

LANCASTER AFFORDABLE HOUSING TRUST

Prescott Building
701 Main Street - Suite 2
Lancaster, MA 01523

March 23, 2022

Ms. Chris Kluchman, Deputy Director
Community Services Division
MA Department of Housing & Community Development
100 Cambridge St #300, Boston, MA 02114

Re: Draft Guidelines for Multi-Family Zoning Requirement for MBTA Communities

Dear Chris,

The Lancaster Affordable Housing Trust respectfully submits this public comment regarding the draft guidelines for the Multi-Family Zoning Requirement for MBTA Communities of the new Section 3A of MGL c. 40A.

The Trust recognizes the need for increased multi-family housing production to improve supply scarcity and inaccessible pricing, economic development, carbon footprint reduction, and land conservation. We respectfully suggest the following three amendments to the draft guidelines to further improve the proposed guidelines.

- (1) Please include an affordability component to address income disparities and housing accessibility in Massachusetts.** Based on the chart “MBTA Communities - Cohort Designations and Capacity Calculations” found at <https://www.mass.gov/info-details/multi-family-zoning-requirement-for-mbta-communities>, Lancaster is an MBTA adjacent community with 2,788 housing units per the 2020 Census PL-94. Like many towns, our local zoning requirement is for a minimum of 750 units and 50 acres. Despite this greatly increasing our housing supply by 27%, the new legislation is silent on affordable units. We understand the choice of requiring affordable units is being left to local bylaws. However, this is an important missed opportunity that will leave many communities significantly further behind in achieving Subsidized Housing Inventory

compliance. Although Lancaster adopted Inclusionary Zoning in 2021, many impacted communities will simply not have time before the new legislation takes effect.

(2) Please include an incentive for public transit connections to further the new legislation’s goal of compact, transit-oriented housing. This is especially important in less dense MBTA Adjacent Communities outside the Boston/MetroWest core where the MBTA Community’s transit hub may be miles away. This could be accomplished by regional bus networks, ride-share programs, and other transit-connected means.

(3) Please adopt uniform definitions between housing initiatives. Section 2 “Definitions” in the current guidelines states on page 2 “ ‘multi-family housing’ means a building with 3 or more residential dwelling units or 2 or more buildings on the same lot with more than 1 residential dwelling unit in each building.” However, the 40R program, which also prioritizes compact residential development, defines multi-family housing at 4 or more residential dwelling units per structure. Similarly, the definition used to calculate existing housing units differs between the multi-family requirement chart on the MBTA Multi-Family Zoning website and that used for tracking local Subsidized Housing Inventory in Massachusetts. It would greatly simplify housing efforts in local communities if the definitions and data sets were more uniform across state programs.

Thank you for the opportunity to comment, and all of your efforts to provide housing solutions throughout Massachusetts.

On behalf of the Lancaster Affordable Housing Trust and its Members,



Victoria Petracca, Chair

cc: Russ Williston, Chair, Lancaster Planning Board

Jasmin Farinacci, Director, Community Development and Planning, Town of Lancaster