

Acton Community Housing Corporation

Nancy Tavernier, Chairman

TOWN OF ACTON

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TO: Acton 2020 Committee
FROM: Nancy Tavernier, Chair, ACHC
SUBJECT: ACHC comments on proposed Goals and Objectives
DATE: October 21, 2011

ACHC appreciated the opportunity to participate in Acton 2020's discussion of affordable housing on September 28. We think everyone in attendance learned a lot that night. We are very impressed with the amount of effort and thought you are putting into the Comprehensive Plan process. We do not envy your schedule.

In preparation for your November 9 public meeting, we wish to offer some comments on the September 19, 2011 version of the Recommended Implementation Program. These are intended to be constructive suggestions specifically on the affordable housing content. We suspect the wording has been evolving on this document so some of these comments may no longer apply.

- We'd like to see fewer references to 40B in the Objectives statements. ACHC's position has always been to focus on meeting Acton's specific affordable housing needs and not on meeting 40B requirements. Meeting 10% is a goal not a mandate. As long as we are constantly working to increase the number of affordable units every year, we are honoring the intent of the law.
- Under Goal 1, bullets 6 and 7, we think the statements "Address 40B restrictions....." and "Support legislation..." should be eliminated. Rather, we think growth options consistent with a comprehensive planning process should be included. For example, creating zoning that provides an incentive to develop affordable housing where and how we want it, using a special permit and not 40B.
- The recommendation about creating a Housing Production Plan needs to be carefully thought through. The cost to do one must be considered because it has to be combined with an updated housing needs assessment. The DHCD-defined production goal of 42 affordable units a year for Acton is unrealistic. At some point in the future, ACHC would entertain the suggestion to create a new Plan but not if it is used to justify a large rental project which is the only way that goal could be met. We have no problem with creating a sensible plan that would include design preferences and a realistic plan for adding units given the finite resources that ACHC has at its disposal. However, this production plan would not be done in the near future. It can't be done without ACHC buy-in.

- Under Objective 5.2, we have several comments. The title itself is a problem: “Support households of all income levels.” We don’t know what this means and think it should be simply revised to read “Support diversity in housing”. This covers all the bases, diversity in location, size, style, and selling prices.
- The strategy statement under Objective 5.2 is well done but the last phrase starting with “and also...” should be dropped.
- Under Objective 5.2, the first bullet: we have a problem with the word “inexpensive” when talking about housing. We can see that you have struggled to find a term for the housing in Acton that is market-rate affordable but not deed restricted. We would suggest using the term that is used in the town’s housing plan “To Live in Acton,” which is “below-market”. Priority Need #5 in the Housing Plan was for below-market homeownership. This can also be applied to rentals. There is no housing that is truly inexpensive unless we are talking about someone with a very high income purchasing a very low priced condo. Below-market means any housing unit that sells or rents for less than the average or median value of all housing units in the town.
- We accept bullet #3 that references the conversion of existing housing units as long as “inexpensive” is removed.
- We like bullet #4 even though this does not fall under ACHC for responsibility. We think Zoning changes that create incentives to increase affordable or a diversity of units are consistent with the comprehensive planning effort.
- We would like to have affordable housing considered any time an open space parcel purchase is proposed, even a small duplex placed in one corner of a lot would make an important statement about retaining open space while increasing affordable housing in small scale developments.

We would encourage the 2020 Committee to read through Acton’s Comprehensive Permit Policy document found on the Planning Department Website under resources: <http://ma-acton.civicplus.com/DocumentView.aspx?DID=114>. This document was created in 2006 as an offshoot of the To Live in Acton process. It was adopted by both the Planning Board and the Board of Selectmen. It makes important policy statements about the siting and design of affordable housing. If you have not reviewed it recently or did not know about it, you might find it comforting to know that so much thought has been put into a comprehensive permit (40B) policy.

We wish you well in your continuing efforts. We hope you will accept these comments in the constructive spirit they are given. We will plan to attend the November 9 meeting.