

SUDBURY HOUSING AUTHORITY

Proposed Redevelopment of Single-Family Homes

QUESTIONS RAISED

Question #1: Given that 21 Great Lake Drive was in disrepair, what confidence is there that the new units won't fall into disrepair? Why didn't you fix 21 Great Lake Drive for the tenants?

Response: This property needed substantial work which was not readily apparent until the tenant vacated the property. The estimate for repairs and updates to 21 Great Lake Drive was over \$137,000 which the SHA had available. Because of a number of factors, including the age of the building, the greater need for units with fewer bedrooms, and the availability of funding from the State, the SHA chose not to use its reserves to make these repairs. Both the State and SHA believe it is better to invest in new homes which will be more energy-efficient and better meet the needs of both current residents and the hundreds of families on the waiting list.

Question #2: If the wait list is so long, why would SHA keep a unit offline for so long?

Response: The SHA is governed by the State agency now known as the Executive Office of Housing and Livable Communities (EOHLC). It is a slow public process to evaluate options and determine the best use of limited dollars. SHA began conversations with the State to convert the single-family homes to two-family homes in June 2021. Permission was granted in September 2023.

Question #3: Duplexes will increase the density of our neighborhood.

Response: Not significantly.

- a.** The additional number of proposed units is 4.
- b.** The anticipated number of additional bedrooms is 4.
- c.** The overall footprint of the new homes is anticipated to be comparable to or not significantly larger than currently exists.
- d.** In addition, Accessory Dwelling Units (ADUs), which create a second dwelling unit on an existing site, are already allowed by Special Permit,
- e.** Local zoning changes are anticipated as a result of recent statewide changes in regulations around ADUs that promote their development.

Question #4: Placing duplexes in the midst of single-family homes will not blend with the neighborhood architecture.

Response: The Housing Authority has built duplexes that blend well with the neighborhoods they are in. The Housing Authority hopes to work with the neighbors to design houses that will be attractive and consistent with the design of existing homes. The neighborhood currently reflects an array of structural designs, as the

original homes have been redesigned or updated. Additionally, the Housing Authority will have to get permission from the Zoning Board of Appeals for any proposed design. The ZBA will also make sure the homes are attractive and fit well with existing architecture.

Question #5: Duplexes will be too big on the small lots.

Response: *Although the SHA does not have the benefit of architectural drawings, it is not anticipated that the proposed duplexes will be significantly larger than the existing buildings.*

The four properties in question are:

21 Great Lake Drive – 0.17 acre with existing 1,166 SF house

8 Oakwood Ave - 0.23 acre with existing 1,242 SF house

2 Beechwood Ave - 0.25 acre with existing 1,664 SF house

9 Richard Ave - 0.16 acre with 752 SF house

Moreover, a brief survey of properties in the neighborhood, including one on Richard Ave, shows that there are already properties in the Pine Lakes neighborhood that have larger buildings on smaller lots than is *anticipated* by the new SHA homes.

Several 0.11 acre lots have existing houses ranging from 1,769 SF to 2,450 SF.

At least one 0.17 acre lot has a 2,066 SF house.

At least one 0.23 acre lot has a 3,500 SF house.

(Source: RedFin)

Question #6: What happens to the existing tenants?

Response: SHA is required to make a relocation plan for every affected household, with tenant involvement in the process. There is no alteration to the status of the tenancy. The details of each household, particularly number of occupants, as well as household composition (for instance, school-aged children, accessibility needs, and size), are among the factors we will consider when relocating our tenants. There are several options that will be considered for relocation for each family.

Question #7: Why can't you keep the *single* family homes for larger families?

Response: The overwhelming majority of applicants on the wait list for SHA housing consists of families that are generally 2 or 3 people – thus a one-, two-, or three-bedroom home is the appropriate size. The SHA can fulfill its mission of housing more families from its wait list by having twice the number of smaller homes.

Also, the State has regulations governing the number of bedrooms that is appropriate for each size family. For example, the State considers a family to be “over-housed” if there are 4 bedrooms for 2 or 3 people. The SHA is obligated to comply with the regulations by striving to match our tenants with the house that is the right size for the number of people who are on the lease. As family compositions change (for example, when children move out of the house) the requirements for bedrooms change and families can become over-housed. This is the case for about 15% of our tenants, but we don’t have smaller homes for them to move into.

Question #8: Won’t affordable housing affect our property values?

Response: National and local studies and the current trends of property values show that affordable housing does not reduce adjacent property value and, in fact, adjacent properties sometimes increase in value at a higher rate than the community-wide average. *The following 3 articles summarize numerous studies on this subject.*

1) Stacy, C. & Davis, C. (2022). *Assessing the impact of affordable housing on nearby property values in Alexandria, Virginia.* Urban Institute.

<https://www.urban.org/sites/default/files/2022-04/Alexandria%20Affordable%20Housing%20Brief.pdf>

2) Center for Housing Policy (2009). *Don’t put it here!: Does affordable housing cause nearby property values to decline?* Center for Housing Policy.

https://furmancenter.org/files/media/Dont_Put_It_Here.pdf<https://doi.org/10.1016/j.jhe.2022.101838>

3) Voith, R., Liu, J., Zielenbach, S., et al. (2022). *Effects of concentrated LIHTC development on surrounding house prices.* *Journal of Housing Economics*, 56.

<https://doi.org/10.1016/j.jhe.2022.101838>

Question #9: What about the possibility of increased crime?

Response: SHA tenants are no different than any other community member, except in qualifying for public housing based on household income. They are no more prone to criminal activity than the general population. In fact, they are more thoroughly screened than private housing tenants or prospective homebuyers and are subject to annual reviews. Additionally, they must adhere to leases that are based on extensive state and/or federal regulatory requirements.

Question #10: Who is housed by SHA?

Response: Our tenants are:

- a. teachers, trades people, business owners, social workers, caregivers, retail workers, and management/administrative personnel.

- b. 85% of the current senior and disabled residents were local (most already living in Sudbury) and, 50% of our families have local connections.
- c. The average household size of families is 2.5, while the average Town-wide household size is 3 people.
- d. The average number of school-aged children per household is one, with a range of none to three.
- e. Several of our families are multigenerational.

Question #11: What is the allowable income for qualification for housing with SHA?

Response: Households with incomes at or below 80% of the Area Median Income (AMI) meet the income eligibility requirement for State public housing. The current 80% income limit is \$104,200 for a two-person household and \$117,250 for a three-person household, although most SHA households earn less than 30% of the AMI.

Question #12: Why should we build any more affordable housing in Sudbury when the Town is over the 10% requirement?

Response: The actual percentage of affordable housing units in Sudbury is about 7.5. This is because market-rate rentals at Meadow Walk and Cold Brook Crossing are included in the 10% figure. Chapter 40B allows this because part of the reasoning behind the law was to increase rentals in the suburbs, regardless of affordability.

It should be noted that the 10% figure does not represent a goal, a level that meets the need for affordable housing among the thousands of families waiting for homes; rather, 10% affordability is a requirement below which localities are penalized for non-compliance.

Question #13: If the SHA can build duplexes, why can't any developer do that?

Response: Current zoning regulations do not allow two-family houses. A developer would have to apply to the Zoning Board of Appeals for a Use Variance. The variance would not be granted unless the developer had special needs or the site presented special challenges. The only exception to this is if the application is under Chapter 40B in which case the units would have to qualify as affordable housing under state law.

Currently, any property owner in Sudbury can apply for a Special Permit to have an Accessory Dwelling Unit which is, in effect, another housing unit attached to the existing house, limited to 850 square feet or 30% of the existing structure, whichever is less. There have been four permits granted for ADU's in the general Pine Lakes neighborhood at 11 Stubtoe Lane, 19 Oakwood Avenue, 38 Birchwood Avenue and 45

Great Lake Drive. These units may be rented to unrelated people and accommodate up to four people.

In addition, any property owner can apply for a Special Permit to enlarge their home or build a new home on a non-conforming lot. In the last 5 years, the ZBA has approved the construction of two houses exceeding 3,000 square feet on non-conforming lots at 16 Oakwood Avenue and 34 Greenwood Avenue. The ZBA has also granted special permits for five additions to existing properties, ranging in size from approximately 306 square feet to 967 square feet, at 1 Pinewood, 66 Pinewood, 69 Pinewood, 14 Basswood, and 16 Basswood. The ZBA also approved a 7-foot extension and a second-floor addition on an existing garage, at 19 Oakwood Avenue.

The SHA does not anticipate that the new homes will be significantly larger than the existing footprint. The process is still in the preliminary stages and the SHA will consult with our neighbors when architectural drawings become available.

Question #14: What is a “friendly 40B?”

Response: “Friendly 40B” is a colloquial term for Local Initiative Program (LIP) projects. It can also be a traditional Comprehensive Permit application that has significant support from Town officials, housing advocacy groups, and residents.

Question #15: What is the LIP program?

Response: The Massachusetts state website defines the LIP program this way. “Local Initiative Program (LIP) is a state program that encourages the creation of affordable housing by providing technical assistance to communities and developers who are working together to create affordable rental opportunities....

LIP allows the Executive Office of Housing and Livable Communities to provide technical assistance.... The LIP may also issue a site eligibility letter for a project, a prerequisite for a developer to apply for a Comprehensive Permit.

Unlike conventional housing subsidy programs, in which a state or federal agency must approve every aspect of financing, design and construction, LIP allows most of these decisions to be made by the municipality. LIP regulations and guidelines address those program components that must be reviewed and approved by EOHLC. For example, incomes of households served, fair marketing, profit limitation and establishing long-term affordability for the units which are built.”

Question #16: How many wait lists does the SHA maintain and what are the sizes of the applicant households?

Response: The SHA is required to maintain separate wait lists for each of its four main programs. The state public housing wait list for families is the largest of the four. As of August 2024, applicants numbered over 16,000: approximately 3,800 are waiting for a one-bedroom unit; 7,500 are waiting for a two-bedroom unit; 4,500 are waiting for a three-bedroom unit; 1,100 are waiting for a four-bedroom unit.

Over the past year, the number of applicants looking for a one-bedroom unit has been trending upwards, while the number of applicants looking for larger units has been trending downwards.

Question #17: Why is the SHA conveying the properties to another entity?

Response: As a State agency, the SHA has to comply with the public procurement process in development and construction. In 2022, Governor Baker recognized that this was an expensive and cumbersome process and an impediment to building affordable housing. Therefore, Chapter 268 of the Acts of 2022 was enacted which allows housing authorities to access procurement relief by conveying the property to an affiliated non-profit or private entity for construction and related redevelopment activity. The property will still be owned and controlled by the SHA.

Question #18: Why add duplexes to an already dense neighborhood? Why not build affordable housing in other neighborhoods?

Response: The SHA is constantly looking for properties that can accommodate housing. Our first duplexes, completed in 1990, were built on Town-owned land which was transferred to the SHA. Since that time, we have sought to replicate that model. For a variety of reasons, even after a 2003 Selectmen-appointed Blue Ribbon Housing Site Selection Committee made specific, well-researched recommendations, requests for additional transfers of Town-owned properties have been consistently denied.

In light of that, the SHA has sought to increase its inventory by converting its single-family homes to duplexes. In 2012, the SHA successfully completed converting four of its single-family homes to duplexes on Great Road, Greenwood Road, and Ford Road. It also constructed a duplex on a portion of the land donated to the Housing Authority on Landham Road. We have recently explored development of a new complex on Nobscot Road but had to abandon the idea because it was too expensive. (The unused amount of the allocation of Community Preservation Act funds for this proposal will be reverted to the CPA General Fund at the next Town Meeting.) We explored the possibility of building homes at Frost Farm where the old farmhouse stood, but decided it was not an appropriate site for family housing. The SHA is not targeting the Pine Lakes neighborhood, but is expanding the use of real estate owned by the SHA in an effort to fulfill our mission and provide homes for four more families seeking housing.

The lack of affordable housing is a Town-wide, state-wide, and national problem. The mission of the Housing Authority is to provide safe and affordable housing to as many people as possible. The Town-wide Housing Production Plan has set goals which include diversifying the housing stock from single-family to two-family houses. The SHA is sure that it will be able to accommodate both the concerns of its neighbors and provide homes for four more families.

Question #19: Why doesn't the Sudbury Housing Trust buy the properties from SHA and keep them as single-family homes?

Response: The mission of the SHA and the SHT is to increase the number of affordable housing opportunities in Sudbury. If the SHT bought these houses, there would be a decrease in affordable rental units (for which there is a greater demand) and no net increase in the number of affordable housing units in town.

Question #20: In the initial application to the EOHLC, the estimate to rebuild the four houses was \$3,520,000. That figure was then increased to \$4,182,005. What happened?

Response: SHA's development consultants received updated information regarding the cost of the modular construction that resulted in revising the estimated cost. The proforma will be refreshed periodically as the project progresses.



Please note that the SHA looks forward to an ongoing dialogue with the Pine Lakes residents and broader community. The answers contained here are our best effort to respond to questions raised to date. *We anticipate updating this document regularly. Please note that the responses are from the Board of Commissioners of the Housing Authority and as such can only be debated at their monthly open meetings.*

Dated: August 14, 2024