a poverty rate of 3%, while most other racial groups have poverty rates of 6% to 19%.
- Households identifying in racial categories other than White also more often tend to live in renter-occupied units, 28% for White, Non-Hispanic or Latino/Latina vs. 31%-40% for other groups.
- The population identifying as Hispanic or Latino/Latina (of any race) were a small sample size, but had lower poverty rates and higher home-ownership rates than that Hispanic or Latino/Latina people in the state and the region as a whole.

Table 17: Racial and Ethnic Diversity of Residents, Tewksbury, 2000, 2010, and 2020

Racial/Ethnic Category	2000		2010		2020		Percent Change 2000-2020
	Population	Percent	Population	Percent	Population	Percent	
White Alone	27,824	96.4%	27,327	94.4%	27,277	87.0%	-2%
Black or African American Alone	194	0.7%	321	1.1%	747	2.4%	285%
American Indian and Alaska Native Alone	36	0.1%	32	0.1%	15	0.0%	-58%
Asian Alone	460	1.6%	786	2.7%	1,301	4.2%	183%
Native Hawaiian and Other Pacific Islander Alone	2	0.0%	1	0.0%	3	0.0%	50%
Some Other Race Alone	118	0.4%	151	0.5%	498	1.6%	322%
Two or More Races	217	0.8%	343	1.2%	1,501	4.8%	592%
Total Population	28,851	100.0%	28,961	100.0%	31,342	100.0%	9%
Hispanic or Latino (All races)	352	1.2%	602	2.1%	1,251	4.0%	255%

Source: U.S. Census Bureau, 2000, 2010, and 2020 Decennial Census. *0.007, **0.003

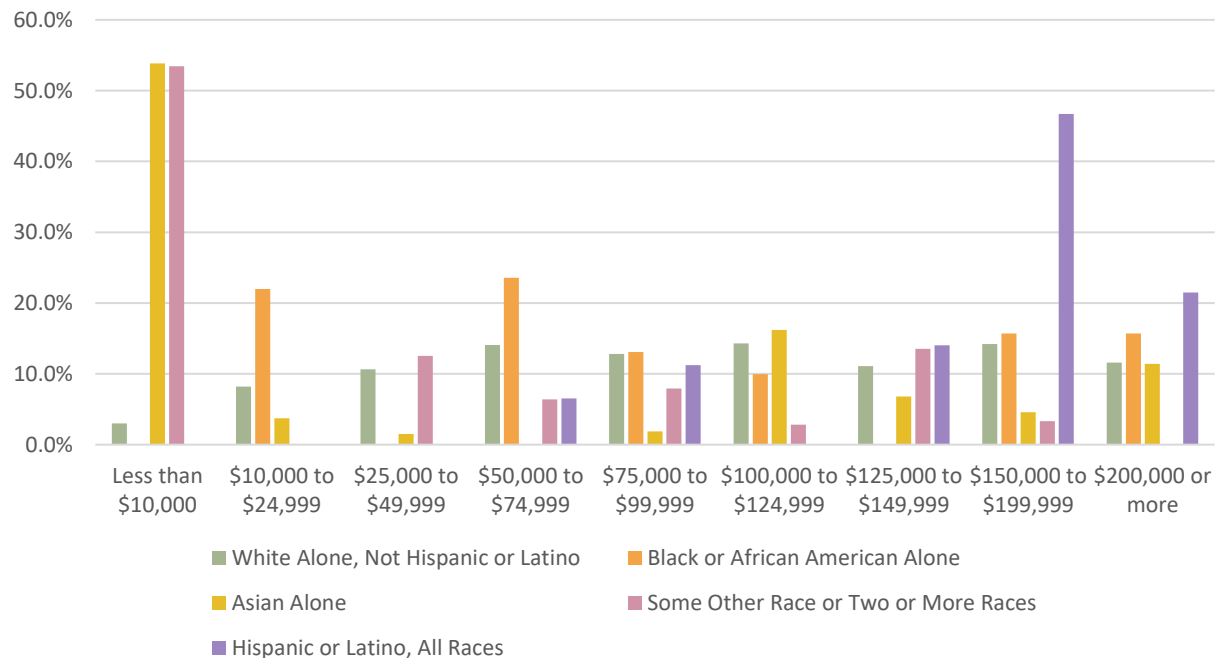
b. Income by Race and Ethnicity

Table 18 and **Figure 10** show the income distribution estimated by the 2015-2019 ACS of certain race and ethnicity categories in Tewksbury. The 2016-2020 ACS was not used because it did not contain complete information. Note that these are sorted by the race and ethnicity of the “householder,” or the first person who filled out their information on the census form, and therefore does not capture mixed-race or ethnicity households. Of 11,022 households identified as White alone, not Hispanic or Latino/Latina, income was roughly distributed evenly: 11.2% earned less than \$25,000 and 11.6% earned \$200,000 or more. This was not the case for Black or African American alone, Asian alone, or some other race or two or more races, of which, 22.0%, 57.6%, and 53.5% earned less than \$25,000 respectively. The only race/ethnicity category to differ from this trend was Hispanic or Latino/Latina. The ACS showed a disproportionately high number of households earning \$150,000 or more in this group: 68.2% of Hispanic or Latino/Latina Households, or 73 households.

Table 18: Households by Race and Ethnicity and Income Category, Tewksbury, 2015-19

	White Alone, Not Hispanic or Latino		Black or African American Alone		Asian Alone		Some Other Race or Two or More Races		Hispanic or Latino, All Races	
	#	%	#	%	#	%	#	%	#	%
Less than \$10,000	333	3.0%	0	0.0%	316	53.8%	209	53.5%	0	0.0%
\$10,000 to \$14,999	333	3.0%	0	0.0%	14	2.4%	0	0.0%	0	0.0%
\$15,000 to \$19,999	354	3.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$20,000 to \$24,999	219	2.0%	42	22.0%	8	1.4%	0	0.0%	0	0.0%
\$25,000 to \$29,999	268	2.4%	0	0.0%	0	0.0%	19	4.9%	0	0.0%
\$30,000 to \$34,999	245	2.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$35,000 to \$39,999	229	2.1%	0	0.0%	9	1.5%	0	0.0%	0	0.0%
\$40,000 to \$44,999	316	2.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$45,000 to \$49,999	116	1.1%	0	0.0%	0	0.0%	30	7.7%	0	0.0%
\$50,000 to \$59,999	657	6.0%	31	16.2%	0	0.0%	0	0.0%	7	6.5%
\$60,000 to \$74,999	896	8.1%	14	7.3%	0	0.0%	25	6.4%	0	0.0%
\$75,000 to \$99,999	1,414	12.8%	25	13.1%	11	1.9%	31	7.9%	12	11.2%
\$100,000 to \$124,999	1,574	14.3%	19	9.9%	95	16.2%	11	2.8%	0	0.0%
\$125,000 to \$149,999	1,223	11.1%	0	0.0%	40	6.8%	53	13.6%	15	14.0%
\$150,000 to \$199,999	1,565	14.2%	30	15.7%	27	4.6%	13	3.3%	50	46.7%
\$200,000 or more	1,280	11.6%	30	15.7%	67	11.4%	0	0.0%	23	21.5%
Total	11,022	100.0%	191	100.0%	587	100.0%	391	100.0%	107	100.0%

Figure 10: Households by Race and Ethnicity and Income Category, Tewksbury, 2015-19



Source: U.S. Census Bureau, 2016-2020 American Community Survey Table B25118

c. Poverty Status by Race and Ethnicity

Table 19 outlines poverty status by Race and Ethnicity in the United States, Massachusetts, Tewksbury, and Greater Lowell. For each area, “Population under poverty” is the estimated number of people living under the poverty threshold in that area identifying as that race or ethnicity, and the “Percent under poverty” is the proportion under the poverty threshold of the total number of people identifying as that race or ethnicity whose poverty status is known.

Table 19: Population by Poverty Status and Race and Ethnicity, Selected Geographies, 2016-2020

	United States		Massachusetts		Tewksbury		Greater Lowell	
	Population Under Poverty	Percent Under Poverty	Population Under Poverty	Percent Under Poverty	Population Under Poverty	Percent Under Poverty	Population Under Poverty	Percent Under Poverty
White Alone, Not Hispanic or Latino	17,854,392	9.3%	313,547	6.7%	926	3.3%	13,828	6.5%
Black or African American Alone	8,726,814	22.1%	86,362	17.6%	181	18.7%	1,744	12.2%
Asian Alone	1,917,691	10.6%	52,349	11.8%	80	9.2%	3,977	10.2%
Some Other Race or Two or More Races	6,444,882	17.8%	114,609	18.7%	48	6.4%	2,793	17.7%
Hispanic or Latino, All Races	10,642,653	18.3%	184,331	23.0%	5	0.8%	6,934	25.9%
Total Under Federal Poverty Level	40,910,326	12.8%	653,454	9.8%	1,235	4.0%	27,012	9.1%
Total Population with Poverty Status Known	318,564,128		6,637,329		30,685		298,335	

Source: U.S. Census Bureau, 2016-2020 American Community Survey, Table B17001A-B17001I.

Although the overall poverty rate using the U.S. Census definition in Tewksbury is 4.0%, 18.7% of people who are Black or African American alone are under poverty (181 people), 9.2% of people who are Asian Alone (80 people), and 6.4% of people who are some other races or two or more races (48 people). These are all significantly higher rates than those who identify as White alone, not Hispanic or Latino/Latina, which is 3.3% or 926 people. This echoes regional, state, and federal trends. Although the rate for Hispanic or Latino/Latina of all races is 0.8%, the same size in Tewksbury is very small (5 people), and this population has the greatest rate of poverty in Greater Lowell as a whole, 25.9% or 6,934 people.

d. Tenure by Race and Ethnicity

The income status of people of different races and ethnicities also impacts the type of housing they live in. **Table 20** outlines tenure (ownership vs. rental) by Race and Ethnicity in the United States, Massachusetts, Tewksbury, and Greater Lowell. For each area, the number of households Note that these are sorted by the race and ethnicity of the “householder,” or the first person who filled out their information on the census form, and therefore does not capture mixed-race or ethnicity households. **Figure 11** focuses on Rental units specifically, showing the percentage of total households that are

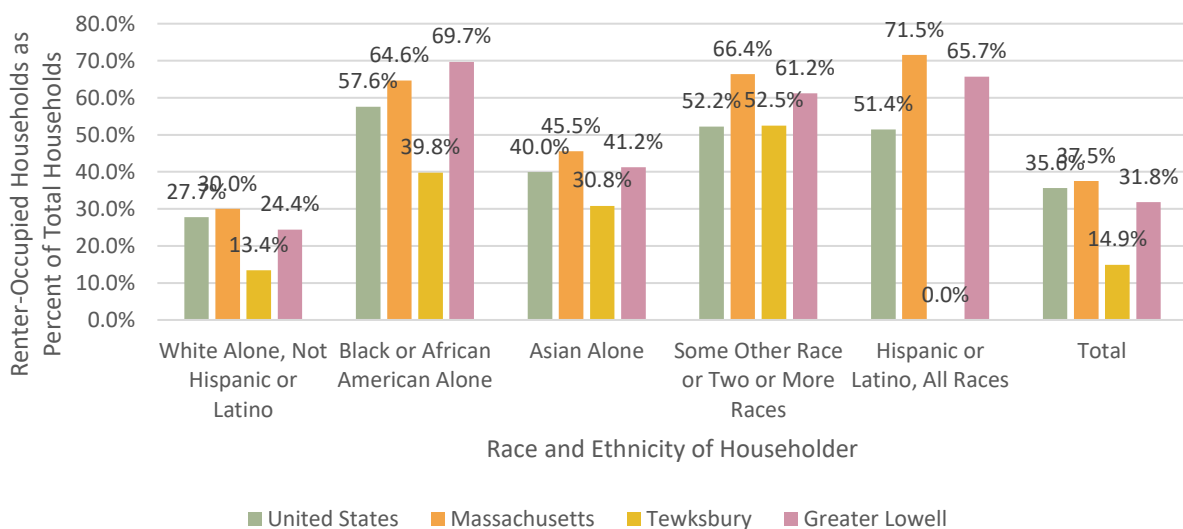
renter-occupied for each geography and race/ethnicity category. Tenure in general and how it has changed over time will be explored in the next subsection, “Housing Inventory Analysis.”

Table 20: Occupied Households by Tenure and Race and Ethnicity, Selected Geographies, 2016-20

	United States		Massachusetts		Tewksbury		Greater Lowell	
	Owner Occupied Households	Renter Occupied Households	Owner Occupied Households	Renter Occupied Households	Owner Occupied Households	Renter Occupied Households	Owner Occupied Households	Renter Occupied Households
White Alone, Not Hispanic or Latino	59,159,656	22,706,626	1,410,157	603,440	9,535	1,475	63,933	12,203
Black or African American Alone	6,376,779	8,645,300	60,809	111,149	174	115	1,487	823
Asian Alone	3,572,810	2,378,711	83,153	69,502	211	94	6,794	2,816
Some Other Race or Two or More Races	4,765,607	5,213,895	61,704	121,834	85	94	1,925	979
Hispanic or Latino, All Races	7,969,105	8,443,892	72,967	183,310	161	0	2,969	1,489
Total	78,801,376	43,552,843	1,654,892	992,088	10,147	1,778	75,767	17,461

Source: U.S. Census Bureau, 2016-2020 American Community Survey, Table B25003A-B25003I.

Figure 11: Percent Renter-Occupied Households by Race and Ethnicity, Selected Geographies, 2016-20



Source: U.S. Census Bureau, 2016-2020 American Community Survey, Table B25003A-B25003I.

It should not be surprising that households identifying as a race other than White and non-Hispanic or Latino/Latina are more often renters. This is true for all geographies, although possibly because Tewksbury has fewer rental units, it has a lower proportion of each race/ethnicity category as rentals. Looking at each category, 39.8% of households identified as Black or African American alone are renter-occupied (115 households), 30.8% of households identified as Asian Alone (94 households), and 52.5% of households who are some other races or two or more races (94 households). These are all

significantly higher rates than households identified as White alone, not Hispanic or Latino/Latina, which is 13.4% or 1,475 households. The only notable difference is the ACS estimated that 0 Hispanic or Latino/Latina households were renter-occupied, although in the other geographies this ethnicity also tends to be renter-occupied at the same rate.

B. Housing Inventory Analysis

This section examines the characteristics of the current housing inventory and local housing market in Tewksbury. The section begins with an analysis of housing types and home values, followed by an examination of development and sales trends, including the median cost of renting or buying a home in Tewksbury. In the next section, this data is compared with data from the previous section to determine the gap between the existing and projected housing inventory and the existing and projected population.

1. Housing Units and Type

Table 21 illustrates the total number of housing units (both occupied and unoccupied) by their type for 2000 through 2016-2020.

In 2000, there were 10,171 housing units in Tewksbury. One-unit detached homes represented the largest percentage of homes, accounting for 76.5% of all housing units. One-unit attached homes accounted for 9.8%, two-family homes accounted for 2.3%, and multi-family dwellings comprised of three or more units accounted for 9.9%. The 2000 census reported 153 mobile homes or other housing units.

Between 2000 and 2010-14, the Town's housing stock had grown by 1,426 units. By 2016-20, it had grown by an additional 589 units. This represents a 19.8% (2,015 unit) increase between 2000 and 2016-20. The number of units of all types had increased except two-family (duplex), small multifamily structures with 3-4 units, and the "other" category. Most of these new units were single-family detached (824 units, an increase of 10.6%). The second-most common type of unit built in that time period were those in large structures of 20 or more units (781 units, an increase of 238.8%). Structures of 10-19 units more than doubled this time as well (307 units, an increase of 126.3%).

Because of the growth of units in these large buildings, the share of single-family detached units fell slightly from

FAST FACTS: HOUSING INVENTORY ANALYSIS

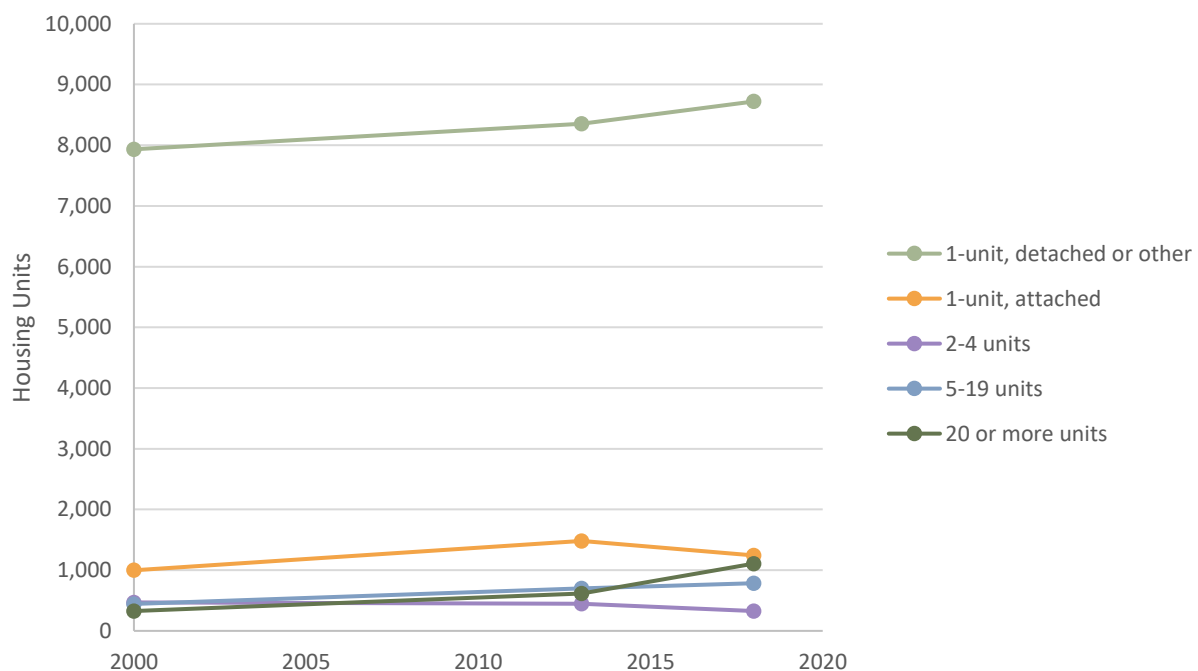
- The number of Tewksbury housing units grew by nearly 20% between 2000 and 2020.
- The largest gains were in single family detached (824 units) and units in buildings with 20 or more units (781 units).
- Duplex units were lost during this time.
- Since 2012, the median detached home price in Tewksbury rose faster than the Massachusetts median, reaching \$560,000 in 2021.
- Housing sales numbers (turnover) have been more-or-less steady since 2016, even through the 2020-21 COVID-19 pandemic.
- Assuming the five-year average of 62 units permitted per year continue, 310 housing units would be built over the five-year life of this plan (including both market rate and affordable). Assuming instead that growth reverts to the ten-year average recorded by the U.S. Census, 625 units would be built.
- The ACS estimated that Tewksbury had a 0% rental vacancy rate in 2016-20.

76.5% to 70.6%. This represents a diversification of Tewksbury's housing inventory and has likely had positive affordability effects for the town. That said, especially since 2011-15, the number of units in structure types other than single family detached or the largest of apartment buildings (20+) has shrunk slightly. This middle housing type often represents a steppingstone from rental to home ownership or an opportunity for supplemental income for homeowners with a small number of additional rental units, and it should not be overlooked.

Table 21: Number of Housing Units by Size of Structure, Tewksbury, 2000, 2011-15, and 2016-20

Housing Units per Structure	2000		2011-2015		2016-2020		Percent Change
	Number	Percent	Number	Percent	Number	Percent	2000 – 2016/20
1-unit, detached	7,780	76.5%	8,211	70.8%	8,604	70.6%	10.6%
1-unit, attached	998	9.8%	1,482	12.8%	1,245	10.2%	24.7%
2 units	232	2.3%	100	0.9%	104	0.9%	-55.2%
3-4 units	237	2.3%	348	3.0%	223	1.8%	-5.9%
5-9 units	201	2.0%	288	2.5%	235	1.9%	16.9%
10-19 units	243	2.4%	413	3.6%	550	4.5%	126.3%
20 or more units	327	3.2%	614	5.3%	1,108	9.1%	238.8%
Mobile Home or other	153	0.0%	141	1.2%	117	1.0%	-23.5%
Total	10,171	100.0%	11,597	100.0%	12,186	100.0%	19.8%

Figure 12: Number of Housing Units by Type of Structure (2000, 2011-2015, and 2016-2020)



Source: U.S. Census Bureau, 2000 Decennial Census and 2011-2015 and 2016-2020 American Community Survey, Table B25024.

2. Housing Tenure

Just as a diversity of housing types to match the needs of diverse households is important, having a mix of housing available for rent and for sale is also important. **Table 22** illustrates housing tenure (ownership vs. rental) from 2000 through 2016-20. In 2000, the Tewksbury housing inventory consisted of 8,887 (89.1%) owner-occupied and 1,087 (10.9%) renter-occupied households. Between 2000 and 2011-15, 734 units were added to the owner-occupied category, and 501 were added to the renter-occupied category. This represented a shift to a greater proportion of units in the renter-occupied category. This trend continued into 2016-20, albeit less drastically, as 536 owner-occupied units and 190 renter-occupied units were added. This resulted in a breakdown of 10,147 (85.1%) owner-occupied units and 1,778 (14.9%) renter-occupied units recorded by the 2016-20 ACS.

Table 22: Occupied Households by Tenure, Tewksbury, 2000, 2011-15, and 2016-20

	2000		2011-2015		2016-2020		Percent Change 2000 – 2016/20
	Number	Percent	Number	Percent	Number	Percent	
Owner Occupied	8,877	89.1%	9,611	82.9%	10,147	85.1%	14.3%
Renter Occupied	1,087	10.9%	1,588	13.7%	1,778	14.9%	63.6%
Total Occupied Housing Units	9,964	100.0%	11,199	100.0%	11,925	100.0%	19.7%

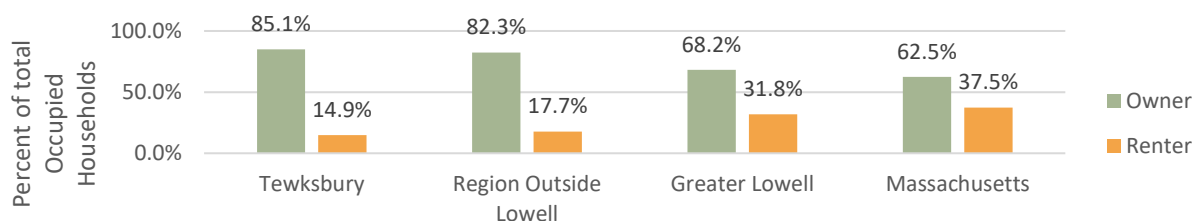
Source: U.S. Census Bureau, 2000 Decennial Census and 2011-2015 and 2016-2020 American Community Survey Table B25032

The number of rental units in Tewksbury is compared to the region outside Lowell (i.e., Lowell suburbs), Greater Lowell, and the state as a whole in **Table 23**. The percentage of rentals in Tewksbury as estimated by the 2016-2020 ACS (14.9%) is lower than its peer suburbs (17.7%) and much lower than the region or state (31.8% and 37.5% respectively). This represents a lack of housing options, especially for those who cannot or prefer not to purchase a home. This also impacts fair access across racial and ethnic groups—as the previous subsection noted, populations identifying as non-White, or Hispanic or Latino/Latina more often live in renter-occupied households.

Table 23: Occupied Households by Tenure, Selected Geographies, 2016-20

	Tewksbury		Region Outside Lowell		Greater Lowell		Massachusetts	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Owner Occupied	10,147	85.1%	58,306	82.3%	75,767	68.2%	1,654,892	62.5%
Renter Occupied	1,778	14.9%	12,536	17.7%	35,335	31.8%	992,088	37.5%
Total Occupied Housing Units	11,925	100.0%	70,842	100.0%	111,102	100.0%	2,646,980	100.0%

Figure 13: Occupied Households by Tenure, Selected Geographies, 2016-2020



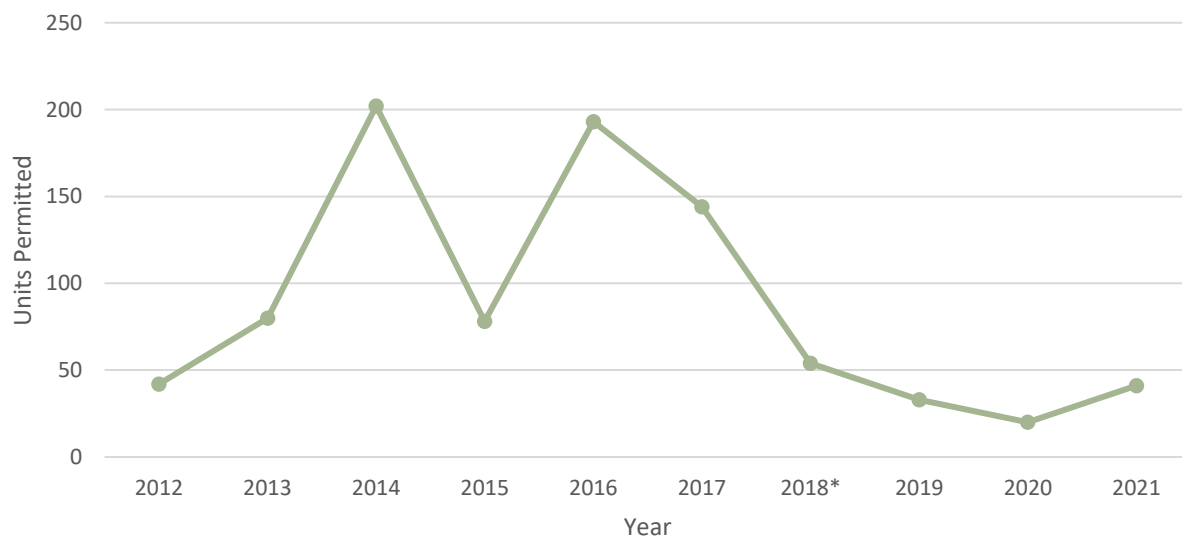
Source: U.S. Census Bureau, 2016-2020 American Community Survey Table B25032

3. Recent Residential Development

a. Units Permitted in New Residential Buildings

This HPP tracks the new units permitted in the last ten years to determine more recent trends in housing that the ACS could show. Figure 14 shows the total units permitted. Two major projects were approved in 2014 and in 2017, contributing to the roughly 200 units permitted in each of those years. However, the number of permitted units dropped to 24 in 2018 and has fluctuated between 20 and 41 since then. Based upon residential building permit data in Tewksbury from January 1, 2017, to December 31, 2021 (roughly the period since the previous HPP's approval), an estimated 169 residential permits were issued for 310 new housing units. During this time, permits for the demolition of 55 units were approved. If all construction and demolition took place, a net of 255 new units would be created.

Figure 14: Total Units Permitted (Not all Permitted Units are Constructed)



*Source: Tewksbury Building Department (2012-2021). * 2018 includes 2230 Main Street, a 30-unit mixed-use building.*

Table 24 and Figure 15 provide more specific information on the number of building permits issued by structure type, the total new units permitted, the total valuation, and the average valuation per unit for all residential permits issued between 2012 and 2021. Notably, although this HPP makes its best effort to summarize building permit data provided by the Town of Tewksbury, these should be considered a proxy or estimate for actual units constructed, as not all permitted units are constructed and there may be small reporting errors.

During 2012-2016, 321 single-family detached homes (64% of total units permitted) were permitted. This number dropped to 134 (43% of total units permitted) during 2017-2021. There were 0 single family attached homes permits identified in 2012-2016, but 19 (6% of total units permitted) were permitted in 2017-2021. There were similarly small numbers for 2-family and 3- and 4-family structures. However, 170 units (34% of total units permitted) in 5+ family structures were permitted in 2012-16, and 144 (46% of

total units permitted) were permitted in 2017-21. That said, 2017 was the last year a structure of this size was permitted.

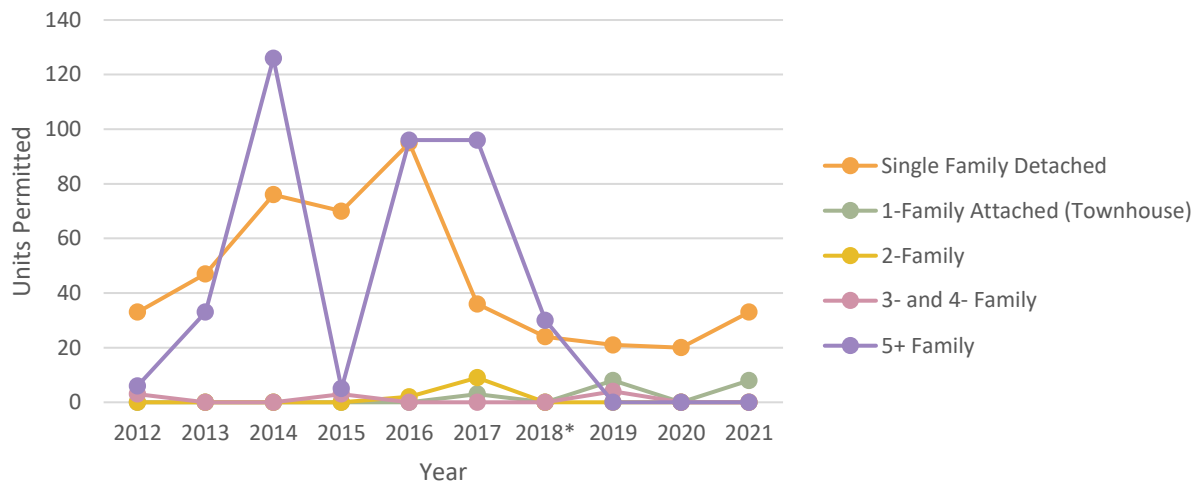
The average construction value per unit ranged from \$142,227 in 2013 to \$329,049 in 2021. Years with many multifamily units permitted have lower average construction values because these types of units are a lower cost to build on a per-unit basis. However, outside of that, construction value per unit jumped significantly in 2020 (by 18%) and 2021 (by 41%), larger increases than median income in the same years. These cost increases mean deeper subsidies will be needed to make new housing affordable to the same income categories and also underscore the importance of allowing the construction of smaller, more affordable units in multifamily structures.

Table 24: New Residential Building Units Permitted (2012 - 2021)

Year	Units Permitted (Not all Permitted Units are Constructed)						Total Construction Value	Average Construction Value Per Unit
	Single Family Detached	1-Family Attached (Townhouse)	2-Family	3- and 4-Family	5+ Family	Total		
2012	33	0	0	3	6	42	\$8,376,376	\$199,438
2013	47	0	0	0	33	80	\$11,378,140	\$142,227
2014	76	0	0	0	126	202	\$24,027,740	\$118,949
2015	70	0	0	3	5	78	\$13,933,283	\$178,632
2016	95	0	2	0	96	193	\$31,939,938	\$165,492
2017	36	3	9	0	96	144	\$25,735,098	\$178,716
2018*	24	0	0	0	30	54	\$9,955,620	\$184,363
2019	21	8	0	4	0	33	\$6,530,455	\$197,893
2020	20	0	0	0	0	20	\$4,661,225	\$233,061
2021	33	8	0	0	0	41	\$13,491,000	\$329,049
Total 2012-16	321	0	2	6	266	595	\$89,655,477	\$150,681
Total 2017-21	134	19	9	4	126	292	\$60,373,398	\$206,758

Source: Tewksbury Building Department (2012-2021). * 2018 includes 2230 Main Street, a 30-unit mixed-use building.

Figure 15: Residential Building Units Permitted by Type of Structure (2012-2021)



Source: Tewksbury Building Department (2012-2021). * 2018 includes 2230 Main Street, a 30-unit mixed-use building.

Examining recent development in the last five years (2017-2021) more closely, major developments of 8 or more units include:

- **Balsam Place:** A development of four 48-unit buildings permitted in late 2016 and early 2017 and completed in spring 2018.
- **Colonial Place:** A development including eight townhouses and four units in a mixed-use structure permitted in 2019.
- **2230 Main Street:** A development of 34 rental units permitted in 2020, 9 of which were SHI units, making the entire project SHI-eligible.
- **1563 Andover Street:** A development of 18 attached units and permitted in 2021.
- **Terramor Drive Subdivision:** An Open Space Residential Design (OSRD) development of 38 single family detached homes on approximately 1/3-acre lots and approximately 35 acres of open space. Permits for construction were approved mostly in late 2021.

Most other projects between 2017 and 2021 consisted of a single single-family detached home or three or four single-family detached or duplex structures.

b. New Family Suites Permitted

Finally, Family Suite units, commonly known as “Accessory Dwelling Units,” are not considered new residential buildings, because they are accessory to an existing building and have certain limitations. However, these units are important because they contribute to the overall number of units in Tewksbury and have the potential to make housing more affordable for both those residing in the “main” unit and the accessory unit. However, the limitations on this accessory use in the zoning limit their effectiveness. See Section I.A.1.e **Accessory Dwelling Units/Family Suite** for information about and analysis of the zoning article that allows them. As **Table 25** shows, 110 new Family Suites were permitted since 2012, an average of 11 each year. Sixty-one of these were permitted in the last five years. This number is significant: when considering the sum of units in new residential buildings and new Family Suites in the last five years, Family Suites make up 17% of the total units produced. Furthermore, unlike new residential buildings, there were more Family Suites permitted in the last five years than the five years prior.

Table 25: New Family Suites Permitted (2012-2021)

Year	Number of Family Suites Permitted
2012	8
2013	12
2014	12
2015	9
2016	8
2017	14
2018	9
2019	16
2020	11
2021	11
Total 2012-16	49
Total 2017-21	61

4. Projected Housing Development

Projecting future housing unit development is difficult as market conditions can quickly change, and updated housing unit projections were not available at the time of drafting this plan. According to data from the U.S. Census, the average annual growth rate of total housing units between the 2010 and 2020 Decennial Census was 129 units annually. However, permit data can provide a more granular—and recent—picture. An average of 81 units were permitted annually in the last ten years. This rate of development has slowed—in the last five years, the average was 59 units annually, and in the last three years, the average was 31 annually. Given that growth seems to be slowing, this HPP therefore contemplates two scenarios:

Scenario A

The first scenario assumes that recent trends will continue. This assumes the 2019 MassDOT projections indicating a slowdown in regional growth will prove true and a combination of rising construction costs and limited greenfield opportunities in Tewksbury will continue to make housing production difficult. This scenario assumes the growth rate of housing units (which include both affordable and market-rate housing) will continue at the five-year average annual rate of new permits net demolitions, 51 units annually and 255 units over the five-year life of this plan.

Scenario B

The second scenario assumes that recent and future zoning changes allow a diversity of housing types in Tewksbury and regional and national conditions result in general population growth in the region. This scenario assumes growth will revert to the ten-year average as recorded by the U.S. Census Bureau, 129 units annually and 645 units over the five-year life of this plan.

These two projection scenarios will be used to set realistic housing production goals.

5. Housing Market Conditions

This section moves from examining the number and types of units built to examining their cost. This will analyze trends in the local housing market in Tewksbury over the last ten years, building upon the work that was completed in the *Tewksbury Housing Production Plan for 2017-2021*. In summary, the town has recovered from the economic recession and housing downturn in the late 2000s. The major challenge now facing Tewksbury is the lack of housing choices for low- and moderate-income residents as sales prices spiked during the COVID-19 Pandemic and, as of 2021, had not receded. It is notable that although prices increased, sales did not slow during the COVID-19 pandemic in 2020 and 2021. However, the housing market may have changed in 2022, and any recent changes would not be reflected in this HPP.

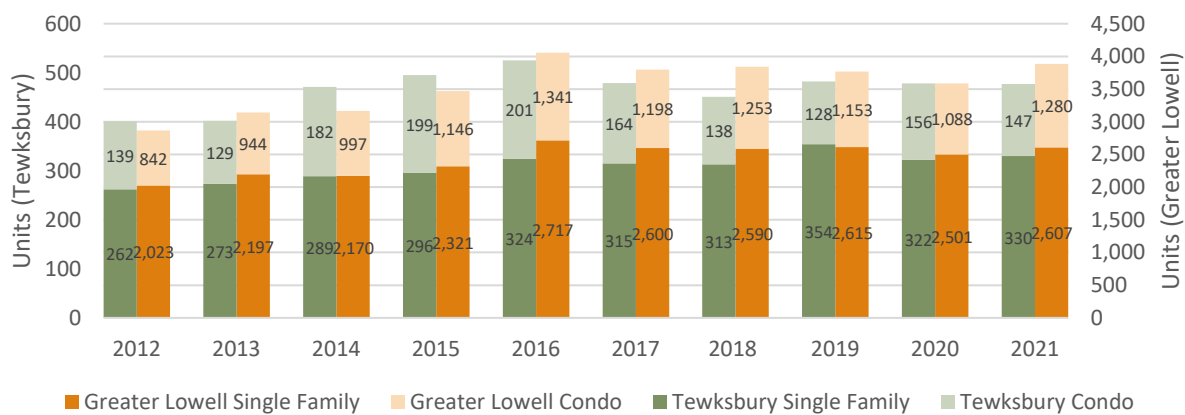
a. Home Sales

During the period from 2012 to 2021, data from the Warren Group shows single-family home sales in Tewksbury started at 262 units as shown in **Table 26** and **Figure 16**. There was an increase in single-family home sales in 2013 (273 units), 2014 (289 units), 2015 (296 units), and 2016 (324 units). At that point, there was a slight dip in 2017-18, before an increase to an all-time high in 2019 (354 units). Greater Lowell is provided for comparison, and Tewksbury generally had slower relative growth in sales during the ten-year period (26.0% for Tewksbury vs. 28.9% for Greater Lowell).

Condominium sales were much more variable and did not grow as single-family home sales did. Condominium sales began at 139 units in 2012, decreased to 129 units in 2013, and then rebounded to 182 units in 2014, 199 units in 2015, and 201 units in 2016. However, 2016 was a high point, and the number of condos sold dropped significantly to 164 units sold in 2017, 138 sold in 2018, and 128 sold in 2019. This number has rebounded somewhat in recent years, reaching 147 in 2021. Unlike Tewksbury, Greater Lowell's condo sales grew by a significant amount during this period. Greater Lowell grew by 52.0%, while Tewksbury grew by only 5.8%.

Table 26: Home Sales in Tewksbury and Greater Lowell (2011-2021)

Year	Tewksbury			Greater Lowell		
	Single Family	Condo	Total	Single Family	Condo	Total
2012	262	139	452	2,023	842	3,511
2013	273	129	453	2,197	944	3,815
2014	289	182	527	2,170	997	3,881
2015	296	199	541	2,321	1,146	4,201
2016	324	201	585	2,717	1,341	4,896
2017	315	164	534	2,600	1,198	4,590
2018	313	138	510	2,590	1,253	4,672
2019	354	128	520	2,615	1,153	4,566
2020	322	156	517	2,501	1,088	4,339
2021	330	147	527	2,607	1,280	4,766

Figure 16: Home Sales in Tewksbury (2012-2021)

Source: The Warren Group, 2021.

b. Sales Prices

Figure 17 and showError! Reference source not found. the changes in the median sales price of single-family homes and condos in Tewksbury and Massachusetts between 2012 and 2021. Despite the oscillating pattern for number of single-family homes sales during this period, the median sales price had a clear pattern of increasing steadily by between 3.4% and 8.4% a year. In total, the median sales price changed by 63.5% from \$297,250 in 2012 to \$486,050 in 2020, separating from the Massachusetts median price in 2013 and growing notably faster after that. In addition, a larger spike occurred in 2021 to \$560,000, an increase of \$73,950 (13.2%) from 2020. 2020 had the second-largest increase in the ten-year period.

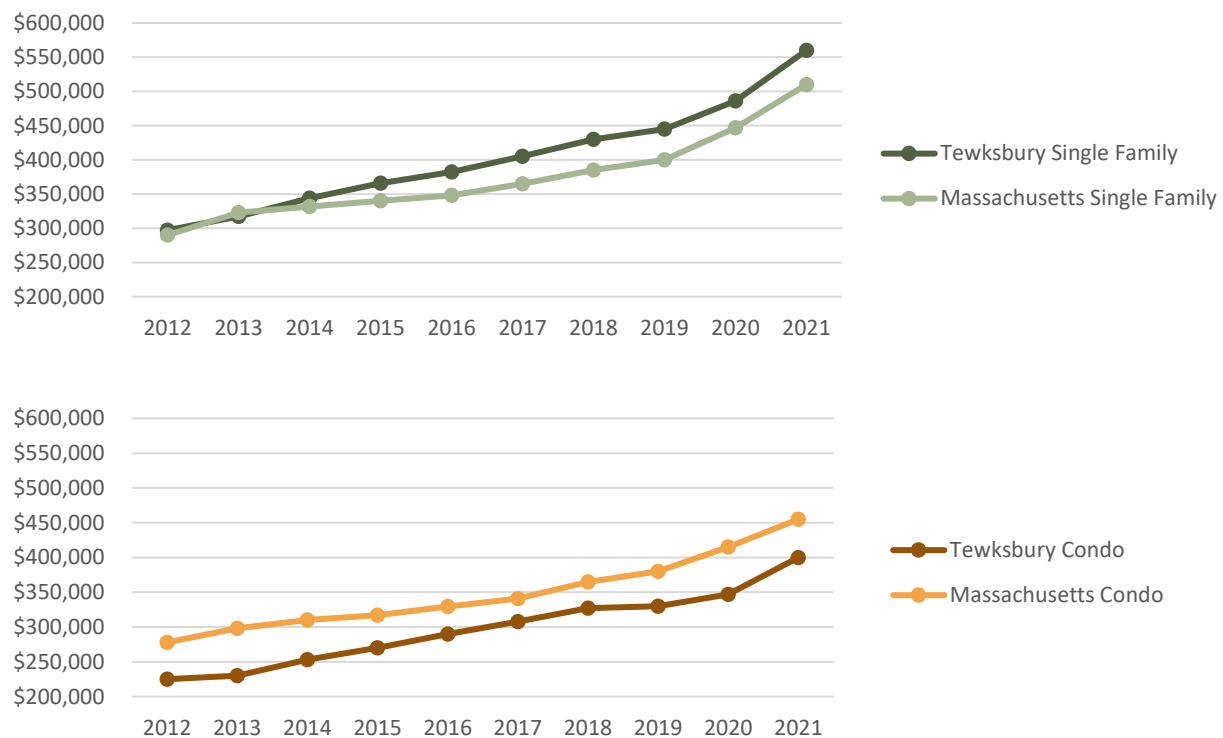
Condominium prices followed a similar pattern at a lower sales price. However, the overall increase of condo median prices is proportionally slightly less than that of single-family homes, with an increase of between 0.9% and 9.1% annually, or a total of 54.2% between 2011 (\$225,000) and 2020 (\$347,000). Like single-family homes, it had a larger-than-average jump in 2021 to \$400,000, a 13.3% increase from the previous year. Unlike single-family homes, the median price in Tewksbury is lower than the median of Massachusetts as a whole.

Table 27: Median Home Sales Price in Tewksbury and Massachusetts (2012-2021)

Year	Tewksbury			Massachusetts		
	Single Family	Condo	Total	Single Family	Condo	Total
2012	\$297,250	\$225,000	\$275,500	\$290,000	\$278,000	\$285,000
2013	\$317,000	\$230,000	\$289,500	\$322,800	\$298,000	\$315,000
2014	\$344,000	\$253,000	\$318,400	\$331,750	\$310,000	\$325,000
2015	\$366,000	\$270,000	\$332,000	\$340,000	\$317,000	\$335,000
2016	\$382,000	\$290,000	\$355,000	\$348,000	\$329,500	\$344,900
2017	\$405,000	\$307,750	\$375,000	\$365,000	\$341,000	\$360,000
2018	\$429,900	\$327,000	\$391,000	\$385,000	\$364,900	\$380,000
2019	\$445,000	\$330,000	\$415,000	\$400,000	\$380,000	\$396,000
2020	\$486,050	\$347,000	\$460,000	\$447,000	\$415,000	\$435,000
2021	\$560,000	\$400,000	\$530,000	\$510,000	\$455,000	\$493,000

Source: The Warren Group 2021.

Figure 17: Median Home Sales Prices in Tewksbury and Massachusetts (2012-2021)



Source: The Warren Group 2021.

Table 28 compares the median selling prices of single-family homes and condominiums in Tewksbury to the other eight communities in the Greater Lowell region in 2021. Tewksbury was in the exact middle of the region for single-family home sales prices, having the fifth highest of the nine communities' medians. As noted previously, the median sales price is over the Massachusetts median—by \$55,000 (10.8%). Tewksbury median condo sales prices are third highest in the region, despite being \$55,000 lower than Massachusetts median sales prices. The Town of Westford had the highest median sales price for both single-family (\$747,500) and condo sales (\$433,000) in 2021.

Table 28: Comparison of Median Sales Prices in Tewksbury and the Greater Lowell region (2021)

Community	Single Family Sales	Median Sales Price	Condo Sales	Median Sales Price	Total Sales	Median Sales Price
Billerica	433	\$570,000	94	\$352,500	639	\$552,000
Chelmsford	380	\$582,550	232	\$337,375	654	\$492,500
Dracut	295	\$458,000	158	\$258,500	549	\$425,000
Dunstable	41	\$665,000	1	N/A	51	\$630,000
Lowell	564	\$410,000	456	\$275,000	1,447	\$389,000
Pepperell	157	\$460,000	18	\$308,250	239	\$450,000
Tewksbury	330	\$560,000	147	\$400,000	527	\$530,000
Tyngsborough	133	\$550,000	63	\$325,000	227	\$456,000
Westford	274	\$747,500	111	\$433,000	433	\$655,000
Greater Lowell region	2,607	N/A	1,280	N/A	4,766	N/A
Massachusetts	56,538	\$510,000	26,316	\$455,000	106,514	\$493,000

Source: The Warren Group, 2021.

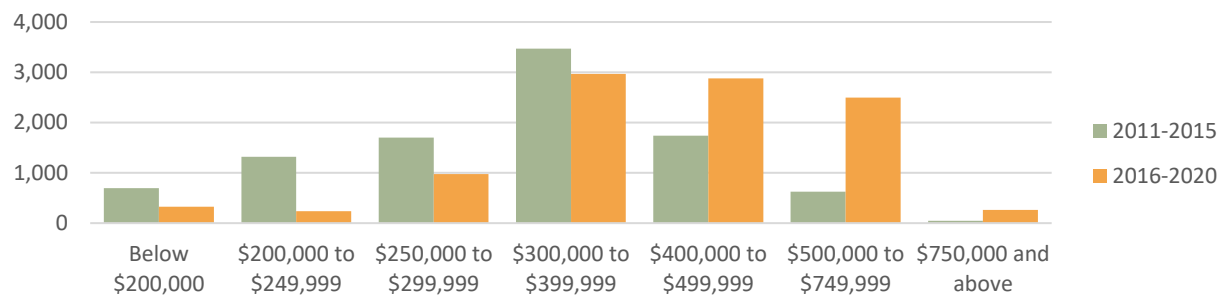
Because Warren Group data only provides median sales price, it is impossible to use the data to understand the distribution of sales prices in the community. Although the data is not as recent and represents all homes, not just homes recently sold, the home value estimates provided by the ACS can serve as a proxy for distribution of sales prices. The ACS estimates, shown in **Table 29** and Figure 18, are based on responses from a sample of survey respondents.

Table 29: Home Value, Homeowner Occupied Units (2011-2015 and 2016-2020)

	2011-2015		2016-2020		Change 2011-15 – 2016-20
	Number	Percent	Number	Percent	
Less than \$50,000	336	3.5%	72	0.7%	-78.6%
\$50,000 to \$99,999	19	0.2%	36	0.4%	89.5%
\$100,000 to \$124,999	50	0.5%	83	0.8%	66.0%
\$125,000 to \$149,999	59	0.6%	37	0.4%	-37.3%
\$150,000 to \$174,999	94	1.0%	24	0.2%	-74.5%
\$175,000 to \$199,999	138	1.4%	72	0.7%	-47.8%
\$200,000 to \$249,999	1,318	13.7%	235	2.3%	-82.2%
\$250,000 to \$299,999	1,700	17.7%	978	9.6%	-42.5%
\$300,000 to \$399,999	3,470	36.2%	2,969	29.3%	-14.4%
\$400,000 to \$499,999	1,739	18.1%	2,881	28.4%	65.7%
\$500,000 to \$749,999	628	6.5%	2,497	24.6%	297.6%
\$750,000 to \$999,999	45	0.5%	250	2.5%	455.6%
\$1,000,000 to \$1,499,999	0	0.0%	13	0.1%	N/A
\$1,500,000 to \$1,999,999	0	0.0%	0	0.0%	N/A
Total	9,596	100.0%	10,147	100.0%	5.7%

Source: U.S. Census Bureau, 2011-2015 and 2016-2020 American Community Survey Table B25075

Figure 18: Home Value, Homeowner Occupied Units (2011-2015 and 2016-2020)



Source: U.S. Census Bureau, 2011-2015 and 2016-2020 American Community Survey Table B25075

The ACS shows that homes valued at less than \$400,000 were much more common in 2011-15 than in 2016-20. There were 7,184 homes valued at \$400,000 or less in 2011-15 and 4,506 in 2016-20, a roughly 37% decrease. There was an increase in homes valued from \$50,000 to \$124,999 during that time, but losses in other cost categories more than offset that increase. The largest change was the increase in homes valued at about \$500,000. Homes valued from \$500,000 to \$749,999 increased from 628 to 2,497 (298% increase) during that time, and homes valued from \$750,000 to \$999,999 increased from 45 to 250 (456% increase) during that time. This type of price increase is difficult for first-time homebuyers.

c. Foreclosures

Based upon data provided by the Warren Group, the foreclosure petitions in Tewksbury from 2012 to 2022 are summarized in **Table 30**. As time passed from the Great Recession, the number of foreclosure petitions decreased from 67 in 2012 to 26 in 2013. They slowly rose again through 2016 to a high of 47, then slowly declined until 2019, when there were 36 foreclosures. In 2020, 2021, and 2022, there have been a smaller number (4 to 12 each year) of foreclosures, which may reflect the foreclosure moratoriums related to COVID-19.¹²

d. Fair Market Rent

HUD uses **Fair Market Rent (FMR)** estimates primarily to determine standard payment amounts for the Housing Choice Voucher program, initial renewal rents for some expiring project-based Section 8 contracts, initial rents for housing assistance payment (HAP), contracts in the Moderate Rehabilitation Single Room

Table 30: Petitions to Foreclosure, Town of Tewksbury, 2012-2022

Year	Number of Single-Family Foreclosure Petitions*	Total Number of Foreclosure Petitions
2012	67	67
2013	26	26
2014	35	36
2015	43	43
2016	47	47
2017	46	47
2018	44	44
2019	36	36
2020	11	11
2021	7	7
2022	12	12

Source: The Warren Group, 2022. *Includes condominium petitions to foreclosure

¹² Most mortgages had certain protections from foreclosure from March, 2020 to September, 2021, with other assistance and rules starting in 2021, see <https://www.mass.gov/info-details/massachusetts-law-about-foreclosure>

Occupancy program (Mod Rehab), and to serve as a rent ceiling in the HOME rental assistance program.¹³ FMR is HUD’s estimate of the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market.¹⁴ As mentioned earlier, HUD defines Tewksbury’s “local housing market” as the Lowell Metro FMR Area. As shown in **Table 31**, the FMR for a 1-bedroom apartment in the Lowell, MA HUD Metro FMR Area in FY 2022 was \$1,359 per month, and all Fair Market Rents were roughly between \$1,200 and \$2,400. This is a fairly large increase from FY 2021’s FMR, which were roughly between \$1,000 and \$2,000.

Table 31: Fair Market Rent for Lowell, MA HUD Metro FMR Area (FY 2022)

	Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
FY 2020 FMR	\$1,066	\$1,188	\$1,534	\$1,912	\$2,078
FY 2021 FMR	\$1,067	\$1,193	\$1,547	\$1,924	\$2,098
FY 2022 FMR	\$1,237	\$1,359	\$1,773	\$2,192	\$2,404

Source: FY 2020, FY 2021, FY 2022 Lowell, MA Metro FMR Area, HUD Fair Market Rent Documentation System.

https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2022_code/2022summary.odn Retrieved April 1, 2022.

e. Median Rent and Gross Rent Distribution

Unlike Fair Market Rent data, the ACS provides rent cost data specific to each community. **Table 32** shows a closer look at the median rent for Tewksbury residents in comparison to the rest of the NMCOG region. According to the 2011-15 ACS, the median gross rent for Tewksbury was \$1,537. It grew to \$1,938 in 2016-20, an increase of 26.1%. Tewksbury’s median gross rent is the second highest in the region, \$126 below Westford.

Table 32: Median Gross Rent in the Greater Lowell region (2011-2015 and 2016-2020)

Community	Median Gross Rent 2011-15	Median Gross Rent 2016-20	Change	% Change
Billerica	\$1,258	\$1,674	\$416.00	33.1%
Chelmsford	\$1,113	\$1,656	\$543.00	48.8%
Dracut	\$1,163	\$1,398	\$235.00	20.2%
Dunstable	\$1,250*	\$1,750	\$500.00	40.0%
Lowell	\$1,005	\$1,229	\$224.00	22.3%
Pepperell	\$1,162	\$1,071	-\$91.00	-7.8%
Tewksbury	\$1,537	\$1,938	\$401.00	26.1%
Tyngsborough	\$1,180	\$1,266	\$86.00	7.3%
Westford	\$1,580	\$2,064	\$484.00	30.6%

Source: U.S. Census Bureau, 2011-2015 and 2016-2020 American Community Survey, Table B25064. *2010-2014 ACS for Dunstable

Just as in homeowner prices, median rents tell only a part of the story. To understand where gaps between need and supply exist and whether the town is moving toward closing those gaps, the

¹³ HOME is the largest Federal block grant to State and local governments designed exclusively to create affordable housing for low-income households. States and localities use HOME grant to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing or provide direct rental assistance to low-income people.

¹⁴ Source: U.S. Department of Housing and Urban Development Office of Policy Development and Research, U.S. Housing Market Conditions Summary, Fair Market Rents.

<https://www.huduser.gov/periodicals/ushmc/winter98/summary-2.html> Retrieved June 30, 2022.

distribution of gross rents is important. **Table 33** and Figure 19 show the distribution of gross rent in 2011-15, 2016-20, and the change between those two time periods. There was a dramatic increase in units less than \$600 a month, from 131 units to 361 units, a 176% increase. This may represent the construction of affordable rental housing in Tewksbury. However, Tewksbury lost units in the range between \$600 and \$1,999. In 2011-15, it had 1,238 units within this range, and in 2016-20, it had 518, a loss of nearly 60%. The largest change proportionately was units \$2,500 and above, moving from 21 units to 370 units, an increase of 1,662%, including the addition of 85 units of \$3,000 or more.

Table 33: Gross Rent (2011-2015 and 2016-2020)

	2011-2015		2016-2020		Change 2011-15 – 2016-20
	Number	Percent	Number	Percent	
Less than \$300	61	3.8%	83	4.7%	36.1%
\$300 to \$599	70	4.4%	278	15.6%	297.1%
\$600 to \$899	133	8.4%	24	1.3%	-82.0%
\$900 to \$1,249	126	7.9%	108	6.1%	-14.3%
\$1,250 to \$1,499	323	20.3%	28	1.6%	-91.3%
\$1,500 to \$1,999	656	41.3%	358	20.1%	-45.4%
\$2,000 to \$2,499	132	8.3%	420	23.6%	218.2%
\$2,500 to \$2,999	21	1.3%	285	16.0%	1257.1%
\$3,000 or more	0	0.0%	85	4.8%	N/A
No cash rent	66	4.2%	109	6.1%	65.2%
Total	1,588	100.0%	1,778	100.0%	12.0%

Figure 19: Gross Rent (2011-2015 and 2016-2020)



Source: U.S. Census Bureau, 2016-2020 American Community Survey, Table B25063.

f. Housing Vacancy Rates

Although the U.S. Census provides quarterly data on vacancies through the Housing Vacancy Survey, the smallest geographical unit available is the Metropolitan Statistical Area. Fortunately, the ACS also provides information on vacancies, both rental-occupied and owner-occupied. **Table 34** focuses on units either owner-occupied or for sale, with the number of units for sale (the vacancy rate) highlighted in green. In 2012-16, an estimated 102 units were for sale, or 1.0% of total units. But even as the ACS estimated Tewksbury added units, the vacancy rate dropped. In 2016-20, the estimated vacancy rate was 0.2%, or 16 units. This is well below what is considered a healthy residential market, which might be considered a 2% vacancy rate. This is a market in which buyers have a good selection of homes.¹⁵

Table 34: Ownership Units by Vacancy Status, Tewksbury, 2012-16 through 2016-20

Year	Owner Occupied		For sale		Sold, not occupied		For seasonal, recreational, or occasional use		Other vacant		Total Owner Units
	Number	%	Number	%	Number	%	Number	%	Number	%	
2012-16	9,824	98.7%	102	1.0%	29	0.3%	34	0.3%	149	1.5%	10,138
2013-17	10,032	99.3%	43	0.4%	29	0.3%	29	0.3%	243	2.3%	10,376
2014-18	9,985	99.7%	0	0.0%	31	0.3%	35	0.3%	172	1.7%	10,223
2015-19	10,090	98.8%	30	0.3%	88	0.9%	37	0.4%	186	1.8%	10,431
2016-20	10,147	99.3%	16	0.2%	55	0.5%	55	0.5%	135	1.3%	10,408

Source: U.S. Census Bureau, 2016-2020 American Community Survey, Table B25004 and Table B25032. Table assumes all seasonal and other vacant units are ownership units.

Table 35 compares Tewksbury to the region outside Lowell (peer suburbs of Lowell), Greater Lowell, and Massachusetts in 2016-2020. Tewksbury's vacancy rate was less than the other geographies, but even Massachusetts as a whole, at 0.9% units for sale, is well below what would be considered a healthy market. For reference, the average ownership vacancy rates across the entire United States was 1.4% in 2016-20.

Table 35: Ownership Units by Vacancy Status, Selected Geographies, 2016-20

	Owner Occupied		For sale		Sold, not occupied		For seasonal, recreational, or occasional use		Other vacant		Total Owner Units
	Number	%	Number	%	Number	%	Number	%	Number	%	
Tewksbury	10,147	99.3%	16	0.2%	55	0.5%	55	0.5%	135	1.3%	10,408
Region Outside Lowell	58,306	97.4%	325	0.5%	172	0.3%	361	0.6%	728	1.2%	59,892
Greater Lowell	75,767	96.9%	533	0.7%	214	0.3%	435	0.6%	1,251	1.6%	78,200
Mass.	1,654,892	88.2%	15,156	0.8%	13,972	0.7%	123,556	6.6%	68,891	3.7%	1,876,467

Source: U.S. Census Bureau, 2016-2020 American Community Survey, Table B25004 and Table B25032. Table assumes all seasonal and other vacant units are ownership units.

¹⁵ *The Empty House Next Door*, Alan Mallach, 2018.

The rental vacancy rate for Tewksbury is even smaller. A vacancy rate of 7% to 8% might be considered a healthy rental market,¹⁶ but Tewksbury's vacancy rate has been near or at zero for many years. **Table 36** details the number of occupied rental units, the number of units for rent, the number of units rented but not yet occupied, and the total number of rental units, with a highlight on the vacancy rate (for rent units). In 2012-16, this number was 1.2%, or 18 units. Since then, the ACS estimated this number to be zero, meaning units are rented out as soon as they are put on the market.

Table 36: Rental Units by Vacancy Status, Tewksbury, 2012-16 through 2016-20

Year	Occupied Units		For Rent Units		Rented, Not Occupied		Total Rental Units
	Number	Percent	Number	Percent	Number	Percent	
2012-16	1,542	98.8%	18	1.2%	0	0.0%	1,560
2013-17	1,535	100.0%	0	0.0%	0	0.0%	1,535
2014-18	1,670	100.0%	0	0.0%	0	0.0%	1,670
2015-19	1,732	100.0%	0	0.0%	0	0.0%	1,732
2016-20	1,778	100.0%	0	0.0%	0	0.0%	1,778

Source: U.S. Census Bureau, 2012-2016 through 2016-2020 American Community Survey, Table B25004 and Table B25032.

Table 37 compares Tewksbury to its peer Lowell suburbs in the Greater Lowell region, Greater Lowell as a whole, and Massachusetts. As with the housing units, all geographies are well below what might be considered a healthy market, but Tewksbury had the lowest vacancy. The region outside Lowell had 270 units for rent, or a 2.1% vacancy rate. Greater Lowell as a whole had 1,105 units or 3.0% vacancy rate. Massachusetts had 34,129 units available for rent or 3.3% vacancy rate. For reference, the United States rental vacancy rate was 5.8% in 2016-20.

Table 37: Rental Units by Vacancy Status, Selected Geographies 2016-20

Year	Occupied Units		For Rent Units		Rented, Not Occupied		Total Rental Units
	Number	Percent	Number	Percent	Number	Percent	
Tewksbury	1,778	100.0%	0	0.0%	0	0.0%	1,778
Region Outside Lowell	12,536	97.6%	270	2.1%	34	0.3%	12,840
Greater Lowell	35,335	96.7%	1,105	3.0%	117	0.3%	36,557
Massachusetts	992,088	95.7%	34,129	3.3%	10,325	1.0%	1,036,542

Source: U.S. Census Bureau, 2016-2020 American Community Survey, Table B25004 and Table B25032.

6. Affordable Housing Development

The final element of this HPP's description of Tewksbury's housing inventory is a description and projection of its affordable and Subsidized Housing Inventory (SHI)-eligible housing development. The Executive Office of Housing and Livable Communities (EOHLC) regularly reports on the housing developments in a community that count toward its 10% affordability goal through the issuance of a SHI report. Based upon the 2020 U.S. Census, Tewksbury had 12,098 year-round housing units and therefore, its 10% subsidized housing goal is 1,210 units. According to EOHLC, Tewksbury had 1,088 SHI units as of August 11, 2023 (See **Table 40**).

¹⁶ Ibid.

Units are added and subtracted from the SHI throughout the cycle of their initial approval and occupancy. A unit is added to the SHI once it has received a Comprehensive Permit or other zoning approval. The Town must then document that a building permit has been issued within one year of the Comprehensive Permit and a certificate of occupancy has been granted within a year and a half from the issuance of a building permit to remain on the inventory.

a. Subsidized Housing Inventory Changes – Tewksbury and Greater Lowell region

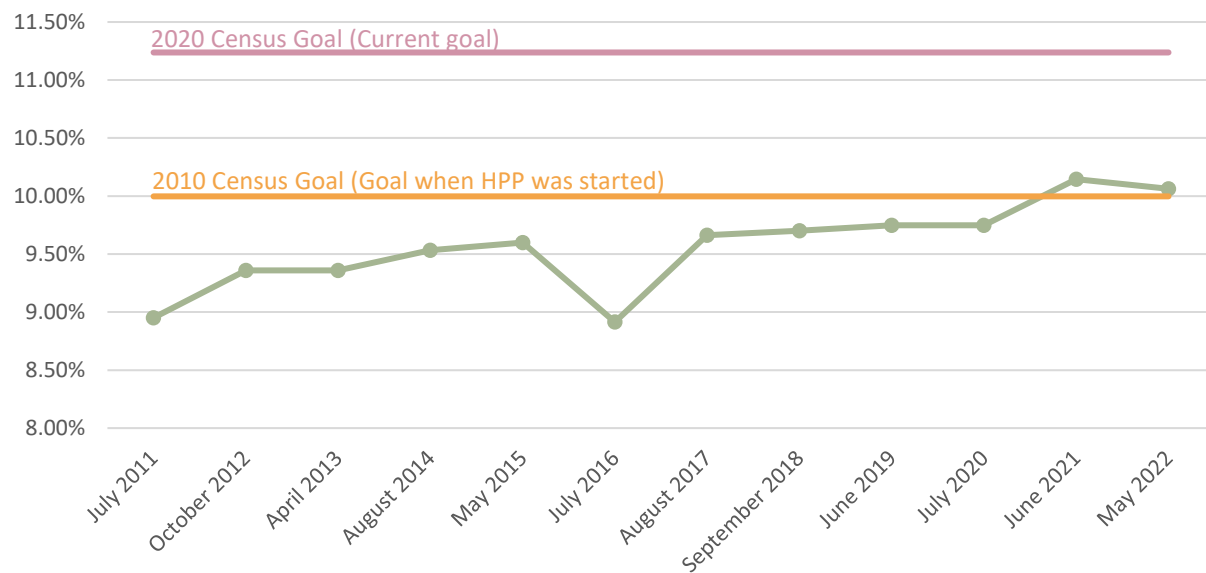
Table 38 and Figure 20 summarize the changes in Tewksbury’s SHI from 2011 to 2022. In June 2011, there were 967 subsidized units in Tewksbury, representing 9.0% of the 2010 year-round housing stock in town. By the completion of the *Tewksbury Housing Production Plan for 2017-2021*, there were 1,040 units. At that time, there was one identified “pipeline” project, 2230 Main Street, a 34-unit rental property. This was added to the SHI in 2021. Others added to the SHI since the last HPP include Foster Place (2 units), South Street (2 units), 1 unit in Maple Court, and 8 additional units in DDS Group Housing. Overall, 47 affordable housing units have been added since the *Tewksbury Housing Production Plan for 2017-2021* was approved by DHCD (now EOHLC).

Table 38: Changes in Tewksbury’s Subsidized Housing Inventory (2011-2022)

Time Period	Total SHI Units	Difference in Units from Previous Period	Percent Affordable
June, 2011	967	0	9.0%
May, 2012	1,011	+44	9.4%
April, 2013	1,011	0	9.4%
December, 2014	1,037	+26	9.6%
May, 2015	1,037	0	9.6%
July, 2016	963	-74	8.9%
September, 2017	1,044	+81	9.7%
September, 2018	1,048	+4	9.7%
August, 2019	1,053	+5	9.8%
December, 2020	1,062	+9	9.8%
June, 2021	1,096	+34	10.2%
May 2022	1,087	-9	10.1%
August 2023	1,088	+1	8.99%*

Source: Massachusetts Department of Housing and Community Development. * A new number of year-round units was calculated based on U.S. Census data in August 2023, resulting in a new percent affordable.

Figure 20: Tewksbury's SHI Compared to 10% Goal based on 2010 and 2020 Census



Source: Massachusetts Department of Housing and Community Development. Note that August 2023 is not represented on this chart.

After the Planning Board and Select Board hearings on this Housing Production Plan, the SHI goal was adjusted based on 2020 U.S. Census Data. Comparisons to the rest of the region were made prior to this, but still assist in understand the pattern of SHI growth over the last ten years. **Table 39** compares Tewksbury to the rest of the region. In January 2014, Tewksbury had 1,030 units representing 9.5% of the 2010 year-round housing stock in town. Tewksbury had the second-highest percentage of year-round housing stock on the SHI in the region. At that time, only one of the communities in the region exceeded Tewksbury: Lowell (12.6%). Overall, 8.9% of Greater Lowell's housing stock was on the SHI.

As of May 2022, 10.1% (1,087) of Tewksbury's units were on the SHI. This was a growth of 5.5% from January 2014. However, the region showed even greater growth in its percentage of housing on the SHI during that time, with its numbers on the SHI growing by 19.5%, resulting in 10.7% of the region's units on the SHI. Billerica, Chelmsford, Lowell, Tyngsborough, and Westford, in addition to Tewksbury, exceeded the 10% target. Tewksbury is now sixth in the region in terms of percentage of total units on the SHI and below the region as a whole. The only communities to lose affordable housing as a proportion of their 2010 housing stock were Lowell (-1.7%) and Dracut (-15.7%). When the count of year-round units was updated with 2020 census data, Tewksbury and some other communities dropped below 10%.

Table 39: Subsidized Housing Inventories in the Greater Lowell region (January 2014-May 2022)

Community	Year- Round Housing Units 2010	Total Subsidized Housing Inventory (SHI) Units			Percent SHI Units	
		January 2014	May 2022	Percent Change	January 2014	May 2022
Billerica	14,442	857	1,668	94.6%	5.9%	11.5%
Chelmsford	13,741	1,064	1,434	34.8%	7.7%	10.4%
Dracut	11,318	719	606	-15.7%	6.4%	5.4%
Dunstable	1,085	0	0	0.0%	0.0%	0.0%
Lowell	41,308	5,215	5,127	-1.7%	12.6%	12.4%
Pepperell	4,335	129	130	0.8%	3.0%	3.0%
Tewksbury	10,803	1,030	1,087	5.5%	9.5%	10.1%
Tyngsborough	4,166	340	476	40.0%	8.2%	11.4%
Westford	7,671	351	1,069	204.6%	4.6%	13.9%
Greater Lowell region	108,869	9,705	11,597	19.5%	8.9%	10.7%

Source: Massachusetts Department of Housing and Community Development.

b. Existing Subsidized Housing Inventory

Upon request, EOHLC will provide a summary including individual projects and includes project names, housing type (rental versus homeownership), total SHI units, affordability expiration, subsidizing agency, and whether or not the development was built using a Comprehensive (40B) Permit. **Table 40** on the following page summarizes the SHI Report of August 11, 2023 (this report is attached in **Appendix 3 Subsidized Housing Inventory Report**). The new additions to the SHI since the previous HPP include the following developments:

- **South Street:** This subdivision includes 2 SHI-eligible sale units. One was built by Tewksbury Home Build, and the other was built by Habitat for Humanity of Greater Lowell.
- **Foster Place:** This development included 2 SHI-eligible rental units in a former school building.
- **2230 Main Street:** This development included 34 rental units, 9 of which were SHI-eligible rental units, making all 34 eligible for the SHI.
- **1047 South Street** is the final of 3 affordable single-family homes completed by Tewksbury Home Build in coordination with Habitat for Humanity of Greater Lowell. It received the Local Action Unit (LAU) approval letter and added to the SHI during the drafting of this HPP.

Table 40: Tewksbury Subsidized Housing Inventory (SHI) (August 11, 2023)

Project Name	Address	Type	Total SHI Units	Affordability Expires	Built with a Comp Permit?	Subsidizing Agency
Robert Flucker Heights	Delaney Drive	Rental	50	Perpetuity	No	HUD
n/a	Pondview Lane	Rental	8	Perpetuity	No	EOHLC
n/a	Carnation Drive	Rental	40	Perpetuity	No	EOHLC
n/a	Carnation Drive	Rental	40	Perpetuity	No	EOHLC
n/a	Saunders Circle	Rental	60	Perpetuity	No	EOHLC
n/a	Roy Way	Rental	8	Perpetuity	No	EOHLC
n/a	Pondview Lane	Rental	8	Perpetuity	No	EOHLC
n/a	Water St & Patriot Rd.	Rental	2	Perpetuity	No	EOHLC
n/a	23 Dirlam Lane/4 Erlin Ave/	Rental	2	Perpetuity	No	EOHLC
n/a	Independence Ave.	Rental	13	Perpetuity	No	EOHLC
Gettysburg Common	Pondview Lane	Ownership	10	Perpetuity	No	EOHLC
Merrimack Meadows	Merrimack Drive	Ownership	86	Perpetuity	No	EOHLC
Orchard Park	Orchard Street	Ownership	8	2043	No	EOHLC
Sullivan Place	11 Old Boston Road	Rental	77	2046	Yes	MassHousing
Sheridan Development	Cinnamon Circle	Ownership	8	-	No	EOHLC
Wamesit Villages Limited	540 Main Street	Ownership	6	2051	No	EOHLC
DDS Group Homes	Confidential	Rental	96	N/A	No	DDS
Rogers Common	42 Rogers Street	Rental	20	2036	Yes	EOHLC
DMH Group Homes	Confidential	Rental	8	n/a	No	DMH
Andover Estates	1582 and 1596 Andover St	Ownership	5	Perpetuity	YES	MassHousing
Shawsheen Woods	1177 Shawsheen Rd	Ownership	4	Perpetuity	YES	MassHousing
Lodge at Ames Pond	Ames Pond Drive	Rental	364	Perpetuity	YES	MassHousing
Village Green	Villa Roma Drive	Rental	56	Perpetuity	YES	MassHousing
Maple Court	79 Maple Road	Ownership	1	Perpetuity	YES	MassHousing
Fahey Place	1360 Main St	Rental	26	Perpetuity	YES	MassHousing
Highland Avenue	Highland Ave and Lowell St	Ownership	2	Perpetuity	YES	EOHLC
Livingston Place	788 Livingston st	Ownership	4	Perpetuity	YES	MassHousing
Roberts Reach	770 Livingston St	Ownership	4	Perpetuity	YES	MassHousing
Saunders Circle	Saunders Circle	Rental	32	2042 est	NO	HUD
State Street	State Street	Ownership	1	Perpetuity	NO	EOHLC
South Street	South Street	Ownership	1	Perpetuity	NO	EOHLC
South Street	South Street	Ownership	1	Perpetuity	NO	EOHLC
Foster Place	940 Main Street	Rental	2	Perpetuity	NO	EOHLC
2230 Main St	2230 Main St	Rental	34	Perpetuity		EOHLC
South Street	South Street	Ownership	1	Perpetuity	NO	EOHLC
Total			1,087			

Source: Massachusetts Department of Housing and Community Development 40B Chapter 40B Subsidized Housing Inventory, May 5, 2022.

c. The Subsidized Housing Inventory Pipeline

As of July 2022, there are seven developments that are planned to include SHI-eligible units in the “pipeline” pending submittal and/or approval as local action units. These would create 35 SHI units if constructed as planned. These are summarized in Table 41 and described below:

- **1660 Main Street** is a 21-unit project being developed by Soldier On for homeless veterans. The Town has contributed \$500,000 from its Affordable Housing Trust Fund for this project.
- **935 Main Street** is the former site of the Tewksbury Police Department. Eighteen rental townhouse units are under construction, and 3 of the units will be affordable. The site provides pedestrian access to Main Street for residents of the Tewksbury Housing Authority’s Carnation Drive affordable senior housing development.
- **940-960 Main Street** has just started construction and will be a mixed-use project with 8 residential rental units of which 2 will be affordable.
- **2122 and 2131 Main Street** are 2 separate mixed-use developments that have been approved by the Planning Board. The total number of affordable units combined will be 5 units.
- Finally, **1037 North Street** is a project that will provide 3 affordable condo units.

In addition, at the time of the drafting of this HPP, there are two projects that may seek a Comprehensive Permit from the Zoning Board of Appeals. These are at different stages of development, but because they have not applied for a permit at the time of drafting, they have not been included in the official pipeline list.

- **Hanover Ames Pond** received a Letter of Eligibility from MassHousing in February 2022. This project proposes to build 300 units on 114 acres of land (of which 28.63 is buildable) at 300 Ames Pond Way, with 25% of units available to households earning at or below 80% AMI. The Town expressed concerns about the proposed project’s impact to traffic, sewage capacity, public safety, site context, wetlands, and wildlife and the Letter of Eligibility provided a list of related issues that “should be addressed in the application to the ZBA, and the Applicant should be prepared to explore them more fully during the public hearing process.” However, the applicant announced that it was withdrawing its proposal in early 2023.
- **1775 Andover Street** submitted a request to Massachusetts Housing Partnership for the development of 130 rental apartments, of which 33 units would be available to households earning at or below 80% AMI. It received a Project Eligibility Letter (PEL) on February 8, 2023.

Table 41: Pipeline of Subsidized Housing Inventory Projects as of July 2022

Address	Type	Affordability Expires	Built with a Comprehensive Permit?	Total SHI Units
1047 South St	Single Family	Perpetuity	No; 40A project	1
1660 Main St.	Veterans' rental	Perpetuity	No; 40A project special permit	21
935 Main St	Rental	Perpetuity	No; 40A project special permit	3
940-960 Main St	Rental	Perpetuity	No; 40A project special permit	2
2122 Main St	Unknown	Perpetuity	No; 40A project special permit	3
2131 Main St	Condo	Perpetuity	No; 40A project special permit	2
1037 North St	Condo	Perpetuity	No; 40A project special permit	3
Total				35

Source: Town of Tewksbury, July 2022.

d. Previous Projected Total Housing Unit Development and SHI Goal compared to Actual Development

It is important for plans to look back and assess the accuracy and success of previous plans. This subsection assesses the accuracy of the *Tewksbury Housing Production Plan for 2017-2021*'s projection of housing development and whether Tewksbury met the goal of SHI units it set in that plan.

Previous Projection and Goal

The *Tewksbury Housing Production Plan for 2017-2021* ("2017 HPP") was submitted to DHCD (now EOHLC) and approved effective on August 23, 2017. At that time, Tewksbury had 1,040 units in the SHI¹⁷. At that time, the latest ACS (2011-15) estimated a total of 11,597 housing units in Tewksbury, but the SHI goal was based on the 2010 Decennial Census count of 10,803 year-round units. Therefore, the Town needed 40 additional subsidized units to meet its 10% goal of 1,080.

The 2017 HPP identified one project that was in the permitting approval process, or "**pipeline**", for an additional 30 units (later adjusted to 35), along with Tewksbury's intent to submit documentation for five additional units at various addresses. The 2017 HPP included these projected units when it outlined several housing development schedules to reach its 10% goal. Each assumed the average growth rate of total households from the 2000 Decennial Census to the 2011-2015 ACS, 14% annually, would continue, adding an average of 106 units of total housing per year. Each further assumed that the projects in the pipeline or already complete (totaling 35 affordable units) would be accepted by DHCD (now EOLHC) onto the SHI in 2018.

1. Assuming a 0.5% production of subsidized units per year in addition to pipeline units, Tewksbury would reach its goal in 2018 and reach 12.5% subsidized in 2022.

¹⁷ Subsidized Housing Inventory (SHI) report dated March 4, 2017, DHCD

2. Assuming a 1.0% production of subsidized units per year in addition to pipeline units, Tewksbury would reach its goal in 2018 and reach 15.0% subsidized in 2022.

Actual Housing Production

The 2020 U.S. Decennial Census reported 12,139 total units. Assuming all 41 permitted units in 2021 were constructed, Tewksbury would have had an estimated 12,180 units by the end of 2021. This is 124 units more than the previous HPP projected (12,056 total units by 2021). That said, because the previous HPP assumed there were the same number of total housing units in 2017 as what was recorded in the 2011-15 ACS, it may have underestimated growth prior to 2017 while over-projecting growth after 2017.

Although Tewksbury reached its 10% goal in 2021, it did not add many units beyond the already-completed projects and the pipeline project. In actuality, Tewksbury added a net 47 units to the SHI, resulting in a total of 1,087 SHI units out of 10,803 total units (*2010 decennial census*), or 10.1% of Tewksbury's total units being listed on the SHI.¹⁸ In other words, **Tewksbury had more market-rate units and fewer SHI units at the end of 2021 than the previous HPP projected.**

¹⁸ This goal is anticipated to change. The 2020 U.S. Decennial Census counted 11,739 occupied housing units and 400 vacant housing units, but this includes vacant seasonal/occasional units, which will not be included in DHCD's calculations. Depending on the number of seasonal vacant units, Tewksbury's current number of units would represent 9.0% and 9.3% of 2020 year-round units, with a new 10% goal anticipated to be between 1,174 units and 1,214 units. The number of vacant year-round units will be released in the Demographic Profile tentatively later in 2022, which is expected to be slightly smaller than the total housing units. DHCD will release a new 10% goal after this data is released.

C. Housing Cost Burden Analysis

The previous subsections examined existing and projected populations and the existing housing inventory. In other words, they looked at current and projected demand and supply. This subsection examines the interaction between supply and demand, including the gap between housing costs that are considered affordable and the actual cost of housing in Tewksbury.

Public officials generally agree that housing that costs 30% or less of a household's total annual income can be considered affordable. Households that spend between 30% and 50% of their annual incomes on housing and related costs (including basic utilities and fuels) are said to be "**moderately burdened**" while those spending more than half of their incomes are considered "**severely burdened**". This section analyzes the housing costs for homeowners and renters in Tewksbury and provides an analysis of their overall housing burden.

1. Housing Cost Burden by Tenure

Typically, renter-occupied households pay a greater proportion of their income on housing than owner-occupied households. This may be because renters typically have lower incomes, but it also may be because rent increases with the market while a mortgage is usually "locked in" even as a household's income increases through the course of the income earners' careers. **Table 42** shows this comparison and how it has changed from 2011-15 to 2016-20.

In 2016-20, renter households that were considered moderately burdened accounted for approximately 20.2% of renter households (360 households) and those considered severely burdened accounted for 23.1% of renter households (410 households). This was an

FAST FACTS: HOUSING COST BURDEN ANALYSIS

- The 2016-20 ACS estimated 20.2% of renter households as moderately burdened and 23.1% as severely burdened, a statistic that has worsened in the last five years.
- The situation for owner households has improved since 2011-15, but still 18.0% of owner households were moderately burdened and 10.3% were severely burdened.
- Cost burden was most prominent for the lowest income earners; 70% of those earning less than 30% of AMI paid more than half their income on housing.
- Small families and elder non-family households are the household types with the largest number of households burdened.
- The median single-family home is unaffordable for nearly 70% of the owner households living in town and the median gross rent in Tewksbury is unaffordable for nearly 60% of the rental households.
- In 2016-20, there was an estimated undersupply of 1,539 ownership units under \$300,000 and 387 rental units under \$1,500 a month.
- In 2014-18, a household would have to have worked 106 hours per week at Massachusetts minimum wage to afford a median 2-bedroom apartment.

increase from 2011-15, when those numbers were 18.2% (289 households) and 22.9% (410 households) respectively.

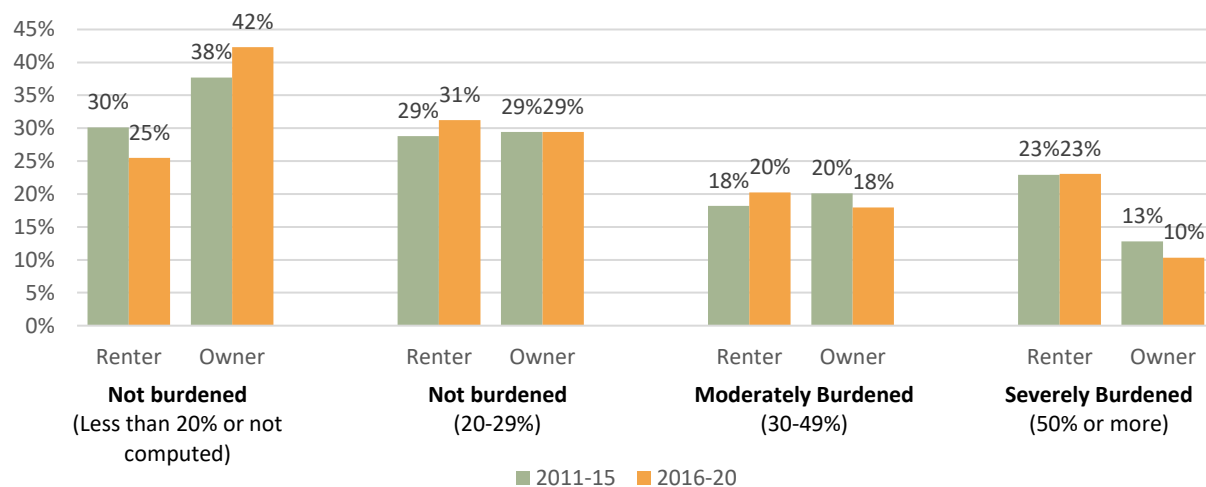
Conversely, the situation improved for owner-occupied households in Tewksbury in the five years prior to the 2016-20 period. In 2016-20, owner households that were considered moderately burdened accounted for 18.0% of owner households (1,822 households) and those considered severely burdened accounted for 10.3% of owner households (1,048 households). This was a decrease from 2011-15, when those numbers were 20.1% (1,930 households) and 12.8% (1,231 households) respectively. There may be a number of reasons for this improvement. For example, income levels of homeowners may have risen faster than home prices, or people with lower incomes may have been priced out of the owner market entirely, leaving proportionately more people with higher incomes and therefore less cost burden.

In summary, as estimated by the 2016-20 ACS, 20.2% of renter households were moderately burdened and 23.1% were severely burdened, a statistic that has worsened in the last five years. The situation for owner households has improved since 2011-15, but still 18.0% of owner households were moderately burdened and 10.3% were severely burdened, which represents thousands of households.

Table 42: Housing Costs as a Percentage of Household Income (2011-2015 and 2016-2020)

Housing Cost Burden	Renters				Owners			
	2011-15		2016-20		2011-15		2016-20	
	Households	Percent	Households	Percent	Households	Percent	Households	Percent
Less than 20% or not computed	478	30.1%	453	25.5%	3,622	37.7%	4,293	42.3%
20 to 29.9%	457	28.8%	555	31.2%	2,828	29.4%	2,984	29.4%
30 to 49.9%	289	18.2%	360	20.2%	1,930	20.1%	1,822	18.0%
50% or more	364	22.9%	410	23.1%	1,231	12.8%	1,048	10.3%
Total	1,588	100.0%	1,778	100.0%	9,611	100.0%	10,147	100.0%

Figure 21: Housing Costs as Percentage of Households Income (2011-2015 and 2016-2020)



Source: U.S. Census Bureau, 2011-2015 and 2016-2020 American Community Survey, Table B25095.

2. Housing Cost Burden by Household Income

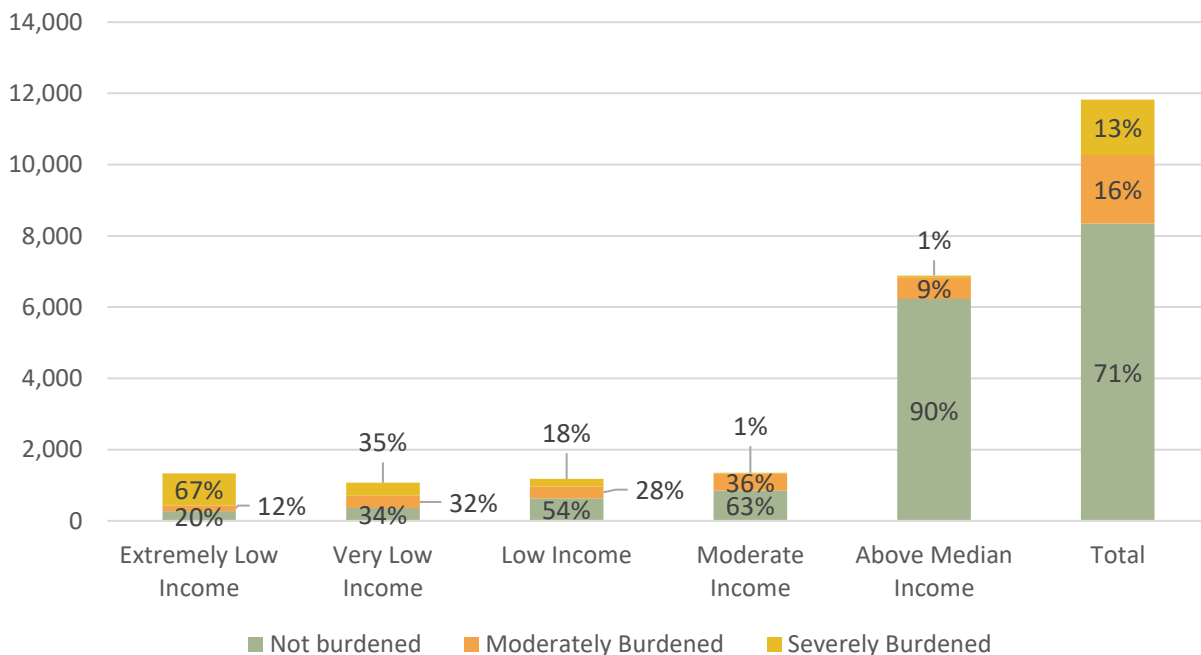
Lower income households also typically face higher housing cost burdens than higher income households. Although the ACS tracks this data, it does not break it down into income limit categories based on AMI as most housing programs do. However, the CHAS data created from the 2015-2019 ACS does tabulate housing cost burden by percent of the region's AMI. Refer to Table 13 for the definition of income limit categories.

Table 43: Tewksbury Cost-burdened Households by Categories of HAMFI, 2015-19

Income Category	Not Burdened		Moderately Burdened		Severely Burdened		Total
	Households	Percent	Households	Percent	Households	Percent	
Extremely Low Income	270	20%	165	12%	900	67%	1,335
Very Low Income	360	34%	340	32%	370	35%	1,070
Low Income	635	54%	330	28%	210	18%	1,175
Moderate Income	850	63%	480	36%	20	1%	1,350
Above Median Income	6,225	90%	610	9%	50	1%	6,885
Total	8,345	71%	1,925	16%	1,550	13%	11,820

Source: U.S Department of Housing and Urban Development, 2015-2019 CHAS Data, Table 1.

Figure 22: Tewksbury Cost-burdened Households by Categories of HAMFI, 2015-19



Source: U.S Department of Housing and Urban Development, 2015-2019 CHAS Data, Table 1.

According to the CHAS data, lower income households were cost burdened more often than those near or above AMI. In 2015-19, HUD estimated that 67% of Extremely Low Income (earning equal to or less than 30% AMI) households in Tewksbury, or 900 households, were severely burdened, paying more than 50% of their income on housing costs. 35% of Very Low Income (earning more than 30% but not more than 50% of AMI), or 370 households were severely burdened. 18% of Low-Income households (earning

more than 50% but not more than 80% of AMI), or 210 households, were severely burdened. Fewer than 2% of households earning more than 80% median income were estimated to be severely burdened.

Moderate burden or paying between 30% and 50% of household income on housing expenses, was also very common in all categories below 80% AMI, at 12% (165 households), 32% (340 households), 28% (330 households), and 36% (4805 households) of all extremely low income, very low income, low income, and moderate-income households respectively. 9% of households earning 100% of median income or more were moderately burdened, which although small as a percentage, represents 610 households.

3. Housing Burden by Household Type

To better understand the types of households and families that most often are moderately or severely burdened, the CHAS data also tabulates burden into five household types:

- **Elderly families**, a 2-person family with at least one member age 62 or over
- **Small families**, a family with 2 persons, neither person 62 years or over, or 3 or 4 persons
- **Large families**, a family with 5 or more persons
- **Elderly non-family**, a nonfamily household with at least one member age 62 or over, including one-person households
- **Other non-family**, a nonfamily household with no members age 62 or over, including one-person households

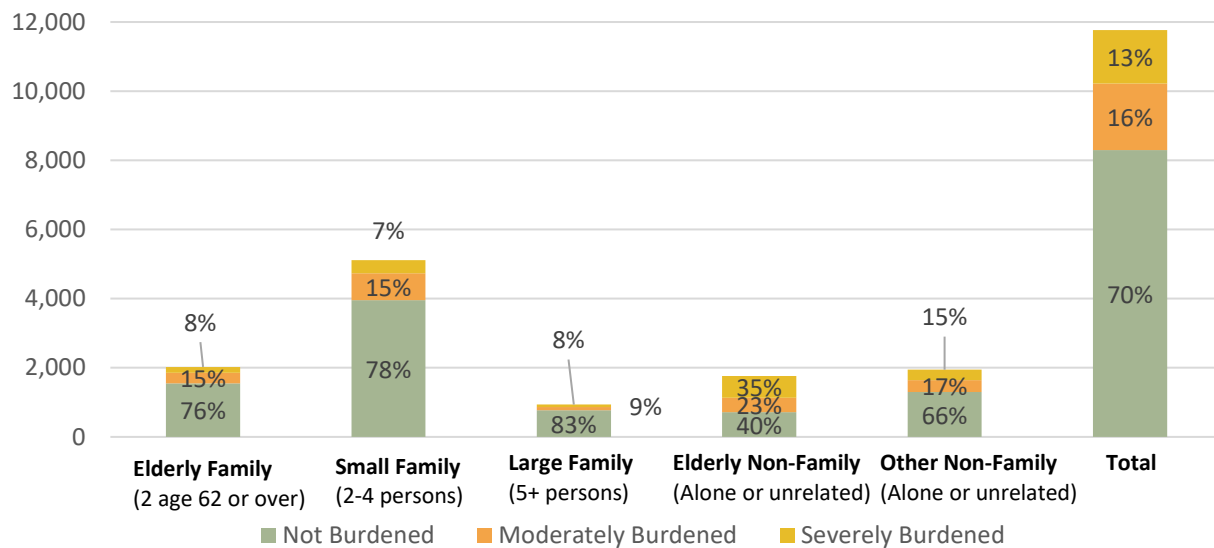
This data is represented in **Table 44** and **Figure 23**. Small families have the highest number of moderately or severely burdened households, at 1,154 families or 23% of small families. However, elderly non-families, often including elders living alone, are the most disproportionately burdened, with 58% of this type of household, or 1,040 households, at least moderately burdened. They are also the most often type of household severely burdened, at 625 households or 35% of elderly non-family households. That said, all household types have significant numbers of burdened households: 160 large family households (17% of large family households), 475 elderly family households (23% of elderly family households), and 644 other non-family households (33% of other non-family households).

Table 44: Tewksbury Cost-burdened Households by Household Type, 2015-19

Household Type	Not Burdened		Moderately Burdened		Severely Burdened		Total
	Households	Percent	Households	Percent	Households	Percent	
Elderly Family	1,549	76%	305	15%	170	8%	2,029
Small Family	3,954	78%	779	15%	375	7%	5,090
Large Family	774	83%	85	9%	75	8%	934
Elderly Non-Family	720	40%	415	23%	625	35%	1,785
Other Non-Family	1,299	66%	339	17%	305	15%	1,980
Total	8,296	70%	1,923	16%	1,550	13%	11,818

Source: U.S Department of Housing and Urban Development, 2015-2019 CHAS Data, Table 7. Percentages may not add up to 100% due to estimation uncertainty.

Figure 23: Tewksbury Cost-burdened Households by Household Type, 2015-19



Source: U.S Department of Housing and Urban Development, 2015-2019 CHAS Data, Table 7. Percentages may not add up to 100% due to estimation uncertainty.

4. Affordability Gap for Ownership Units

Looking at Census data alone, the median household can afford median owner costs in Tewksbury. The median household income in 2016-2020 was \$104,610 (see **Table 10**). Therefore, the amount the median earner could pay for housing costs and not be considered cost burdened was \$2,615.¹⁹ The median selected monthly owner costs were \$2,449 for housing units with a mortgage and \$916 for housing units without a mortgage (\$2,038 was the median for all housing units).²⁰

However, this number represents the median of all household costs, which include households who may have bought decades ago. The census doesn't provide data for households who have purchased recently, but the Warren Group provides median sales price, which can be used as a proxy to estimate selected monthly owner costs for a family who purchased a home in Tewksbury today. The Warren Group reported that the 2021 median sales price for single-family homes in Tewksbury was \$560,000. Assuming a 30-year fixed mortgage at a conservative 5% interest rate, 10% down, 1.2% property tax, and \$800/year home insurance, monthly owner costs would be approximately \$3,550, well above the \$2,615 median income affordability threshold calculated above. In fact, a household would need to earn approximately \$142,000 per year for the median single-family mortgage to be affordable.²¹

¹⁹ Median annual income divided by 12 and multiplied by 30%.

²⁰ 2016-2020 American Community Survey 5-Year Estimates, Table B25088, U.S. Census Bureau,

²¹ Zillow Affordability Calculator, Zillow, retrieved Jan 15, 2023, <https://www.zillow.com/mortgage-calculator/house-affordability/>

As of 2016-20, an estimated 70.2% of total owner households (7,124 households), made less than \$150,000 per year, with 43.5% (4,410) making less than \$100,000. In other words, **the median single-family home is unaffordable for nearly 70% of the owner households living in town.** This number is also likely higher in reality, as it does not include utilities or costs besides mortgage, taxes, and insurance.

As the distribution of housing costs and incomes may reveal needs the medians of cost and income do not, NMCOG created a simple analysis that compares the 2016-2020 ACS estimates of values of owner-occupied residential units with the 2016-2020 ACS estimates of income distribution of owner households. Each group of households in an income category was assigned the range of housing that would roughly be considered “affordable” for it using the methodology above. For example, 30% of the income that households earning \$35,000 to \$49,999 receive would be able to pay for a house between \$141,102 and \$201,574 with the above assumptions about mortgage and interest rates. This roughly corresponds to the home price category of \$150,000 to \$199,999. A similar calculation was made for each income category. Although this methodology doesn’t provide exact numbers, it does suggest areas of housing mismatch.

There were an estimated 1,537 homeowner-occupied homes valued at less than \$300,000 in Tewksbury in 2016-20, but the number of households that could not afford a home valued more than \$300,000 without being housing cost burdened were estimated to be 3,076 households. This meant there was a deficit of 1,539 homes in this price range. There was a surplus of homes in the \$300,000 to \$399,999 price range. Notably, this analysis does not consider vacant units on the market or the actual cost of the units that were sold during that time, only the estimates of home value the ACS provided.

Table 45: Estimated Gap between Owner-Occupied Housing Supply and Demand

Home Value	Estimated Demand	Estimated Supply	Mismatch
Less than \$50,000	257	72	-185
\$50,000 to \$99,999	331	36	-295
\$100,000 to \$149,999	535	120	-415
\$150,000 to \$199,999	591	96	-495
\$200,000 to \$299,999	1,362	1213	-149
\$300,000 to \$399,999	1,334	2,969	1635
\$400,000 to \$499,999	2,714	2,881	167
More than \$500,000	3,023	2,760	-263
Total	10,147	10,147	0

Source: U.S. Census Bureau, 2016-20 American Community Survey, NMCOG Analysis

5. Affordability Gap for Rental Units

In 2016-2020, the median rental unit in Tewksbury would have been considered “affordable” to households making at least \$77,520 per year. While this income level is lower than Tewksbury’s overall household median income in 2016-20 (\$104,610), an estimated 57.2% of all renter households (1,017 households), made less than \$75,000 per year. In other words, **the current median gross rent in**

Tewksbury is unaffordable for at least 57.2% of the rental households living in Town. Although these affordability thresholds are low, it's important to remember they do not incorporate the cost of housing-related expenses, such as heat and utilities, into total housing costs.

In fact, a recent analysis based on 2014-2018 ACS data showed that a household earning Massachusetts minimum wage would have to have worked 106 hours per week to afford a median 2-bedroom apartment.²²

NMCOG created a simple analysis that compares the 2016-2020 ACS estimates of gross rent paid for renter-occupied residential units with the 2016-2020 ACS estimates of income distribution of owner households like the analysis for owner-occupied units. In this case, each group of households in an income category was assigned the range of housing that would roughly be considered “affordable” for it based on Gross Rent. Although the analysis should be taken as a rough estimate only, it shows a similar pattern of undersupply of units costing below \$1,500 (an estimated 387 units), with the only category in which supply meets demand are units that are affordable to those making less than \$10,000 annually, and therefore having an affordability range of less than \$300 monthly gross rent.

Note this is likely an underestimate of the undersupply of rental housing which costs less than \$1,500 monthly, because it does not include other expenses commonly included in such calculations such as utilities.

Table 46: Estimated Gap between Renter-Occupied Housing Supply and Demand

Gross Rent	Estimated Demand	Estimated Supply	Mismatch
Less than \$300 or no cash rent	162	192	30
\$300 to \$599	296	278	-18
\$600 to \$899	88	24	-64
\$900 to \$1,249	261	108	-153
\$1,250 to \$1,499	210	28	-182
\$1,500 to \$2,499	166	778	612
\$2,500 or more	595	370	-225
Total	1,778	1,778	0

Source: U.S. Census Bureau, 2016-20 American Community Survey, NMCOG Analysis

²² Community Needs Assessment 2021, Community Teamwork, Inc., 2021.

D. Housing Issues

The amount, type, and cost of housing only partially describe Tewksbury's housing inventory. The other way of describing the inventory is to qualitatively evaluate housing conditions. This includes the physical condition of Tewksbury's housing and whether that housing is accessible to seniors or people with disabilities. Other housing issues include meeting requirements to "affirmatively further fair housing" to eliminate housing discrimination and residential segregation. Finally, evaluating housing conditions includes determining whether current housing serves existing and projected needs, such as providing access to jobs and/or services and providing adequate room and conditions for family activities such as working at home or studying.

1. Fair Housing

Protected classes should have access to housing and not experience inequitable housing costs, unsafe living conditions, and unequal access to opportunity. Fair housing laws address discrimination based on characteristics that are often (though not always) personal and immutable. These characteristics are called "protected classes" in fair housing law and include the following: race; color; national origin; religion; sex; familial status (families with children); disability; age (40 and older); marital status; genetic information; sexual orientation; gender identity; military service; arrest record; and public assistance. According to the Consumer Financial Protection Bureau, the "Home Mortgage Disclosure Act (HMDA) requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. This data helps show whether lenders are serving the housing needs of their communities; they give public officials information that helps them make decisions and policies; and they shed light on lending patterns that could be discriminatory. The public data are modified to protect applicant and borrower privacy."²³ The data were analyzed to determine whether there were racial or ethnic disparities in home lending in Tewksbury.

As **Figure 24** illustrates, 8% of Home Purchase applications in Tewksbury identified as Hispanic or Latino/a, and 3% were Joint Ethnicity. This roughly aligns with the 10.9% of the population in Greater Lowell overall that was identified as Hispanic or Latino/a in the 2020 Decennial Census. However, 75% of mortgage applications for home purchase in Dunstable were from an applicant identifying as White, not counting those who were an Unknown Race who may identify as White. The 2020 Decennial Census

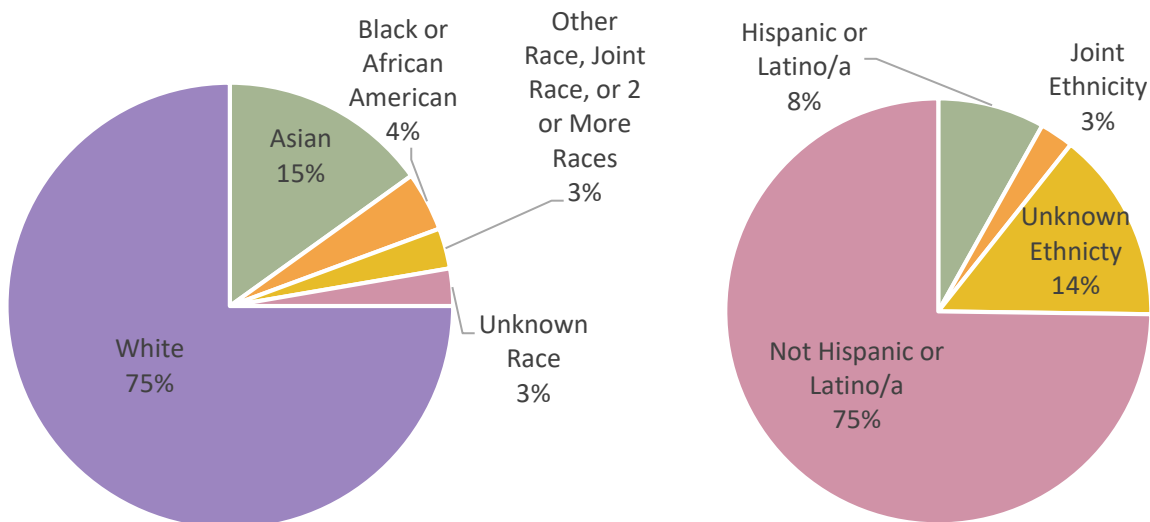
FAST FACTS: HOUSING ISSUES

- In 2021, Hispanic or Latino/a applicants for a home-purchase mortgage withdrew or were denied their application at nearly twice the townwide average.
- Black or African American applicants and Hispanic or Latino/a applicants tended to apply for higher loans for similarly-priced homes, potentially pointing to a lack of available capital for a down payment.

²³ "Mortgage data (HMDA)", Consumer Financial Protection Bureau, retrieved May 31, 2023, <https://www.consumerfinance.gov/data-research/hmda/>

counted 67% of Greater Lowell as White. This indicates that the proportion of non-White Tewksbury mortgage applicants in 2021 was smaller than the non-White population living in the region.

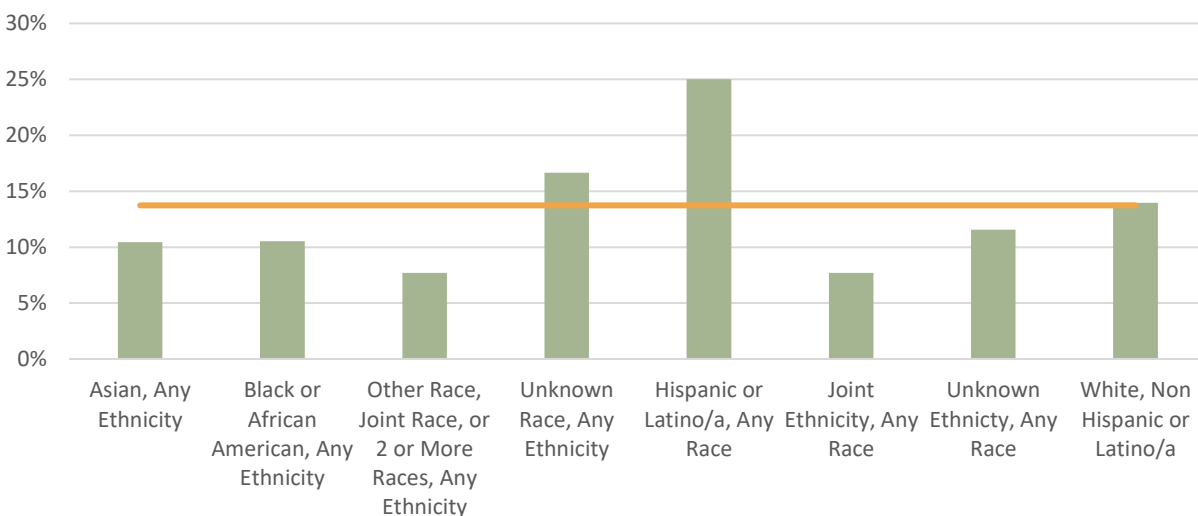
Figure 24: Mortgage Applications for Purchase of Home in Tewksbury by Race and Ethnicity, 2021



Source: Home Mortgage Disclosure Act, 2021

Notably, Black or African American, Unknown Race, and Hispanic or Latino/a were more likely to withdraw their application (11%, 17%, and 17% respectively, compared to the 9% average). Hispanic or Latino/a also had a higher denial rate at 8%, compared to the 5% average. When these two numbers are combined as illustrated in **Figure 25**, it becomes clear that applications by Hispanic or Latino/a applicants more often do not result in a mortgage as compared to other race or ethnicity groups.

Figure 25: Proportion of Applicants who had a Mortgage Application Withdrawn or Denied by Race and Ethnicity, Tewksbury, 2021



Source: Home Mortgage Disclosure Act, 2021

Not counting withdrawn applications, there were 31 applicants denied mortgages: 1 Asian household, 4 Hispanic or Latino/a households, 16 white households, and 19 of unknown race or ethnicity. The majority of mortgage applicants denied mortgages (17) were due to a high debt-to-income ratio. Part of this may be due to the median loan values of each racial/ethnic group. White, Not Hispanic or Latino/a mortgage applicants applied for lower assessed property values, loan amounts, and loan-to-value ratios than the median of all Tewksbury applicants. This means that, on average, White, Not Hispanic or Latino/a applicants were buying more affordable properties, took out smaller loans, and may have had more available capital for a down payment. Black or African American applicants and Hispanic or Latino/a applicants also tended to apply for properties assessed for lower than the median. However, they applied for higher loans potentially pointing to a lack of available capital for a down payment.

Although the numbers described above relate to mortgages for new homes, not all mortgages are for new homes. As shown in **Table 47**, making a home purchase was the primary purpose for loan applications of 41% of Asian applicants, 38% of Black or African American applicants, and 43% of Hispanic or Latino/a applicants respectively. Refinancing was the top mortgage application purpose of White, Not Hispanic or Latino/a applicants. When examining all types of mortgages, rather than limiting the analysis to those for a new home, there are comparatively much higher numbers of White, Non-Hispanic or Latino/a applicants than Asian, Black or African American, or Hispanic or Latino/a applicants, 1,787 total compared to 165, 50, and 121 applicants respectively. While many loans originated across the board, Black or African American and Hispanic or Latino/a faced higher percentages of loan denials than other races and ethnicities.

Table 47: Purpose of Loan, Mortgage Applicants in Tewksbury, 2021

Race and Ethnicity	Sample Size	Home Purchase	Home Improvement	Other Purpose	Not Applicable	Refinancing	Cash-Out Refinancing
Asian, Any Ethnicity	165	41%	5%	8%	0%	38%	8%
Black or African American, Any Ethnicity	50	38%	6%	2%	0%	26%	28%
Other Race, Joint Race, or 2 or More Races, Any Ethnicity	41	32%	2%	0%	0%	51%	15%
Unknown Race, Any Ethnicity	65	18%	3%	2%	0%	49%	28%
Hispanic or Latino/a, Any Race	121	43%	4%	3%	0%	31%	18%
Joint Ethnicity, Any Race	43	30%	2%	0%	0%	42%	26%
Unknown Ethnicity, Any Race	714	24%	4%	3%	0%	43%	25%
White, Non Hispanic or Latino/a	1,787	20%	7%	4%	0%	45%	24%
Total	2,945	24%	6%	3%	0%	44%	23%

Source: Home Mortgage Disclosure Act, 2021

2. Tax Rate

The tax rate or tax costs was the largest “write-in” housing issue noted during Housing Production Plan outreach. Taxes, in addition to mortgages or similar debts on the property; real estate taxes; fire, hazard, and flood insurance on the property; utilities; fuels; and where appropriate condo or mobile

home fees; are included in the ACS statistics that are used in this HPP.²⁴ Therefore, Tewksbury's tax rate is "baked in" to our analysis of owner-occupied housing costs and cost burden. Tewksbury's renters, who do not directly pay property taxes and have housing costs more directly tied to the changing market, are more often cost-burdened than owner-occupied units.

Tewksbury's residential tax rate in 2023 was \$14.10 per \$1,000 assessed (1.41% of the assessed fair value), down from \$15.72 in 2021. This is slightly higher than the median of all communities in the state (\$13.6) and Middlesex County (\$13.1).²⁵ However, there are exemptions for multiple classes of people that meet other qualification guidelines including legally blind people; seniors (41C); seniors, surviving spouses, and minor children of a deceased parent (17D); and veterans. There is also a Citizens Taxation Fund that provides taxation assistance for the elderly and disabled residents of Tewksbury from volunteer contributions of its citizens on their real estate tax forms.

Importantly, one of the largest drivers of a tax bill is not the tax rate, but the assessed value, which has seen considerable increases. Although an owner benefits from the increase in value of their property when they sell which may offset the increased tax costs, it may be hard to realize these gains in the short-term. A major goal of the Housing Production Plan is to moderate home ownership costs.

3. Other Housing Issues

Other issues identified by residents in outreach by more than 20 survey respondents include homes being too large and difficulty keeping up with maintenance. The median age of Single-Family Residential properties in Tewksbury is 1968, with 4,587 older than 50 years old and 275 older than 100 years old.²⁶ Older homes may have more maintenance concerns than homes built within the last 30 years and may have been built for different family sizes and types.

One additional theme voiced during outreach was fatigue or concern with large multifamily developments, especially in concentrated areas. Notably, an estimated 494 units in buildings that had 20 or more units were created between the 2011-15 ACS and the 2016-2020 ACS. To place this number into context, it is approximately 4.6% of Tewksbury's total number of units as counted in the 2010 census.

However, a larger number of survey respondents noted a concern about affordability in Tewksbury. As this HPP notes, Tewksbury had above-average rents, and 20.2% of renter-occupied households were cost-burdened and 23.1% were extremely cost-burdened (paying more than 50% of their income on rent) as estimated by the 2016-20 ACS. This cost burden estimate does not take many of the new units into account. An increase in supply generally eases prices, which still are high, which is why this HPP recommends all types of development, including multifamily development.

²⁴"Median Selected Monthly Owner Costs - Housing units with a mortgage and without a mortgage," U.S. Census Bureau, retrieved May 31, 2023, <https://www.census.gov/quickfacts/fact/note/US/HSG651221>

²⁵ Data Analytics and Resources Bureau, Retrieved May 31, 2023, https://dls.gateway.dor.state.ma.us/reports/rdPage.aspx?rdReport=PropertyTaxInformation.taxratesbyclass.taxratesbyclass_main

²⁶ Assessors' Database, Use=Single Family Residential, Year Built=Prior to 1973 or 1923.

The public feedback points toward benefits in building consensus around the best ways to develop complete neighborhoods that provide a wide variety of housing types; multimodal connections to jobs, services, and open space; sufficient infrastructure to serve those units; and an equitable, safe, and comfortable living environment.

E. Affordable Housing Efforts

This section of the Comprehensive Needs Assessment provides information on the progress the Town has made since the *Tewksbury Housing Production Plan for 2017-2022* ("2017 HPP") and the current resources the Town may call upon for housing development. This is provided both as a baseline for continued improvement and to evaluate what agencies and resources may be utilized to advance goals defined in the next chapter. This section starts with a summary of the progress made on steps in the *2016 Tewksbury Master Plan* and 2017 HPP since its completion.

1. Tewksbury Master Plan

The *Tewksbury Master Plan* was updated in 2016 for the first time since 2003. This Master Plan incorporated the *2012-2016 Affordable Housing Production Plan* by reference. One of the key goals listed in the plan was the following:

Ensure that decent and affordable housing is available to all income groups while continuing to add more state-recognized, deed-restricted affordable units to achieve the 10 percent minimum under Chapter 40B.

It noted two key issues related to housing:

- Tewksbury has a shortage of affordable rental housing. According to the Tewksbury Housing Authority, the waiting list for families is 509, with 61 of those dedicated to local preference applicants. The Housing Authority experiences 1-2 turnovers per year, which means that the local preference wait time is at best 30 years.
- Housing affordability and housing cost burden remain troublesome for many Tewksbury residents. In 2010, 3,010 households in Tewksbury (28.7 percent of all households) paid more than 30 percent of their monthly income on housing costs. The problem is worse for renters: housing cost burden affected 48.8 percent of all renter households in Tewksbury in 2010. Tewksbury may be very close to the 10 percent statutory minimum under Chapter 40B, but that does not mean the Town's affordable housing needs have been met.

To address these issues, the Housing Goals developed by the Local Housing Partnership were summarized as follows:

MAJOR ACCOMPLISHMENTS SINCE THE 2017 HPP

The Town of Tewksbury outlined housing goals and strategies through the development of the 2017 HPP, submitted to DHCD (now EOHLC) and approved effective on August 23, 2017. Since then, it has met several major goals. The Town increased its subsidized unit count from 1,040 to 1,087 achieving a Subsidized Housing Inventory (SHI) percentage of 10.06%. In addition, the Town's recodification and update of the Zoning Bylaw took place from 2016-2021. The final document received Town Meeting approval in May 2022.

- Preserve Tewksbury’s existing housing affordability by providing a mix of residential types and home prices. This includes rentals for existing and future Tewksbury residents.
- Pursue workforce housing units for a range of potential homebuyers and tenants.
- Encourage reuse and redevelopment of existing structures and infill development.
- Respect the architectural integrity of historic buildings and provide good access to community services and Town infrastructure.
- Update development review and permitting policies so they are fair, clear, and consistent.
- Coordinate the work of Town boards and departments with permitting responsibilities and the Tewksbury Housing Authority.
- Develop affordable housing that adheres to the State’s Sustainable Development Principles.
- Monitor progress of affordable housing production to meet annual production goals.
- Address the housing needs of veterans in the community and partner with local veterans’ organizations.

The 2016 Tewksbury Master Plan also listed the recommendations directly or indirectly related to housing summarized in **Table 48**. These recommendations have guided town decisions since 2016.

Table 48: 2016 Tewksbury Master Plan Housing Recommendations

Number	Recommendation
4.3.1	Partner with other organizations for infill on Town-owned parcels upon completion of a comprehensive parcel inventory.
4.3.2	Reuse Town-owned residential buildings.
4.3.3	Encourage development of infill of private sector affordable housing.
4.3.4	Continue to be proactive in maintaining and protecting existing affordable housing units.
4.3.5	Consider preserving historic structures by taking advantage of the Town's Demolition Delay Bylaw to convert historic structures into affordable housing.
4.3.6	Promote programs that allow residents, especially those that are elderly and disabled, to remain in their homes.
4.3.7	Evaluate and revise existing development regulations and Comprehensive Permit Policy for fairness and efficiency.
4.3.8	Take advantage of Tewksbury Hospital services for residents with subacute and chronic medical diseases, traumatic brain injuries and other neurologic conditions.
4.3.9	Work cooperatively with developers and the state to establish some level of local preference in new affordable housing developments for persons living or working in Town.
4.3.10	Investigate the potential for adopting a Chapter 40R Overlay District.
4.3.11	Encourage development of more affordable rental housing.
4.3.12	Document the specific needs for veterans living in and around Tewksbury and construct affordable veterans housing units that meet those needs.
4.3.13	Make training and educational opportunities on affordable housing available for Town Board and Committee members and staff.
4.3.14	Increase public awareness of and support for affordable housing through increased outreach and public education.
4.3.15	Pursue the purchase of units and provide a subsidized buy-down on the purchase price to qualified first-time homebuyers.
4.3.16	Research additional alternative funding sources to subsidize new affordable housing units.
4.3.17	Investigate opportunities available under a Regional HOME Consortium to generate additional funding for housing.
4.3.18	Work with the Northern Middlesex Council of Governments to develop a Regional Housing Plan for the Greater Lowell Region.
4.3.19	Research and promote First-Time Homebuyer Program opportunities in the region and State to make existing homes more affordable.
4.3.20	Research and communicate Foreclosure Assistance Programs in the region and State to help homeowners avoid foreclosure.
4.3.21	Work with programs like the Common Ground Development Corporation, a subsidiary of Community Teamwork, Inc., to develop affordable housing projects.
4.3.22	Refer families who are, or in jeopardy of becoming, homeless to the HomeBASE Household Assistance program.
4.3.6	Promote programs that allow residents, especially those that are elderly and disabled, to remain in their homes.
4.3.7	Evaluate and revise existing development regulations and Comprehensive Permit Policy for fairness and efficiency.

2. Implementation of the 2017-2021 Affordable Housing Production Plan

The Town has made significant progress in achieving the Housing Goals and Strategies outlined in the *Tewksbury Housing Production Plan for 2017-2021*. As mentioned previously, these activities have resulted in an additional 47 affordable housing units. Furthermore, additional goals have been met. Outlined in **Table 49** are the Housing Goals from the previous HPP and the status in achieving each goal.

Table 49: 2017 HPP Goals and Progress Toward Goal

Goal	Progress Toward Goal
Preserve housing affordability by providing a mix of residential types and home prices that meet the needs of a wide variety of tenants and owners, including families and aging seniors. This includes creating units that are available at a wide range of income levels, especially those below 80% of the area median income.	The Town continued to permit family suites (accessory dwelling units, see Section I.A.1.e Accessory Dwelling Units/Family Suite) and used Affordable Housing Trust Fund (AHTF) funds to support a project by Tewksbury Home Build.
Pursue the creation of workforce housing units for a broader range of potential homebuyers and tenants.	Through its work with several nonprofit organizations, the Town has been able to broaden its range of homebuyers in particular at 1057 and 1067 South Street.
Encourage the reuse and redevelopment of existing structures and infill development.	A project containing three detached one-family infill units was completed on South Street with partnerships with Habitat for Humanity, Tewksbury Home Build and Shawsheen Vocational Tech.
Respect the architectural integrity of historic buildings and provide good access to community services and Town infrastructure.	During this period the Planning Board approved 18 new-construction rental units at 935 Main Street of which 3 units will be affordable. 960 Main Street will have 8 new-construction rental units and 24 Pleasant Street will also see the construction rental units. All of these projects are within the Town Center and will respect the architectural integrity of the area.
Update the local development review and permitting policies in accordance with the updated December 2014 State Guidelines so they are fair, clear, and consistent.	The local development review and permitting policies were reviewed and updated as needed.
Coordinate the work of Town boards and departments with permitting responsibilities and the Tewksbury Housing Authority in order to achieve consistency in the interpretation and administration of local affordable housing requirements.	Town Departments meet weekly for coordination purposes. Coordination with the Tewksbury Housing Authority staff is provided through the Town Manager's office.
Develop affordable that adheres to the Commonwealth's Sustainable Development Principles.	The Sustainable Development Principles were incorporated as a natural part of the local review process.

Table 49: 2017 HPP Goals and Progress Toward Goal

Goal	Progress Toward Goal
Monitor the progress of affordable housing production to meet annual production goals.	The Town has closely monitored affordable housing production, but it has not kept pace with the affordable housing production goals as outlined in the Affordable Housing Production section.
Address the housing needs of veterans in the community and partner with local veterans' organizations to identify possible housing sites.	Tewksbury Home Build has partnered with Soldier On to build 21 affordable units on Main Street. The project was permitted on Main Street and has received over \$500,000 in support from the Town's Affordable Housing Trust Fund.

Source: Tewksbury Housing Production Plan for 2017-2022 and Town of Tewksbury Department of Community Development

3. Tewksbury Housing Authority

The Tewksbury Housing Authority (THA), established in 1967, is the local body responsible for the expenditure of State and Federal housing grants. The THA currently owns and manages 190 units of housing for the elderly and disabled, 18 units of family rental housing, and 24 units of housing for people with special needs. An additional 110 family units are administered in partnership with local landlords, as well as 32 units of HUD subsidized 202 supportive housing owned by AgeSpan (formerly known as Elder Services of Merrimack Valley and the North Shore). The THA housing programs are subsidized and regulated by the Executive Office of Housing and Economic Development (EOHED) and the U.S. Department of Housing and Urban Development (HUD). The THA Board of Commissioners, four of whom are elected by the Town for five-year terms and one who is appointed by the Governor, set policy and oversee THA's operations. The Executive Director and her staff carry out the day-to-day activities.

The THA is a MassHousing-certified Chapter 40B monitoring agent and serves Tewksbury and the surrounding communities in managing and tracking their affordable housing units. The THA has also been designated as a Chapter 40B consultant to the Citizens' Housing and Planning Association (CHAPA) and the Executive Office of Housing and Livable Communities (EOHLC). For example, in 2021, THA drafted the Affirmative Fair Housing Marketing Plan for an affordable housing unit constructed by a private developer.²⁷

The THA provides the following services:

- Manage housing units and maintain relationships with EOHLC and HUD;
- Plans and manages affordable housing lotteries, and in the development of public education, advocacy and outreach programs related to affordable housing;
- Establishes and maintains a master list of private and public affordable housing units in the Town in connection with the Town's subsidized housing inventory;
- Receives requests for assistance and approvals made by owners of affordable housing units, including requests for refinancing and notices of intent to sell;

²⁷ Tewksbury 2021 Annual Town Report, Town of Tewksbury

- Verifies information annually concerning all rental and homeowner affordable units in the Town, including compliance with applicable affordable housing restrictions;
- Verifies with the Town Assessor's Office that the assessed value of affordable units in the Town reflect the applicable deed restrictions; and
- Participates with the Local Housing Partnership and Affordable Housing Trust Fund.

4. Affordable Housing Trust Fund

The Affordable Housing Trust Fund (AHTF) was authorized by Chapter 105 of the Acts of 2003 by the General Court to be under the control of the Select Board and with the Town Treasurer designated as the custodian of the funds. The purpose of the AHTF was to create or preserve affordable housing in the Town of Tewksbury. The funds from the AHTF may be specifically used to: "(a) purchase and improve land; (b) purchase dwelling units; (c) develop new or rehabilitate existing dwelling units for purchase or rental by low- or moderate-income housing purchasers or tenants; and (d) preserve existing subsidized housing inventory as maintained by the Department of Housing and Community Development under chapter 40B".

The Select Board receives input from staff regarding opportunities to create or preserve affordable housing through the Trust Fund. The AHTF is comprised principally of funds provided through the Town's fee in lieu of affordable units program. The AHTF also receives allocations from the Community Preservation Fund. As of 2022, the AHTF had a balance of \$5,315,555. **Table 50** provides a summary of Affordable Housing Trust Fund expenditures from 2018 through 2022.

Table 50: Affordable Housing Trust Fund Expenditures (2018-2022)

Recipient	Purpose	Year	Amount
Tewksbury Home Build	Construction costs at 1047 South Street	2018	\$40,000
Tewksbury Home Build	Site work at 1660 Main Street	2019	\$30,000
Soldier On	Assistance at 1660 Main Street for 21 affordable units for veterans	2021	\$500,000
Total			\$570,000

Source: Town of Tewksbury, December 2022

5. Community Preservation Committee

Tewksbury adopted the Community Preservation Act (CPA) in 2006. This state legislation allows communities to impose a surcharge on annual property tax bills and use the funds to preserve open space and historic resources and create affordable housing. Tewksbury residents pay a 1.5% property tax surcharge to finance these community preservation projects. This resulted in roughly \$1.3 million in 2021.

Similar to many communities that have adopted the CPA, Tewksbury's Community Preservation Committee (CPC) allocates a minimum of 10% of the estimated revenue each year towards Affordable Housing initiatives. In the last five years, this 10% was allocated toward a reserve each year. The CPC did not allocate any other appropriations to housing-related projects during that time. **Table 51** provides a list of these appropriations.

Table 51: Community Preservation Committee Affordable Housing Appropriations (2018-2022)

Project	Action Taken	Date	Appropriation
CPC Housing Reserve	Retain in CPC Housing Reserve	2018	\$94,729
CPC Housing Reserve	Retain in CPC Housing Reserve	2019	\$102,617
CPC Housing Reserve	Retain in CPC Housing Reserve	2020	\$108,874
CPC Housing Reserve	Retain in CPC Housing Reserve	2021	\$119,702
CPC Housing Reserve	Retain in CPC Housing Reserve	2022	\$131,332
Total			\$557,254

Source: Town of Tewksbury, July 2022

6. Habitat for Humanity of Greater Lowell

Habitat for Humanity of Greater Lowell (HFHGL) is a nonprofit 501 (c)(3) organization that “works to strengthen families and communities through affordable homeownership opportunities. Since its founding in 1991, HFHGL has built or renovated 40 homes in the Greater Lowell region, Bedford, Concord, and Reading. Homeowners pay for their homes through a monthly mortgage and 225-400 hours of “sweat equity”. HFHGL built its first home in Tewksbury in 2015 and completed an additional project in 2019.

7. Tewksbury Home Build

The Tewksbury Home Build (THB) is a nonprofit 501 (c)(3) public volunteer organization dedicated to “promoting and undertaking the development and maintenance of affordable housing for the benefit of low- and moderate-income residents within Tewksbury”. Originally formed from a small group of active members at Tewksbury Congregational Church, THB is now comprised of volunteer members from other faith organizations, civic organizations, and committed Tewksbury residents. THB has assisted HFHGL on its two homes and worked with the Town of Tewksbury to complete an additional two affordable single-family homes on South Street. THB is now working with the Town and Soldier On, a nonprofit serving veterans, on a project on 1660 Main Street.

8. Tewksbury Local Housing Partnership

The Tewksbury Local Housing Partnership (Partnership) was incorporated by the Select Board to study the need for affordable housing and to recommend procedures for the implementation of Tewksbury’s Affordable Housing policy. In 2021, the Local Housing Partnership voted to recommend to the Select Board to dissolve the committee. The responsibilities of the partnership were ultimately merged into the Department of Community Development.

9. Tewksbury Department of Community Development

The Town’s Department of Community Development has assumed the functions below and works on behalf of the Select Board in consultation with the Planning Board and Tewksbury Housing Authority to provide the following functions:

- Develop affordable housing action plans based on housing needs studies;
- Establish criteria to evaluate affordable housing proposals;
- Make recommendations on the pros and cons of particular housing proposals;

- Identify local, state, and federal housing resources to fund development projects;
- Locate available land suitable for development;
- Review land use regulations and zoning bylaws;
- Work with private and nonprofit affordable housing developers;
- Increase public awareness through forums and other public events; and
- Work in cooperation with the Town Boards.

The Department of Community Development is the Town's initial contact for developers of proposed affordable housing projects. These projects are site-specific and may require an increase in the allowed density or other variances to encourage the development of affordable housing.

F. Development Constraints and Limitations

This section examines land constraints and limitations that have an impact on the development of new housing opportunities in Tewksbury. It includes a review of the land use development patterns, zoning provisions, and infrastructure analysis, and concludes with a summary of the Town’s plans to address and overcome these constraints.

1. Land Use Development Patterns and Potential

NMCOG analyzed the Town of Tewksbury Assessor’s tax database by land use code in order to estimate the acreage of land that was occupied by commercial, industrial, institutional, and residential uses, including undeveloped land. As shown in **Table 52** and **Figure 26** (full size map in Appendix 1 **Maps**), nearly 55% of land not occupied by water or rights of way is occupied by a residential use, which includes single-family detached, multi-family, and facilities such as group homes and assisted living facilities.

Table 52: Tewksbury Land Use by Acreage, 2022

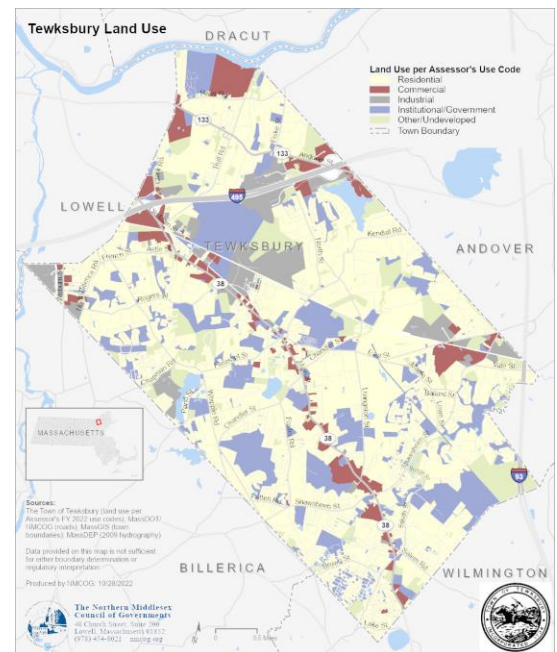
Land Use Category	Acreage	Percentage of Total
Residential	6,394	53.9%
Commercial (Incl. Commercial Recreation)	729	6.1%
Industrial (Incl. Warehouse)	874	7.4%
Institutional/Government	758	6.4%
Institutional/Government Open Space	1,946	16.4%
Other/Undeveloped	1,154	9.7%
Total	11,855	100.0%

Source: Town of Tewksbury Assessor’s Fiscal Year 2022 tax parcel database use codes and GIS parcel boundaries. Note that the acreage does not include Rights of Way and water acreage.

The second-largest category of land at 22.8% was institutional/government. For the purpose of land use analysis, this was split into parcels occupied by buildings with uses such as schools, nonprofit agencies, and municipal uses (6.4% of total) and parcels with no buildings, which includes large open spaces such as cemeteries and conservation land. Industrial uses, which includes manufacturing, R&D, utilities, and warehouses were 7.4% of land, and Commercial, including retail, restaurants, office, and recreational land such as golf courses, was 6.1% of land.

Notably, the “other” category was 9.7% of land not occupied by water or rights of way. Although this includes a small amount of agricultural and recreational land, the majority is categorized as vacant. Using an estimate of constrained land from each parcel provided as part of MAPC Communities

Figure 26: Tewksbury Land Use, 2022



compliance model and based on MassGIS data layers²⁸, NMCOG estimated that roughly 631 acres in the other/undeveloped category were unconstrained.

Redevelopment is also a possibility for housing construction. For the purposes of this analysis, NMCOG estimated the acres that were occupied by a single home on large lots, which often are redeveloped when the home owner sells their property, and commercial recreation, which also are often redeveloped when the owner sells the property. NMCOG estimated that 227 acres were parcels that were ten or more acres with only one single family detached structure, 112 of which is unconstrained. NMCOG estimated 240 acres were commercial recreation, 208 of which is unconstrained.

This is not meant to imply that all properties that meet these criteria are ideal for housing development and is also not meant to imply that redevelopment could not take place on other types of properties. Criteria for ideal housing development will be explored in **Implementation Strategies**.

2. Zoning

NMCOG undertook an analysis of how zoning constrains or enables housing production in the Town of Tewksbury. This is based on the comprehensive rewrite of the Tewksbury Zoning Bylaw, approved by the May 2022 Town Meeting and pending Attorney General Review.

a. Overview

The 2022 Zoning Bylaw has 15 zoning districts, all of which but two, Industrial 2 (I2) and Park (P), allow some types of housing as of right or by special permit from the Planning Board. Four of these are intended as residential districts:

- Residence 40 (R40),
- Multifamily (MF),
- Village Residential (VR), and
- Farming (F).

These four districts and two others allow single family detached by right. The two others, Limited Business (LB) and Transitional (TD), are small, neighborhood-specific zones, with the LB intended as low density, mixed-use area and TD as a small area limited to low-density residential uses.

In addition, townhouses, two-family, multifamily of up to seven units, and congregate residences are allowed as of right in MF and VR districts. Finally, dwelling units above the ground floor of a commercial building and live/work units are allowed as of right in VR and several business districts. Table 53 lists all housing types the zoning allows, and which zones allow them as of right or by special permit from the Planning Board. Notably, overlay districts such as the Ground Water Protection District limit the type and density of development in areas that would impact the quality and quantity of drinking water supply.

²⁸ Constraints include Hydrography (waterbodies and waterways), Wetlands (per Mass DEP 2009 data), Title V and Surface Water Protection Zone A, Mass DEP Wellhead Protection Zone 1, and Restricted Open Space. As all calculations are based on parcel data, no right-of-way is included in the calculation.

Table 53: Housing Types by Zoning Districts

Housing Type	As of Right	Special Permit
Single Family Dwelling, Detached	F, R40, MF, VR, LB, TD	
Townhouse	MF, VR	
Two-Family Dwelling	MF, VR	
Multifamily Dwelling, Up to 7 Units	MF, VR	MUB, TC, SB
Multifamily Dwelling, 8 or More Units		TC
Multi-Family Development		MF, VR, MUB, TC, SB
Dwelling Units above the Ground Floor of a Commercial Building	VR, MUB, TC, LB, WNB, SB, GB	
Live/Work Units or Artist Loft	VR, MUB, TC, SB	MF, LB, WNB, GB
Open Space Residential Development (OSRD)		F, R40, MF
Congregate Residence	MF, VR	MUB, TC, WNB, SB, GB, I1, OR
Assisted Living Residence	MF, VR	TC, SB, GB, I1, OR
Continuing Care Retirement Community	MUB	MF, VR, GB, I1, OR

Source: Town of Tewksbury Zoning Bylaw, 2022

Although MF and VR allow a flexible array of housing in buildings up to 7 units as of right, these districts combined only cover approximately 3.2% of the town. Zoning on the remainder of the land:

- Allows only single-family detached dwellings (F, R40, LB, and TD, 75.9%);
- Allows only very specific types of residential development such as units over the ground floor of a commercial building as of right (MUB, TC, WNB, SB, and GB, 7.2%); or
- Does not allow any residential development as of right (I1, I2, OR, and P, 13.7%).

The sum effect of the zoning regulations appears to:

- Maintain a one unit per acre suburban development pattern over most of the community, zoned R40, which is largely but not entirely covered by existing housing;
- Concentrate development away from certain farming and park lands, zoned F or P, to areas near or adjacent to the Town Center, zoned VR and TC, and to certain nodes on major streets, zoned MF;
- Allow a denser mix of uses, including residential uses, by special permit complementing town center development east and west of the Town Center, zoned MUB; and
- Reserve certain areas near highways zoned I1, I2, OR, and GB for industrial, office, or general business development, serving economic development goals but limiting housing.

Other districts are small with specific purposes that do not appear to impact overall development patterns.

b. District Descriptions

The four major residential zoning districts are described as follows:

Residence 40 District (R40): The R40 District is designed to accommodate single-family residences as of right. In addition to the traditional single-family residences, cluster development, Open Space Residential Design (OSRD) and family suites are allowed by Special Permit through the Planning Board. The minimum lot area allowed within the R40 District is one acre. Notably, many existing nonconforming homes in the R40 district have lot sizes ranging from 0.15 to 0.3 acres, largely near the Town Center and in the south corner of the town. 4,939 acres, or roughly 57% of the land use in this district, is single family residential, with most of the remainder municipal or vacant. About 96 acres, or roughly 1% of the land, in this district is two-family or multifamily. The district contains an estimated 700 acres of vacant parcels (not agricultural), with 385 acres estimated to be unconstrained.

Multifamily District (MF): The MF District regulates multi-family housing developments through eligibility criteria. Single family detached, townhouses, two-family, and multifamily dwellings up to 7 units per acre are allowed. This occurs in nodes along Main Street and other main roads and is intended to provide a variety of housing. All uses except single-family and two-family dwellings require site plan review. An estimated 387 acres, or 96% of the land, in this district is multi-family or condominium, with a small amount of utility, single family, or other use. There is very little vacant land in this district—an estimated 5.4 acres, 3.9 of which is unconstrained.

Village Residential (VR): The VR District is adjacent to the Town Center or other key intersections. Like MF, it regulates multi-family housing developments through eligibility criteria. Single-family, townhouses, two-family, and multifamily dwellings of up to 7 units per acre are allowed. It is intended to encourage compact development near commercial services and allow mixed-use development. Like MF, all uses except single-family and two-family dwellings require site plan review. This district is very small, roughly 18 acres. 1.4 acres is occupied by multifamily residential and 3.8 is occupied by single family residential. The remainder is occupied by commercial or utility uses.

Farming (F): The Farming district is the lowest-density district in Town. It includes the historic Tewksbury State Hospital property and surrounding agricultural lands near the center of Town. Development in this district is limited to single-family homes on relatively large lots and some residential accessory uses. In addition to the traditional single-family residences, cluster development, Open Space Residential Design (OSRD) and family suites are allowed by Special Permit through the Planning Board. The minimum lot area allowed within the F District is one acre. This district includes nearly 360 acres, most of which is publicly owned open space (estimated 207 acres) or other government/institution parcels (estimated 85 acres), much of which is associated with the Tewksbury Hospital. 3.7 acres, or 1% of the district, is occupied by single family residential. There is an estimated 41 acres of undeveloped land, or 11.5% of the district. An estimated 5.6 acres is vacant unconstrained. The remainder of the land is a mix of commercial recreational uses.

The permitted residential uses by zoning district are shown in **Table 54**.

Table 54: Allowed Residential Uses by Zoning District: 2022

Residential Uses	F	R40	MF	VR	MUB	TC	LB	WNB	SB	GB	I1	I2	OR	TD	P
Principle Use															
Single Family Dwelling, Detached	Y	Y	Y	Y	N	N	Y	N	N	N	N	N	N	Y	N
Townhouse	N	N	Y	Y	N	N	N	N	N	N	N	N	N	N	N
Two-Family Dwelling	N	N	Y	Y	N	N	N	N	N	N	N	N	N	N	N
Multifamily Dwelling, Up to 7 Units	N	N	Y	Y	PB	PB	N	N	PB	N	N	N	N	N	N
Multifamily Dwelling, 8 or More Units	N	N	N	N	N	PB	N	N	N	N	N	N	N	N	N
Multi-Family Development	N	N	PB	PB	PB	PB	N	N	PB	N	N	N	N	N	N
Dwelling Units above the Ground Floor of a Commercial Building	N	N	N	Y	Y	Y	Y	Y	Y	Y	N	N	N	N	N
Live/Work Units or Artist Loft	N	N	PB	Y	Y	Y	PB	PB	Y	PB	N	N	N	N	N
Open Space Residential Development (OSRD)	PB	PB	PB	N	N	N	N	N	N	N	N	N	N	N	N
Congregate Residence	N	N	Y	Y	PB	PB	N	PB	PB	PB	PB	N	PB	N	N
Assisted Living Residence	N	N	Y	Y	N	PB	N	N	PB	PB	PB	N	PB	N	N
Continuing Care Retirement Community	N	N	PB	PB	Y	N	N	N	N	PB	PB	N	PB	N	N
Accessory Use															
Family suite	PB	PB	PB	PB	N	N	N	N	N	N	N	N	N	PB	N
Home occupation	Y/ SP	Y/ SP	Y/ SP	Y/ SP	Y/ SP	Y/ SP	N	N	Y/ SP	N	N	N	N	Y/ SP	N
Family child care home	Y	Y	Y	Y	SP	N	N	N	N	N	N	N	N	Y	N
Family child care home, large	SP	SP	SP	SP	SP	N	N	N	N	N	N	N	N	N	N

Source: Town of Tewksbury Zoning Bylaw, 2022. Y: Allowed as of right; PB: Allowed through Special Permit from the Planning Board; SP: Allowed by Special Permit from the Select Board; N: Not allowed

c. Multifamily Development

Section 8.2 of the Tewksbury Zoning Bylaw regulates the development of multifamily dwellings by establishing eligibility requirements and reasonable conditions for construction. It applies to all multifamily developments, whether they are as of right or by special permit. All multifamily developments are subject to Site Plan Review by the planning board.

Multifamily developments outside the Town Center must have a minimum of a one-acre lot and 150' of frontage. Furthermore, they are subject to a seven units per acre and 14 bedrooms per acre limit. Only 5% of the site area within wetlands or flood plain shall be used to calculate this density. There is also a 30% maximum building coverage area and 60% of the upland site area must be set aside for open space. Finally, there is a 50' setback from all lot lines, and a 45' maximum building height.

Multifamily developments in the Town Center must have a minimum of a 40,000 square foot lot, 150' of frontage on Main Street, 35% maximum building coverage area, 50' setback from all lot lines, and follow the Town Center guidelines. Multifamily zoning at 15 units per acre is not currently allowed as of right,

meaning the Town is not currently in compliance with Chapter 40A, Section 3(a), also known as the Multi-Family Zoning Requirement for MBTA Communities.

d. Open Space Residential Development (OSRD)

Section 8.4 of the Zoning Bylaw allows the development of a tract of land of at least three acres in the R40 or F District to reduce the minimum lot size in order to conserve natural features. To be eligible for an OSRD permit, a project must be comprised of no less than 3 acres comprised of contiguous parcels. A minimum of 50% of the development tract must be set aside as open space with no more than 50% of this area comprised of wetlands or land with a grade greater than 25%. Although the minimum lot size may be reduced to 10,000 square feet in these developments, the article is designed in such a way to allow only the same number of units that could have been built under conventional zoning. In addition, there is only a limited amount of space left in these districts that contain tracts of land 3 acres or greater, so the overall impact of OSRD on development town-wide is minimal.

e. Accessory Dwelling Units/Family Suite

A Family Suite is allowed by special permit as an accessory use in a single-family dwelling in R40, F, TD, MF and VR districts that can be up to 1,000 square feet in floor area with a maximum of 2 bedrooms. It must be contiguous with a single-family dwelling and not have a separate front door. The owner must occupy one primary or accessory unit, and no more than 3 related persons (or, with conditions, a personal care attendant) may occupy the accessory unit. Any additions must comply with dimensional requirements of the applicable zoning unless variances are granted. Finally, the Planning Board may impose additional conditions. Although this has a large potential to increase the number of housing units, the restrictions of occupancy to related persons may limit its overall impact on housing affordability.

f. Affordable Housing Bylaw

The Affordable Housing bylaw, Section 8.3, was developed to outline and implement a set of policies and objectives for the development of affordable housing in compliance with M.G.L. Chapter 40B, section 20-23, and various initiative programs developed by state and local government. The housing units developed under the Affordable Housing bylaw are considered Local Initiative Project (LIP) units in compliance with the requirements established by the Executive Office of Housing and Urban Communities (EOHLC).

The bylaw applies to all construction of six or more dwelling units on one or more contiguous parcels in MF, TC, MUB, or VR districts, and to all OSRDs. It requires that any multifamily development include 15% of the total units as affordable and OSRD permit requires 10% of the total units are affordable.

Key components in the bylaw include:

- For multifamily projects, the 15% affordable units are mandated to be provided on-site.
- Applications for an OSRD Permit requires that at least 10% of the units be established in perpetuity as affordable, if the Town is over 10% of its affordable housing requirement, the Planning Board may accept a fee in lieu of the affordable units.

- The siting and timing of construction of affordable units shall coincide and be comparable with market rate units in a mixed-use development.
- Applicants must submit a marketing plan for approval, which describes how the affordable units will be marketed to potential homebuyers or tenants.

g. Conclusion

Overall, the zoning is a constraint on housing production insofar as two-family and multi-family developments are largely limited to the Route 38/Main Street corridor with a few exceptions. As much of the housing is built more densely than the R40 District currently allows, only development on the town's remaining greenfields which are not constrained by wetlands would be anticipated without zoning relief or changes in zoning. Furthermore, where redevelopment is possible along Route 38/Main Street, it is limited by dimensional requirements that may make innovative mixed-use redevelopments difficult. Although the Town is to be commended for allowing accessory dwelling units as a powerful strategy to increase housing affordability, the Family Suite article is limited in scope. That said, with special permits or possible dimensional variances, there are a number of potential opportunities for affordable housing development within these constraints.

Notably, Chapter 358 of the Acts of 2020 requires that the Town create a zoning district where multi-family housing is allowed as of right. As Tewksbury is considered an "Adjacent Community," the zone must accommodate at least 10% of the housing units recorded in the 2020 Decennial Census, or 1,214 units, and be at least 50 acres in size. Furthermore, as in all MBTA Communities, the zone must "not require multi-family uses to include units with age restrictions," or "limit or restrict the size of the units, cap the number of bedrooms, the size of bedrooms, or the number of occupants, or impose a minimum age of occupants."

The zone may include an affordability requirement, so long as affordable units are SHI-eligible, not more than 10% of units are required to be affordable, and the cap on income is not less than 80% AMI. Up to 20% of the units can be affordable if "the affordability requirement applicable in the multi-family zoning district pre-dates the enactment of Section 3A and the MBTA community demonstrates to DHCD [now EOHLC] that the affordability requirement has not made and will not make multi-family housing production infeasible." The affordability requirements of zoning districts which require EOHLC approval, such as Smart Growth Overlay Districts adopted under Chapter 40R, are also eligible. Other restrictions and guidelines exist for this district.²⁹

The Town is currently examining the feasibility of allowing such uses in areas of concentrated development. This may be either through creation or modification of a base district or through the use of an overlay district.

3. Infrastructure and Service Limitations

This section provides information on the sewer, water, and transportation infrastructure and identifies the limitations that present barriers to new residential development. This summary is based upon

²⁹ Section 3A Guidelines, DHCD (now EOHLC), 2022

information within the Annual Town Report, the Water Department web site, the *2016 Tewksbury Master Plan*, and the *Northern Middlesex Regional Transportation Plan for 2020-2045*.

Much of the remaining undeveloped land in Tewksbury is limited by environmental factors, such as rock ledge, slopes, and wetlands. Sewer, which is processed by the Lowell Regional Wastewater Utility, and water both have capacity for additional residential development depending on its location.

The transportation network, principally through access to Interstate 495 and Interstate 93, has provided advantages to Tewksbury in attracting businesses and homeowners. However, there are some constraints related to the public transportation network. The Lowell Regional Transportation Authority (LRTA) provides two fixed bus routes from Lowell: LRTA Route 12 via Massachusetts Route 38, terminating at the Wilmington Train station and LRTA Route 11 via Massachusetts Route 110 terminating at the IRS facility in Andover.

a. Sewer Capacity

The Town of Tewksbury completed a town-wide sewer construction project in 2009, with continual capacity and maintenance projects since then. The Town currently has more than 180 miles of gravity and forced (pump station) sewer mains, 47 active sewer pumping stations, and thousands of sewer manholes. Upon completion of the 2009 sewer project, a large majority of residential households had the potential to be connected to the sewer system. However, as of now, only 78% of eligible users, including commercial users, are connected. The Town sends its sewage to the Lowell Regional Wastewater Utility (LRWWU), which is permitted to treat an average of 32 million gallons per day (MGD) from the City of Lowell and the Towns of Chelmsford, Dracut, Tewksbury, and Tyngsborough. The capacity of the plant can be increased to 100 MGD during stormwater events. The system can also store additional water during these events to be processed when the storm passes. Despite this, some storm events surpass the amount which can be stored and combined sewer overflow diversion stations discharge to area rivers.

Although the town has not currently met its limit on the amount of flow sent to LRWWU, some pump stations are operating at their maximum capacity. The ability for the system to handle additional flow from new households would depend on the location of the new home(s) within the system.

b. Water Supply and Protection

The Town of Tewksbury built its water treatment facility in 1988 and originally treated 3 million gallons of water per day from the Merrimack River. Today, the Town's water system consists of approximately 170 miles of water mains, over 10,500 service connections, 1,500 fire hydrants, and thousands of water main valves. **Table 55** shows public water consumption in Tewksbury.

Table 55: Public Water Delivered, Town of Tewksbury

Year	Annual Million Gallons Delivered (MGD)	Average Daily MGD
2012	862.4	2.36
2013	929.6	2.55
2014	812.7	2.23
2015	833.7	2.28
2016	794.0	2.18
2017	868.5	2.38
2018	875.7	2.40
2019	869.8	2.38
2020	953.1	2.61
2021	887.5	2.43

Source: Town of Tewksbury Department of Public Works

The treatment plant can now treat up to 7 million gallons of water per day and three water storage tanks can store an additional 7 million gallons. As 2021's peak daily production was 4.295 million gallons, and the average Tewksbury resident uses 52 gallons per day (Residential Gallons per Capita Day or RGPCD)³⁰, there is ample daily water capacity for growth. When looking at annual water consumption, Tewksbury is currently permitted for a withdrawal of 1,157.1 million gallons per year. As Table 55 shows, annual water consumption peaked in 2010 at 1000.2 million gallons per year and has generally stayed between 800 and 1,000 million gallons per year, which also indicates additional capacity for growth.

That said, pipe infrastructure from the plant to the neighborhoods limit capacity in certain areas. This may suggest a criterion for preferred housing sites should be proximity to existing water infrastructure capacity or sites for which an upgrade in water infrastructure, which might include repairs of leaks, larger pipes, or other upgrades, would allow housing to be built near other existing infrastructure or services. Finally, it would also suggest a preferred characteristics of housing would be to incorporate best practices in water conservation to allow existing infrastructure to service more units.

c. Transportation Network

Tewksbury is served by a regional transportation network comprised of several modes of transportation, including automobiles, buses, commuter rail, bicycles and pedestrians. The roadway network is framed by its interstate highway network, consisting of Interstate 495 and 93, and consisting of 166.47 centerline miles (338.99 lane miles) of roadway in 2020, according to MassDOT. Ideally situated between the two interstate highways, Tewksbury residents, employers and visitors have relatively easy access to Boston, the Merrimack Valley and New Hampshire.

Tewksbury's roadway system includes a blend of historic local roads and regional highways. The local roadway system is built upon the original farming community in the seventeenth century and

³⁰ Town of Tewksbury Department of Public Works

transitioned to the suburban community it is today. The growth of industrial and commercial activity in Lowell and along Routes 128 and I-495 brought further development to Tewksbury, which has now become the home of major technology firms in numerous office parks along I-495.

Main Street (Route 38) is a key highway traveling through the Town Center and contains many of the densest zoning districts. To measure its and other roads' congestion, NMCOG measures studies speed over a period. It then creates a "speed index", which is a ratio of average speed during peak hour compared with the free flow speed. A value of less than 0.70 is considered "congested" and value between 0.70 and 0.90 are "somewhat congested." Main Street is considered "somewhat congested" during A.M. peak hour. During P.M. peak hour, it is considered "somewhat congested" travelling away from Town Center and "congested" traveling toward Town Center. The segment of Route 495 in Tewksbury is considered "not congested" during A.M. peak hour and "somewhat congested" during P.M. peak hour. NMCOG also identified congested intersections along Route 38 and South Street, Shawsheen Street, Chandler Street, Pleasant Street, and the ramps of I-495. The ramps at Route 133 and I-495 are also congested. This congestion does not suggest the transportation system has no capacity for additional units. Rather, it points toward a need to encourage new and existing housing units to use alternative transportation such as walking, transit, or carpooling whenever possible.

The Lowell Regional Transit Authority (LRTA) provides bus service in Tewksbury. The one-way adult fare for fixed-route bus service is \$1.25 within one community and \$1.85 for service between two or more communities. Seniors and disabled persons are eligible for a 50% discount.

Route 12 travels from the Kennedy Center in Lowell along the length of Route 38 to the Wilmington Train Station Monday through Saturday. On weekdays the first bus leaves the Kennedy Center at 7 A.M. with subsequent trips every hour until 6:00 P.M. On the return, the first bus leaves the Wilmington Train Station at 7:45 A.M. with subsequent trips every hour until 6:45 P.M. On Saturdays, the first bus leaves Kennedy Center at 7:00 A.M. and the last bus leaves at 5:00 P.M. On the return, the first bus leaves the Wilmington Train Station at 7:45 A.M. and the last bus leaves at 5:45 P.M. Although LRTA piloted Sunday service for a time during the HPP period, dropping ridership during and after the COVID-19 Pandemic has caused LRTA to scale back services. Route 12 services now end an hour earlier than they did prior to the Pandemic.

In addition, Route 11 provides service to the northern corner of Tewksbury. It travels from the Kennedy Center in Lowell via Route 133 to the Internal Revenue Service (IRS) office in Andover on weekdays. Buses leave the Kennedy Center at 6:00 and 7:00 A.M., as well as 3:00 and 4:00 P.M. Return trips leave the IRS Facility at 6:30 and 7:30 A.M., as well as 3:30 and 4:30 P.M. Map 6 in the Appendix shows the actual routes for these two bus services.

Through agreements with private transportation carriers and local Councils on Aging, the LRTA currently provides paratransit services for the elderly and disabled in ten communities. The LRTA furnishes demand response and prescheduled van service, known as "Road Runner", to eligible clients in the communities of Acton, Billerica, Carlisle, Chelmsford, Dracut, Groton, Maynard, Lowell, Pepperell, Tewksbury, Townsend, Tyngsborough and Westford. The one-way bus fare is \$2.00 within one

community and \$3.00 for travel between two or more communities. These services also include a program with extended service hours and long-distance medical transportation, and special transportation services for area nursing homes funded by MassDOT. Additionally, the LRTA offers an expanded paratransit service as part of its Americans with Disabilities Act compliance program. Through agreements with private transportation carriers and local Councils on Aging, the LRTA currently provides paratransit services for the elderly and disabled in ten communities. The LRTA furnishes demand response and prescheduled van service, known as “Road Runner”, to eligible clients in the communities of Acton, Billerica, Carlisle, Chelmsford, Dracut, Groton, Maynard, Lowell, Pepperell, Tewksbury, Townsend, Tyngsborough and Westford. The one-way bus fare is \$2.00 within one community and \$3.00 for travel between two or more communities. These services also include a program with extended service hours and long-distance medical transportation. Additionally, the LRTA offers an expanded paratransit service as part of its Americans with Disabilities Act compliance program.

Commuter rail is an important transportation mode for Tewksbury residents as well. Although there are no train stations in Tewksbury, there is access to train stations at Kennedy Center in Lowell, Wilmington Center and North Billerica. This commuter rail system provides direct access to Boston and Lowell. Map 6 in the Appendix shows the location of these train stations.

G. Comprehensive Needs Assessment Conclusions

As the previous subsections illustrate, there is a gap between the current and anticipated housing needs of the local population and the existing and projected housing stock. This subsection brings the rest of the Comprehensive Needs Assessment together, summarizing the issues that the Affordable Housing Goals must address. These findings are in no particular order of importance.

There are a significant number of residents who make very low incomes and extremely low incomes, and their housing needs aren't being met.

Tewksbury defied projections and grew 8.2% between 2010 and 2020. At roughly the same time, the income distribution was increasingly concentrated among those earning more than \$100,000. That said, as of 2014-2018, there were 1,315 Extremely Low Income (30% or less AMI) and 870 Very Low-Income households (making between 30% and 50% AMI, see Table 14).

At the most extreme end of the income spectrum, many families fall under the poverty threshold. For example, a family of three making \$23,030 or less annually is considered living under poverty (see Table 15). According to the 2015-20 ACS, 4.0% of the population, or 1,235 Tewksbury residents, were in poverty. This is a slight improvement since the last HPP but still significant.

There is not enough housing in Tewksbury that is affordable for this population. In 2014-18, 70% of Extremely Low-Income households in Tewksbury were severely cost burdened, paying more than 50% of their income on housing costs. 41% of Very Low Income were severely cost burdened (see Table 43).

Another way of considering this issue is through comparing supply and demand. As of the 2016-20 ACS, an estimated 807 renter households made less

SUMMARY OF CONCLUSIONS

1. There are a significant number of residents who make very low incomes and extremely low incomes, and their housing needs aren't being met.
2. Homeownership is increasingly out of reach for the median income earner, creating concerns about fair access to housing.
3. Renters fare significantly worse than owners on access and cost of housing.
4. Tewksbury has a growing population that will need accessible housing, especially seniors in non-family households.
5. Tewksbury has a growing need for smaller units suitable for individuals or small but growing families.
6. There are racial disparities in income in both Tewksbury and the Greater Lowell region and less racial and ethnic diversity in Tewksbury than other Lowell suburbs.
7. New and existing housing should provide a high quality of life, and there are conflicting visions on how to maintain this quality of life.
8. Infrastructure capacity varies across the town.

than \$50,000, which roughly falls into the Very Low or Extremely Low Income categories. Yet only 602 units were \$1,249 a month or less, which would be considered affordable to those categories (see **Table 46**). This means more than 200 additional units at this level of affordability would need to exist just to meet the current need, and that assumes no higher-income residents occupy units within this rent range.

This is also echoed in the long wait times for affordable units for families and individuals. Tewksbury Housing Authority continues to address the needs of families and individuals in Tewksbury. There are 8,906 Family Applicants on the CHAMP wait list. The THA estimates that there is a wait period of five to ten (5-10) years or longer for these standard applicants. In 2021, there were only two vacancy turnovers in family housing units.³¹

Homeownership is increasingly out of reach for the median income earner.

Even looking beyond, the lowest income levels, the number of households that have housing costs that are cost burdened is a problem in Tewksbury. In 2016-20, an estimated 2,870 households (28.3% of total owner-occupied households) in Tewksbury, were considered at least “moderately burdened”, paying more than 30% of their income on their housing costs (see **Table 42**). This situation is anticipated to worsen as houses turn over: with a 2021 median single-family sales price of \$560,000, a household would need to earn at least \$142,000 a year to not be considered “burdened” (see **3.C.4 Affordability Gap for Ownership Units**).

Many households looking to establish themselves in Tewksbury find the cost of market-rate housing prohibitive. According to 2014-18 CHAS data, nearly half of those who fall in the Low-Income category (incomes between 50% and 80% AMI) are at least moderately burdened, and although not many households in the Moderate Income (between 80% and 100% AMI) category are severely cost burdened, 41% are moderately cost burdened. This may indicate a need to bring down market rate housing costs or additional affordable housing targeted at that income category.

Renters fare significantly worse than owners on access to and cost of housing.

According to the 2011-2015 ACS, the percentage of “moderately burdened” rental households was 41.1% or 653 rental households. By the 2016-20 ACS, this number had increased to 770 households, or 43.3% of total renter households. Worse yet, the 2016-20 ACS estimated that 410 households, or 23.1% of rental households, were “severely burdened” (see **Table 42**). Tewksbury’s current median gross rent is \$1,938, second-highest in the region. This is more than HUD’s Fair Market Rent for a 2-Bedroom in the Greater Lowell region (\$1,773, see **Table 31** and **Table 32**), and unaffordable for at least 57.2% of the rental households living in town (**3.C.4 Affordability Gap for Ownership Units**).

Even though Tewksbury has made great strides in providing rental housing, it still lags behind its peer Greater Lowell suburbs (see **Table 23**). In fact, the ACS has estimated that Tewksbury has had a rental

³¹ Tewksbury 2021 Annual Town Report, Town of Tewksbury

vacancy rate of 0.0% (See **Table 37**). In other words, units are rented the moment they come on the market. This may be a large factor in the affordability gap for rental units.

Higher income levels often pay less than 20% of their income on housing and occupy housing that might be affordable to those who earn less.

A possibly counter-intuitive finding of the Comprehensive Needs Analysis is that 42.3% of owners and 25.5% of renters pay less than 20% of their income on housing (see **Table 42**). This lines up with the findings that there are more people who could afford homes on the high end of the cost spectrum (more than \$500,000 for sale or \$2,500 or more per month) than the supply in those categories (see **Table 45** and **Table 46**).

Although this does not mean homes are too inexpensive in Tewksbury, it does indicate that homes that might be affordable to some groups are being occupied by higher-income households. This is often the result of situations in which the prices of homes were “bid up” by higher-income households until they were just out of reach of lower income households. Notably, a study undertaken by the Metropolitan Area Planning Council (MAPC) in 2020 found that, in a Greater Boston study area including Tewksbury, households without children occupy 64% of owner-occupied units with three or more bedrooms and 57% of renter-occupied units.³² This indicates the value of expanding market rate housing of a large range of sizes along with income-restricted affordable units.

Tewksbury has a growing population that will need accessible housing, especially seniors in non-family households.

As the demographic analysis section of this plan illustrates, the Town has experienced population growth among its aging and special needs populations. Between 2010 and 2016-20, the number of residents between 60 and 74 years of age increased by 49% and the population of residents 75 and older increased by 16%. Residents 70 and older are projected to further increase by 101%, more than doubling between 2020 and 2040. Residents aged 60+ are anticipated to comprise 37.4% of the total Tewksbury population in 2040 (see **Table 6** and **Table 8**). This population will require special resources and housing from the community.

The 75 years and older represented the largest single age cohort living under poverty, with 20.4% estimated to be living under poverty. Those 65 to 74 years was an additional 5.5% of those living in poverty. Younger residents, such as those in the 0-17 age group comprised an additional 16.5% of the total population living in poverty (see **Table 16**).

Despite this age category being a growing proportion of Tewksbury, seniors—especially seniors who live in non-family households which may include living alone—are disproportionately cost burdened. As of 2014-18, an estimated 60% of this type of household, or 1,005 households, were at least moderately

³²“Research: Crowded In and Priced Out—Why It’s so Hard to Find a Family-Sized Unit in Greater Boston.” Tim Reardon, Sarah Philbrick, Jessie Partridge Guerrero, January 2020. Retrieved from <https://metrocommon.mapc.org/reports/10>

burdened. They are also the most often type of household severely burdened, at 520 households or 31% of elderly non-family households (see **Table 44**).

Residents with disabilities are another group that will require special attention related to their housing needs. Approximately 10.4% of Tewksbury's population (3,181) was reported to have a disability in 2016-20, which is an increase from 2011-15 (see Table 9). Residents with disabilities often have unique housing needs in terms of the physical design and/or accessibility of their homes, access to services, and the cost relative to a fixed or limited income.

The Tewksbury Housing Authority (THA) has dealt with the specific needs of the elderly and special needs populations. In 2019, DHCD (now EOHLC) launched Common Housing Application for Massachusetts Public-Housing (CHAMP), a centralized application and waiting list for all State Aided Public housing in Massachusetts. As of July 1, 2022, there were 1,269 elderly applicants and 1,894 applicants interested in accessible housing. The THA estimates that wait times for these populations are one to three (1-3) years. There were only 19 vacancy turnovers in 2021 in units reserved for the population who is elderly or has disabilities.³³

This Housing Production Plan needs to be sensitive to the needs of elders and those with disabilities in considering future affordable housing developments. This needn't mean housing that is age- or disability- restricted. Rather, it indicates a need for ensuring housing is accessible, ideally within accessible neighborhoods that allow seniors or people with disabilities a variety of accessible transportation and recreation options. It may also indicate a need for supportive programs, including providing options to age in place or downsize without moving out of town. Given the limited resources available to the elderly and the projected growth for this age cohort, the Town will need to keep in mind their special circumstances and work with partners to address those needs.

Tewksbury has a growing need for smaller units suitable for individuals or small but growing families.

According to the U.S. Decennial Census and the 2016-20 ACS, the average household size in Tewksbury has been shrinking since 2000. In 2000, the average household size in Tewksbury was 2.81 persons (3.24 for average Tewksbury family). In 2010, it was 2.7 persons (3.18 for average Tewksbury family). In 2016-20, it had declined to 2.56 persons.

The distribution of household sizes has been changing as well. In 2010, 21.5% of all households were 1-person households. This grew to 25.0% in 2011-15, then stayed more-or-less steady into 2016-20. During that time, 2-person households jumped from 32.8% of total households in 2011-15 to 36.3% in 2016-20. This has been accompanied in households with three to six people shrinking as a proportion of all households, but especially mid-size households of three to four people. These two categories went from 17.6% and 17.4% of total households in 2010, respectively, to 14.1% and 14.2% of total households

³³ Tewksbury 2021 Annual Town Report, Town of Tewksbury

in 2016-20. It should be noted that almost all households above 2 people are family households (see Table 3).

Examining age may add some context to these changes. Between 2011-15 and 2016-20, the proportion of households headed by people aged 15-34 years old, both family and nonfamily, shrunk from 11.7% of total households to 9.8% of total households (1,312 to 1,172 households, see **Table 4**.) At the same time, individuals in that age cohort grew from 17.4% of the population to 18.4% of the population (5,254 to 5,737 individuals, see Table 6.) What this indicates is that young people in Tewksbury may be growing into adulthood but staying at parents' house or rooming together. This may be at least partially because of housing affordability issues. Non-elderly, non-family households are disproportionately moderately or severely burdened, at 37% or 663 households, and small families have the highest number of moderately or severely burdened households, at 1,179 households or 23% of small families (see **Table 44**).³⁴ This may indicate a need to create more homes that are attractive and affordable to this population, whether they choose to live alone or start new families.

During the period from 2000 to 2020, Tewksbury diversified the types of housing units that are available. There should be a continued emphasis on housing for single people living alone and small families (1- and 2-bedroom units) to address the needs of these households and to ensure that everyone who wants to live in Tewksbury can find housing that meets their specific needs in terms of unit size and price. That said, Tewksbury should not limit larger units, as there is evidence that the school-age population will reverse its previous as these young Tewksbury families establish themselves and grow.

There are racial disparities in income in both Tewksbury and the Greater Lowell region and less racial and ethnic diversity in Tewksbury than other Lowell suburbs.

Of 11,022 households identified as White alone, not Hispanic or Latino/Latina, income was roughly distributed evenly: 11.2% earned less than \$25,000 and 11.6% earned \$200,000 or more. This was not the case for Black or African American alone, Asian alone, or some other race or two or more races, of which, 22.0%, 57.6%, and 53.5% earned less than \$25,000 respectively (see **Table 18**). This mirrors regional and national trends. The poverty rate among these groups was similarly higher than White alone, not Hispanic or Latino/Latina. Perhaps unsurprisingly, these groups were also more likely than White alone, not Hispanic or Latino/Latina to rent their home (see **Table 20**).

Perhaps because Tewksbury has a lower number of rental homes proportionately than other communities in the region, as of the 2020 U.S. Decennial Census, it had the third-lowest proportion of people who identify as a race other than White alone: 3.6% compared to 5.1% average for communities in the region besides Lowell.

³⁴ The small family category includes all families of 2-4 people, including empty nesters who are not yet 62, older childless couples, older families, and nontraditional families.

Notably, the Hispanic or Latino/Latina group differed from this trend. The ACS showed a disproportionately high number of households earning \$150,000 or more in this group: 68.2% of Hispanic or Latino/Latina Households, or 73 households.

New and existing housing should provide a high quality of life, and there are conflicting visions on how to maintain this quality of life.

A recurring theme heard during public outreach was the importance of quality of life; complete neighborhoods; and equitable, multimodal access to jobs, amenities, and greenspace, which should include transit whenever possible. Main Street (Route 38) is a key highway traveling through the Town Center and contains many of the densest zoning districts. As of a 2017 analysis as part of the Regional Transportation Plan, it was categorized as “somewhat congested” both ways during the morning rush hour and “congested” travelling toward Town Center in the evening rush hour. This is also largely the route that the LRTA Route 12 bus takes. The other LRTA services in Tewksbury are Route 11 in the Northern corner of Tewksbury and paratransit services for seniors and people with disabilities. This suggests a need to prioritize transportation improvements that support and improve multimodal access, including busses and active transportation, to areas with housing development and encourage developers to promote multimodal transportation with amenities such as bicycle parking, bus stops, carpooling boards, or other demand management strategies. Quality of life considerations may also include ensuring units are well-maintained, making sure there is adequate public park and greenspace that is accessible, and maintaining vibrant commercial zones that also have good multimodal access. This may require building consensus among citizens, developers, and town officials on achieving these complimentary goals.

Infrastructure capacity varies across the town.

Although water, wastewater, and transportation capacity overall does not currently seem to limit the production of affordable housing in Tewksbury, the capacity is not evenly distributed across the town. In some areas, sewer pump stations or water mains are at capacity. In addition, there is traffic congestion at key intersections along Main Street. With that in mind, the Town may consider different approaches to mitigate these capacity issues to ensure their housing goals may be met. That may include the promotion of water conservation efforts, green infrastructure that focuses on the absorption of stormwater on-site even with limited open space, the targeting of development where there is existing capacity, or making targeted capacity upgrades that would allow the town to meet its housing goals. It also suggests promoting development patterns that most efficiently and fully make use of existing or planned infrastructure.

CHAPTER 3

Housing Goals

Housing Production Plans may include two types of goals:

- **Quantitative goals**, which are numerical targets such as the goal of producing several affordable units equal to 0.5% or 1.0% of year-round housing units as described in Section 1.A; and
- **Qualitative goals**, which describe aspirational statements of the types of housing being produced, people being served, or how needs are met.

This Housing Production Plan starts with a vision statement developed based on community input gathered throughout the planning process. Then, goals were developed to address each of the Comprehensive Needs Assessment conclusions listed in Section 2.G. For each goal, a qualitative “indicator” was selected to track progress toward that goal. In the next chapter, an action plan of strategies to achieve the goals will be laid out, including characteristics of ideal affordable housing, a list of potential sites selected based on those characteristics, regional partnerships to achieve shared goals, and other recommended zoning changes, policies, investments, or actions to achieve the goals.

A. Tewksbury’s Housing Vision

Visioning is a collaborative process to express desired characteristics of a community or an element of a community. Although a vision cannot include every opinion, it can represent a melding of input into common themes and ideals. This plan strives to express a vision that is inclusive of the many, diverse voices that provided input into the plan. The goals in this chapter will address the challenges identified in the Comprehensive Needs Assessment while working toward the desired vision of Tewksbury:

Tewksbury is a community that supports a full life cycle: children can choose to start their own households in Tewksbury and older adults can age in Tewksbury. Its housing will be inclusive, with options for all, regardless of race, age, origin, disability status, or income. The community will have a mix of housing types focused on providing high quality of life that is affordable to residents, including but not limited to underrepresented housing types: small single-family structures on small lots, duplexes, triplexes, and adaptively reused structures. Tewksbury neighborhoods will have multimodal connections, with good access to jobs and services including active transportation options and transit whenever possible.

B. Affordable Housing Production Goal

The Housing Production Plan guidelines require that the HPP set an annual goal for housing production, pursuant to which there is an increase in the municipality’s number of SHI Eligible Housing units by at least 0.50% of its total units during every calendar year included in the HPP, until the overall percentage exceeds the 10% Statutory Minimum. There should be a direct link between the setting of these goals and the results of the needs assessment. The numerical goal should be based on the total year-round number of housing units.

Tewksbury has achieved its 10% goal, so its goal is now to maintain 10% of total units as SHI units even as new market-rate units are added. Because it is difficult to predict the amount of total housing production, it is difficult to know how many SHI units would be needed each year to maintain the 10% goal. Therefore, Section 2.B.4 created two scenarios: Scenario A, assuming the low growth of the last five years of **total** units would continue at an average of 51 units per year and Scenario B, assuming that **total** housing unit growth would return to its ten-year average of 129 units per year. This would require an average of 5.1 SHI units per year if Scenario A were to occur and 12.9 SHI units per year in Scenario B.

In addition, continued subsidized unit development may help Tewksbury reach other goals. This should include easing the housing cost burden of those who may qualify for SHI housing, especially those paying more than half their income on housing. However, the number of households in this category is large:

As of the most recent data (2015-19 ACS), an estimated 1,480 households below 80% AMI pay more than 50% of their annual income on housing costs.

A goal could be set to produce enough SHI units in five years to meet that need. However, an average rate of 296 units a year would be much higher than Tewksbury's normal rate of production and likely unrealistic for this HPP.

To determine an attainable goal, this HPP considers previous SHI production over the last ten years, which averaged 12 SHI units per year, or 19.4 units per year if not considering the 74 unit drop in 2016.

This HPP also considers likely changes to zoning to comply with the Multi-Family Zoning Requirement for MBTA Communities that would encourage more multifamily production, of which 15% would be required to be affordable as part of the Affordable Housing Bylaw. It is difficult to project how many units will be produced as part of future zoning changes, but in the previous 10 years, an average of roughly 45% of units permitted were multifamily. If that trend continues, an average of 23.0 units per year in Scenario A would be multifamily, producing 3.4 SHI units per year; and an average of 58.1 units per year in Scenario B would be multifamily, producing 8.7 SHI units per year.

Tewksbury may anticipate that the proportion of units in multifamily structures would go up, as there is a smaller amount of land available for new subdivisions and there may be more emphasis on adaptive reuse and similar projects. With this in mind, a goal of an average of at least 25 SHI units each year for the next five years has been set. The goal of 25 SHI units per year would maintain the 10% goal even in the high-growth scenario. However, it's important to note that this is just a small fraction of meeting the need of current Tewksbury residents. At that rate, it would take nearly 60 years to produce enough SHI units to meet the need of 1,480 units. Therefore, SHI units will ideally be targeted to those most in need, and other qualitative goals and strategies will build upon this SHI goal. This is summarized by the finding and associated goal below:

Finding: Almost 1,500 households that earn 80% of AMI or less pay 50% or more of their income on housing.

Goal 1: Produce an average of at least 25 SHI units each year. This goal is reflected in **Table 56** below.

Indicators: *Number of units that are added to the SHI*

Table 56: SHI-Eligible Housing Production Goal in Scenario A and Scenario B

A: Year	B: End of Year Total Year-Round Units	C: Net new Year-Round units	D: End of Year SHI Units	E: Net new SHI units	F: Percent of Total Units on SHI	G: Percent of 2020 Census Count Total Units on SHI
Scenario A (Low Growth)						
2023	12,292	51	1252	165	10.2%	10.3%
2024	12,343	51	1277	25	10.3%	10.5%
2025	12,394	51	1302	25	10.5%	10.7%
2026	12,445	51	1327	25	10.7%	10.9%
2027	12,496	51	1352	25	10.8%	11.1%
Scenario B (High Growth)						
2023	12,526	129	1252	165	10.0%	10.3%
2024	12,655	129	1277	25	10.1%	10.5%
2025	12,784	129	1302	25	10.2%	10.7%
2026	12,913	129	1327	25	10.3%	10.9%
2027	13,042	129	1352	25	10.4%	11.1%

Source: NMCOG Analysis. This table estimates the total number of Year-Round units by starting at the highest possible number at the 2020 census (12,139 year-round units) and projecting that forward by 51 for Scenario A or 129 for Scenario B annually.

Because goals are updated by EOHLC once every ten years, but it is ideal for a community to maintain its 10% goal year-to-year, Column F tracks the percentage of each year's projected total year-round households that would be on the SHI, while Column G tracks the percentage of 2020 year-round units that would be on the SHI.

In addition to the above goals, the Tewksbury HPP will comply with the new HPP 2020 Census Projection goals as they are released.

C. Qualitative Goals

Fourteen qualitative goals were developed by utilizing the Housing Vision, as voiced in section 3.B above, to address each of the eight Comprehensive Needs Assessment findings listed in section 2.G. The goals are grouped below by the findings they seek to address, and each goal has been paired with a quantitative indicator that can be used to measure progress toward the goal. These goals are in no particular order, and their order does not indicate priority. Note that goals describe **what** the community wants to achieve. **How** the community can achieve the goals is explored in the next chapter, Implementation Strategies.

Finding: There are a significant number of residents who make very low incomes and extremely low incomes, and their housing needs aren't being met.

Goal 2: Continue increasing the number of safe, comfortable, affordable units through new construction, conversion, or adaptive reuse, especially those that are targeted to incomes at 60% AMI or lower.

Indicators: *Number of units that are added to the SHI, Qualifying income levels of units*

Goal 3: Monitor existing income-restricted units, maintain these units as affordable, and ensure that these units are meeting all the requirements of their deed restrictions.

Indicator: *Number of units that are removed from the SHI*

Finding: Homeownership is increasingly out of reach for the median income earner, creating concerns about fair access to housing.

Goal 4: Create more diverse types and sizes of ownership units, including types such as smaller single-family detached, duplexes, and townhouses at affordable prices that could serve as "starter homes"

Indicator: *Median sales price for condos and single-family detached homes*

Goal 5: Develop ladders to home ownership in Tewksbury both for Tewksbury residents and those who may wish to settle in Tewksbury.

Indicator: *Number of first-time homebuyers in Tewksbury*

Finding: Renters fare significantly worse than owners on access and cost of housing.

Goal 6: Increase suitable rental housing options for extremely low- to middle-income households through new construction of or conversion of existing units to affordably priced market-rate rental units and subsidized, income-restricted rental units.

Indicators: *Median rent in Tewksbury, percent of renters who are housing-cost burdened*

Finding: Tewksbury has a growing population that will need accessible housing, especially seniors in non-family households.

Goal 7: Increase the proportion of fully accessible units that meet the needs of people with mobility or other impairments through new construction or conversion.

Indicator: *Number of accessible units*

Finding: Tewksbury has a growing need for smaller units suitable for individuals or small but growing families.

Goal 8: Provide equitable access to affordable homeownership and rental homes suitable for a variety of household types, including single bedroom apartments and smaller homes with multiple bedrooms suitable for families with children.

Indicator: *Number of units by number of bedrooms*

Finding: There are racial disparities in income in both Tewksbury and the Greater Lowell region and less racial and ethnic diversity in Tewksbury than other Lowell suburbs.

Goal 9: Actively address racial and other disparities by including people of diverse races, ethnicities, ages, and backgrounds in housing decision-making processes.

Indicator: *Number of people who have diverse lived experiences in roles that impact housing production, both decision-making and advisory roles*

Goal 10: Monitor for discrimination in mortgages or leases and ensure Tewksbury housing is welcoming and accessible to all.

Indicators: *Number of mortgages applied for and approved by nonwhite or Hispanic or Latino/a households, complaints recorded by the Massachusetts Commission Against Discrimination*

Goal 11: Build awareness of Tewksbury's role in breaking down housing inequities in the region and the state.

Indicator: *Number of educational opportunities*

Finding: New and existing housing should provide a high quality of life, and there are conflicting visions on how to maintain this quality of life.

Goal 12: In new development or redevelopment, build complete neighborhoods with a variety of housing types which may include multifamily, townhouses, duplexes, and smaller single-family detached homes and equitable, safe, multimodal access to green spaces, jobs, services, and amenities.

Indicators: *Average commute travel time, amount of green space within ¼ mile of new developments*

Goal 13: Build awareness about affordable housing needs and create opportunities to build consensus on how to meet those needs.

Indicator: *Number of educational opportunities*

Finding: Infrastructure capacity varies across the town.

Goal 14: Increase infrastructure capacity in areas targeted for development or redevelopment.

Indicator: *Number of households water and sewer/wastewater infrastructure can support in targeted areas*

Goal 15: Encourage development patterns that make wise use of existing resources while increasing the amount of affordable and market-rate housing and promote water and energy conservation and other sustainable practices for existing and new development.

Indicator: *Average water, sewer/wastewater, and energy use per household*

CHAPTER 4

Implementation Strategies

The DHCD [now EOHLC] Housing Production Plan Guidelines³⁵ state that HPPs should have an “explanation of the specific strategies will achieve its housing production goals as well as a time frame/schedule for achieving the housing goals identified.” The strategies in the Tewksbury HPP are divided into five sections:

- F. **Implementation Strategies**, which are specific actions the town or other agencies will undertake to meet the goals articulated in the previous section;
- G. **Attributes of Proposed Residential or Mixed-Use Developments**, which is a list of attributes such as performance standards and location to guide siting and features of housing development;
- H. **Proposed Modifications to Zoning Districts**, which is a list of Implementation Strategies that modify zoning;
- I. **Land with Potential for Affordable Housing**, which are lists of specific parcels chosen based on the attributes described in Subsection B that the town will encourage Comprehensive Permit (40B) developments or will pursue issuing Requests for Proposals (RFPs); and
- J. **Regional Collaborations**, which is a list of Implementation Strategies that will require or would benefit from regional collaborations.

A. Implementation Strategies

The 41 implementation strategies below have been chosen to be realistic and achievable by the Town or other partners in the five-year performance period of this HPP. Some require cooperation between public and private actors, while others are actions that the Town may take on its own. In addition, strategies could be time-constrained (the strategy is complete when the action is taken, i.e., adopting an amendment to zoning) or could be open-ended (the strategy is ongoing, i.e., encouraging certain types of development). Each implementation strategy may advance one or more goals.

1. Affordable Housing Policy Strategies

1.1. Encourage Comprehensive Permit (40B) Developments that meet the attributes described in Section 5.C

To effectively meet the goals of this Housing Production Plan, the Town should clearly communicate preferences for the type—for example, multifamily, townhouse, mixed-type—location, and design of affordable housing. Although not all attributes can be met in all circumstances due to funding restrictions, site constraints, or other issues, clearly communicating desired attributes has the potential to benefit both the community and developers. This includes providing prospective developers with application guidelines and meeting with them to ensure an understanding of the development review process and timeline. Higher-quality developers are attracted to communities that clearly articulate their preferences in advance of proposals.

³⁵ "Housing Production Plan Section II. B of M.G.L. c. 40B Comprehensive Permit Projects Subsidized Housing Inventory Guidelines," DHCD (now EOHLC), Updated 2014. Retrieved from <https://www.mass.gov/doc/hpp-guidelines/download>

Mechanisms to encourage 40B development that meet desired attributes may include holding educational and outreach sessions about the HPP and continue discussions about Section 5.C with potential developers, making sure the Zoning Board of Appeals and Select Board are aware of Section 5.C and guide developers to meet those preferred attributes, and posting the HPP on the Town's website and in other locations to allow developers to learn more about opportunities when considering building in Tewksbury.

1.2. Work with regional nonprofit organizations to identify sites and barriers for homes that are affordable to 60% AMI or less

The town may benefit from closely working with regional nonprofit organizations with experience in the construction of affordable housing such as Coalition for a Better Acre, Common Ground/CTI, CHOICE, and others. This strategy recognizes that although the need for units that are affordable to 60% AMI and lower AMIs such as 30% and 50% are clearly identified and articulated in this HPP, it is difficult for many traditional developers to meet these deep subsidies through traditional mixed-income development. CBA, Common Ground, and CHOICE are nonprofit housing developers who have deep experience in the NMCOG region. The Town should work with these or other nonprofit agencies it identifies by sharing the HPP and the list of preferred housing sites with them and discussing whether any sites are appropriate for mixed-income housing with deeply subsidized units. They should also discuss what barriers there are to development, which may include the need for local subsidy, assistance with acquisition, developing a strategy to relieve zoning, or other actions that could reduce the barriers to development.

1.3. Update the Zoning Board of Appeals (ZBA) Regulations to align with EOHLC guidelines and reference the current Housing Production Plan (HPP) for desired attributes of affordable housing

The Zoning Board of Appeals (ZBA) Regulations on Comprehensive Permit projects was last updated on August 31, 2006. ZBA regulations should not include independent guidelines on affordable housing, but rather reference the most up to date HPP. In addition, the ZBA Regulations should be reviewed for alignment with current EOHLC guidelines, which were last updated December 2014 at the time of drafting this HPP.

1.4. Work with the Massachusetts Division of Capital Asset Management and Maintenance to identify potential areas at the Tewksbury State Hospital property for redevelopment for or new construction of affordable housing with a goal to create mixed, village-like developments

The new state administration has indicated an openness to evaluate areas that are state-owned and potentially suitable for housing development. This HPP has indicated several parcels on the Tewksbury State Hospital site that are not currently used for open space or agricultural purposes that meet the desired location attributes of Affordable Housing. Next steps would be for the Town to engage the appropriate parties in state departments such as the Division of Capital Asset Management and Maintenance and the planned Housing Secretariat created by the new administration.

1.5. Create a comprehensive parcel inventory of Town-owned parcels suitable for infill housing

This Housing Production Plan has utilized GIS to identify town-owned parcels that currently are not permanently protected as open space or referenced by the *2019 Tewksbury Open Space and Recreation Plan (Section 5: Lands of Conservation and Recreation Interest)*. This can be used as a starting point to inventory town-owned parcels suitable for infill housing that may be advertised via Request for Proposals (RFP) to interested affordable housing developers.

1.6. Conduct a market study to determine how to create housing options for people who make 60% AMI or less and amend the Affordable Housing Bylaw to require or provide bonuses for this level of affordability

A market study should be undertaken to understand how much subsidy a market-rate development at current construction costs and rates could bear, and whether that subsidy could be used to fund on-site units at 60% AMI or less. This may be adjusted to provide an option for fewer units at deeper subsidy, simply require a small number of units to be at deeper levels of subsidy or provide density or other zoning relief bonuses if deeper subsidies are provided. Finally, the Affordable Housing Bylaw could allow or require these options only in certain zoning districts, such as those districts near transit, so long as the market study showed that the options wouldn't dissuade development.

1.7. Participate in the Regional Housing Workgroup to develop a regional partnership to help about the Town of Tewksbury's achieve and maintain affordable housing goals through interregional partnerships

Effectively monitoring the Subsidized Housing Inventory of affordable housing requires time and resources. NMCOG is currently facilitating a Regional Housing Workgroup consisting of representatives from its nine member communities, seven housing authorities, and several affordable housing committees to explore the development of a regional partnership to ensure that communities across the region can achieve and maintain affordable housing goals, including maintaining existing subsidized housing inventories. A higher level of monitoring provides benefits to communities, to owners of deed-restricted affordable housing, renters of affordable housing, and people seeking affordable housing opportunities. For example, the Southeast Regional Planning and Economic Development District (SRPEDD) conducted deed research related to the SHI and extended the affordability of 320 SHI units by more than 30 years and added 3 units to the SHI.

In addition, there may be deed-restricted affordable housing that is not eligible for the SHI, such as housing affordable to 120% AMI, but may still benefit from inventorying and monitoring. Additional information can be added to a local or regional database that is not in the state database, such as the number of income-restricted units in a mixed-income rental development. This information could be used to better prepare for when income-restricted units have expiring affordability, evaluate the supply of affordable housing compared to the demand in long-term planning, and assist those seeking affordable housing. Tewksbury should continue participating in the Regional Housing Workgroup to determine the feasibility of participating in a shared-service model or other model to achieve these goals.

1.8. Maintain SHI by continuing to monitor expiring units, pursuing right of first refusal opportunities, and maintaining funding to act on opportunities to extend deed restriction terms.

Currently, Tewksbury monitors SHI units and provides funding to extend deed restrictions and affordable housing regulatory agreements that would otherwise expire. Town staff should formalize this procedure and ensure Affordable Housing Trust Funds and/or Community Preservation Act funds are consistently available for units anticipated to expire.

1.9. Work with Tewksbury Home Build and Habitat for Humanity of Greater Lowell to create affordable homes on small lots and through infill opportunities

This HPP has identified many small lots that would be suitable for affordable housing. The scale of opportunity is ideal for nonprofits such as Tewksbury Home Build or Habitat for Humanity to create new homes and diversify the for-sale affordable housing options.

1.10. Work with the Tewksbury Housing Authority to expand opportunities under its Section 8 Housing Voucher program, including using vouchers to help renters become homeowners or leveraging project-based vouchers to support new housing development

Section 8 Housing Vouchers are flexible, including the possibility to allocate a certain number to project-based vouchers, which may facilitate funding of new affordable and SHI-eligible housing. They may also be used to help renters become homeowners by providing subsidies toward mortgage. Town staff or an affordable housing partnership (see **Strategy 4.1**) can discuss expanding the use with Tewksbury Housing Authority (THA) and other regional housing providers to meet THA and town goals for deeply subsidized developments and/or encouraging ladders to home ownership.

2. Zoning Strategies

2.1. Develop an inclusive outreach process with assistance from Citizens' Housing and Planning Association (CHAPA) for evaluating and developing zoning complaint with M.G.L. c. 40A § 3A, the Multi-Family Zoning Requirement for MBTA Communities, then update zoning accordingly.

Tewksbury is one of the 177 communities that are subject to M.G.L. c. 40A § 3A, the Multi-Family Zoning Requirement for MBTA Communities. To meet the requirements set forth by the law and associated guidelines, Tewksbury must make a district or districts with a minimum land area of 50 acres that would allow multifamily development of an average of 15 units per acre that would have the capacity for 1,214 units. Additional requirements are in the guidelines set forth by the Massachusetts Executive Office of Housing and Livable Communities (EOHLC).³⁶

Tewksbury is currently developing scenarios which would be complaint with M.G.L. c. 40A § 3A. It should consider working with Citizens' Housing and Planning Association (CHAPA) Community Engagement Technical Assistance program to develop an inclusive outreach strategy to evaluate alternatives and build support for a compliant multifamily district. This may include working with NMCOG to develop alternative scenarios, reaching out to hard-to-reach populations such as

³⁶ "Multi-Family Zoning Requirement for MBTA Communities," EOHLC, retrieved 6/5/23 from <https://www.mass.gov/info-details/multi-family-zoning-requirement-for-mbta-communities>

seniors, renters, and other populations to evaluate those scenarios and provide education on the benefits and requirements of compliance with M.G.L. c. 40A § 3A; and education and outreach leading to Fall Town meeting in 2023.

2.2. Strengthen the Family Suite bylaw through as-of-right Accessory Dwelling Units (ADUs) and expanding and removing barriers to ADU development

Tewksbury's Zoning Bylaw currently defines Family Suites as *"An accessory dwelling unit located within a single-family dwelling subordinate in size to the principal unit and separated from it in a manner that maintains the appearance of a single-family dwelling. Brothers, sisters, maternal parents and grandparents, paternal parents and grandparents, in-laws and or children of the residing owners of the principal dwelling unit may only occupy the family suite."* It provides an exception for a personal care attendant. The Family Suite section has a number of other restrictions.

When most municipalities recodify, they update definitions of who may live together in a household, creating a more simple, friendly, current, and relevant definition of family. In addition, there are a few problems with creating a cap on the number of unrelated persons that can reside in a home. The first is that it is in violation of the Fair Housing Act's clause regarding Reasonable Accommodations. The second is that it is potentially in violation with the State Building Code which sets habitation standards based on how much space is needed per person in shared dwellings. While it may be permissible for a municipality to implement a nondiscriminatory limit on the number of unrelated persons that may constitute a household, exceptions are always needed.

In addition, these and other restrictions make it difficult for homeowners to utilize the provision allowing for Family Suites. The Town should evaluate the rationale for both restricting an ADU to family members and other restrictions such as contiguousness, front doors, the special permit process, and the right to revoke a special permit at any time, and adjust to make the Family Suite bylaw modern, easy-to-use, and predictable.

2.3. Research and identify areas in residential districts with primarily smaller lots than those zoning districts allow, evaluate feasibility of reducing minimum lot size in those areas, and implement reductions if feasible

The zoning analysis in section 3.F.2 noted that many existing nonconforming homes in the R40 district have lot sizes ranging from 0.15 to 0.3 acres, largely near the Town Center and in the south corner of the town. Reducing lot minimums in these areas may bring these existing nonconforming homes into compliance and allow for infill development. Reducing the required amount of land for each house may reduce the overall cost for the home because of the reduced cost of land and associated infrastructure and provide additional housing options.

2.4. Evaluate allowing two-family dwellings throughout the R40 district

Two-family dwellings are generally considered compatible with single family development and provide an opportunity to expand a housing type that has decreased proportionately in Tewksbury

in the last 10 to 20 years. Providing an opportunity to build such homes in neighborhoods across Tewksbury in a zoning district that covers nearly three-quarters of Tewksbury's land and has an estimated 385 acres of unconstrained, vacant land would reduce the constraints on housing supply and provide more opportunities for "starter homes."

2.5. Evaluate the possibility of creating subdistricts near multifamily zoning or new MBTA zoning that allow smaller multifamily developments, duplexes, or smaller lot minimums to encourage creation of "missing middle" housing within walking/cycling distance of major transit stops, services, or schools

The phrase "Missing Middle" is often used to describe housing developments that are denser than single family, but less dense than high-rise multifamily buildings. These may be duplexes, small multifamily buildings, and townhouses. These often match the scale and massing of existing single-family homes while offering additional housing rental and ownership options for a variety of household sizes and housing preferences.

According to the zoning analysis, despite a desire for additional duplexes, townhomes, and smaller multifamily developments such as triplexes and quads, these housing types are only allowed in zoning districts that cover 3.2% of the town (Multifamily and Village Residential). The new district being developed will allow these types, along with additional housing types. The Town may consider a transitional district or districts that could allow densities above the single-family detached district but below the 15 units per acre or more required by M.G.L. c. 40A § 3A in areas that it does not wish to encourage the higher scale of development.

2.6. Review and evaluate feasibility of adjusting dimensional requirements in the Multifamily, Village Residential, Mixed-Use Business, and Town Center zones for mixed-use or other innovative projects

The dimensional requirements in the Multifamily, Village Residential, Mixed-Use Business, and Town Center zones require 50' setback and 60% of upland area for open space. These dimensional requirements should be reviewed to determine how they can be amended to create a more village-like feel for developments. These amendments may include reducing the amount of open space or setbacks required, reducing parking minimums, and adjusting the maximum height required to a floor-area-ratio requirement that provides more flexibility in meeting dimensional requirements. Notably, the expectation of usable amenities in these developments can be maintained even if the amount of open space is reduced.

2.7. Evaluate opportunities for adaptive reuse to residential, identify possible barriers to conversion, and propose amendments to zoning or other Town policy

There are several first-floor commercial units that were constructed as a mixed-use project, but owners have not found tenants for these units. The Town should investigate which spaces may be appropriate for residential conversions and provide a path toward converting those units into residential units. In addition, an inventory of other underutilized or vacant buildings should be undertaken to identify buildings that are suitable for adaptive reuse to residential, determine the barriers, zoning or otherwise, that prevent redevelopment, and proposed amendments to zoning

or other Town policy. Potential ways to address barriers may include encouragement of 40B Comprehensive Permit developments, offering financial incentives, or providing other forms of zoning relief.

2.8. Amend zoning bylaw to add group homes and other congregate housing types to the use table in all zoning districts in compliance with MGL c40A § 3

The Town currently allows congregate or group homes as of right in MF and VR and by special permit in MUB, TC, WNB, SB, GB, I1, OR. They are prohibited in all other zoning districts. Congregate or group housing falls under the Dover Amendment, which is the common name for Massachusetts General Law (MGL) Chapter 40A, § 3. Among other stipulations, the law states, *“Notwithstanding any general or special law to the contrary, local land use and health and safety laws, regulations, practices, ordinances, by-laws and decisions of a city or town shall not discriminate against a disabled person. Imposition of health and safety laws or land-use requirements on congregate living arrangements among non-related persons with disabilities that are not imposed on families and groups of similar size or other unrelated persons shall constitute discrimination.”* The Town should amend the zoning law to allow group homes and other congregate housing types to all zoning districts.

2.9. Research potential Short-Term Rental zoning and Town bylaw requirements and amend zoning and Town bylaws accordingly to allow use and communicate requirements of owners seeking the opportunity

The Town has identified Short-Term Rental opportunities as a growing need. These types of options would serve those who travel for work or otherwise require seasonal housing or longer term stays when visiting the area. Tewksbury should research the existing potential for this use in existing zoning and Town bylaw, research potential zoning amendments that would address these opportunities, and clearly communicate requirements to interested parties.

2.10. Research and identify eligible sites for Open Space Residential Development (OSRD) and determine if current zoning is viable or requires amendments to encourage more complete neighborhoods

To be eligible for an Open Space Residential Development (OSRD) permit, a project must be comprised of no less than 3 acres comprised of contiguous parcels within the F, R40, or MF districts. There is only a limited amount of space left in these districts that contain tracts of land 3 acres or greater, so the overall impact of OSRD on development town-wide is minimal. The remaining eligible land should be evaluated to determine whether the OSRD could be modified to continue its goal of conserving natural features. This may include allowing smaller tracts to utilize OSRD and allow greater density for OSRD developments while maintaining equitable access to remaining open space and natural features.

3. Transportation, Water, Sewer, and Open Space Strategies

3.1. Identify areas in which Sewer Pump Stations are at or near capacity and determine whether additional growth is possible or desired in areas those stations serve. Target funding to improve desired-growth areas and explore limitations or conservation efforts in areas in which growth is not desired.

The Development Constraints and Limitations analysis revealed that although there is no overall constraint on sewer capacity as of this time for the growth projected in this HPP, that capacity is not evenly distributed through town. Certain sewer pump stations are near capacity and may limit growth in certain areas of town. Town staff should determine which stations are near capacity, determine whether those stations serve as a limitation in an area that is otherwise desired for housing growth, and develop a plan to increase capacity if needed.

3.2. Promote water and energy conservation programs.

Both water and energy conservation programs can ensure that the Town is able to accommodate housing demand and reduce costs for residents. The town should promote these programs by partnering with utilities, nonprofits, or other agencies to bring such programs to Tewksbury or promote existing programs.

3.3. Identify and dedicate conservation land, including an evaluation of ecological value, value to quality of life for residents, and recreational open space value, especially near neighborhoods that have limited opportunity for on-site open space.

A priority voiced during public outreach was to maintain quality open spaces and ensure equitable access to open spaces. Identification and dedication of land will advance this priority, and land both within and outside of the Tewksbury State Hospital location should be considered. Notably, existing State land includes many sites that are highly suitable for affordable housing and sites that are highly suitable for conservation for agricultural, recreational, or ecological purposes. Tewksbury should work with the state to identify which parcels would be conserved if State Hospital land were opened to affordable housing development. It should also utilize the Open Space and Recreation Plan (OSRP) to identify existing or desired conservation parcels outside of Tewksbury State Hospital.

This can be used as a basis to ensure that new housing developments have equitable access to open space through a variety of transportation modes, such as transit, bicycle, and walking. This may involve identifying necessary complete streets improvements or trail improvements between open and recreational space and sites that are preferred for affordable housing development and integrating them into future Complete Streets prioritization plans, other long-term transportation plans, or OSRPs.

3.4. Develop connections between sites with existing affordable housing, potential for affordable housing, or high concentrations of housing to open space, services, and jobs. Include pedestrian, bicycle, and transit connections.

To encourage alternative transportation, Tewksbury should prioritize complete streets or trail connections that would provide access from housing to areas of local services or jobs, such as but

not limited to commercial areas near Main Street and I-495, Tewksbury Town Center, Tewksbury's six K-12 schools, and commercial areas near Shawsheen Street and Main Street. This may also include exploring installation or improvement of sidewalks, bike paths, pedestrian trails, or transit shelters as part of larger developments.

3.5. Investigate feasibility of allowing Transportation Demand Management (TDM), bicycle parking, or other transportation alternatives in lieu of required parking minimums to encourage a multimodal system that works for all types of users.

As Tewksbury adds more multifamily units, both affordable and market-rate, the importance of equitable access to alternative transportation options increases. This is critical both due to the need to consider transportation costs as part of overall housing affordability by offering opportunities to save time and money spent on transportation and to reduce traffic congestion, improving air quality, and decreasing energy consumption.³⁷

Transportation Demand Management (TDM) refers to a package of policies and programs that are designed to reduce drive-alone trips and enable the transportation system to function more effectively and efficiently through measures that shift passengers from single-occupancy vehicle (SOV) travel. Specifically, TDM encourages using alternative travel modes (bicycling, walking, and transit); promoting alternatives to SOV travel (teleworking, ridesharing including carpooling and vanpooling); and increasing the number of passengers in vehicles (carpooling and vanpooling).³⁸

3.6. Work with NMCOG and the LRTA to evaluate potential service expansion, including a better understanding of desired destinations of those living in areas of high concentrations of housing and coordination with regional bus and rail.

The Town has identified a need to prioritize transit in affordable housing development. This should include close coordination with Northern Middlesex Council of Governments (NMCOG) and the Lowell Regional Transit Authority (LRTA) to evaluate service expansion that may include reduced headways, additional routes, or other improvements to better connect existing or proposed concentrations of housing to their desired destinations, including both jobs and services.

4. Public Education, Communication, and Engagement Strategies

4.1. Incorporate community engagement into discussions about and decision-making for affordable housing.

The Tewksbury Local Housing Partnership (Partnership) was established by the Select Board to study the need for affordable housing and to recommend procedures for the implementation of Tewksbury's Affordable Housing policy. In 2021, the Local Housing Partnership voted to recommend to the Select Board to dissolve the committee. Although the Local Housing Partnership's responsibilities were merged into the Department of Community Development, this reduces the opportunity for community input into the development and implementation of

³⁷ *Transportation Demand Management Case Studies and Regulations*, Metropolitan Area Planning Council (MAPC), 2015, retrieved from http://www.mapc.org/wp-content/uploads/2017/10/TDM-FINAL-REPORT-7_15_0.pdf

³⁸ *ibid*

housing policies. In addition, it reduces the capacity for the Town to explore strategies such as working with nonprofit and other community-based organizations and the Tewksbury Housing Authority due to limited staff.

Although the structure of the Partnership was determined not to be the right fit for Tewksbury, the Town should consider other forms of community input and engagement. This could include the possible formation of a more informal coalition or working group of local or regional nonprofits, developers, and interested residents to strengthen partnerships and provide input and recommendations to Town staff.

4.2. Develop a list of banks and nonprofits that support or provide education for first-time homebuyer programs.

Merrimack Valley Housing Partnership, Mass Housing Partnership, Cambodian Mutual Assistance Association, Community Teamwork, Inc, MassHousing, and Habitat for Humanity of Greater Lowell, among other agencies, provide education and access to low-cost mortgages for qualifying first-time homebuyers. Local banks may also participate in many of these programs. The town, potentially through a Housing Coalition (See **Strategy 4.1**), could compile a list of these sources to be used through public education and to answer community questions.

4.3. Advertise Town board and committee vacancies broadly, including outreach through nonprofit and community-based organizations, renters, younger people, and other groups that are currently underrepresented on Town boards and committees.

It is important that people of diverse backgrounds, genders, lived experiences, races and ethnicities, and ages, among other diverse characteristics, may contribute to decisions that impact housing policy in Tewksbury. This includes both regulatory and advisory boards and committees. Openings to these boards and committees should be advertised in innovative ways including but not limited to nonprofit and community-based organizations, property managers, and public schools.

4.4. Determine whether residents are utilizing existing tax abatement programs and provide tailored marketing and education to groups who are eligible but not utilizing these programs.

Concerns about taxes, especially for those on fixed incomes that may not increase at the same rate as inflation such as seniors, were frequently raised during public input. Tewksbury's residential tax rate in 2023 was slightly higher than the median of all communities in the state and in Middlesex County. However, there are exemptions for multiple classes of people that meet other qualification guidelines including legally blind people; seniors (41C); seniors, surviving spouses, and minor children of a deceased parent (17D); and veterans. There is also a Citizens Taxation Fund that provides taxation assistance for the elderly and disabled residents of Tewksbury from volunteer contributions of its citizens on their real estate tax forms.

Town staff, a housing coalition, (see **Strategy 4.1**) and/or the Tewksbury Council on Aging and the Tewksbury Disability Commission may consider researching how many residents are utilizing of

these programs against an estimated number of eligible participants and determining whether public education about these programs should and can be enhanced.

4.5. Improve communications between and across Select Board, Planning Department, and regional entities to discuss housing issues of importance through regular meetings and/or an annual or semiannual "Housing Summit".

In August 2015, the Town of Tewksbury held a Tewksbury Housing Summit before the televised meeting of the Tewksbury Select Board. The summit's goal was to increase public awareness and support for affordable housing. Tewksbury staff may consider reviving this summit on an annual basis, which would provide a forum for annual reports from Tewksbury staff, Tewksbury Housing Authority, the Planning Board, and a Housing Coalition if Tewksbury chooses to develop such a group. This would provide a space both for coordination on housing strategies, a way to elevate the housing crisis and housing issues in the public consciousness, provide a method of reliable tracking and reporting on progress on this Housing Production Plan, and provide an opportunity for regional nonprofits and agencies to learn about and discuss challenges with Tewksbury staff, boards, and committees. This meeting, which could be flexibly developed as an "open house" or "forum" rather than a Town Meeting-style meeting, would also present an opportunity to engage interested residents in the issue of affordable housing.

4.6. Engage regional and state organizations to identify opportunities for Tewksbury to host or publicize educational opportunities for the public, including discussions on housing affordability and on programs to help individuals and families who are suffering from housing insecurity, which may include online or public access television channels.

Education can serve two important goals: Building support for creation of affordable housing and connecting affordable housing resources with the people who need it. This is a possible role for the Housing Coalition contemplated in **Strategy 4.1**.

The first goal can include sharing stories of people who have benefited from affordable housing, including multifamily affordable housing, connecting housing needs in Tewksbury to economic development needs, and sharing stories from similar communities following best housing practices. This may also include participating in the regional housing strategy discussed in strategy 33. The Citizens' Housing and Planning Association (CHAPA) created a document called The Faces of 40B which can serve as a starting point:

<https://www.chapa.org/sites/default/files/Facesof40B.pdf>. Other agencies that could assist include but are not limited to Abundant Housing, Community Teamwork Inc, or other entities.

In addition, this should be paired with education targeting people who may be having trouble affording their existing housing about existing local and regional programs. The HPP's analysis showed that while there are many resources in the area, there may not be knowledge within Tewksbury of those programs. These can help avoid mortgage foreclosure, aid first-time homebuyers, and provide other types of assistance. Programs may be advertised through local access television, at boards and committees, through social media, at festivals and fairs, and through targeted discussion.

4.7. Identify state and regional training and educational opportunities on affordable housing and make these available for Town Board and Committee members and staff.

The education of local boards and committees is a critical element of creating and maintaining affordable housing and maintaining compliance with state and federal fair housing laws. Training may include basics or a refresher on fair housing, M.G.L. c. 40B, affordable housing generally, and similar topics. The Citizens' Housing and Planning Association (CHAPA) is a resource for educating local boards and committees about affordable housing. The University of Massachusetts Extension's Citizen Planner Training Collaborative (CPTC) also provides training for boards and committees. Training should emphasize the importance of creating units that are accessible to all incomes, abilities, and ethnicities to encourage diversity and inclusivity.

4.8. Provide information about regional and community-based services to people at-risk of or experiencing housing instability, including foreclosure, eviction, and legal assistance.

The analysis in this HPP suggests there are a large number of households that are severely cost-burdened who may be at risk of experiencing housing instability. In addition, some people that are at-risk or experiencing housing instability may not show in statistics, such as people who may be staying temporarily with friends or relatives, delinquent on mortgages, or have other challenges not captured by census data.

Foreclosures have dropped to single digits since 2020, potentially due to foreclosure moratoriums related to COVID-19. However, those protections have expired, and the Town may consider monitoring foreclosures through the HPP performance period to determine whether they grow to previous levels (30-40 annually).

In addition, the town, potentially as part of educational outreach contemplated in **Strategy 4.1**, should provide information and resources to people at-risk of or experiencing housing instability. For example, there are a number of Foreclosure Assistance Programs available, including those that help avoid foreclosure and those that provide legal assistance during foreclosure. These include fixed-rate refinancing loans from MassHousing and Massachusetts Homeowner Assistance Fund.³⁹ In addition, the town may refer families who are at risk of housing instability to the HomeBASE Household Assistance program.

4.9. Work with partners to identify and distribute information about housing improvements that could be used to increase the accessibility of units

The town has a significant and growing portion of the population over age 65, and input received during the HPP process indicated a strong desire to age in place. In addition, accessibility improvements benefit all types of people. One way to increase accessibility for both residents of housing and visitors for those residents is to bring existing units to Americans with Disabilities Act (ADA) or more stringent Universal Design standards. A major resource is the Home Modification Loan Program. Other resources may be available as well. Tewksbury should consider working with

³⁹ "Foreclosure Prevention," MassHousing, retrieved 6/5/2023 from <https://www.masshousing.com/home-ownership/homeowners/foreclosure-prevention>

the Tewksbury Council on Aging, AARP, and other agencies to identify and distribute information about programs that could provide improvements that would increase the accessibility of units. More information can be found at <https://www.mass.gov/service-details/hmlp-resources-and-links>

5. Other Strategies

5.1. Work with the NMCOG to develop a Regional Housing Strategy for the Greater Lowell Region.

Housing challenges typically do not stop at local borders, and housing affordability in Tewksbury is impacted by and impacts neighboring communities. Northern Middlesex Council of Governments (NMCOG) has reported that they have received feedback in multiple planning processes that a lack of affordability and availability of housing as the most pressing economic and quality of life issue in the NMCOG region, which includes Tewksbury and eight other communities. This has created a crisis of homelessness, severely impacted quality of life, and hindered regional firms' ability to recruit and retain talent. NMCOG communities have voiced support for a Regional Housing Strategy that will supplement and support local Housing Production Plans and other local policy and planning work.

NMCOG is developing a scope of work for a plan to create a shared regional vision of fair, equitable access to homes in Greater Lowell and build local commitment to working toward that vision. The vision will include local benchmarks for housing affordability and/or creation, in number and type, tailored for each community for use in local HPPs and other planning and policy. The plan will provide communities and agencies with needed direction and tools to enact policy changes and prioritize policies that will make the biggest impact where it's needed. This includes building public awareness and shared understanding of local and regional housing conditions and breaking down myths about housing production. This will include collecting the stories of individuals with a variety of backgrounds and housing situations that will be shared to advance the public conversation.

Tewksbury should work closely with NMCOG to support this planning process through staff involvement, data sharing, letters of support, and public commitment to working together with other communities to confront and create solutions to shared housing challenges.

5.2. Research additional alternative funding sources to subsidize new affordable housing units and to continue funding the Affordable Housing Trust Fund.

As Tewksbury may no longer collect payment in lieu of affordable units as part of its Affordable Housing Bylaw, it should consider providing other funding sources for the creation and preservation of affordable housing. This may include the following: direct funding from the Community Preservation Act; transfers of "free cash" when available; sale proceeds from the transfer of properties in tax title; cell phone tower lease payments; negotiated developer fees; bonds; or other dependable sources of funds. Ensuring the AHTF continues to be capitalized is important, as this local funding leverages larger amounts of state funding available, especially for deeply subsidized units.

5.3. Develop a five-year Affordable Housing Trust Action Plan to guide the Select Board in utilizing Affordable Housing Trust Funds.

As of 2022, the Affordable Housing Trust Fund contained \$5,315,555. An Action Plan would utilize the strategies from this HPP and guide the Select Board's actions and activities relative to funding affordable housing. The purpose of the action plan would be as follows: to create a transparent and clear plan for use by the Board to communicate its work, goals, and priority initiatives to the community; to identify one or more areas of focus for the Trust based on available and anticipated resources combined with community-informed goals for the production and preservation of affordable housing; and to ensure that Trust resources are used to further the Town's goals and objectives in addressing local housing needs and related community goals. The Action Plan could also include a preference to be the "first in" as a required match for state or federal programs, a preference for using funds to create affordable to 60% AMI or lower when those units would not otherwise be created, or a preference for projects that aim to incorporate attributes outlined in Section 5.C.

5.4. Work with NMCOG to participate and support a dashboard updated annually of Home Mortgage Disclosure Act data and Massachusetts Commission Against Discrimination, including collaboratively determining key metrics to track, and share these data via the Town website and other channels.

The Home Mortgage Disclosure Act (HMDA) requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages.⁴⁰ The Massachusetts Commission Against Discrimination (MCAD) is the independent state agency that enforces the Massachusetts anti-discrimination laws by investigating Discrimination Complaints to determine if the case may proceed to conciliation or a public hearing at the Commission. The MCAD also offers remedial and preventative training, and publishes resources online such as model policies, posters, and guides.⁴¹

For the purposes of regional housing planning, Northern Middlesex Council of Governments (NMCOG) is currently collecting data from both sources, which includes comprehensive information about home loans, socio-economic information about borrowers, and outcomes of loans, and tenant complaints related to discrimination. Tracking and analyzing this data over time can reveal whether there are intentional or unintentional patterns of discrimination in Tewksbury and in the region. Tewksbury should collaborate with NMCOG to determine the best measures to track and the best way to publicly share this information on an annual basis.

⁴⁰ "Mortgage Data (HMDA)," Consumer Financial Protection Bureau, retrieved 6/5/2023 from <https://www.consumerfinance.gov/data-research/hmda/>

⁴¹ "Massachusetts Commission Against Discrimination (MCAD)," Massachusetts Commission Against Discrimination, retrieved 6/5/2023 from <https://www.mass.gov/orgs/massachusetts-commission-against-discrimination>

5.5. Conduct an equity audit to determine whether Tewksbury’s existing residential zoning has a disproportionate adverse impact on Black, Indigenous and People of Color (BIPOC) and other groups protected under state and federal fair housing laws.

In addition to discriminatory lending and other real estate practices, the foundation of the housing system is established in land use and zoning. Those systems and policies have created documented discriminatory effects and have led to income and racial disparities, including disparities in access to housing opportunities, across the region. An equity audit would specifically aim to evaluate the impact of local land use and zoning policies and practices on racial and ethnic diversity, income diversity, and equity for people with disabilities, families with children, and others. The audit may also provide additional information to guide revisions to Tewksbury’s zoning bylaw, elated policies, the zoning map, and zoning procedures and practices.

B. Action Plan

The above strategies have been arranged into a five-year action plan, with each year containing low, medium, and high priority activities. This is intended to help guide the Town to make steady progress toward the goals of the HPP and track its progress.

Table 57: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
1.1	Encourage Comprehensive Permit (40B) Developments that meet the attributes described in Section 5.C.	1, 2, 4, 6, 7, 8, 12, 15	Planning Dept, ZBA	High	Ongoing Starting Now
1.2	Work with regional nonprofit organizations to identify sites and barriers for homes that are affordable to 60% AMI or less.	1, 2	Planning Dept., Nonprofits	High	2024
1.3	Update the Zoning Board of Appeals (ZBA) Regulations to align with EOHLC guidelines and reference the current Housing Production Plan (HPP) for desired attributes of affordable housing.	2, 4, 7, 8, 12	ZBA, Planning Dept.	High	2024
1.4	Work with the Massachusetts Division of Capital Asset Management and Maintenance to identify potential areas at the Tewksbury State Hospital property for redevelopment for or new construction of affordable housing with a goal to create mixed, village-like developments.	1, 2, 4, 6, 7, 8, 12, 15	Planning Dept., DCAMM	Medium	2026
1.5	Create a comprehensive parcel inventory of town-owned parcels suitable for infill housing.	1, 2, 4, 6, 7, 8, 12, 15	Planning Dept.	Medium	2023

Table 57: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
1.6	Conduct a market study to determine how to create housing options for people who make 60% deeply affordable units at 60% AMI or less and amend the Affordable Housing Bylaw to require or provide bonuses for this level of affordability.	2	Planning Dept.	Medium	2025
1.7	Participate in Regional Housing Workgroup to develop a regional partnership to help about the Town of Tewksbury's achieve and maintain affordable housing goals through interregional partnerships.	3, 13	NMCOG, Planning Dept.	Medium	Ongoing
1.8	Maintain SHI by continuing to monitor expiring units, pursuing right of first refusal opportunities, and maintaining funding to act on opportunities to extend deed restriction terms.	3	Planning Dept.	High	Ongoing
1.9	Work with Tewksbury Home Build and Habitat for Humanity of Greater Lowell to create affordable homes on small lots and through infill opportunities.	1, 4	Planning Dept., Nonprofits	Medium	Ongoing
1.10	Work with the Tewksbury Housing Authority to expand opportunities under its Section 8 Housing Voucher program, including using vouchers to help renters become homeowners or leveraging project-based vouchers to support new housing development.	5	Tewksbury Housing Authority, Planning Dept.	Medium	Ongoing
2.1	Develop an inclusive outreach process with assistance from Citizens' Housing and Planning Association (CHAPA) for evaluating and developing zoning complaint with M.G.L. c. 40A § 3A, the Multi-Family Zoning Requirement for MBTA Communities, then update zoning accordingly.	4, 6, 8, 13	Planning Dept, Planning Board, Select Board	High	2023-24
2.2	Strengthen the Family Suite bylaw through as-of-right Accessory Dwelling Units (ADUs) and expanding and removing barriers to ADU development.	4, 6, 8	Planning Dept.	High	2024-25
2.3	Research and identify areas in residential districts with primarily smaller lots than those zoning districts allow, evaluate feasibility of reducing minimum lot size in those areas, and implement reductions if feasible.	4, 8, 12	Planning Dept.	Medium	2026

Table 57: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
2.4	Evaluate allowing two-family dwellings throughout the R40 district.	4, 8, 12	Planning Dept.	Medium	2026
2.5	Evaluate the possibility of creating subdistricts near multifamily zoning or new MBTA zoning that allow smaller multifamily developments, duplexes, or smaller lot minimums to encourage creation of "missing middle" housing within walking/cycling distance of major transit stops, services, or schools.	4, 8, 12, 15	Planning Dept.	High	2023-24
2.6	Review and evaluate feasibility of adjusting dimensional requirements in the Multifamily, Village Residential, Mixed-Use Business, and Town Center zones for mixed-use or other innovative projects.	1, 4, 8, 12	Planning Dept.	Medium	2025
2.7	Evaluate opportunities for adaptive reuse to residential, identify possible barriers to conversion, and propose amendments to zoning or other Town policy.	1, 2, 4, 6, 7, 8, 12, 15	Planning Dept.	High	Ongoing
2.8	Amend zoning bylaw to add group homes and other congregate housing types to the use table in all zoning districts in compliance with MGL c40A § 3.	2, 4, 6	Planning Dept.		
2.9	Research potential Short -Term Rental zoning and Town bylaw requirements and amend zoning and Town bylaws accordingly to allow use and communicate requirements of owners seeking the opportunity.	6	Planning Dept.	Low	2027
2.10	Research and identify eligible sites for Open Space Residential Development (OSRD) and determine if current zoning is viable or requires amendments to encourage more complete neighborhoods.	12, 15	Planning Dept.	Medium	2026
3.1	Identify areas in which Sewer Pump Stations are at or near capacity and determine whether additional growth is possible or desired in areas those stations serve. Target funding to improve desired-growth areas and explore limitations or conservation efforts in areas in which growth is not desired.	14	DPW, Planning Dept.	High	Ongoing
3.2	Promote water and energy conservation programs.	15	DPW	Medium	Ongoing

Table 57: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
3.3	Identify and dedicate conservation land, including an evaluation of ecological value, value to quality of life for residents, and recreational open space value, especially near neighborhoods that have limited opportunity for on-site open space.	12	Planning Dept., Conservation Commission	High	Ongoing
3.4	Develop connections between sites with existing affordable housing, potential for affordable housing, or high concentrations of housing to open space, services, and jobs. Include pedestrian, bicycle, and transit connections	12	Planning Dept.	Medium	Ongoing
3.5	Investigate feasibility of allowing Transportation Demand Management (TDM), bicycle parking, or other transportation alternatives in lieu of required parking minimums to encourage a multimodal system that works for all types of users	12	Planning Dept.	Low	2026
3.6	Work with NMCOG and the LRTA to evaluate potential service expansion, including a better understanding of desired destinations of those living in areas of high concentrations of housing and coordination with regional bus and rail.	12, 14	Planning Dept., NMCOG, LRTA	Low	Ongoing
4.1	Incorporate community engagement into discussions about and decision-making for affordable housing.	9, 11, 13	Planning Dept.	High	Ongoing
4.2	Develop a list of banks and nonprofits that support or provide education for first-time homebuyer programs.	5	Planning Dept., NMCOG, Nonprofits	Low	2026
4.3	Advertise Town board and committee vacancies broadly, including outreach through nonprofit and community-based organizations, renters, younger people, and other groups that are currently underrepresented on Town boards and committees.	9	Select Board	Medium	Ongoing
4.4	Determine whether residents are utilizing existing tax abatement programs and provide tailored marketing and education to groups who are eligible but not utilizing these programs.	5	Planning Dept.	Low	Ongoing

Table 57: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
4.5	Improve communications between and across Select Board, Planning Department, and regional entities to discuss housing issues of importance through regular meetings and/or an annual or semiannual "Housing Summit".	11, 13	Select Board, Planning Dept., Town Manager	Medium	Ongoing
4.6	Engage regional and state organizations to identify opportunities for Tewksbury to host or publicize educational opportunities for the public, including discussions on housing affordability and on programs to help individuals and families who are suffering from housing insecurity, which may include online or public access television channels.	11, 13	Planning Dept., NMCOG	High	Ongoing
4.7	Identify state and regional training and educational opportunities on affordable housing and make these available for Town Board and Committee members and staff.	11, 13	Select Board, Planning Board, ZBA	High	Ongoing
4.8	Provide information about regional and community-based services to people at-risk of or experiencing housing instability, including foreclosure, eviction, and legal assistance.	5	Planning Dept., Nonprofits	Medium	Ongoing
4.9	Work with partners to identify and distribute information about housing improvements that could be used to increase the accessibility of units.	7	Tewksbury COA, Planning Dept.	Medium	Ongoing
5.1	Work with NMCOG to develop a Regional Housing Strategy for the Greater Lowell Region.	11, 13	NMCOG, Planning Dept.	Medium	2023-24
5.2	Research additional alternative funding sources to subsidize new affordable housing units and to continue funding the Affordable Housing Trust Fund.	1, 2	Planning Dept.	High	Ongoing
5.3	Develop a five-year Affordable Housing Trust Action Plan to guide the Select Board in utilizing Affordable Housing Trust Funds.	1, 2, 3, 4, 6, 7, 8, 12, 15	Planning Dept., Select Board	Medium	2026
5.4	Work with NMCOG to participate and support a dashboard updated annually of Home Mortgage Disclosure Act data and Massachusetts Commission Against Discrimination, including collaboratively determining key metrics to track, and share these data via the Town website and other channels.	10, 11	NMCOG, Planning Dept.	Medium	Continuous

Table 57: Action Plan

No	Strategy	Goals Advanced	Lead, Partners	Priority	Target Completion
5.5	Conduct an equity audit to determine whether Tewksbury's existing residential zoning has a disproportionate adverse impact on Black, Indigenous and People of Color (BIPOC) and other groups protected under state and federal fair housing laws.	10	Planning Dept., NMCOG	N/A	2027
5.6	Participate in the regional studies and initiatives related to regional wastewater and sewer constraints	14	NMCOG, Planning Dept.	N/A	Continuous

C. Attributes of Proposed Residential or Mixed-Use Developments

EOHLC Guidelines state that strategies should include “Characteristics of proposed residential or mixed-use developments that would be preferred by the municipality for example, infill development, cluster developments, adaptive re-use, transit-oriented housing, mixed-use development, and/or inclusionary zoning. Preferred characteristics should take into account the surrounding context of the built and natural environment. Characteristics placing special restrictions on the development of affordable housing, such as limiting size of affordable units, limiting diversity in types of housing, or applying other zoning constraints, will not be approved. In addition, affordable housing plans must comply with all state and federal fair housing laws” (c.3).

These attributes provide guidance and criteria for identification of specific sites for which the municipality will encourage the filing of Comprehensive Permit applications and specific publicly owned sites to consider for requests for proposals (RFP) to develop SHI Eligible Housing. These attributes also explain the expectations Tewksbury has for affordable housing developments and provide guidance for the Zoning Board of Appeals (ZBA) when considering Comprehensive Permit applications. However, it should be noted that not all attributes can be met in all circumstances due to funding restrictions, site constraints, or other issues.

1. Type

Tewksbury prefers a mix of housing types arranged in a village style whenever possible. This would include single family detached units (cottages) on small lots, townhouses, and small multifamily structures of 4-8 units each.

Mixed use is possible but should be integrated in the plan such that commercial uses are on the first floor and on main streets. These should be undertaken if the developer can demonstrate a high level of confidence that the commercial space will be occupied.

Other types of housing are appropriate depending on the context.

2. Location

The following criteria relate to location:

- Developments within walking distance (.25 mi) to existing transit stops or transit lines are highly preferred
- Within walking/cycling distance (.5 mi) of amenities (especially open space) is preferred
- Development that utilizes existing sewer pump station capacity or where pump station capacity can be upgraded as part of the development is preferred
- Development on land currently or previously categorized as 61B is NOT preferred
- Redevelopment is preferred

3. Design

When possible, developments should meet applicable design standards articulated in the Tewksbury Zoning Code. All affordable units constructed or rehabilitated should be situated within the development so as not to be in less desirable locations than market-rate units in the development and shall, on average, be no less accessible to public amenities, such as open space, as the market-rate units. Affordable units within market-rate developments shall be integrated with the rest of the development and shall be compatible in design, appearance, construction, and quality of materials with other units. Interior features of affordable units shall comply in all respects with the minimum design and construction standards of the Executive Office of Housing and Livable Communities (EOHLC) for the Local Initiative Program or other applicable subsidy.

Features that encourage active transportation or transit are highly encouraged. This includes bus shelters, indoor bicycle storage, and clear drop-off/pick-up zones whenever possible. This also includes electric vehicle (EV) charging stations as appropriate.

Other sustainability features that are preferred include:

- Energy – Features that go beyond minimum codes, especially when those features can reduce long-term maintenance costs or costs to tenants, such as tight weatherization and heat recovery ventilation; high-efficiency heating system, controls, lighting, and appliances; and integration of solar or other alternative energy technologies
- Storm water – Appropriate best management practices (BMPs) for storm water management, including green infrastructure, rain barrels, or other storm water management strategies
- Open space – Ecologically-beneficial open space such as habitat, pollinator gardens, space suitable for food production, green walls or roofs, or other open space creation that may be affordably integrated into site design
- Light pollution – Appropriate and adjustable brightness for outdoor lights, elimination of light trespass, and promotion of “dark sky” measures
- Water efficiency – Minimization of vegetation requiring permanent irrigation, water-efficient fixtures such as toilets, faucets, washers, and other water-consuming appliances
- Indoor air quality – Moisture control plans, create handling plans for Volatile Organic Compound (VOC) emission, and ventilation

- Construction – Best practices during construction to mitigate or minimize run-off, solid waste, disturbance to habitat, and other temporary and permanent construction impacts

4. Re-use

Adaptive re-use is highly preferred by the Town, which may include formerly commercial units or other structures.

5. Density and Scale

The Town prefers a mix of scales and densities to a single building type when the site allows.

6. Affordability Performance Standards

The Town prefers deeper levels of affordability whenever possible. This includes 30% AMI, 50% AMI, and 60% AMI levels. The Town prefers for developments to be mixed-income, that is, a mix of market rate and affordable units.

D. Proposed Modifications to Zoning Districts to Create SHI Units

EOHLC Guidelines state that strategies should include “The identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating SHI Eligible Housing developments to meet its housing production goal. Zoning indicates a community’s interest in the types of uses to be encouraged. The zoning strategy should identify points where the zoning needs to be changed to accommodate additional dwelling units: Can density be increased? Can accessory apartments be accommodated? Are upper story residential units allowed in commercial districts? In identifying geographic areas, communities must ensure that any constraints can be overcome in a timely and cost-effective manner. Additionally, communities should consider the Commonwealth’s Sustainable Development Principles at:

<http://www.mass.gov/hed/docs/dhcd/cd/smartgrowth/sdprinciples.pdf>.” (c.1).

Strategies 2.1-2.10 involve changing zoning to reduce barriers to housing development. These are listed on the following page.

Table 58: Strategies that Include Zoning Changes

No	Strategy	Zones Impacted
2.1	Develop an inclusive outreach process with assistance from Citizens' Housing and Planning Association (CHAPA) for evaluating and developing zoning complaint with M.G.L. c. 40A § 3A, the Multi-Family Zoning Requirement for MBTA Communities, then update zoning accordingly.	New District or Overlay District
2.2	Strengthen the Family Suite bylaw through as-of-right Accessory Dwelling Units (ADUs) and expanding and removing barriers to ADU development.	F, R40, MF, VR, TD
2.3	Research and identify areas in residential districts with primarily smaller lots than those zoning districts allow, evaluate feasibility of reducing minimum lot size in those areas, and implement reductions if feasible.	Primarily R40, possibly others
2.4	Evaluate allowing two-family dwellings throughout the R40 district.	R40
2.5	Evaluate the possibility of creating subdistricts near multifamily zoning or new MBTA zoning that allow smaller multifamily developments, duplexes, or smaller lot minimums to encourage creation of "missing middle" housing within walking/cycling distance of major transit stops, services, or schools.	Primarily R40, possibly others
2.6	Review and evaluate feasibility of adjusting dimensional requirements in the Multifamily, Village Residential, Mixed-Use Business, and Town Center zones for mixed-use or other innovative projects.	MF, VR, MUB, TC
2.7	Evaluate opportunities for adaptive reuse to residential, identify possible barriers to conversion, and propose amendments to zoning or other Town policy.	All
2.8	Amend zoning bylaw to add group homes and other congregate housing types to the use table in all zoning districts in compliance with MGL c40A § 3.	All
2.9	Research potential Short -Term Rental zoning and Town bylaw requirements and amend zoning and Town bylaws accordingly to allow use and communicate requirements of owners seeking the opportunity.	All
2.10	Research and identify eligible sites for Open Space Residential Development (OSRD) and determine if current zoning is viable or requires amendments to encourage more complete neighborhoods.	F, R40, MF

E. Land with Potential for Affordable Housing

To assist Tewksbury in selecting land with potential for affordable housing, NMCOG developed a scoring criteria that ranked parcels by their alignment to the desired attributes described in Section 5.C such as proximity to transit and proximity to amenities. All Tewksbury's Fiscal Year 2023 GIS parcels were scored based on these criteria. Parcels were then given a score of zero if they were identified as open space or electric utility parcels.

Town Staff reviewed the highest-ranked parcels to select sites with a high potential for affordable housing. Staff also added parcels that may have been missed by the GIS analysis. These parcels were analyzed for current use, zoning, location, and site characteristics. NMCOG staff also conducted site analysis to identify the development limitations of the identified properties, which are included under the characteristics column of **Table 59** and **Table 60**.

Map 2 in the Appendix 1: **Maps** shows the location and distribution of these parcels throughout the community, while Map 3 shows the location of these parcels in relation to the current zoning and overlay districts. Map 4 highlights the Wetlands, Floodplains, and Rivers Protection Act (RPA) Regulated Areas, and Map 5 shows the water infrastructure related to the parcels. Map 6 outlines the LRTA bus routes and commuter rail stations in Wilmington and Billerica.

1. Privately-Owned Land

EOHLC Guidelines state that strategies should include "The identification of specific sites for which the municipality will encourage the filing of Comprehensive Permit applications. Identification of specific sites should be consistent, to the greatest extent possible, with Sustainable Development Principles. Strategies should include any proposed zoning changes, advantages to construction on the site, an acknowledgement of site constraints, and the costs to overcome such constraints" (c.2).⁴²

As shown in **Table 59**, nine privately-owned sites were identified. Of these, 940 Main Street, 1455 Main Street, 725 Main Street, and 1037 North Street recently developed as mixed-use with opportunity for conversion of their commercial unit to housing. These could be anticipated to create one affordable unit each. 1775 Andover Street has a hotel use currently that is suitable for residential conversion. The other properties are vacant and suitable for multifamily construction. This list of privately-owned land with potential for affordable housing will help guide the Town as it moves forward in addressing its affordable housing needs over the next five years.

⁴² "Housing Production Plan Section II. B of M.G.L. c. 40B Comprehensive Permit Projects Subsidized Housing Inventory Guidelines." EOHLC (DHCD became EOHLC in 2023), Updated 2014. Retrieved from <https://www.mass.gov/doc/hpp-guidelines/download>

Table 59: Privately-Owned Land with Potential for Affordable Housing

Site	Acres	Current Use	Characteristics	Zoning District	Zoning Amendment Needed?
1325 Main Street	2.09	Vacant		MUB	Y
1775 Andover Street	8.77	Hotels, motels, and nursing homes		OR	Y
940 Main Street	1.27	Apartments with more than eight units		TC	Y
1418 Main Street	1.67	Vacant		MUB	Y
1455 Main Street	1.01	Condominiums		MUB	N
725 Main Street	0.35	Mixed use		VR	N
2131 Main Street	2.56	Vacant		SB	Y
1037 North Street	1.57	Condominiums		MUB	N
935 Main Street	6.49	Vacant		TC	Y

2. Publicly Owned Land

EOHLC Guidelines state that strategies should include “Identification of municipally owned parcels for which the municipality commits to issue requests for proposals (RFP) to develop SHI Eligible Housing, including information on appropriate use of the site, and a timeline for the issuance of an RFP. DHCD [now EOHLC] can provide some assistance in the development of such an RFP” (c.4)

The sites outlined in **Table 60** include several parcels the Town has acquired through tax title and state-owned property at Tewksbury State Hospital.

Table 60: Publicly-Owned Land with Potential for Affordable Housing

Site	Acres	Current Use	Characteristics	Zoning District	Zoning Amendment Needed?
Rebecca Lane (Parcel ID 106-11, 106-12, 106-18)	0.55 + 0.16 + 0.34	Vacant		R40	N
97 Florence Ave	0.09	Single Family Detached		R40	N
365 East Street	206.08	Tewksbury State Hospital		R40	Y

F. Regional Collaborations

Strategies 1.2, 1.7, 3.6, 4.2, 4.8, 4.9, 5.1, 5.4, and 5.6 involve working in collaborations with other municipalities or regional nonprofits to advance shared housing goals. These are listed in **Table 61**.

Table 61: Strategies that Include Regional Collaborations

No	Strategy	Possible Partners
1.2	Work with regional nonprofit organizations to identify sites and barriers for homes that are affordable to 60% AMI or less.	CBA, Common Ground/CTI, CHOICE, Other agencies
1.7	Participate in Regional Housing Workgroup to develop a regional partnership to help about the Town of Tewksbury's achieve and maintain affordable housing goals through interregional partnerships.	NMCOG, NMCOG Communities
3.6	Work with NMCOG and the LRTA to evaluate potential service expansion, including a better understanding of desired destinations of those living in areas of high concentrations of housing and coordination with regional bus and rail.	NMCOG, LRTA, Neighboring Communities
4.2	Develop a list of banks and nonprofits that support or provide education for first-time homebuyer programs.	Merrimack Valley Housing Partnership, Mass Housing Partnership, Cambodian Mutual Assistance Association, Community Teamwork, Inc, MassHousing, and Habitat for Humanity of Greater Lowell, Other agencies
4.8	Provide information about regional and community-based services to people at-risk of or experiencing housing instability, including foreclosure, eviction, and legal assistance.	Nonprofit agencies
4.9	Work with partners to identify and distribute information about housing improvements that could be used to increase the accessibility of units.	Nonprofit agencies
5.1	Work with the NMCOG to develop a Regional Housing Strategy for the Greater Lowell Region.	NMCOG, NMCOG Communities
5.4	Work with NMCOG to participate and support a dashboard updated annually of Home Mortgage Disclosure Act data and Massachusetts Commission Against Discrimination, including collaboratively determining key metrics to track, and share these data via the Town website and other channels.	NMCOG
5.6	Participate in the regional studies and initiatives related to regional wastewater and sewer constraints	NMCOG, NMCOG Communities

APPENDIX 1

Maps

Tewksbury Land Use

DRACUT

Land Use per Assessor's Use Code

- Residential
- Commercial
- Industrial
- Institutional/Government
- Other/Undeveloped
- Town Boundary

LOWELL

TEWKSBURY

ANDOVER



Sources:

The Town of Tewksbury (land use per Assessor's FY 2022 use codes); MassDOT/NMCOG (roads); MassGIS (town boundaries); MassDEP (2009 hydrography)

Data provided on this map is not sufficient for either boundary determination or regulatory interpretation.

Produced by NMCOG: 10/28/2022



The Northern Middlesex Council of Governments

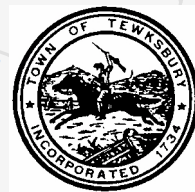
40 Church Street, Suite 200
Lowell, Massachusetts 01852
(978) 454-8021 nmcog.org

BILLERICA

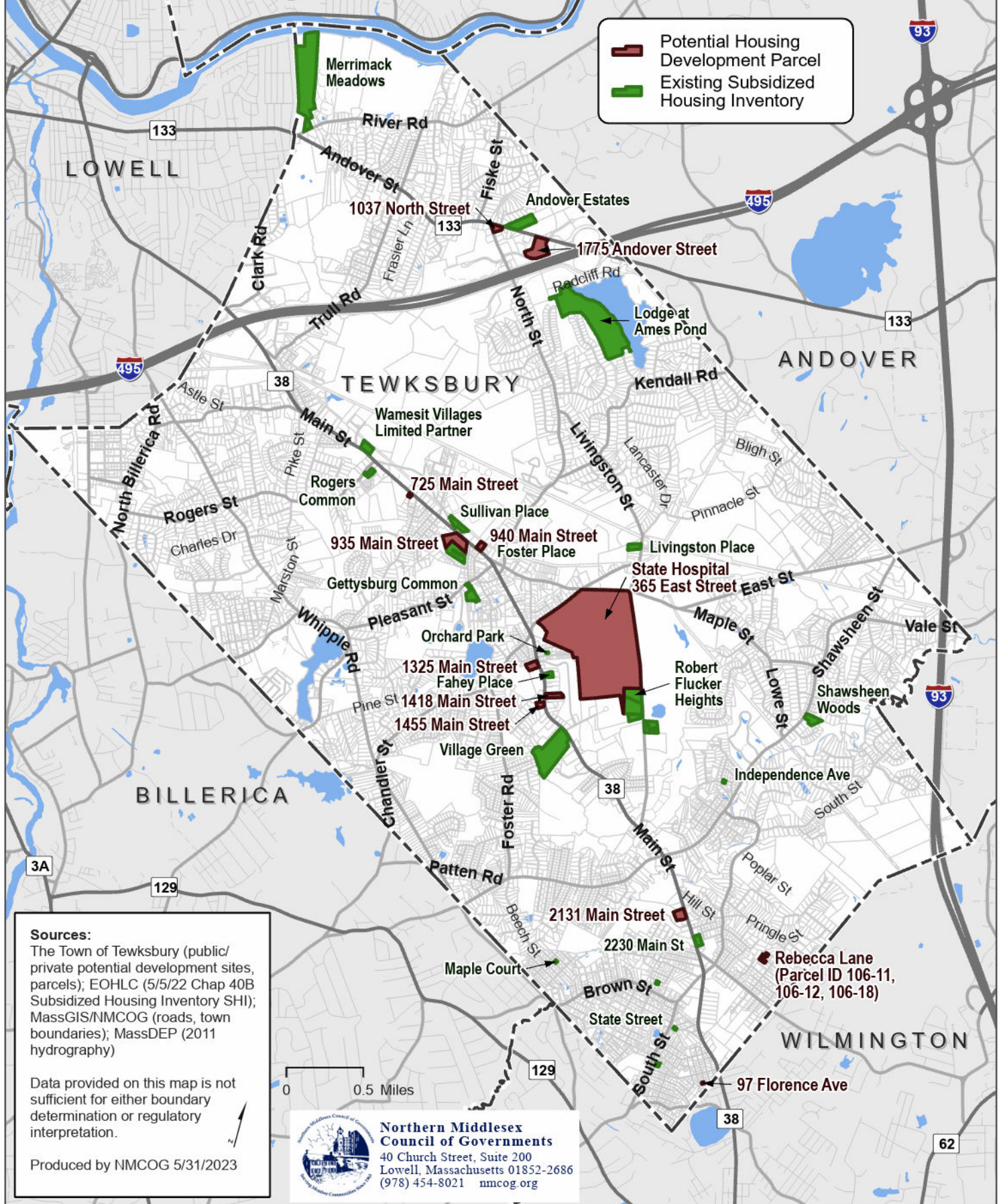
WILMINGTON



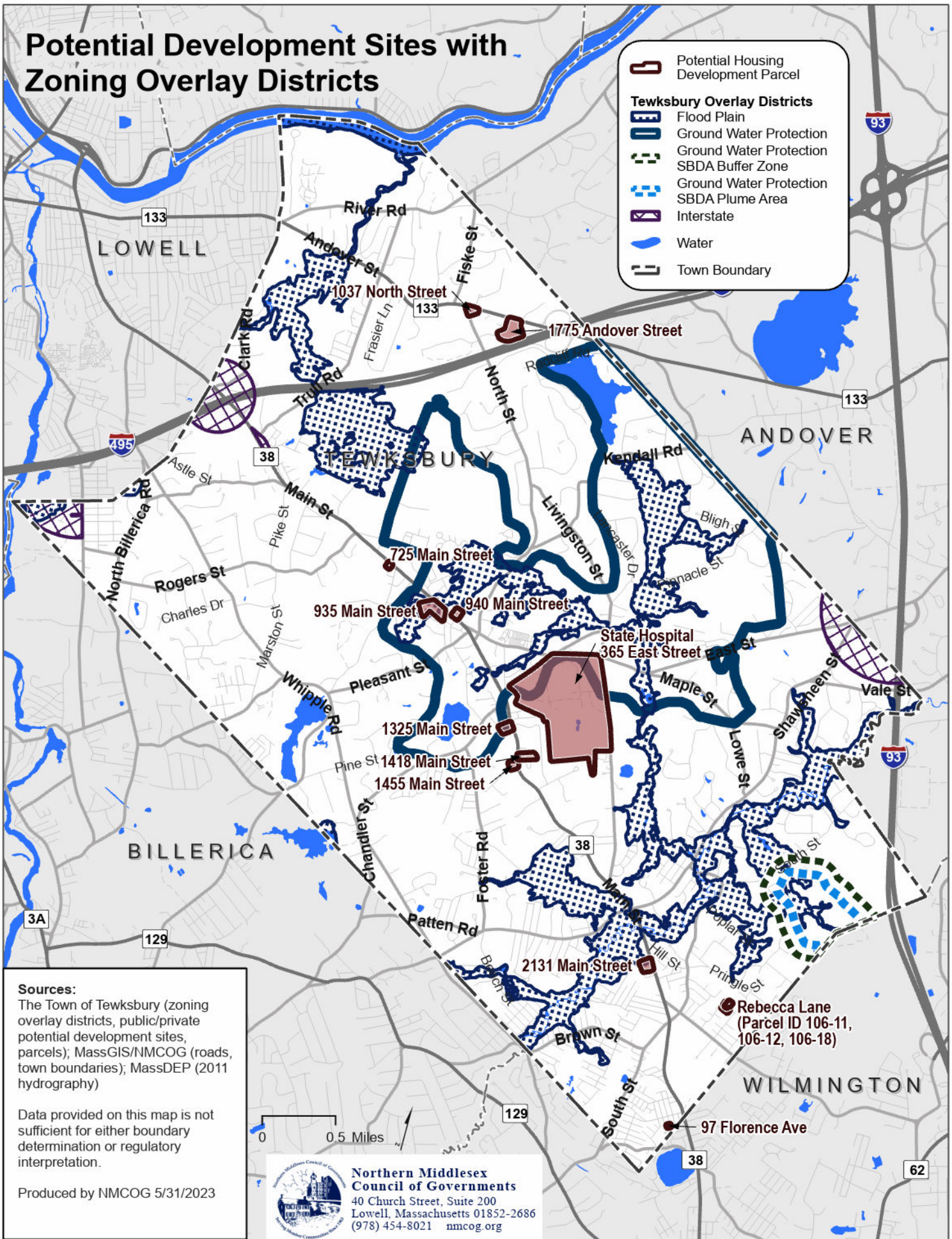
0 0.5 Miles



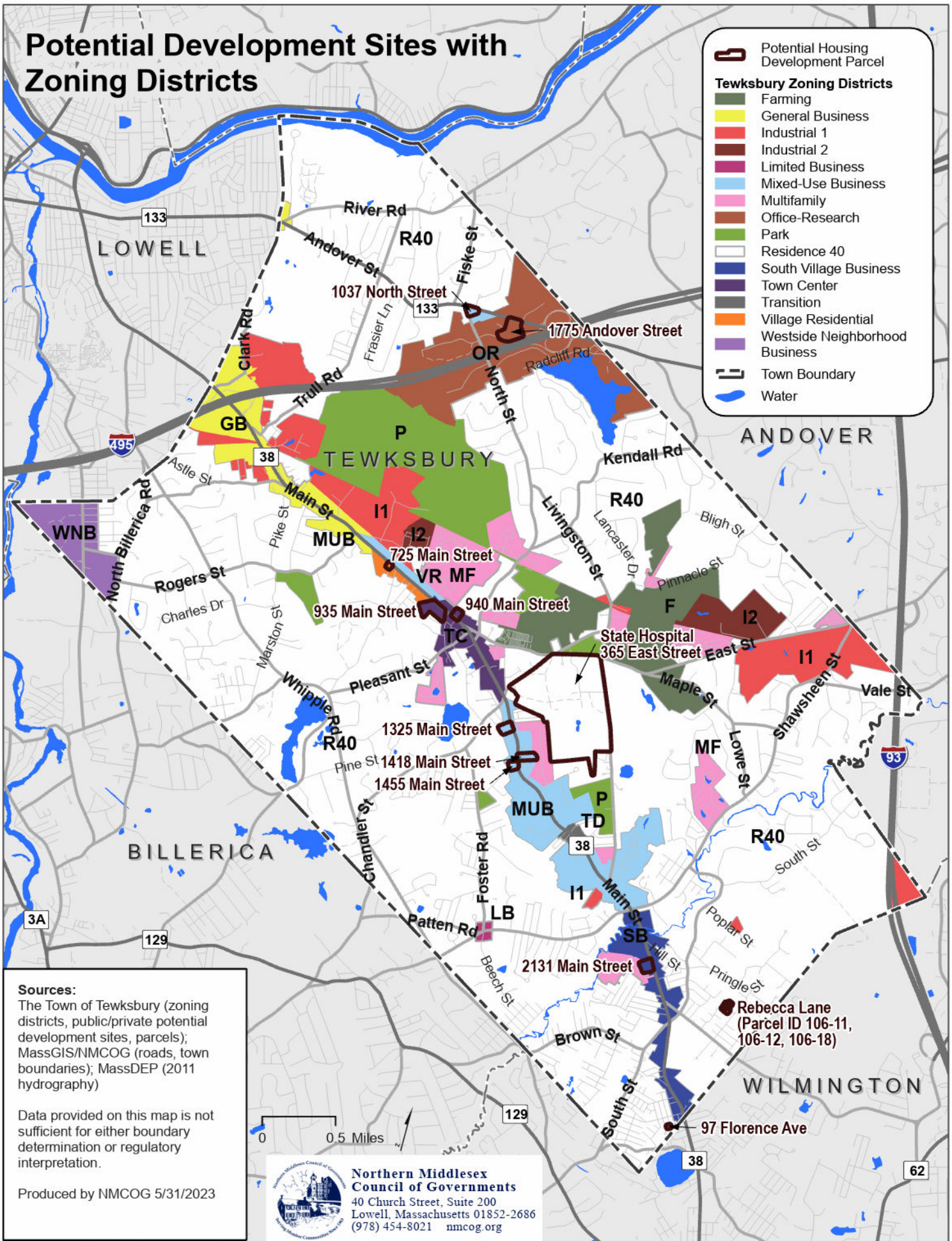
Existing Subsidized Housing Units and Potential Housing Sites



Potential Development Sites with Zoning Overlay Districts

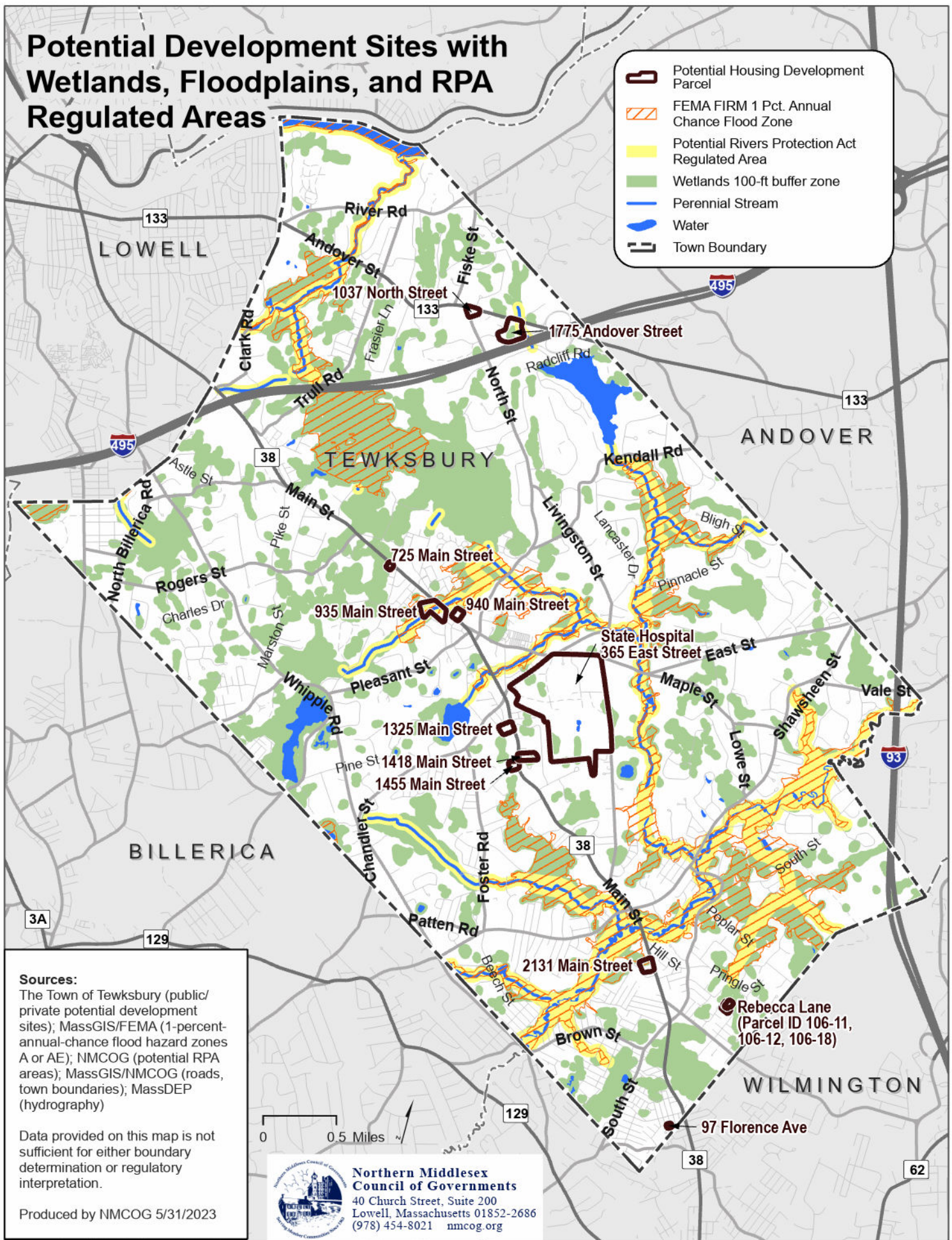


Potential Development Sites with Zoning Districts



Potential Development Sites with Wetlands, Floodplains, and RPA Regulated Areas

- Potential Housing Development Parcel
- FEMA FIRM 1 Pct. Annual Chance Flood Zone
- Potential Rivers Protection Act Regulated Area
- Wetlands 100-ft buffer zone
- Perennial Stream
- Water
- Town Boundary



Sources:

The Town of Tewksbury (public/private potential development sites); MassGIS/FEMA (1-percent-annual-chance flood hazard zones A or AE); NMCOG (potential RPA areas); MassGIS/NMCOG (roads, town boundaries); MassDEP (hydrography)

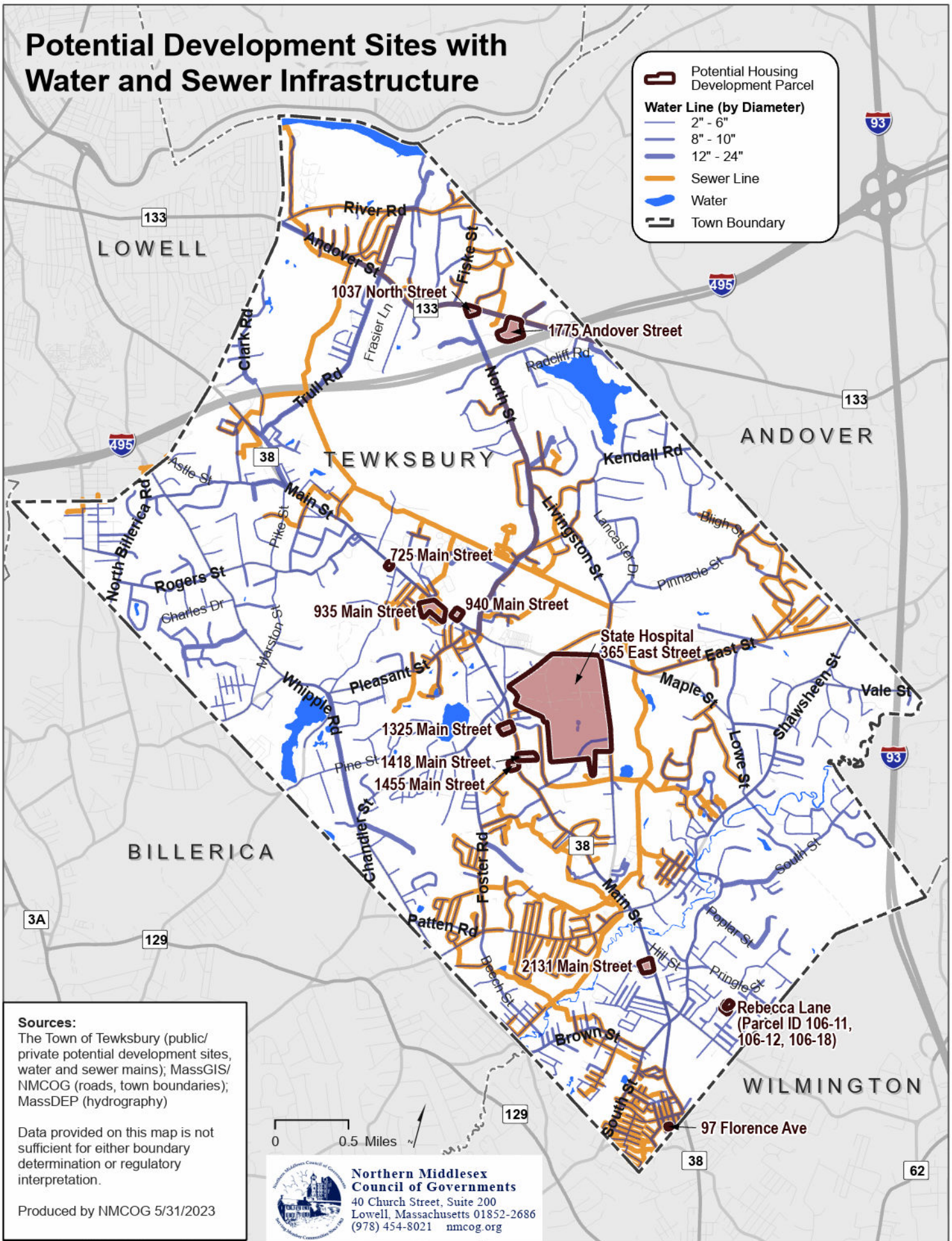
Data provided on this map is not sufficient for either boundary determination or regulatory interpretation.

Produced by NMCOG 5/31/2023

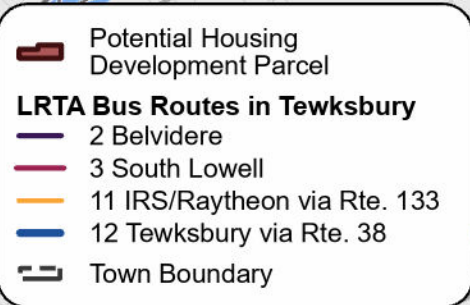


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(978) 454-8021 nmcog.org

Potential Development Sites with Water and Sewer Infrastructure



Potential Development Sites with LRTA Bus Routes and Commuter Rail

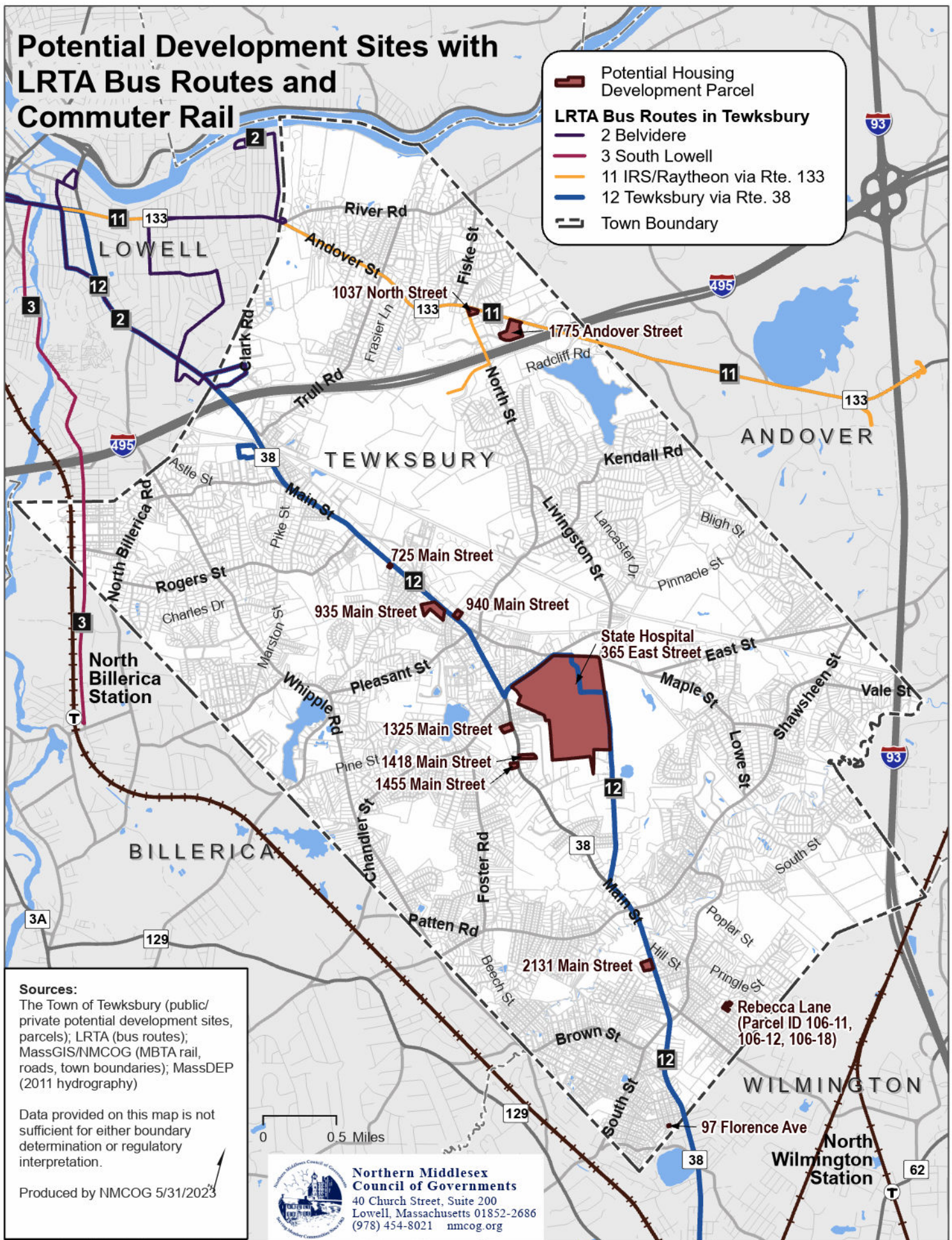


The Town of Tewksbury (public/private potential development sites, parcels); LRTA (bus routes); MassGIS/NMCOG (MBTA rail, roads, town boundaries); MassDEP (2011 hydrography)

Data provided on this map is not sufficient for either boundary determination or regulatory interpretation.

Produced by NMCOG 5/31/2023²

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APPENDIX 2

Acronyms

ACS – American Community Survey

ADU – Accessory Dwelling Unit

AHTF – Affordable Housing Trust Fund

AMI – Area Median Income

CHAS – Comprehensive Housing Affordability Strategy

CPA – Community Preservation Act

DHCD – Massachusetts Department of Housing and Community Development

EOHLC – Executive Office of Housing and Livable Communities

FMR – Fair Market Rent

HAC – Housing Appeals Committee

HAMFI – HUD Area Median Family Income

HFHGL – Habitat for Humanity of Greater Lowell

HHS – U.S. Department of Health and Human Services

HMDA – Home Mortgage Disclosure Act

HPP – Housing Production Plan

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

LIP – Local Initiative Program

LIHTC – Low Income Housing Tax Credits

MassDOT – Massachusetts Department of Transportation

MGL – Massachusetts General Law

MPO – Metropolitan Planning Organization

NMCOG – Northern Middlesex Council of Governments

OSRD – Open Space Residential Development

SHI – Subsidized Housing Inventory

THA – Tewksbury Housing Authority

THB – Tewksbury Home Build

ZBA – Zoning Board of Appeals

APPENDIX 3

Subsidized Housing Inventory Report

EXECUTIVE OFFICE OF HOUSING AND LIVABLE COMMUNITIES CH40B SUBSIDIZED HOUSING INVENTORY

Tewksbury

DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
3130	Robert Flucker Heights	Delaney Drive	Rental	50	Perp	No	HUD
3131	n/a	Pondview Lane	Rental	8	Perp	No	EOHLC
3132	n/a	Carnation Drive	Rental	40	Perp	No	EOHLC
3133	n/a	Carnation Drive	Rental	40	Perp	No	EOHLC
3134	n/a	Saunders Circle	Rental	60	Perp	No	EOHLC
3135	n/a	Roy Way	Rental	8	Perp	No	EOHLC
3136	n/a	Pondview Lane	Rental	8	Perp	No	EOHLC
3137	n/a	Water St & Patriot Rd.	Rental	2	Perp	No	EOHLC
3138	n/a	23 Dirlam Lane/4 Erlin Ave/6 Independence Ave.	Rental	2	Perp	No	EOHLC
3139	n/a	Pondview Lane	Rental	13	Perp	No	EOHLC
3140	Gettysburg Common		Ownership	10	Perp	No	EOHLC
3141	Merrimack Meadows	Merrimack Drive	Ownership	86	Perp	No	EOHLC
3142	Orchard Park	Orchard Street	Ownership	8	2043	No	EOHLC
3143	Sullivan Place	11 Old Boston Road	Rental	77	2046	Yes	MassHousing
3144	Sheriden Development	Cinnamon Circle	Ownership	8	-	No	EOHLC
3145	Wamesit Villages Limited Ptnr	540 Main Street	Ownership	6	2051	No	EOHLC
4480	DDS Group Homes	Confidential	Rental	96	N/A	No	DDS
6113	Rogers Common	42 Rogers Street	Rental	20	2036	Yes	EOHLC

8/8/2023

Tewksbury
Page 1 of 3

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EXECUTIVE OFFICE OF HOUSING AND LIVABLE COMMUNITIES CH40B SUBSIDIZED HOUSING INVENTORY

Tewksbury

DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
7603	DMH Group Homes	Confidential	Rental	8	n/a	No	DMH
7897	Andover Estates	1582 abd 1596 Andover St	Ownership	5	perp	YES	MassHousing
							MassHousing
7898	Shawsheen Woods	1177 Shawsheen Rd	Ownership	4	perp	YES	MassHousing
							MassHousing
8861	Lodge at Ames Pond	Ames Pond Drive	Rental	364	perp	YES	MassHousing
8863	Village Green	Villa Roma Drive	Rental	56	perp	YES	MassHousing
							MassHousing
8864	Maple Court	79 Maple Road	Ownership	1	perp	YES	MassHousing
8865	Fahey Place	1360 Main St	Rental	26	perp	YES	MassHousing
8866	Highland Avenue	Highland Ave and Lowell St	Ownership	2	perp	YES	EOHLC
9065	Livingston Place	788 Livingston st	Ownership	4	Perp	YES	MassHousing
9066	Roberts Reach	770 Livingston St	Ownership	4	Perp	YES	MassHousing
9441	Sauders Circle	Sauders Circle	Rental	32	2042 est	NO	HUD
9891	State Street	State Street	Ownership	1	perp	NO	EOHLC
10223	South Street	South Street	Ownership	1	Perp	NO	EOHLC
10224	South Street	South Street	Ownership	1	Perp	NO	EOHLC
10225	Foster Place	940 Main Street	Rental	2	Perp	NO	EOHLC
10561	2230 Main St	2230 Main St	Rental	34	Perp	NO	EOHLC

8/8/2023

Tewksbury
Page 2 of 3

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EXECUTIVE OFFICE OF HOUSING AND LIVABLE COMMUNITIES CH40B SUBSIDIZED HOUSING INVENTORY

Tewksbury

DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
10570	South St	South St	Ownership	1	Perp	NO	EOHLC
Tewksbury Totals				1,088	Census 2020 Year Round Housing Units		12,098
					Percent Subsidized		8.99%