

## 8. HOUSING STRATEGIES

The strategies outlined below are derived primarily from the priority housing needs identified in Section 5.7, research on development opportunities, interviews and meetings as part of the planning process, existing local initiatives and resources, and the experience of other comparable localities in the area and throughout the Commonwealth. The strategies are grouped according to three specific strategic goals that include:

1. Promote greater local capacity to produce affordable housing
2. Amend zoning to promote affordable housing and smart growth development
3. Partner with developers to leverage other public and private resources

The strategies are also categorized according to priority – those higher priority short-term actions to be implemented within Years 1 and 2, more middle-term strategies for implementation in Years 3 to 5, and longer-term strategies for consideration beyond Year 5. A summary of these actions is included in Table 1-2 of the Executive Summary.

The strategies also reflect state guidelines that require communities to address all of the following major categories of strategies to the greatest extent applicable:<sup>31</sup>

- *Identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating affordable housing developments to meet its housing production goal;*
- *Identification of specific sites for which the municipality will encourage the filing of comprehensive permit projects;*
- *Characteristics of proposed residential or mixed-use developments that would be preferred by the municipality;*
- *Municipally owned parcels for which the municipality commits to issue requests for proposals to develop affordable housing.*
- *Participation in regional collaborations addressing housing development*

It should be noted that a major goal of this Plan is not only to strive to meet annual housing production goals and eventually the state's 10% affordability threshold under Chapter 40B, but to also to serve the range of local needs. Consequently, there are instances where housing initiatives might be promoted to meet these needs that will not necessarily result in the inclusion of units in the Subsidized Housing Inventory (examples include the promotion of accessory apartments and mixed-income housing that includes "community housing" or "workforce housing" units)<sup>32</sup>. More commonly, housing affordability is being referred to as either little "a" affordability, meaning that the units do not meet all state

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<sup>31</sup> Massachusetts General Law Chapter 40B, 760 CMR 56.03.4.

<sup>32</sup> Community housing generally refers to units directed to those earning between 80% and 100% AMI, whereas workforce housing often refers to units directed to those earning between 80% and 120% or even 140% or 150% AMI, for example, but still priced out of the private housing market.

requirements for inclusion in the Subsidized Housing Inventory (SHI) but still serve local housing needs, versus big “A” affordability for those units that can be counted as part of the SHI.

The Town will also encourage developers to incorporate universal design and visitability standards, particularly given the high and increasing number of older adults in the community, in addition to enhanced energy efficiency standards. The Town’s *Policies and Preferences for Affordable Housing*, prepared in 2010, also provide important guidance to developers on the Town’s development priorities.

Within the context of these compliance issues, local needs, existing resources, and affordability requirements; the following housing goals and strategies are proposed. **It is important to note that these strategies are presented as a package for the Town to prioritize and process, each through appropriate regulatory channels.**

## **GOAL 1: PROMOTE GREATER LOCAL CAPACITY TO PRODUCE AFFORDABLE HOUSING**

### **Strategy 1: Conduct Substantial Community Outreach**

*Responsible Party:* Housing Partnership working with all sponsors of affordable housing-related initiatives

*Timeframe:* Short Term and Ongoing

**Current Status:** The Housing Production Plan Steering Committee embarked on a substantial community outreach process in the preparation of this Housing Plan that included the following major activities:

- *Bi-weekly Public Meetings*
- *Interviews with Key Local and Regional Housing Stakeholders (Staff, Consultants, Organizations/Project Managers, etc.)*
- *Meetings with Representatives of Relevant Boards and Committees*
- *Meetings with Local Housing and Civic Organizations*
- *Meetings with Potential Development Partners*
- *Stakeholder Meetings*
- *Public Forums and Workshops*
- *Articles in the Town Crier newspaper*

**Next Steps:** Most of the strategies included in this HPP will rely on local approvals. Consequently, as the Town moves forward toward implementing this Plan, it intends to undertake a concerted effort to promote continued civic engagement in all housing-related activities. This outreach will be essential for informing local leaders and residents about proposed initiatives, obtaining important community feedback, and ultimately garnering essential local support.

The Town anticipates using the following important approaches in conducting public outreach and maximizing local input into all proposed housing activities:

- *Town Website*
- *Cable Access TV*
- *Feature Articles*

- *Special PowerPoint Presentations*
- *Written Materials*
- *Meetings with Relevant Boards and Committees*
- *Stakeholder Meetings*
- *Public Forums*
- *Meetings with Abutters*
- *Annual Housing Summits*

The Housing Partnership, whose mission is to increase public awareness on affordable housing, will support the work of the sponsoring entity of any proposed housing initiative (Zoning Board of Appeals, Planning Board, Housing Trust, Elderly Housing Committee, etc.) to make sure there are ample opportunities to engage the community and address questions and concerns.

**Required Resources:** In addition to the donated time of members of the Housing Partnership and other sponsors of particular housing initiatives, some staff support will also be required.

## Strategy 2: Capitalize the Housing Trust

*Responsible Party:* Board of Selectmen and Community Preservation Committee  
*Timeframe:* Short Term

**Current Status:** The Housing Trust received \$2,688,500 in CPA funding towards the feasibility analyses, design and construction of the Warren Avenue project. To explore other development opportunities, it will be necessary to provide the Housing Trust with additional resources to conduct further feasibility analyses, undertake potential design work, prepare Requests for Proposals, and subsidize construction costs among other activities.

### Models for Capitalizing Housing Trusts

Some communities have decided to commit Community Preservation Act (CPA) funding on an annual basis to Housing Trusts without targeting the funding to any specific initiative. For example, the Towns of Grafton and Sudbury have been directing 10% of their annual CPA allocation to their Trust Funds and encourage the Trust to apply for additional CPA funds for specific projects. Scituate’s Town Meeting funded its Housing Trust with \$700,000 of Community Preservation funding from its community housing reserves. The Town of Harwich has committed lease payments from its cell tower as well as sale proceeds of a Town-owned property (fetching more than a million dollars) to its Housing Trust Fund. Towns with inclusionary zoning bylaws that allow cash in lieu of actual affordable units have also used these funds to capitalize their Housing Trusts, and other communities have obtained funding from developers through negotiations on proposed developments or excess profits from Chapter 40B developments for example.

**Next Steps:** The Housing Trust should prepare proposals for what resources they will require to take the next steps in implementing this HPP and meet with the Community Preservation Committee to discuss funding needs. For example, as the Housing Trust explores additional projects for development as part of this HPP, it will need to determine the suitability of development alternatives and opportunities through preliminary feasibility analyses including activities related to survey and engineering, financial feasibility, potential design work, and legal issues for example.

The Housing Trust proposal should include a request that at least 10% of the Town's annual CPA allocation (local surcharge and state match) be used to capitalize the Housing Trust with the option of additional funding based on need. This funding would also require Town Meeting approval. Other opportunities to capitalize the Housing Trust should also be explored including donations (funding and property), negotiations with developers, cash in lieu of affordable units through zoning bylaws that include some affordability requirements, special fundraisers, grants, etc.

**Required Resources:** The Housing Trust received \$280,000 in CPA funding for preliminary feasibility work, including design, for its Warren Avenue project. It can be expected that at least if not more than this amount would be required to conduct preliminary feasibility work on Town-owned parcels identified in this HPP. Additional funding will also be required to subsidize construction costs, the amounts dependent on the type and size of the project, target incomes, the percentage of affordable units, and other considerations that would require funds beyond the internal subsidies available in Chapter 40B projects.

### **Strategy 3: Enhance Communication and Coordination of Housing Activities and Consider Future Consolidation of Housing Responsibilities – Governance**

*Responsible Party:* Board of Selectmen

*Timeframe:* Middle to Long Term

**Current Status:** There are a number of Town boards and committees that have some designated responsibilities for housing, including affordable housing, such as the Community Preservation Committee, Planning Board, Zoning Board of Appeals, and Permanent Building Committee. The following committees, however, focus solely on housing and are therefore pivotal to the development and implementation of this Housing Production Plan:

- *The Housing Partnership*  
Growing out of the former Housing Needs Committee, the Housing Partnership was established in 2008 as the strategic planning entity for maximizing local control over affordable housing development and proactively addressing the range of local housing needs. The Partnership has been charged with participating in the review of Chapter 40B proposals, serving as a resource to developers, increasing public awareness about the needs and opportunities for affordable housing, and developing a set of *Priorities and Criteria* on affordable housing development in Weston to guide developers and Town boards.
- *Affordable Housing Trust*  
The Town established the Weston Affordable Housing Trust in 2011 to serve as the implementing entity with respect to Town efforts to create affordable housing opportunities. Shortly after, in May 2012, the Town approved the conveyance of Town-owned property at the end of Warren Avenue to develop seven (7) rental units, four (4) to those earning at or below 80% AMI and the remaining three (3) to those earning between 80% and 100% AMI. The Trust has been focusing on this development since then with occupancy planned for early 2016.
- *Elderly Housing Committee*  
The Elderly Housing Committee is responsible for assessing needs and promoting housing for seniors which has included the management of the Brook School Apartments. The Committee

has overseen the development of four (4) buildings at the Brook School that now include 75 total rental units of which 55 are offered at subsidized rents, calculated at 30% of tenant household income, with market rents of about \$1,600.

The division of local responsibilities for housing with a Housing Partnership accountable for strategic planning and project review plus a Housing Trust focused on fiscal management of a Housing Trust Fund and the implementation of housing activities is not an unusual structure for coordinating local housing activities. What is unusual in Weston's model is the level of Town control in development.

Most communities do not elect to serve as developer but choose instead to partner with affordable housing developers, both for profit and non-profit, in the development of Town-owned property by issuing Requests for Proposals (RFP). The RFP articulates the Town's terms and conditions for the development as well as selection criteria for bringing in a development team and proposal that best meets local priorities for the best value. By conveying the property through a sale or lease to a developer, Chapter 30B procurement rules are not triggered and thus project costs are typically significantly lower. Moreover, most communities do not have the expertise to serve as the affordable housing developer nor want the headaches and risks that are often associated with such development. If state or federal subsidies are involved, it is also beneficial to partner with a developer with a proven track record of obtaining these subsidies, which are increasingly more limited and competitive.

While the Town has assumed the roles of both owner and developer for the Brook School Apartments and Warren Avenue with the Elderly Housing Committee and Housing Trust responsible for oversight, respectively (with the Permanent Building Committee responsible for construction), it may be pragmatic to focus instead on partnerships with developers on most future projects, particularly when several projects might be in the pipeline simultaneously as is likely to occur in the course of implementing this HPP. Because the Housing Trust has been heroically and completely focused on the Warren Avenue project, it has not been able to turn its attention to other potential development opportunities.

If the Housing Trust is able to shift its focus from hands-on development to actively exploring and analyzing development opportunities, it will be able to handle a number of activities simultaneously. In this capacity the respective roles and responsibilities of the Housing Partnership and Housing Trust begin to blur somewhat. For example, the Housing Partnership's responsibility for strategic planning for new development, including identifying land that might be suitable for housing development and opportunities for acquiring these sites, overlaps a major element of the Housing Trust's mission. Given the Housing Trust's experience in developing Warren Avenue, it may be in a good position to also review other developers' proposals that seek to build affordable housing in Weston, a function that is currently assigned the Housing Partnership.

Many communities have decided to maintain a single housing board or committee to oversee housing-related projects and issues, including the implementation of a Housing Production Plan. Some have found that it has been challenging to attract the necessary interest and expertise to two separate housing entities (and in Weston's situation there are three such committees) and have preferred to concentrate on developing the appropriate capacity on a single board, typically a Housing Trust that brings with it the advantage of a number of additional statutory powers. Other anticipated outcomes of a single entity include greater accountability and improved coordination of housing activities.

Table 8-1 summarizes the configurations for a number of communities in the area ranging from no municipal housing entities in Dedham and Needham at this time to several entities in Lincoln. Most of the communities have a single entity, typically a Housing Trust or Housing Development Corporation.

**Table 8-1: Housing Entities in Nearby Communities**

<b>Community</b>	<b>Housing Entity</b>
Acton	Acton Housing Development Corporation <sup>33</sup>
Bedford	Housing Partnership and Housing Trust with many overlapping members (the entities meet consecutively on the same date)
Belmont	Housing Trust
Carlisle	Housing Trust
Concord	Concord Housing Development Corporation
Dedham	Nothing besides the Housing Authority
Dover	Housing Partnership
Lexington	Housing Partnership and LexHAB (development entity)
Lincoln	Affordable Housing Coalition made up of Housing Commission, Housing Trust and Lincoln Foundation
Needham	Nothing besides the Housing Authority but considering a Housing Trust
Stow	Housing Trust with an Inactive Housing Partnership
Sudbury	Housing Trust
Wellesley	Housing Development Corporation
Winchester	Housing Partnership

**Next Steps:** If the Housing Trust chooses to adopt a different model of housing development in the future, partnering with a selected developer instead of assuming the role of developer itself, it will be important for the Trust to more clearly define its role and specific responsibilities vis a vis the Housing Partnership. Once the implementation of the HPP begins in earnest, the Housing Partnership and Housing Trust will schedule joint meetings to discuss respective activities, maintain active communication, and insure the effective and efficient coordination of housing development. Because the expansion of the Brook School Apartments is anticipated to be a key short-term component of the HPP, regular communication that includes the Elderly Housing Committee must also be addressed, including joint meetings of all three (3) entities.

Some discussion may be warranted about eventually folding the Housing Partnership and its responsibilities into an expanded Housing Trust that becomes responsible for the oversight of affordable housing activities in Weston, particularly the implementation of this HPP. The turnover of key committee members in the future may present a compelling rationale to explore such a consolidation of entities. The most important consideration is that the members have the requisite expertise and interest to make important contributions to an enhanced Housing Trust, even integrating key Housing Partnership members into the Trust.

**Required Resources:** Ongoing communication and coordination among the various Town housing entities will create the need for additional meetings and likely some modest increases in the donated

<sup>33</sup> The Action Community Housing Corporation was created in 1996 by a home rule petition to serve as the Town’s initial contact with developers of affordable housing projects, providing early input on proposals and monitoring the affordability of units once produced.

time of committee members as well as staff time. If there is a future decision to merge the responsibilities of the Housing Partnership into those of the Housing Trust, there may be some corresponding rearrangement of staffing needs. Moreover, as the Housing Trust explores potential development opportunities, it will need ongoing CPA funding to support preliminary feasibility work (engineering, financial feasibility, legal, etc.).

#### **Strategy 4: Consider Future Consolidation of Housing Responsibilities – Staffing**

*Responsible Party:* Board of Selectmen

*Timeframe:* Middle to Long Term

**Current Status:** Housing activities are currently divided among the following staff persons and consultants:

- *Housing Partnership Administrator*  
The Housing Partnership Administrator’s position includes CPA funding for the equivalent of about 2½ hours per week to staff the Housing Partnership. The Administrator is also responsible for staffing the Zoning Board of Appeals which absorbs most of her time and focus, and for which she has considerable expertise, including the comprehensive permit process. Because the Housing Partnership developed Town Policies and Preferences with respect to affordable housing development and applies these guidelines when it reviews and comments on such development proposals, including Chapter 40B projects, it makes sense for this Administrator to staff the Partnership. However, based on the limited time allocated to the Housing Partnership and need for staff support on other Partnership activities (such as advocacy, education, identifying sites, recommending zoning changes, etc.), it may be prudent at some point in the future to significantly increase the allocated staff time for Partnership activities and/or bring on another housing professional to support the Housing Partnership with the Administrator maintaining her important work with the Housing Partnership on the review of development proposals, 40B developments in particular, that dovetail with ZBA activities.
- *Housing Trust Administrator*  
The Housing Trust Administrator is designated to work on housing activities that generally also involves about 2½ hours per week of her part-time schedule. The time devoted to Housing Trust issues has varied somewhat, consuming much more time last year due to the Warren Avenue development. The Administrator also staffs the Community Preservation Committee and has supported some Historic Commission work as well in the past. The position is totally covered by CPA administrative funds. Once again, given the limited time typically allocated to housing-related functions, it may be necessary to approve an increase in the amount of staff time/funding devoted to housing or shift the housing-related functions to another position.
- *Brook School Apartments Manager*  
The Brook School Apartments Manager works full-time in managing the Brook School property and is projected to also be responsible for the management of the Warren Avenue units and a potential expansion of the Brook School Apartments. Such a Town position is relatively rare as most Town governments do not own and manage housing. Because property management is a challenging and demanding profession that relies on specialized expertise, having a skilled professional on site has been an essential ingredient to the success of the Brook School development. As the number of local rental units expands however, it will be necessary to

provide greater staff support for this Manager and/or insure that any new rental development incorporates a private property manager with a proven track record.

- *Town Planner*  
The Town Planner's primary responsibility is to staff the Planning Board, however responsibilities of staffing the Housing Production Plan Steering Committee was also initially assumed by the Town Planner early in the planning process.
- *Regional Housing Services Office (RHSO)*  
The Regional Housing Services Office was established as a collaborative effort among the six communities of Acton, Bedford, Burlington, Concord, Lexington, Sudbury, and Weston to provide assistance in planning, permitting, monitoring, maintaining, and increasing their inventory of affordable housing. Each participating community pays an annual membership fee to the Town of Concord to cover the Office's expenses. This fee provides access to part-time consultants with expertise in affordable housing, funded by Community Preservation Funds. Given the recognized expertise of the RHSO consultants in providing a wide range of housing services, the Office could potentially expand its role in Weston beyond current responsibilities for overseeing the SHI, monitoring affordability and conducting some lotteries.
- *Metro West Collaborative Development*  
The Metro West Collaborative Development is a private non-profit organization that operates in 15 Metro West communities, including Weston, on issues related to creating and preserving affordable housing. The organization is currently serving as marketing and lottery agent for the Town's Warren Avenue project.
- *Weston Affordable Housing Foundation, Inc. (WAHFI)*  
WAHFI is a private, non-profit organization that was created to help meet Weston's need for affordable housing and has developed and manages several small rental projects in town. While the organization does not provide direct staff or consultant services to the Town, it nevertheless and has the capacity to continue to partner with the Town on new small-scale development opportunities.

Despite this diffused staffing structure, the clearly defined nature of respective roles and responsibilities has contributed to a system that, perhaps even surprisingly, appears to be working. While some of these staff persons and consultants are allocated relatively little time to focus on the housing-related work to which they are assigned, less than a few hours per week on average, their commitment, interest and experience in performing these tasks have produced good results. Nevertheless, as existing staff potentially turns over and job responsibilities increase due to the demands of implementing this Housing Production Plan, it may be advisable to consolidate some job functions in the future. Such consolidation, with increased funding, might serve the following purposes:

- Insure that there is the necessary accountability and expertise on board in the event of staff turnover, expanding responsibilities, and other demands associated with implementing the HPP.
- Enhance communication among various Town boards and committees involved in housing given the involvement of a housing professional that supports multiple committees.
- Reduce some potential confusion about who to contact when a particular housing issue arises.

- Accommodate some potential reshuffling of housing-related responsibilities among local boards and committees.

Weston’s current division of housing-related responsibilities is unique, and there are more typical models for staffing municipal housing activities. For example, many towns are using their CPA funding and hiring housing consultants (usually referred to as Affordable Housing Specialists or Housing Coordinators) on a part-time basis to oversee their housing activities based on a defined Scope of Services. The Town is already doing this to some extent with RHSO and the Metro West CD, but typically the Scope of Services is broader than the current arrangement with additional responsibilities for staffing the local housing partnership and/or trust, providing technical input into affordable housing development proposals, conducting outreach and advocacy on the range of affordable housing issues, coordinating planning activities, implementing strategies included in the Town’s Housing Plan, supporting efforts to obtain necessary funding for housing developments, etc. Some communities have also brought this expertise on board as staff with on-site regular hours, typically working for the Town Planner.

**Next Steps:** Given the sound performance of the existing individuals and consultants, there should be no rush to make structural staffing changes. However, as time passes and demands on existing staff increase with possible staff turnover as well, it may be necessary to reconsider the current configuration. Clearly more CPA funding will need to be committed to housing given the ambitious nature of this HPP. Additionally, if there is some future consolidation of the Housing Partnership and Housing Trust, as mentioned for eventual consideration in Strategy 3 above, the division of staffing responsibilities will have to be rethought.

Several options might be considered:

- Expand RHSO’s Scope of Services and time commitment to incorporate additional activities related to implementing the HPP. Consideration of enhanced activities for the Metro West Collaborative Development might also be explored.
- Expand the number of hours available and job responsibilities for the Housing Partnership, and/or Housing Trust Administrators, and/or Town Planner.
- Consolidate the Housing Partnership and Housing Trust responsibilities under a single housing professional with the existing Housing Partnership Administrator working solely for the ZBA and the Housing Trust Administrator focusing on CPA activities with perhaps some additional time allocated to the Historic Commission. This could be accomplished through a housing consultant or other staff person.
  - In the case of a housing consultant, issue a Request for Proposals (RFP) to hire a part-time housing consultant to coordinate all major housing-related activities not related to the Planning Board, CPA and ZBA as defined in a Scope of Services as part of the RFP. CPA funding could be used to support this position. The consultant would report directly to either the Town Manager or Town Planner. This option would probably result in securing a more seasoned housing professional who, while simultaneously likely working on other consultant contracts, would be able to perform job responsibilities in an efficient, cost-effective manner. The position would also not involve costs related to staff benefits for Town employees.
  - In the case of a staff position, prepare a job description that includes the overall coordination of the HPP as well as staffing for the Housing Partnership and Housing

Trust. This position could also be supported by CPA under the supervision of the Town Manager or Town Planner. Under this scenario, it is likely that the person hired could be available on site at Town Hall for some regular work hours but the cost of the position would have to be sufficient to attract the required expertise plus associated job benefits.

**Required Resources:** The costs associated with all of these options would be based on the prescribed Scope of Services or job description. Based on an expanded housing agenda, the costs would also be higher than what is currently allocated for housing-related activities of approximately \$15,000 to \$20,000 per year not including the housing-related functions of the Town Planner.

### **Strategy 5: Maximize Local Preference in Unit Occupancy**

*Responsible Party:* Housing Partnership  
*Timeframe:* Short Term

**Current Status:** With approval from the subsidizing agency such as DHCD, state policies also enable municipalities to reserve up to 70% of the affordable units created in state subsidized developments, including comprehensive permit projects, for those who live, work or attend school in the community, referred to as “local preference” units.

**Next Steps:** The Town will pursue local preference approval from the state for each development that includes more than a single affordable unit through the following process:

- Demonstrate the need for local preference in an Affirmative Fair Housing Marketing and Resident Selection Plan that must be approved by the subsidizing agency, DHCD for LIP units.
- Justify the extent of the local preference (the percentage of the units proposed to be set-aside for local preference), that is how the documented local need, in the context of the size of the community, the size of the project and the regional need, justifies the proposed size of the local preference for a given project. In no case can the percentage exceed 70% of the affordable units in a project.
- Demonstrate that the proposed local preference will not have a disparate or discriminatory impact on protected classes.
- Provide the developer with the documentation required to support a local preference within three (3) months of final issuance of the comprehensive permit. Failure to comply with this requirement will be determined by the state that there is not a need for a local preference and it will not be approved as part of any Affirmative Fair Housing Marketing Plan or use restriction.

Sample documentation for local preference is included in Appendix 3.

The Housing Partnership will work with developers and their marketing/lottery agents in updating and augmenting the information (make more project specific to fully justify the 70% level) in Appendix 3 for inclusion in Affirmative Fair Housing Marketing and Resident Selection Plans and in obtaining approval from the subsidizing agency to allow local preference at the 70% level. The Housing Trust and Elderly Housing Committee will take the lead for particular developments for which they are the project sponsors.

**Required Resources:** Donated time from members of the Housing Partnership with staff support from the Housing Partnership Administrator.

## GOAL 2: AMEND ZONING TO PROMOTE AFFORDABLE HOUSING AND SMART GROWTH DEVELOPMENT

As with most communities, Weston’s Zoning Bylaw includes large lot zoning in most areas of town and other exclusionary provisions that constrain the development of affordable housing. This creates the likely need for regulatory relief for many residential developments that include affordable units, possibly through the “friendly” comprehensive permit process that overrides local zoning.

The Town of Weston should consider the following zoning-related strategies to promote the production of additional affordable units and to direct new development to appropriate locations. These actions can be considered as tools that the Town will have available to promote new housing opportunities, each applied to particular circumstances. These strategies enable new affordable unit creation that is more responsive to local needs and priorities.

It should also be noted that changes to Chapter 40B regulations several years ago expanded the items that a subsidizing agency must consider when determining the appropriateness of a site for eligibility through the comprehensive permit process and includes information provided by the municipality or other parties regarding *municipal actions previously taken to meet affordable housing needs, including inclusionary zoning, multi-family districts and 40R overlay districts.*<sup>34</sup> Therefore, a community’s progress in reforming its land use provisions to promote affordable housing and smart growth will likely have a meaningful impact on the determination of project eligibility/site approval for comprehensive permit projects.

### Strategy 1: Consider Modifying Existing Multi-family Zoning

*Responsible Party:* Planning Board  
*Timeframe:* Short Term

**Current Status:** Weston’s Zoning Bylaw significantly limits multi-family housing development or almost all types of housing beyond single-family detached units. This is not a unique circumstance among communities in Massachusetts as many towns do not have any zoning in place to allow multi-family housing development and much of the state’s developable land area is limited to single-family units.

Weston’s Zoning Bylaw defines multi-family housing as two (2) or more dwelling units not including a single-family house with an accessory apartment. Table 6-2 in Section 6 of this Plan provides a summary of dimensional requirements of two (2) multi-family zoning districts, Multiple Dwelling District A and Multiple Dwelling District B. Multiple Dwelling District A has not been mapped and District B consists of only two (2) sites – Jericho Village (now called Stonegate) and Merriam Village.

**Next Steps:** The Planning Board in consultation with the Housing Partnership should modify existing zoning related Multiple Dwelling Districts to appropriately map these districts and incorporate language that would mandate the inclusion of affordable units.

<sup>34</sup> Massachusetts General Laws, Chapter 40B, Section 56.04.

The Planning Board should review inclusionary zoning provisions in other communities to determine the most appropriate requirements. For example Wellesley’s inclusionary zoning provisions require that 20% of all units in projects of five (5) or more units be affordable and Newton’s requirements include a 15% affordability level for projects of four (4) or more units.

It will also be important to provide sufficient incentives to developers to make sure that the incorporation of affordable units will be financially feasible. Incentives also reduce the risk of litigation from developers who claim that the mandatory inclusion of affordable units involves a “taking” of their property rights. In fact inclusionary zoning can be legally vulnerable if requirements make it impossible for the developer to earn a reasonable return on the project as a whole. Consequently, it would be prudent for the Town to add incentives, such as density bonuses, to cover these legal questions and insure that the zoning works economically.

**Required Resources:** Donated time of the Planning Board with support from the Housing Partnership as well as staffing from the Town Planner. It will be useful for the Town to consider hiring a consultant to assist the Town Planner with these zoning changes. These costs would be eligible CPA activities and staff technical assistance funding might be available from DHCD’s Planning Assistance Toward Housing (PATH) Program.

## Strategy 2: Consider Changes to the AARD Bylaw

*Responsible Party:* Planning Board  
*Timeframe:* Middle Term

**Current Status:** The Town adopted an Active Adult Residential Development (AARD) bylaw to fulfill the following objectives:

- Provide alternative housing for a maturing population (all dwellings are limited to those 55 years of age or older);
- Provide a type of housing which reduces residents’ burdens of property maintenance as well as demands on municipal services;
- Encourage the development of affordable housing for active adults with low and moderate income, as defined in 760 CMR 45.02 (at least 10% of the units must be affordable and eligible for inclusion in the SHI, however some or all of the affordable units may not be age-restricted); and
- Promote flexibility in site planning while protecting natural features, scenic views into property, existing vegetation and land forms and the utilization of land in harmony with neighboring properties.

This bylaw enabled the development of Highland Meadows that includes 62 units of which seven (7) are affordable and included in the SHI. Four (4) of the affordable units are in a four-unit building for families and the other three (3) units are age-restricted and scattered throughout the development. The market purchase prices were high, ranging from \$1.5 million for some of the smaller market units to almost \$5 million. On the other hand, the three-bedroom affordable family units sold for \$192,000 and the two-bedroom age-restricted units sold for \$178,500.

An AARD is allowed in Single-family Residence Districts A or B and Business District B with Concept Plan approval by a two-thirds vote of Town Meeting and subsequent Site Plan and Special Permit Approval by the Planning Boards. AARD's must also contain at least 40 acres and meet other requirements.

**Next Steps:** The Planning Board should modify the AARD bylaw to make additional developments more feasible by reducing the minimize site requirements to ten (10) acres. It may also consider increasing the affordability requirement to at least 15% of all units, perhaps even requiring another income tier of up to 150% AMI for those with somewhat higher incomes but still priced out of the local housing market.

**Required Resources:** Donated time of the Planning Board with support from the Housing Partnership as well as staffing from the Town Planner.

### Strategy 3: Explore 40R/40S Smart Growth Zoning

*Responsible Party:* Planning Board  
*Timeframe:* Short Term

**Current Status:** The State Legislature approved the Chapter 40R zoning tool for communities in 2004 in recognition that escalating housing prices, beyond the reach of increasing numbers of state residents, were causing graduates from area institutions of higher learning to relocate to other parts of the country in search of greater affordability. In essence, housing demand was outstripping housing supply and driving up housing prices. The statute enabled communities to establish Smart Growth Overlay Districts to promote smarter, more compact and denser development in appropriate locations.

The key components of 40R include:

- Allows local option to adopt Overlay Districts near transit, areas of concentrated development, commercial districts, rural village districts, and other suitable locations;
- Allows “as-of-right” residential development of minimum allowable densities;
- Provides that at least 20% of the units be affordable;<sup>35</sup>
- Promotes mixed-use and infill development;
- Provides two (2) types of payments to municipalities (one based on the number of projected housing units in the District and another for each unit that receives a building permit); and
- Encourages open space and protects historic districts.

The state also enacted Chapter 40S under the Massachusetts General Law that provides additional benefits through insurance to municipalities that build affordable housing under 40R that they would not be saddled with the extra school costs caused by school-aged children who might move into this new housing. In effect, 40S is a complementary insurance plan for communities concerned about the impacts of a possible net increase in school costs due to new housing development in 40R Districts.

Almost 40 communities have created 40R Smart Growth Overlay Districts and others are in the process of being established. For example, Natick not only is expecting the two forms of subsidy provided directly by 40R as well

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<sup>35</sup> If 25% of the units are affordable, all units in rental projects will count as part of the SHI.

as protection from added school costs from 40S, but also received significant state funding for its new high school as described below.

#### **Model: 40R in Natick**

Natick has been able to access \$1,434,000 in state funding to support new local development priorities including the building of a new high school and the redevelopment of former Natick Paperboard Factory site into 138 apartments and 12 townhouses by adopting a Chapter 40R Smart Growth Overlay District. The state gave the town \$820,000 towards the costs of its new high school because it was awarded an extra percentage point towards state funding from the Massachusetts School Building Authority due to its approval of a Chapter 40R district. It has also received \$200,000 from the state as an incentive payment for creating the 40R district and expects to receive another \$414,000 as housing development moves forward. Moreover, the Town is eligible for receiving additional state support from Chapter 40S that provides insurance to towns that build affordable housing under 40R that they would not be saddled with the extra school costs caused by school-aged children who might move into the new housing.

It is also worth noting that the Towns of Easton and Reading were able to avoid what they considered inappropriate Chapter 40B developments, largely by the state's recognition that these towns had in good faith been proactively promoting affordable housing by created 40R districts.

**Next Steps:** There are sites included in this Housing Production Plan that may be conducive to a Smart Growth Overlay District, where larger-scale and denser housing development is appropriate and where there may also be some integration of commercial uses. An example of such sites may be the Regis College or Boston Properties/Biogen properties.

The Weston Planning Board will explore such zoning during the early term of the implementation of this HPP to determine feasibility. Representatives from DHCD are also available to attend meetings to provide information on the program and answer questions.

The formal steps involved in creating the 40R Overlay District are as follows:

- The Town holds a public hearing as to whether to adopt an Overlay District per the requirements of 40R;
- The Town applies to DHCD prior to adopting the new zoning;
- DHCD reviews the application and issues a Letter of Eligibility if the new zoning satisfies the requirements of 40R;
- The Town adopts the new zoning through a two-thirds vote of Town Meeting subject to any modifications required by DHCD;
- The Town submits evidence of approval to DHCD upon the adoption of the new zoning; and
- DHCD issues a letter of approval, which indicates the number of projected units on which its subsidy is based and the amount of payment.

**Required Resources:** Donated time of members of the Planning Board to prepare the necessary zoning with time from the Town Planner and input/advocacy from the Housing Partnership. It will be important for the Town to hire a consultant to assist the Town Planner with this process. The state's Planning Assistance Toward Housing (PATH) Program could cover consultant fees as could CPA funding.

## Strategy 4: Consider Changes to Promote Assisted Living Development

*Responsible Party:* Planning Board  
*Timeframe:* Middle Term

**Current Status:** There are limited assisted living options in Weston, including Sunrise of Weston and Maplewood at Weston. Other than those two facilities, residents who require supportive services beyond what is available locally through the Council on Aging or other regional service providers typically must relocate to other communities. While a small sample of assisted living facilities integrate some affordability, most such units are extremely expensive. A nearby development in Lincoln, being redeveloped by Benchmark Senior Living, does incorporate some affordable units and might be a useful model to explore but would likely involve significant subsidies and challenges in obtaining state approval to have the units included in the SHI.

Also, as documented in the Housing Needs Assessment, the number of seniors has been growing as those 65 years of age and older climbed by 58% between 1980 and 2013, from 1,212 to 1,915 residents, while the population as a whole increased by only 3.3%. Of particular note were the frail elderly of at least age 85 who increased by 150% during these decades.

The Metropolitan Area Planning Council (MAPC) projects that the number of seniors will increase from 17.8% to 27.9% of all residents between 2010 and 2030, representing a gain of about 1,200 residents in this age category by 2030. Clearly housing alternatives to accommodate this increasing population of seniors – such as more handicapped accessibility, housing with supportive services, and units without substantial maintenance demands – should be considered in housing planning efforts. This includes mixed-income housing for those who can afford market units but wish to downsize and maintain a connection to the Weston community.

There are examples of senior housing developments that include supportive services, also integrating affordable units at varying income tiers such as Maple Woods in Wenham.

### **Model: Maple Woods in Wenham**

Harborlight Community Partners is developing 60 units of rental housing in Wenham for those 55 years of age or older. The project will be built in two phases, each planned with 30 units. Most of the units will be targeted to those earning at or below 60% of area median income but some will include units for extremely low-income seniors with incomes below 30% AMI. All units will have 650 square feet and one bedroom with a patio, balcony or Juliette balcony. The project will also involve a full-time Property Manager and a part-time Service Coordinator available to provide programs and services to residents. This project involves the “friendly 40B” process, local CPA and Housing Trust Funds as well as state subsidies. It will further enable Wenham to surpass the 10% affordability threshold under Chapter 40B.

**Next Steps:** The Planning Board should explore a zoning provision that would encourage senior housing with supportive services to be developed in Weston, also incorporating language that would mandate the inclusion of affordable units. The alternative would be “friendly 40B” permitting through the state’s Local Initiative Program (LIP).

**Required Resources:** Donated time of members of the Planning Board to prepare the necessary zoning with time from the Town Planner and input/advocacy from the Housing Partnership.

### GOAL 3: PARTNER WITH DEVELOPERS TO LEVERAGE OTHER PUBLIC AND PRIVATE RESOURCES

The following strategies describe Weston’s approach for producing new affordable housing. It will be important for the Town to partner with developers, non-profit and for profit, and potentially even other communities to create new housing opportunities.

#### Strategy 1: Make Suitable Public Property Available for Affordable Housing

*Responsible Party:* Board of Selectmen and Housing Trust

*Timeframe:* Short Term

**Current Status:** Weston has a long history of conveying Town-owned property for the purpose of creating affordable housing. Examples include the Brook School Apartments, Merriam Village, and Warren Avenue developments. The continued contribution or “bargain sale” of land or buildings owned by the Town but not essential for municipal purposes could enable Weston to take further proactive measures to address local housing needs and become certified under state Housing Production requirements.

The HPP Steering Committee actively studied a wide range of Town-owned properties that might potentially be appropriate and become available for affordable housing. It met with relevant boards and committees to discuss issues related to particular parcels and the measures that would be required to make development feasible. On November 7, 2015 it held a workshop to engage residents in the review of potential Town-owned sites and to discuss the criteria to be used in evaluating the appropriateness of these sites for some type of affordable housing development. These criteria include the elimination from consideration of the following types of properties:

- Conservation land
- Parkland including cemeteries
- Deed restricted land (Cat Rock and Leo J. Martin land)
- Wetlands, marshes and riverfront areas
- Land areas of less than five (5) acres established as non-buildable due to limitations of the number of houses due to site conditions and Weston’s zoning bylaws, and septic disposal requirements
- Land areas that would not support housing and co-exist with current uses
- Sites that would produce dangerous traffic conditions
- School property and the site of the old Field School

Union Studio Architects was also brought into the project to evaluate potential properties, make recommendations regarding siting and numbers of units, and provide visual illustrations of development options.

Through the course of evaluating a wide range of Town-owned properties, the HPP Steering Committee is recommending the following potential sites for inclusion in this Plan:

- *Expansion of Brook School Apartments*  
The Brook School Apartments, which is owned and managed by the Town of Weston, includes 75 units of senior housing in several buildings on School Street near the Town Center. There is additional land to expand the development with septic capacity for another 14 units.
- *Existing buildings at 131-133 Wellesley Street*  
Part of the Case Estates that the Town acquired from Harvard University, this property includes three (3) existing structures – a small schoolhouse, a single-family house, and a barn. Although the barn has been determined to be unsuitable for conversion to housing, the other two (2) properties are likely to be feasibly rehabilitated and made affordable with subsidies.

**Next Steps:** The Town will undertake the necessary due diligence to determine project feasibility of Town-owned sites. To accomplish this, it will be necessary to obtain funding from the Community Preservation Committee (CPC) for preliminary feasibility work that includes initial environmental testing, a financial feasibility analysis, potential design work, legal support, etc. These parties will also need to work with other Town boards and committees such as the Housing Partnership, Elderly Housing Committee, Planning Board, Recreation Commission, Board of Health, Conservation Commission, etc. to identify the range of development issues for each site, determine how such issues may be resolved, and to pragmatically prioritize projects.

Fundamental to this Housing Production Plan and its approach to development is substantial community outreach as described under Goal 1, Strategy 1 above. Town Meeting approval of the conveyance of the property for affordable housing as well as CPA funds will also be required.

The first year of the housing production goals (see Table 7-1) suggests an expansion of the Brook School Apartments with 14 units, which is the limit that can be built under existing septic capacity. The Elderly Housing Committee served as primary developer in the past and continues to manage the existing development. This HPP recommends that the Elderly Housing Committee continue to take the lead in the development process, working with the Housing Trust and other relevant Town boards and committees as appropriate.

With respect to other future development of Town-owned property, including 131-133 Wellesley Road, the Town should pursue partnerships with selected developers, whether for profit or non-profit, through the issuance of a Request for Proposals (RFP) based on the Town's specified terms and conditions. The issuance of an RFP typically occurs after Town Meeting approval of the property disposition for affordable housing and perhaps other uses, and the determination of the sponsoring entity, likely the Housing Trust in the case of Weston, of these development terms and conditions. By establishing clear requirements and guidelines, the Town exerts substantial local control over what is built but does not have the added responsibilities of actual development and construction. The goal is to select the respondent that best meets specific criteria included in the RFP including the experience and track records of the development team, financial capacity, design approach, proposed budget, etc. Moreover, because the property would be conveyed to a developer by lease or sale, the project would not be considered a public project and subject to state Chapter 30B public procurement regulations which results in reduced project costs. Chapter 30B also requires that the Town accept the lowest bidder as opposed to a ranking of a number of criteria that is afforded by the RFP process.

It will be the responsibility of the developer (the Elderly Housing Committee in the case of the Brook School Apartments expansion) to obtain the necessary permitting and subsidies to make the project feasible. The projects may require densities or other regulatory relief beyond what is allowed under the existing Zoning Bylaw, and the use of the “friendly” comprehensive permit process through DHCD’s Local Initiative Program (LIP) would likely be used for permitting unless special zoning had been enacted (see strategies under Goal 2 above).

Comprehensive permits typically do not involve external public subsidies but use internal subsidies by which the market units in fact subsidize the affordable ones. Many communities have used the “friendly” comprehensive permit process to take advantage of these internal subsidies, to create the necessary densities to make development feasible, and to make it easier to navigate the existing regulatory system. Other communities want to incorporate more than the required amount of affordable units in a particular development, which often requires multiple layers of external public subsidies to fill the gap between the total development costs and what low- and moderate-income occupants can afford beyond the internal cross subsidies available from the market units and nominal site costs. *This is particularly compelling in the case of publicly-owned property which should provide greater public benefits and maximize project affordability.*

In addition to predevelopment funding support, CPA funding will be necessary as a gap filler to subsidize construction costs to insure project affordability, also assuming that additional public and private funds will be secured to make the project financially feasible without overburdening Weston’s resources. Projects could also incorporate several income tiers, once again reflected in the terms and conditions established by the Town in the RFP. The bonding of CPA funding should be explored for future projects.

While the Needham project described below was not developed on Town-owned property, it nevertheless demonstrates how a relatively small site can be developed with a comprehensive permit that includes both affordable units directed to those earning at or below 80% AMI as well as a somewhat higher income tier targeted to those earning at or below 150% AMI. In this case the developer was able to secure a \$150,000 grant from MassHousing that helped subsidize the project. One of the higher income units recently was resold for approximately \$380,000, far below Needham’s current median house price of almost \$900,000.

#### **Model: Small 40B Infill Townhouse Development – Junction Place in Needham**

Junction Place is a condominium project in Needham comprised of five (5) attached townhouse units in close proximity to a commuter rail station. The project was developed on a site with less than 12,000 square feet by a private developer. All of the townhouses were sold at below market prices to eligible families through a lottery. Two (2) of the homes were sold for \$165,000 to families earning up to 80% of the area median income while the remaining three sold for \$310,000 to families earning up to 150% of the area median income. Each of the units contains approximately 1,512 square feet including 3 bedrooms, 2½ bathrooms, a laundry room with a washer and dryer, a one-car garage and an outside parking space.

The Town may also decide to acquire privately-owned sites at some time in the future for the purposes of developing some amount of affordable housing, potentially including other uses such as protecting open space, preserving historic properties, and/or creating recreational opportunities. CPA funding is an important resource for such acquisition. For example, the Town of Carlisle acquired land for affordable housing development that also included open space preservation and other public benefits as pictured

and described below. This project provides another example of conveying Town-owned property to a developer who successfully was able to put together the necessary financing, including Low Income Housing Tax Credits and considerable CPA funds, to make the project feasible.

#### **Model: Benfield Farms in Carlisle**

The Town of Carlisle issued a Request for Proposals to develop 26 units of senior rental housing on a Town-owned site it acquired by bonding a portion of its Community Preservation funding. Most of the parcel was preserved as open space with the development of some athletic fields on a portion of the property projected for the future. The Town provided the land for a nominal amount and approved \$425,000 in CPA funding to support costs related to infrastructure and an additional allocation to further subsidize the development. The Town selected the nonprofit organization Neighborhood of Affordable Housing (NOAH) as the developer. The design includes a three-story main house connecting to a two-story barn and incorporates green building, sustainability and universal design standards.

Monitoring and enforcing affordability requirements will continue to be critical to the effective provision and preservation of affordable housing. The Town will have to insure that any additional affordable units are eligible for inclusion in the Subsidized Housing Inventory (SHI), provide the state with all of the appropriate documentation, and monitor affordability on an annual basis working closely with the sponsoring entity and the state subsidizing agency.

**Required Resources:** This work will involve a substantial commitment of resources that beyond the donated time of Town board and committee members will include the following:

- Staff and consultant costs related to conducting property research and analysis, issuing RFP's, selecting developers, applying for local subsidies, insuring that affordable units are included on the SHI and continue to meet all state requirements, etc.
- Predevelopment funding to conduct initial feasibility analyses.
- Subsidies to fill the remaining gaps between the total costs of development and what qualifying occupants can afford net of other public and private financing.

The amounts of the funding required will vary considerably by project depending in large part on the size of the development, available economies of scale, income targets, infrastructure costs, other leveraged subsidies, etc.

**Projected # Affordable Units Produced:** 17 units

## **Strategy 2: Support Private Developments that Complies with Local Policies**

*Responsible Party:* Housing Partnership, Housing Trust, Community Preservation Committee, Planning Board and Zoning Board of Appeals  
*Timeframe:* Short Term

**Current Status:** This Housing Production Plan proposes working with private entities to promote affordable housing including establishing partnerships with:

1. *Owners with large land holdings*  
Members of the HPP Steering Committee, in their efforts to conduct substantial community outreach on this HPP, have met with representatives of entities with large land holdings

including Boston Properties, for example. Initial meetings with Boston Properties on the potential development of its Biogen property have been encouraging. The Town also has several major institutions, such as Regis College, Campion Center and St. John XXIII Seminary, where discussions to find some common ground and mutual advantages to creating housing that incorporates some amount of affordable housing on their properties may hold some promise. By focusing on those property owners that have a substantial presence and investment in the Weston community, it is anticipated that the Town, with political and financial support, can not only provide sufficient incentives for residential development on these properties but also steer such development through new zoning or the “friendly 40B” process.

2. *Owners with smaller properties who are interested in developing or donating parcels for some amount of affordable housing*

Weston has a long and respected history of private property donations for affordable housing development. Ed and Polly Dickson received statewide recognition for their commitment to affordable housing by donating property for the development of Dickson Meadows and then subsequently have donated property on Jones Road and Pine Street. Another property, that includes two existing duplex structures for the creation of four affordable units (216-218 Boston Post Road), is in the process of being conveyed by Polly Dickson to the Weston Affordable Housing Foundation, Inc. (WAHFI).

Such donations are occurring in other communities as well. For example, the Town of Chatham is currently working with a family that approached the Town about selling their property at a below market price for development as affordable housing, anticipating increasing the number of units on site.

3. *Developers interested in acquiring property and developing it within the Town’s Policies and Preferences for Affordable Housing*

In addition to partnerships between the Town and existing property owners, the Town has worked cooperatively with private developers, non-profit and for profit, on new affordable unit creation. For example, the Town has supported WAHFI in its development projects including recent CPA funding of \$1,118,100 for its Viles Street Project. The Town also worked with the developers of Winter Gardens, processing the project through the “friendly 40B” process.

With incentives created in the zoning bylaw to promote affordable housing (see Goal 2 above), the availability of the “friendly 40B” option, and the Town’s *Policies and Preferences for Affordable Housing* that provides important guidance on Weston’s development priorities, the Town is in a good position to continue to work cooperatively with developers to guide new development that incorporates affordable units. Moreover, when the Town obtains certification under Housing Production by meeting its annual production goals, it will be in an even better position to negotiate with private developers on project terms and conditions since it will be able to likely deny what it considers inappropriate comprehensive permit projects that do not address local needs.

**Next Steps:** Based on the three (3) basic approaches described above, the Town expects to pursue partnerships through the following implementation strategies:

1. *Owners with large land holdings*

Members of the Board of Selectmen and the Housing Trust will pursue further discussion with existing institutions and businesses to determine how best the Town can support new housing creation through new zoning such as Smart Growth Overlay Districts through Chapter 40R/40S (see Goal 2, Strategy 2), other special zoning, the “friendly 40B process (LIP), and subsidies. There may also be opportunities to engage neighboring communities in partnering on new development as some potential site locations extend beyond Weston boundaries.

2. *Owners of smaller properties who are interested in developing or donating parcels for some amount of affordable housing*

It will be important to showcase previous examples of property donations during the course of this planning process to present models for other property owners who might consider donating property for some amount of affordable housing development. Such owners may elect to donate or provide a discounted purchase price to the Housing Trust or WAHFI and be eligible for tax benefits. If such property becomes available to the Housing Trust, it would be incumbent upon the Trust to determine the terms and conditions of the development and issue an RFP to select a developer. Zoning changes described in Goal 2 that suggest zoning to allow more housing diversity in the community, may be particularly applicable to some of these smaller sites.

3. *Developers interested in acquiring property and developing it within the Town’s Policies and Preferences for Affordable Housing*

Weston’s current governance structure has the Housing Partnership taking the lead in reviewing development proposals that include affordable units. Given some consideration to consolidating housing functions into the Housing Trust solely, as referred as a future possibility in Goal 1, Strategy 2, this responsibility may at a later time be shifted to the Trust.

Based on the current framework, once the Housing Partnership has met and provided feedback to a developer in regard to a specific development proposal, it will be the responsibility of the permitting entity, the Planning Board or Zoning Board of Appeals, to move the project forward to some decision. The Housing Partnership and Housing Trust can both be available throughout the development process to advocate for developments that meet local priorities, providing support during project permitting and financing.

Because the *Town’s Policies and Preferences for Affordable Housing* was prepared in 2009 to 2010, it may also be worthwhile for the Housing Partnership and Housing Trust to revisit the document and make necessary adjustments to bring them up-to-date with changes in state guidelines and more in line with the content of this Housing Production Plan.

The Housing Trust will reach out to local developers who have been active in producing affordable housing in the area to discuss the Town’s interest in promoting affordable housing development, possible areas and opportunities for new development, and local guidelines and priorities.

**Resources Required:** CPA funding and Housing Trust Funds to help subsidize preliminary feasibility analyses, some acquisition costs or other subsidies are good investments towards meeting production goals and local needs whether the developer is non-profit or for profit. Once again, the amounts of the

funding required will vary considerably by project depending in large part on the size of the development, type of developer (small non-profit versus large established private developer), available economies of scale, income targets, infrastructure costs, other leveraged subsidies, etc. This strategy will also involve the donated time of members of key Town boards and committees such as the Housing Partnership, Housing Trust, Planning Board and Zoning Board of Appeals in addition to appropriate Town staff.

***Projected # Affordable Units Produced:*** 244 units