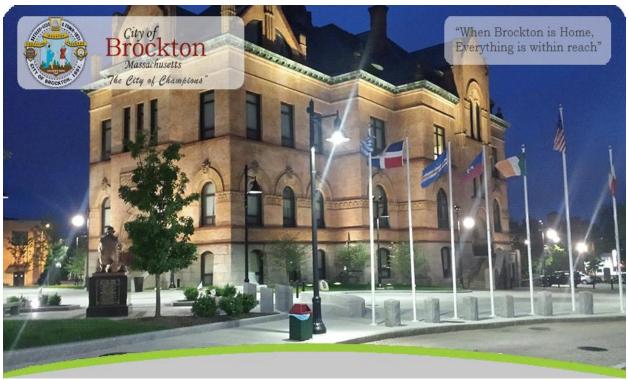
Housing Strategy Plan

City of Brockton, Massachusetts



City of Brockton, Massachusetts

Prepared for City of Brockton

By
The Old Colony Planning Council

NOTICES

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The *City of Brockton Housing Strategy Plan* was prepared by the following members of the Old Colony Planning Council staff under the direction of Pasquale Ciaramella, Executive Director.

REPORT PREPARATION

Laurie Muncy, Principal Comprehensive Planner lmuncy@ocpcrpa.org

James R. Watson, AICP, Comprehensive Planning Supervisor

Eric Arbeene, Community Planner

Shawn Bailey, Transportation Planner

Lisa Sullivan, Senior Planner

Anthony Hebert, Planning Intern

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Office of the Mayor, City of Brockton

Honorable William Carpenter, Mayor

City of Brockton Planning Department

Rob May, Director of Planning and Economic Development



Old Colony Planning Council (OCPC)



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OCPC Staff

Pasquale Ciaramella	Executive Director
Janet McGinty	Fiscal Officer
Patrick Hamilton	AAA Administrator
Lila Burgess	Ombudsman Program Director
Jane Selig	Ombudsman Program Assistant
Laurie Muncy	Principal Comprehensive Planner
Lisa Sullivan	Senior Planner
Jimmy Pereira	Community/ Transportation Planner
Bruce Hughes	Economic Development/ Community Planner
Andrew Vidal	GIS Manager/ Communications and IT Specialist
Charles Kilmer, AICP	Assistant Director/ Transportation Program Manager
Paul Chenard	Senior Transportation Planner
Raymond Guarino	Senior Transportation Planner
William McNulty	Senior Transportation Planner
Kyle Mowatt	Transportation Planner
Shawn Bailey	Transportation Planner
Anthony Hebert	Planning Intern

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I. Executive Summary

The City of Brockton has made significant progress in providing affordable housing opportunities for its residents, now well past the state's affordability goal of 10% of its year-round housing stock, at 13% as of September 14, 2017. Despite this level of affordability, City officials and other housing stakeholders recognize that additional housing is needed to address still unmet community housing needs. These officials have also identified some notable shifts in the local housing dynamic. For example, housing

In Brockton, 21.9% of households are extremely low income, 15.7% of households are very low income and 18.35% of households are low income. This means that 55.95% of all Brockton households qualify for federal and state affordable housing programs based on household income. Households that spend more than 30% of median income on housing are "cost burdened" and those that spend 50% or more of median income on housing are "severely cost burdened." Areas where more than 30% of households are cost burdened face an affordable housing shortage. In Brockton, 24.5% of households are cost burdened and 23.61% of households are severely cost burdened. Of the 32,865 Households residing in Brockton, 13.91% of property owners are cost burdened and 10.75% are severely cost burdened. Of the Households that are property renters, 10.14% are cost burdened and 12.87% are severely cost burdened.

prices have been increasing and are now close to surpassing pre-recession levels, thus widening the gap between housing price and what residents can afford. This widening affordability gap has caused many households to pay far too much of their income on housing costs, whether it is for rental or homeownership.

There has also been a significant resurgence of developer interest in residential development, particularly in or near the Downtown. While this new investment can certainly be viewed as a positive sign of Brockton's growing economic health and a strengthening housing market, it also suggests a heightened need to proactively guide new development to appropriate locations and target populations.

The City has therefore embarked on a process to prepare this Housing Strategy Plan that will document current and growing priority housing needs, assess current housing regulations and partnerships, and identify new or modified strategies to address unmet housing needs, while also recommending how the City can strategically invest its local resources in its future housing agenda. The establishment of an Affordable Housing Trust will assist the City in managing the implementation of this new Housing Plan in coordination with other City departments, boards and committees, as well as other important housing stakeholders such as the Brockton Housing Authority, non-profit developers and service providers, and for profit development companies.

This Housing Strategy Plan has been prepared in accordance with the Massachusetts Department of Housing and Community Development guidelines and provides a framework and strategy to guide its housing policies and plans to increase the production of affordable housing in Brockton over the next decade (2018 - 2028). A summary of key demographic, housing stock, and affordability data, as well as an overview of the goals and strategies, are contained therein.

II. Introduction

A. History of Housing Development in Brockton Early History

The development of housing in the City of Brockton followed the familiar pattern of most turn of the century industrial cities in the northeast. The factories, mills and manufacturing buildings were built next to transportation corridors, commonly rivers or railroad lines. Housing for the hundreds and then thousands of employees needed to work in these mills and factories was built as close as possible to these work sites. Multi-family wooden structures on small individual lots were built in record time. This period of housing development was dominated by low-cost Victorian architecture, most notably the triple-



decker, an ingenious form of housing that allowed for good light and ventilation, ample space, and frequent carpentry artistry. Sometimes triple-deckers were constructed as pairs in one structure allowing for even greater density. Triple-deckers became New England's main form of tenement that produced significant density prior to the era of elevators and high rises.

As the Industrial Revolution progressed and horse-drawn carriages were replaced with trolleys, housing began to spring up further away from the places of employment. As transportation moved outside of the inner city, so did the commercial corridors and new housing. This housing was built in subdivisions of former farmland, most typically single family or two-family dwellings. The depression of the shoe industry in the 1950s signaled changes for Brockton. The slump in the local economy forced some businesses out of the Downtown and a significant number of residents left Brockton for employment elsewhere. Like many other older industrial

cities, Brockton's leaders needed to focus on diversifying the economic base from primarily industrial and manufacturing to include new opportunities in the service industry.

Up until the mid-1950s much of Brockton remained predominantly rural with a population of approximately 62,000. The 1960s saw a surge in development activity, and the City became more urban and suburban in nature. During this time, many of the more outlying areas of the City were developed, largely populated by former residents of Boston in search of affordable housing. An example of such development is the 7,500 units of what is referred to as the Campanelli Homes, featuring small, single-family ranch homes on concrete slab





foundations. Typically, the type of housing that was built in these more peripheral areas of the city strongly resembled the housing available on the other side of the City borders such as Stoughton, Holbrook, or West Bridgewater. This high number of newer housing units has affected federal funding formulas, resulting in lower allocations committed to Brockton compared to other cities in the Commonwealth of comparable size.

Beginning in the 1970s, federal and state funds also supported the development of

affordable public housing for elderly and handicapped families. A significant number of these new developments were built along the Oak Street corridor, and others were nestled among the relatively stable single and two family home neighborhoods throughout the city. These developments added more than 2,000 units to the housing stock of Brockton, focusing on residents earning up to 80% of the area's median income. The continued affordability of many of these developments is in jeopardy today, as the owners have the ability to prepay mortgages and convert the units to market rentals.

Recent History

As the economy continued to do well in metropolitan Boston and housing prices soared during the 1980s,

greater numbers of Boston residents transplanted themselves to Brockton. In the 1980s the population increased above 95,000 and population densities increased from 3,390 persons per square mile in 1960 to 4,421 in 1980. Some families were drawn to Brockton as a place to purchase their first home and raise families. However, Brockton did not realize many of the large economic gains that occurred in other parts of the state, and moreover was badly stung by the recession that followed. A serious water crisis also prompted water connection moratoriums that further exacerbated Brockton's economic woes.

Development ground to a virtual halt.



Brockton's economy continued on a downward trend during the late 1980s and early 1990s. During this time Downtown Brockton and some of the surrounding neighborhoods became increasingly blighted by vacant and boarded up buildings, unsightly vacant lots, and rampant crime. Families who could not afford to remain in other areas of the Commonwealth were increasingly drawn to Brockton because of its lower housing costs, good transportation system, and excellent social service network.

The City of Brockton's primary response to widespread disinvestment and housing deterioration was to demolish buildings for health and safety reasons and a lack of resources to make them habitable. More than 400 buildings were torn down between 1996 and 2001, primarily in the older, denser neighborhoods

rimming the Downtown. Some unscrupulous landlords who let their properties lapse into disrepair conspired with other landlords to "flip" their properties to capture inflated values, further exacerbating housing problems. Also at this time, many of the Brockton Housing Authority's projects and other publicly financed, multi-family developments began to face greater strains, showing more wear and tear, and frequently required the intervention of the local police.

In the mid to late 1990s, Brockton's economy began to rebound due largely to several critical



developments. First, the state's restoration of services along the Old Colony rail line gave Brockton three commuter rail terminals, bringing commuters within thirty minutes of Boston's South Station and linking City residents to other areas along the system. Second, Brockton opened a \$4 million bus terminal at the edge of the Downtown to further reinforce the local transportation network. Third, a new \$35 million District Court House, as well as a new federal office building, were built on Main Street with the hope they would further anchor the Downtown area. Progress was made in other important areas including the

success of the city's economic development agency, and the 21st Century Corporation, in drawing new businesses into the area and promoting existing business to grow in Brockton; and the continued investment and success of the Brockton Public School System.

Economic Recession and Present Conditions

This economic turnaround had a significant impact on housing in Brockton. In this time period, the city saw increasing home values, particularly among single-family homes, which saw there median sales price increase from \$71,500 in 1995 to \$144,500 in 2001. Construction of new homes and subdivisions began once more in the City but not in a high enough volume to make up for the units that were lost or demolished in the Downtown area years earlier. The result was an increasingly tight rental supply and an increase in the cost of rental apartments. Unfortunately, housing quality did not keep pace with housing prices, and much of the rental stock was under-maintained and in need of significant repair.

For much of the 2000s, Brockton's housing market steadily improved as housing prices increased. Brockton's housing stock was also on the rise; however when the recession of 2009 hit much of the progress from the past decade was lost. The recession hit Brockton's economy very hard and dealt a significant blow to the housing market; Brockton had one of the highest home foreclosure rates in the state during the worst of the recession through 2009 and 2010. Brockton's housing market has been recovering from the recession ever since and home prices have rebounded or surpassed pre-recession levels by 2017. City leaders are now turning their attention to, among other things, the issue of housing and how to best address the concerns of the citizenry, while planning for the future housing needs of the city. Mayor Carpenter has initiated the process to create a new Master Plan for the City of Brockton; a key aspect of which being housing and the strategies the city can adopt to improve it.

In the past decade Brockton has seen a handful of new housing developments built, mostly through the Downtown area of the city. New apartment construction took off in 2006 and, although slowed significantly during the worst of the recession, is once more resuming with new building projects in the works. Some of the new apartment buildings built in recent years include the SoCo apartments on 147 Centre Street and 146 Court Street, Station Lofts, Enterprise Block, and Standard Modern Printing blog Project. There are also plans to build additional apartment buildings under the *Downtown Brockton Urban Revitalization Plan*, including converting the Brockton Furniture Building on Montello Street into a housing complex. These new apartment buildings in the Downtown are improving economic and living conditions in the area and making use out of the many older shoe factories that lay vacant. The addition of

these new apartments has helped relieve some of the pressures for low income and middle class housing the city was in much need of in the late 1990s and early 2000s.

This section on the history of housing development in Brockton was adapted from the original 2002 Housing Strategy Report*



III. Research & Outreach

A. Demographic Data

Section One: Population Trends

Brockton's population is relatively stable with periods of slight decline in the past decade, and a projected slight decline compared to the greater growth in the less developed surrounding communities. The outlying growth can be expected to reflect local natural increase as well as in-migration from older, more densely developed communities.

The 2010 census data reports Brockton as having a population of 93,810, which is down 0.5% from the 94,304 of 2000. However, data from recent years has shown this trend reversing and the population increasing with an estimated 94,532 persons living in the City (up 0.2%) in 2015. In contrast, the Old Colony region grew by 3.9%, from 2000 to 2010. The City is projected by MassDOT to grow from 93,810 to 96,651 (up 3.0%) by 2020 and to 98,536 (up 1.9%) by 2030; assuming sufficient housing stock, with projections showing a decline to 97,886 (-0.6%) by 2040.

The reason for the drop is not stated. It most likely comes from allocating the slow growth projected for the region to individual communities, and does not reflect on the community's expected holding capacity.

In contrast Mass DOT expects the OCPC region to grow from the 362,406 in 2010 to 375,667 (up 3.6%) by 2020, and to 387,204 (up 3.1%) by 2030. For comparison, the 2000 EOEA build-out analysis for Brockton projected a 2005 to 2010 population drop from 87,261 to 85,944, with a potential ultimate buildout under present regulations of 105,889. The actual results will depend on available land and infrastructure capacities (especially sewer and water) and influence of population movements.

Recent redevelopment projects, the conversion of vacant mill space to housing, and intensified local development patterns have expanded residential areas. In addition, the city has been making progress with both water and sewer capacities between the availability of Aquaria desalinated water and the upgraded waste water treatment plant, though the latter is subject to discretionary regulatory decisions.

Table 1 Total Population

	1990	2000	2010	2020	2030	2040
Brockton	N/A	94,304	93,810	96,651	98,536	97,886
OCPC	296,864	348,927	362,406	375,667	387,204	388,458
Region						

Source: US Census & MassDOT in 2016 OCPC CEDS Report

Section Two: Population Age & Growth

What is notable in the city's age mix compared to the OCPC region is the expansion in the 20 to 34 year old family-forming age range, 20.6% vs.14.8 % for the region. This supports the expected population growth from both in-migration and natural increase. At the same time, the population over 40 is slightly less than that in the region, suggesting slower growth of the Boomer population and slowing local demand for elderly housing, and a future growth in need for workforce housing. Similarly, the city's median age of 36.7 is lower than that of the region or the state. This contrast may reflect the in-migration of a relatively young population.

Table 2 Age Mix / % in 2010

Ages/ Community	0- 4	5- 9	10- 14	15- 19	20- 24	25- 34	35- 44	45- 59	60- 64	65- 74	75- 84	85+	Median Age
Brockton	7.3	6.2	6.9	7.5	7.34	13.3	13.6	20.5	5.0	6.4	3.7	1.7	36.7
OCPC Region	5.4	6.3	7.3	7.3	5.7	9.1	14.3	23.6	6.1	7.5	3.9	1.6	41.2
Mass.	5.6	5.9	6.2	7.1	7.3	12.9	13.6	41.0	5.70	6.9	4.6	2.2	39.1

Source: 2010 American Factfinder/ACS

Table 3 Age Progression 2000 - 2015

Ages/ Brockton	0- 4	5- 9	10- 14	15- 19	20- 24	25- 34	35- 44	45- 59	60- 64	65- 74	75- 84	85+	Median
2000	7.3	8.0	8.2	7.1	6.4	14.6	15.9	17.2	3.6	5.8	4.27	1.7	34.0
2010	7.3	6.9	6.9	7.5	7.0	13.3	13.6	18.2.	5.0	6.4	3.7	1.8	35.9
2011-2015	7.4	7.2	6.7	7.2	6.7	13.3	12.9	20.2	5.3	7.0	3.8	2.1	35.9

Source: 2010. 2011-2015 American Factfinder/ACS

The Baby Boomers born between 1946 and 1964 are now between 53 and 71 years old and their needs have long dominated studies of housing and other social issues.

Their progression through age groups can be seen in the increases in the 45-59, 60-64, and 65-74 year old groups from 26.6% in 2000 to 29.6% in 2010 and an estimated 32.5% by 2015, while the 75+ group went from 5.97% to 5.5% to 5.9%. At the same time the younger group's share of the growing population fluctuated in proportion to the growing share of the older population. In terms of absolute numbers, the period showed the following:

Table 4 Distribution of Age Groups in Brockton in 2016

Ages/ Brockton	0-9	10-19	20-34	35-44	Total < 45	45-59	60-74	75-84	85+
2000	14,368	14,463	19,798	15,027	63,656	16,209	8,909	3,984	1,573
2010.	13,275	13,510	19,052	12,752	64,598	19,336	10,687	3,545	1,651
2011-	13,864	13,125	18,937	12,216	58,142	19,056	11,692	3,629	2,013
2015									

Source: 2010 American Factfinder/ACS /in OCPC CEDS, 2016

The pattern is still one of growth in the ages over 44 and of decline in the earlier years. But it remains that 2015 has an estimated population under 45 of 58,142, and a population over 44 of 36,390. Thus the "post Boomer" population is not insignificant and its needs should be acknowledged and addressed.

Section Three: Racial/Ethnic Patterns

The city accommodates a large proportion of the region's minority population with 49,989 persons (53.3%) out of Brockton's 93,810 self-identifying as other than "White alone" in 2010, compared to 67,337 (18.5%) of the 362,406 persons in the entire OCPC region. Thus the city has 74.2% of the region's "non-white" population, and the non-white population drops off greatly as you cross into adjacent communities. The 49,989 was a 37.6% increase over the 36,315, which was 38.5% of the population in 2000. What is noticeable on the city's population map is that every part of Brockton has some minority population yet no area is dominated by a minority population. Also every community in

the region has at least some minority population making this part of the state much less segregated than some other metropolitan areas.

Table 5 Racial Distribution 1980 - 2010

	1980	1980	1990	1990	2000	2000	2010	2010	2015	2015
	#	%	#	%	#	%	#	%	#	%
White	87,422	91.9%	74,449	80.2%	57,989	61.5%	43,821	46.7%	38,795	41.0%
Black	4,929	5.2%	12,028	13.0%	16,811	17.8%	29,276	31.2%	36,484	38.6%
Hispanic*	2,032	2.1%	5,860	6.3%	7,552	8.0%	9,357	10.0%	3,301	3.5%
Asian	566	0.6%	1,589	1.7%	2,066	2.2%	2.151	2.3%	1,919	2.0%
Other	2,255	2.4%	4,722	5.1%	9,886	10.5%	18,574	19.8%	14,033	18.4%
Total	95,172	100%	92,788	100%	94,304	100%	93,810	100%	94,532	100%

Source: US Census in 2016 OCPC CEDS Report

Section Four: Education

Table 6 Educational Attainment of Population 25 or Older (2015)

	Less than High School	High School Graduate or GED	Some College	Associates Degree	Bachelor's Degree	Graduate or Professional Degree
Brockton	19.1%	34.1%	20.3%	8.4%	12.4%	5.3%
Plymouth County (2014)	7.7%	24.0%	19.0%	9.9%	22.1%	10.1%
Massachusetts (2014)	10.2%	25.4%	19.0%	7.7%	22.8%	17.7%

Source: American Fact Finder 2011-2015

Table 6 shows the educational achievement of adults 25 or older in the City and in the region. In 2015, 19.1% of Brockton residents had not finished high school, while 34.5% had done so, 20.3 % had some college education, 8.4% had an Associate's degree, 12.4% had a Bachelor's Degree, and 5.3% had a graduate or professional degree. As can be seen on the table, a higher proportion of city residents had attained only a high school diploma or had only some college compared to the county or the state. However, slightly fewer had associates degrees than in the county but more than in the state, and only about half as many had bachelors, graduate, or professional degrees than in the county, and even fewer compared with the state.

^{*} Note: The Hispanic population is not counted separately in the totals since this cultural rather than racial group can be of any race and is already in the respective race totals.

What this does not indicate is the degree of training in independent or public technical- vocational school or apprenticeship programs, which can significantly increase the skills and earning capacity of graduates and thereby lessen the need for housing assistance.

Section Five: Employment Patterns

Brockton's employment patterns are quite similar to those of the county and state, with the differences reflecting its role as a sub-regional center for trade and services. Thus it exceeded the county and state in wholesale and retail trade, transportation, warehousing and utilities, educational, health care and social assistance services, arts, entertainment, recreation, and food services; and other services. It remained ahead of the county but behind the state in manufacturing. The biggest gap was in the highly paid professional, scientific management group. As of the 2011-2015 American Community Survey, only 9% of the population worked in manufacturing compared to 15.9% in wholesale and retail trade and 29.4% in the typically modest paying educational, health care, and social assistance sectors as shown in table 7.

Table 7 Employment Patterns

Employment in Brockton, Plymouth County, and Massachusetts 2011-2015	Brockton		Plymouth County	Massachusetts
Sector	Number	%	%	%
Agriculture, forestry, fishing hunting and mining	177	0.4%	0.5%	0.4%
Construction	1,694	4.0%	6.8%	5.4%
Manufacturing	3,845	9.0%	7.2%	9.2%
Wholesale trade	1,268	3.0%	2.8%	2.4%
Retail trade	5,502	12.9%	12.4%	10.8%
Transportation, warehousing and utilities	2,170	5.1%	4.6%	3.6%
Professional, scientific, management, administrative and waste management services	3,742	8.8%	10.9%	13.2%
Educational, health care and social assistance services	12,552	29.4%	25.3%	27.9%
Arts, entertainment recreation, accommodations and food services	4,129	9.7%	9.5%	8.8%
Public administration	1,653	3.9%	4.7%	4.0%
Other services	2,466	5.8%	4.4%	4.4%

Source: American Factfinder/American Community Survey 2011-2015

Labor Force Participation

Typically "working-age persons" is defined as people between the ages of 16-64. People in those age groups who are not counted as participating in the labor force are typically students, homemakers, non-civilians, institutionalized people, and persons under the age of 64 who are retired.

In the United States the labor force participation rate is usually around 67-68%, but this figure is thought to have declined modestly in recent years. There are more job openings in America today than at any point since the Bureau of Labor Statistics first started tracking vacancy data back in December 2000. Yet the percentage of adult Americans working or actively looking for a job stands at about 62.2% (2015), the lowest in nearly four decades. America's labor force participation reflects changing demographics as well as the results of policies that may have yielded unintended results. The participation rate of so-called prime age workers (those between 25 and 54 years old) has slipped in recent years. This is an age bracket that has mostly completed educational requirements and isn't yet retiring, so prime age down-ticks are difficult to explain. Prime age workers that left the labor force do not seem to be coming back, which creates a problem in terms of their own earning capacity, but for the country as well.

The Baby Boomers have aged and are now retiring in large numbers, that exodus has dragged (and will continue to drag) on the country's overall participation rate. That explains some of the drop in labor force participation, the second factor is education and staying in school longer. Younger people are opting to educate themselves rather than work and can be out of the labor force for 5-7 years for post-secondary education.

In Table 8 there are the labor force particiaption numbers and unemployment rates for the City of Brockton over the course of the 2017 year. Of particular interest is the narrowing gap between the total labor force and number of persons employed (labor force = total number of employered and unemployed persons of working age). Brockton's unemployment rate has seen a steady decline since January of 2017 and by December of 2017 was at 4.1%; 1.2% lower compared to the start of the year. This drop in unemployment follows the statewide pattern as the rates have also been on the decline in the Commonwealth. Brockton's unemployment rate remains higher than the statewide average however the gap between the two is not as significant as seen in years past. Lower unemployment in th city points to improving economic conditions and if Brockton can keep its unemployment rate around 4.0% or lower, the economic health of the city should continue to improve.

Table 8 Brockton Labor Force and Unemployment Rates

Month	Labor Force	Employed	Unemployed	Area Rate	Mass. Rate
January	47,021	44,531	2,490	5.3%	4.0%
February	47,738	45,119	2,619	5.5%	4.2%
March	48,210	45,682	2,528	5.2%	3.9%
April	48,592	45,996	2,596	5.3%	3.8%
May	48,410	45,597	2,813	5.8%	4.1%
June	48,459	45,481	2,978	6.1%	4.4%
July	48,685	45,518	3,167	6.5%	4.4%
August	48,128	45,426	2,702	5.6%	3.7%
September	47,462	45,074	2,388	5.0%	3.5%
October	47,215	45,072	2,143	4.5%	3.3%
November	47,308	45,209	2,099	4.4%	3.3%
December	47,246	45,308	1,938	4.1%	3.1%

Massachusetts Department of Unemployment Insurance

Section Six: Income Levels

As of 2011-2015, Brockton's median family and household incomes of \$56,679 and \$47,557 respectively, were far behind the comparable state and county levels as shown in Table 9 below. In each case, the mean (average) incomes reflect a few upper income households that were higher, at \$68,224 and \$60,272 respectively. County-wide and state-wide incomes had similar patterns but at higher levels. Incomes vary widely within the city, being highest on the west side, lower but very varied incomes on the east side, and the lowest along the central corridor along Main Street and Warren Ave. At the same time the median family income of \$56,679 was nearly twice that of non-family households (\$29,385) many of whom were persons living alone.

The household income distribution in the city is shown in table 9, while the regional comparisons follow.

Table 9 Comparative Incomes, 2011 - 2015

Comparative Incomes 2011- 2015	Median Household Income	Mean Household Income	Median Family Income	Mean Family Income
Brockton	\$47,557	\$60,272	\$56,679	\$68,224
Plymouth County	\$75,459	\$97,204	\$91,720	\$113,082
Massachusetts	\$68,563	\$94,143	\$87,085	\$112,945

Source: American Fact Finder/ ACS 2011-2015

The city's 2015 estimated median household income of \$47,557 is 54.6% of the most recent Area-wide Median Income (AMI) of \$87,100. The city's incomes are well below the surrounding communities, which differ greatly between themselves. In any case, the City's median income is well below the 80% Low Income threshold of \$69,680. However it is above the 50% and 30% thresholds required for admission to assisted units reserved for very low and extremely low income households. The key thresholds and the proportions of the affected residents are shown in table 10.

Table 10 Proportions of Brockton's Low, Very Low, and Extremely Low Income Populations

Median Household Income	\$87,100	Percentage

Low income <80% of median	<\$69,680	55.0%
Very low Income <50% of median	<\$43,550	49.9%
Extremely Low Income < 30% of median	<\$26,130	28.8%

Source: Calculated from ACS income data

It is notable that the proportion of the population with a Very Low Income (49.9%) is just slightly below that with a Low Income (55.0%) This means most of the low income population is really in the very low income category. The detailed distribution of household incomes follows.

Table 11 Distribution of Household Incomes

Income/Benefits 2015	Brockton	Brockton	Plymouth County	Plymouth County	Mass.	Mass.
2013	#	%	#	%	#	%
<\$10,000	2,849	8.7%	7,928	4.4%	155,390	6.1%
\$10,00-\$14,999	2,356	7.2%	6,652	3.7%	131,036	5.1%
\$15,000-\$24,999	3,883	11.9%	13,328	7.3%	217,314	8.5%
\$25,000-\$34,999	3.086	9.4%	13,639	7.5%	196,102	7.7%
\$35,000-\$49,999	4,893	14.9%	18,787	10.4%	266,140	10.4%
\$50,000-74,999	5,835	17.8%	29,796	16.4%	402,960	15.8%
\$75,000-\$99,999	4,164	12.7%	25,217	13.9%	317,568	12.5%
\$100,000-\$149,999	3,935	12.0%	34,212	18.9%	429,874	16.9%
\$150,999-\$199,999	1,252	3.8%	16,232	8.9%	206,541	8.1%
>\$200,000	511	1.6%	15,634	8.6%	226,796	8.9%
Median	\$47,557		\$75,459		\$68,563	
With cash Public	2,288	7.0%	5,424	3.0%	76,066	3.0%
Assistance						
With Food	8,881	27.1%	19,314	10.6%	319,009	12.5%
Stamp/SNAP in past						
12 months	22.7.1		101 107		2.7.10.721	
Total Households	32,764		181,425		2,549,721	

Source: American Community Survey 2011-2015

Table 12 Income Trends 2000 - 2015

Income/Benefits	Brockton 2000	Brockton 2015
	%	%
<\$10,000	12.0%	8.7%
\$10,00-\$14,999	7.8%	7.2%
\$15,000-\$24,999	12.4%	11.9%
\$25,000-\$34,999	12.2%	9.4%
\$35,000-\$49,999	16.7%	14.9%
\$50,000-74,999	20.7%	17.8%
\$75,000-\$99,999	10.4%	12.7%
\$100,000-\$149,999	6.0%	12.0%
\$150,999-\$199,999	1.4%	3.8%
>\$200,000	.5%	1.6%
With cash Public	5.6%	7.0%
Assistance		
Total Households	33,672	32,764

Source: American Community Survey 2000, 2015

This data indicates that Brockton residents have a lower median household income than the county or the state, and the residents are more than twice as dependent on public assistance or Food Stamps/SNAP benefits as residents of either the county or state. The 2000 to 2015 Income Trends also shows that the generally increasing income level as the proportion of households making under \$74,999 dropped from 2000 to 2015, while the proportion making more than \$75,000 increased. Adjusted for buying power, the difference in constant dollars would not be as great except for those with long-term fixed rate mortgages and other debt, which would become increasingly affordable.

Poverty

A greater indicator of need than median and mean incomes is the proportion of families earning less than the current Federal poverty levels. As of 2011-2015, 18.6% of all people in Brockton and 15.8% of all families were under the poverty level, as were 24.0% of all families with related children under 18 years old, 30.7% of female headed families, and 39.5% of all female headed families with related children under 18.

These poverty levels greatly understate probable hardship since the 2017 Guideline of \$24,300 for a family of four in the contiguous 48 states is far below actual needs. The moderate Brockton area fair market rent for two bedrooms, \$1,158, would cost \$13,898/year or 57.2% of the total budget, well beyond the recommended 30% of income for housing, and leave only \$10,402 for all other family expenses. However the comparison helps to make sense of the range of deprivation between different communities and household types.

Table 13 Levels of Poverty





People served from
40+ cities & towns
across Southern Massachusetts



permanent, supportive housing units managed by FBMS 500 Veterans Served



400+ CHILDREN PROVIDED

EMERGENCY SHELTER

230,000 MEALS SERVED AT TWO INDIVIDUAL SHELTERS

Comparative Incomes 2011- 2015	% all persons < poverty level	% Families < poverty level	% families with children < 18	% female headed households	% female headed households with children<18
Brockton	18.6%	15.8%	24.0%	30.7%	39.5%
Plymouth	8.2%	5.9%	9.7%	20.2%	28.7%
County					
Massachusetts	11.6%	8.2%	13.1%	25.5%	35.3%

Source: American Fact Finder/ ACS 2011-2015

In all, the income, poverty levels, and public assistance dependency indicate a continuing need for low cost and affordable housing along with programs to raise incomes and increase family self-sufficiency. This data also suggests the need for "Workforce Housing" for households making no more than 20% of the median (\$104,520).

Section Seven: People with Disabilities

Understanding the needs of Brockton's disabled population is crucial in planning for their housing. There were 13,813 persons or 14.8% of the population of 93,441 with a disability in 2011-2015, of which 7,674 (55.6%) were between 18 and 64 years old and 4,681 were over 65 years old. The most common disability was ambulatory causing serious difficulty in walking or climbing stairs, affecting 6,864 people (7.9%), including 3,164 people over 65. The next most common difficulties were cognitive, 6,448 (6.9%), Independent living, 5,197 (5.6%), self-care, 2,901(3.1%), and vision, 2,182 (2.3%); some people have more than one disability, so that the values total more than the number of disabled people.

Some of the limitations, such as with mobility, can be relieved by handicapped access and accommodations design, with warning lights and signals, and by placement in ground floor units. These needs may require supportive services. Congregate units with such services may be appropriate for some of the younger disabled population. Other people may have behavioral and emotional problems requiring appropriate supportive/protective shelter in public housing or in an institutional setting.

Section Eight: Homelessness

The count of the homeless is difficult since the population is often transient. *The Brockton /Plymouth County Continuum of Care* seeks to measure homelessness and to identify needed actions. The annual January Point in Time Survey concentrates on the larger communities with major shelters, such as Brockton and Plymouth and therefore may under count the homeless in smaller communities.

The 2010 Brockton and Plymouth County Point in Time Surveys found 870 homeless people including 655 family members, 226 family households, and 215 individuals. In recent years the state's Home Base program has worked to get people out of shelters and motels and into permanent housing thereby reducing the overall number.

Another indicator of homelessness is the experience of the three family shelters in Brockton operated by the Old Colony YMCA. These have a capacity for 60 families and are always full. In addition, the MainSpring Shelter for men has capacity for 120 and is full during the cold weather months.

B. Housing Data

<u>Section One</u>: Distribution of Household Types

What is noticeable is the city's decline in population and households from 2000 to 2010 and the subsequent predicted growth to 2030, and then slight decline in population to 2040. This can make small area populations very sensitive to housing supply ("if you build it…") at the same time that projection might be used to predict needs over a larger area. During this period:

- Female headed households with no husband present grew from 6,693 to 7,435 and those with children younger than 18 grew from 4,203 to 4,419.
- Husband-wife family households dropped from 14,148 to 12,796 (minus 9.5%)
- The average local household grew from 2.74 to 2.76 persons and the average family grew from 3.35 persons to 3.37 persons. This is counter to the commonly noted general decline in household sizes, but may reflect the typically younger minority families who are a growing portion of the city's population.
- Households including people over 65 grew from 7,820 to 8,318

Table 14 Household Types in Brockton 2000 - 2010

	2000 #	2000 %	2010#	2010 %	Change 2000- 2010 #	Change 2000- 2010 %
Family households	22,748	67.6	22,479	67.5%	-269	18%
Husband-wife	14,148	42.0	12,796	38.4%	-1,352	-9.5%
With children < 18	6,702	19.9	5,641	16.9%	-1061	-15.8%
Male Householder, no wife present	N/A	N/A	2,248	6.8%	N/A	N/A
With children < 18	n/a	n/a	1,002	3.0%	N/A	N/A
Female householder	6,693	19.9	7,435	22.3%	+742	+11.1%
no husband present						
With Children < 18	4,203	12.5	4,419	13.3%	+216	+5.1%
Non-family	10,927	32.4	10.824	32.5%	-103	-0.9%
households						
Householder alone	8,950	26.6	8,995	26.9%	+45	+0.5%
Householder > 65	3,191	9.5	3,244	9.7%	+53	+1.7%
Households with individuals < 18	13,171	39.1	12,772	38.4%	-399	-3.0%
Households with individuals > 65	7,820	23.2	8,318	25.0%	+498	+6.4%
Average Household Size	2.74	-	2.76	-	+.02	+.07%
Average Family Size	3.35	-	3.37	-	+.02	+.06%
Total Households	33,675		33,303		-372	-1.1%

Sources: American Community Survey 2000, 2010

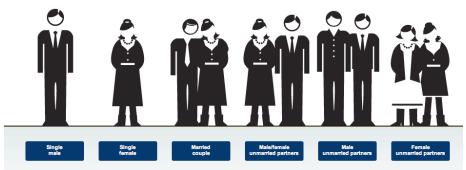
Growth in total demand can be expected as the younger population matures and forms families. In the meantime, the decline of in intact families and the increase in female-headed household suggests an increase in households challenged to meet housing costs and daily expenses, and hence greater demand for assisted housing. At the same time, an increasing number of households include persons over 65, possibly suggesting further demand for housing for the elderly, if those households become burdened.

How Many Households Are Like Yours?

Explore different types of American households and see how they have changed over time. Related Article »

Start building your household. First, choose the primary residents.

For example, the person whose name is on the mortgage or lease. If there is no such person, start with any adult living in the household.



Section Two: Housing Stock

Table 15 Brockton Housing Types

	2000	2000 %	2010	2010 %	2015	2015 %
Total units	34,837	100%	33,540	100%	35,915	100%
					32,764*	100%*
1 Detached	16,228	46.6%	16,553	49.9%	17,024	47.4%
1 Attached	634	1.8%	603	1.8%	862	2.4%
2-4 Units	10,346	29.7%	9114	27.2%	9948	27.7%
5-9 Units	2,282	6.6%	1945	5.8%	2748	6.9%
10+ Units	5,307	15.2%	5294	15.8%	5495	15.3%
Mobiles/Other	40	0.1%	33	0.1%	108	0.3%

Sources: ACS 2010, Table DP-1; 2015 Table CP04 *Occupied Units

The Brockton housing stock is 47.4% in single family detached houses and 2.4% in single family attached houses, with another 27.7% in small 2-4 unit multi-family buildings. Thus 77.5% of residents live in small neighborhood scale houses or 2 and 3 family houses, while only 22.2% live in large multi-unit apartment buildings, including Brockton Housing Authority buildings. Of these, the family housing is mostly in low- rise attached buildings with separate entrances and small yards, while the housing for the elderly/handicapped is largely in large multi-tenant high rise buildings.

It is worth noting that Brockton's three-deckers are commonly freestanding next to lower rise houses giving residents more light and space than in the solid contiguous three-decker neighborhoods seen in some larger communities. Other recent housing for mixed-income, mixed-age occupancy is in several privately developed former mills at the edge of downtown, or in contemporary low rise multi-unit buildings largely in the northeastern corner of the City.

In all, Brockton offers much housing in low rise neighborhoods with some non-institutional looking buildings largely in the northeastern corner of the City. Current policy is to preserve and improve the older low-rise housing stock as described in the 1998 Brockton Comprehensive Policy Plan. This policy preserves opportunities for owner-occupancy by resident landlords in 2-4 unit buildings.

Rooms and Bedrooms

Table 16 Number of Rooms and Bedrooms in Occupied Units

Subject	Occupied Units	Owner Occupied units	Renter Occupied Units
Number of Rooms			
1	0.9%	0.1%	1.9%
2-3	12.1%	1.5%	24.9%
4-5	34.6%	27.1%	43.7%
6-7	34.4%	47.3%	18.9%
8+	17.9%	23.9%	10.7%
Number of			
Bedrooms			

0+	1.1%	0.1%	2.2%
1	14.2%	2.4%	28.3%
2-3	68.7%	74.1%	62.2%
4+	16.0%	23.4%	7.3%

Source: U.S. Census, 2011-2015 American Community Survey

Table 16 indicates that the owner occupied units, commonly houses, are generally larger than the rental units with 71.2% having 6 or more rooms compared to 29.6% of the rental units.

On the key question of the number of bedrooms, 97.4% of the owner-occupied units had 2 or more bedrooms compared to 69.5% of the rental units. However, this does not indicate how many units have the 3 or more bedrooms needed by larger families, although Massachusetts housing agencies require at least 10% of publicly assisted units to have three bedrooms. This is a modest goal in itself since an estimated 39.8% of the total Brockton stock has 3 bedrooms according to the 2011-2015 American Community Survey, and 54.9% had 3 or more bedrooms.

Vacancy Rates

These estimated rates can vary greatly over a short period. The respective owner and rental vacancy rates were 2.0% and 5.7% for the 2006-2010 period, but the overall vacancy was 6.3% by 2010. By 2015, the estimated overall vacancy rate had risen to 8.8% with 10.2% rental vacancies and 2.4% home owner vacancies. As of 2010, 48.9% of the vacant units were available for rent and 14.1% for sale, 8.2% were rented or sold, but not yet occupied, 1.7% was held for occasional use and 28.9% were simply vacant.

The vacant units not available for rent, or otherwise accounted for, might be abandoned. An inventory of such stock from Building Department and Assessors/Tax Collectors' records could lead to finding rehabilitation prospects.

In the short period from 2010 to the 2011-2015 estimates, owner -occupancy dropped minimally from 18,588 units to 18,479 units, but vacancy increased by 911 units from 6.3% to 8.8% and the rental vacancy rate increased from 6.9% to 10.2%, more than twice the reported 5% healthy rate.

Concentrations of such units could indicate distressed neighborhoods need closer examination and more than housing rehabilitation. This could involve remedying dangerous environmental conditions, resolving dangerous or degrading land use conflicts, improving neighborhood amenities, resolving traffic hazards, and improving public safety through a neighborhood revitalization program.

Pockets of deterioration and vacancy led to a previous city program of demolishing vacant and deteriorated houses and small multi-unit dwellings. However, overall conditions are not such as to justify extensive clearance and redevelopment as with past slum clearance and urban renewal. Instead the problem is largely one of cost with a need for more affordable housing for low and moderate income households.

Vacant city owned land is a minimal resource because all such land is reviewed by the City's consultant real estate custodian, and the buildable land is put to auction regularly. Similarly, the City does not hold on to other buildable vacant land except for municipal purposes. Thus, according to John O'Donnell,

Chair of the Board of Assessors, the listed city owned tax-title lands are generally wetlands or have high bedrock and are essentially unbuildable.

Tenure

A majority of Brockton housing units are owner occupied. As of the 2000 Census 54.6% of the stock was owner- occupied and 45.5% was rental. By 2010, ownership had risen to 55.8% with 44.2% renter occupied. Then by the 2011-2015 American Community Survey, estimated home ownership had returned to 54.6%. Given that as of the 2006-2010 estimates, only about 49.4% of the stock was in attached or detached single units, a number of homeowners were in multi-unit buildings or condos. This could present opportunities for increasing self-employment for small scale owner-occupant landlords, given appropriate support and training.

Housing Conditions

Going by the Census' limited criteria, housing conditions are generally good. The 2015 ACS found only 0.4% of units lacking "complete plumbing facilities" and only 0.9% lacking "complete kitchen facilities" and there is limited overcrowding since only 2.5% of units had more than one person per room. The earlier 2010 figures were quite similar. Still there are pockets of housing with significant exterior deterioration and signs of under-maintenance as indicated by observation and the demand for the city's housing rehabilitation programs.

Table 17 Housing Occupancy



2010 2010 2015 2015

Total Units	35,552	100%	35.915	100%
Occupied Units	33,303	93.7%	32,764	91.2%
Owner Occupied	18,588	55.8%	18,479	54.6%
Renter Occupied	14,715	44.2%	14,875	45.4%
Vacant Units	2,249	6.3%	3160	8.8%
For Rent	1,099	3.1%	-	-
Rental vacancy rate		6.9%		10.2%
For Sale	316	.9%	-	-
Homeowner vacancy rate	1.7%	-	2.4%	-
Occasional Use	38	.1%	-	-
Owner Occupied units/population/ Average Household	18,588/54,862/2,95	55.8%	17,889/53,846/ 3.01	54.6%
Renter Occupied units/Population/ Average Household	14,715/37,180/2.53	44.2%	14,877/38,978/ 2.62	45.4%

Sources: ACS, 2010, DP-1; 2015, CPO4 *Occupied units

One example of Brockton's significant low and moderate cost housing supply is that between 2000 and 2010 the African-American and Asian populations increased by 12,555 from 18,877 to 31,427, while the white population dropped by 14,168 from 57,989 to 43,821. Thus upwards of 12,555 people found housing in the private market, averaging 2.76 people per household city-wide, while approximately 4,550 units were made available from the present total supply, although some of the affected population may have entered or left assisted housing.

Recent Building Permits

Development in Brockton fluctuates with the mixture of project types each year, but overall the building permits issued from 2001 through 2014 totaled 1,276, of which 706 were for single family houses and 400 were 5+ unit multi-family buildings. The total building permits by type are shown in Table 18.

Table 18 Brockton Building Permits 2001 - 2014

2001-2014 Building Permits	# of Permits	Possible Maximum # of Units		
Single-Family Detached	706	706		
2-unit Multi-Family	114	228		
3 & 4 unit Multi-Family	56	224		
5+ Unit Multi-Family	400	2000+		
Total	1276	31,258		

Source: Homefacts Data Service 2015

The 400 permits for developments of 5-plus units are from three large projects of 118, 111, and 80 units respectively. What is encouraging is the continued development not of just single family houses, but of 170 two to four-unit buildings, with the potential for owner occupancy by resident landlords. At a minimum, these total at least 396 units. Many of the strategies recommended in the 2002 Housing Strategy Proposal focus on encouraging such development and facilitating ownership by owner occupants. To support this, the present document recommends landlord training for prospective owner-occupant landlords.

Developable Land and Buildings

Brockton is largely built out with little developable upland, but there are opportunities for redevelopment of deteriorated buildings and facilities, conversion of mills and schools to housing often at a higher density than the surroundings, and intensification of uses.

According to MassGIS, there are 530 acres of undeveloped upland and 12.3 acres of minimally usable wetland or flood plains or severely constrained land, such as former landfills. Given City-wide sewer and water service, most upland will be developable even if unsuitable for septic systems.

Prime among the vacant sites is the 31-acre CSX-owned former Freight Yards east of the railroad tracks and just south of Downtown and abutting a sound residential neighborhood. Since rail freight using industrial /commercial development is unlikely, this area was proposed for an extensive mixed use residential and commercial development in the 2010 City of Brockton Housing Strategy.

In addition, there are many scattered parcels in varied residential neighborhoods resulting from fires and demolition suitable for in-fill development, and there are buildings suitable for rehabilitation for residential or mixed uses or new construction.

In addition to the 31-acre vacant Freight Yard, there are various Downtown sites and others throughout the city listed below:

- The three-story vacant Hotel Grayson on 1.29 acres
- 214 Main St. an occupied three story Brick Commercial/Office building on a 8,712 sq. ft. lot
- The Standard Furniture Building, a multi-story concrete building proposed for continued retail on the ground floor and apartments above.
- The Professional Building, at 47 West Elm St. a burnt-out four story office building on .17 acres of land.
- The 7 floor factory building next to SoCo Lofts, It has 92,337 sq. Ft. on a 22,270 sq. ft. parcel and is partially occupied by small firms. Housing reuse has been proposed.
- 137-147 Main St. a 20,000 square foot two floor retail building on 3 parcels totaling 32,000 square feet, with one vacant lot.
- The Lincoln School, 70 Highland St. a vacant 2 1/2 story plus basement elementary school in very good condition, on .856 acres and in a residential area.
- 11-15 Frederick Douglas Ave. 2 story commercial building with first floor store fronts on .167 acres.

- 19 Main Street, The First Parish Building, a three story, 25,956 square foot commercial building with many store fronts on a 10,300 square foot lot.
- The St. Patrick's Total Abstinence Society a five floor, 14,154 sq. ft. building on 5628, sq. ft. at 28-30 Ward St, i.e. the former Petronelli Gym.

Redevelopment or conversion of former mills or schools also offer possibilities for significant housing stock expansion since one mill or school could accommodate the equivalent of several blocks of single family houses. The restoration of large houses converted to multi-unit buildings could reduce the number of units giving some larger families access to sizable units.

<u>Section Three</u>: Housing Market Activity Recent Market Activity

Recent sales and prices for residential units have fluctuated greatly with the economy and to a lesser extent with the value of the available stock. The houses listed on the Zillow and Lutria pages are commonly one to one and one half story, or two story 2-3 bedroom single-family frame houses. There were few if any 2-4 unit buildings and one three decker had been converted to 14 rental rooms. There were no two and three unit buildings suitable for owner occupant landlords. Many such buildings in poor condition were demolished some time ago, thereby removing perceived blight while lessening

opportunities for such investment. Most of the listed properties were along a north-south corridor although there were some houses scattered along either side of Route 24 or others on Cary Hill and on the eastern edge of the city. Most prices were in the \$200,000s with an average of \$236,719 for 3 bedroom houses.

The Brockton Office of Neighborworks notes that most three-deckers are bought by investors, not by prospective owner-occupants. They make basic and cosmetic improvements and sell for



substantial profit, while others hold the property for rental income. Relatively few families still live in one unit as owner-occupants while renting out the rest of the apartments as was customary. Neighborworks offers landlord training to help small scale landlords function well, whether owner-occupants or not.

Single family house prices have ranged from as low as \$81,000 in 1994 to as high as \$275,000 in 2005 and 2006. They were relatively steady in the \$200,000s from 2003 to 2007, then dropping to under \$200,000 from 2008 to 2013, and later rising from \$205,000 in 2014 to \$247,500 by early 2017.

Condominium prices followed a similar pattern but with greater extremes, falling from \$81,000 in 1987 to \$24,950 in 1993 and then rising to \$196,500 in 2005, and then falling to the \$70,000s from 2009 to 2013, and rising to \$121,000 by early 2017. These great fluctuations may partly reflect what is on the market at the moment, particularly with larger condominium projects. (See Figure 1 Housing Price Variations)

Sales have also fluctuated but far less than prices. Single family home sales ranged from as few as 464 in 1991 to as many as 1,110 in 2004, but remained in the 700s and 800s from 1993 to 1998 and in the 900s from 1999 to 2003 peaking at 1,100 in 2004 and dropping to the 500s and 600s from 2007 to 2014, and rising to 983 by 2016.

Most recently single-family home prices for the last complete year, 2016, were at a near record high of \$240,000 and those for 2017 to date have been higher at \$247,500. Similarly 2015's single family sales at 983 were the highest since 2005 and the fourth highest on record. In contrast condominium sales of 66 in 2016 were the lowest since 1987, although the first third of 2017 had 42 sales. (See Figure 1 Housing Price Variations)

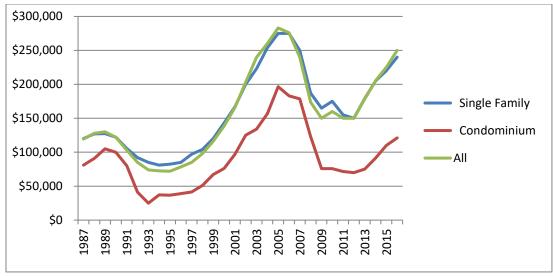
The relative steadiness of single family home sales suggest that people buy houses when they need to, paying a penalty when a move requires buying during a high price period and taking a loss in diminished equity if they must sell during a period of low prices. (See Figure 2 Housing Sales)

The relationship between sales and prices is contradictory; depending on the causation, sales might be expected to increase with falling prices and to drop with rising prices given constant buying power. But then prices might be expected to rise with greater demand exhibited by increasing sales and to fall with lesser demand exhibited in falling sales. Sales began to rise in 1991 – 1992 while prices were still falling. Then in 2006, sales and prices were at their highest and both dropped over the next several years. Later prices began to rise in 2013, but sales did not pick up significantly until 2015. This data suggests that sales and prices basically rise and fall in response to the overall economy.

Trends in Sales Prices

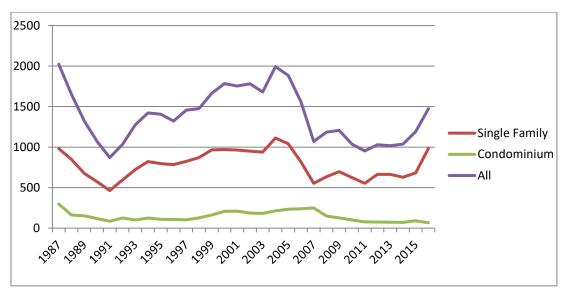
As can be seen in Figure 1, any overall trend line would clearly be upwards despite intervening low points. Thus the most recent chart shows the recent post 2013 rapid increase in sales prices particularly for single family detached houses, after the 2008-2012 slump. Rental prices can be assumed to follow suit.

Figure 1 Housing Price Variations



Source: The Warren Group Town Stats

Figure 2 Housing Sales



Source: The Warren Group Town Stats

Table 19 Brockton Home Sales 2002 - 2016

Year #	# 1-family Sales	# Condo Sales	All (Inc. Others)
--------	------------------	---------------	--------------------

2016	983	66	1,474
2015	782	90	1,191
2014	628	72	1.037
2013	633	73	1,018
2012	664	76	1,028
2011	52	77	952
2910	624	101	1,037
2009	698	126	1,207
2008	633	149	1,185
2007	553	248	1.071
2006	817	239	1,561
2005	1,041	233	1,884
2004	1,112	214	1,992
2003	938	182	1,680
2002	949	185	1,782

Source: The Warren Group Town Stats

Table 20 Brockton Median Home Prices 2002 - 2016

Year	Single-Family	Condos	All (In Ohers)
2016	\$240,000	\$211,000	\$249,900
2015	\$220,000	\$121,000	\$225,000
2014	\$205,000	\$91,250	\$200,000
2013	\$179,000	\$75,201	\$178,250
2012	\$150,000	\$70,000	\$150,000
2011	\$155,000	\$71,500	\$150,000
2010	\$174,950	\$75,900	\$160,000
2009	\$165,000	\$75,150	\$150,000
2008	\$187,000	\$123,000	\$173,500
2007	\$\$50,000	\$178,550	\$240,000
2006	\$275,000	\$183,000	\$276,000
2005	\$275,000	\$196,500	\$283,000
2004	\$254,000	\$157,000	\$283,000
2003	\$233,000	\$134,000	\$239,900
2002	\$199,900	\$125,000	\$203,000

Source: The Warren Group Town Stats

Locational Patterns

Generally speaking, Brockton's housing prices are highest on the west side with many large single family houses; lowest along the North-South corridor along Main Street and Warren Avenue with many smaller house and small multi-unit buildings and in a wide range on the east side reflecting the areas varied neighborhoods.

West side listings include:

- A 5,304 square foot,6 bedroom, 6 bath house for \$750,000
- A 1,484 square foot, 3 bedroom, 4 bath house for \$549,000
- A 2,958 square foot 4 bedroom, 3 bath house next to a golf course for \$489,000
- An 880 square foot, bedroom, 1 bath Oak St. condominium with many amenities for \$121,900.

Listings along the Main Street/Warren Ave. corridor with some multi-unit buildings with owner-occupant landlord potential are:

- A 1,467 square foot, 4 bedroom, 2 bath, two-family house near commuter rail at \$265,000
- A 1,700 square-foot 3 bedroom, 3-bath new townhouse condominium unit for \$309,900
- An over-sized 5,376 square-foot 3-decker with 2 apartments and 10 rental rooms for \$699,990
- A 2,800 square-foot two-family house with 7 bedrooms and 3 bathrooms for \$390,000
- A 1,591 square-foot, 3 bedroom, 2 bath house for \$245,000

Listings on the East side vary in terrain and age. They include:

- A 2,800 square-foot, 5 bedroom, 2 bath contemporary house in a postwar neighborhood for \$289,000
- A 1,412 square-foot, 3 bedroom, 2 bath one floor house on the Holbrook line for \$279,900
- A 1,584 square-foot, 4 bedroom, 2 bath thoroughly upgraded house for \$309,900
- A 1,598 square-foot, 3 bedroom, 1.5 bath split-level near the West Bridgewater line for \$265,000.

Section Four: Foreclosures

The community also has a large number of foreclosed properties City-wide, with the most in the central areas. The prices may be lower than through a conventional sale, depending on the debt, but they are still substantial.

Such foreclosures can result from people taking on mortgages beyond their means or from lost income, unexpected expenses, or past aggressive marketing of under documented loans. All of these can cost families their homes. The numbers declined from 422 foreclosure deeds in 2010 to 100 in 2014, and then increased to 183 in 2016 with the orders of notice following a similar pattern. While the numbers fluctuate, Brockton often has the state's highest number of foreclosures. The 2010 to 2014 decline in initial Orders of Notice and ultimate Foreclosure Deeds may have reflected fewer houses with unmanageable undocumented mortgages, but the recent increases are a cause for concern.

Brockton has had more foreclosures than other low income communities such as Fall River and New Bedford. As of January 2014 Brockton had 478 distressed units, while Fall River had 243 and New

Bedford had 274. These are one to four-unit buildings where a foreclosure petition has been filed, an auction scheduled in the past year, or the property has been bank owned for up to two years.

It may be that Brockton's housing prices are relatively higher than its wages compared to the other communities due to its good schools, commuter rail service, and proximity to Boston. Thus it could attract and hold people who pay more for housing here although incomes lag.

Table 21 Orders of Notice and Foreclosure Deeds in Brockton 2010 - 2016

Year	Orders of Notice	Foreclosure Deeds
2010	766	422
2011	550	281
2012	560	275
2013	274	138
2014	244	100
2015	363	127
2016	387	183

Source: Plymouth County Registry of Deeds

In response to these needs, Housing Solutions for Southeastern Massachusetts and other agencies such as Boston Capital offer foreclosure prevention assistance with counseling, loan modification, mortgage refinancing, buying foreclosed properties for favorable resale to original owners, and other options while protecting tenants from early eviction.

Examples of Current foreclosed Brockton properties listed for sale:

- 34 Eastfield Drive, north of East Ashland St. on the East Side, a 1,828 square-foot, 3 bedroom, 2 Bath, house with a yard and pool. Foreclosure Estimate: \$285,075
- 114 Armiston St. next to Ames Nowell State Park on the East side, a 1,792 square-foot, 3 bedroom, 2 bath raised ranch. Foreclosure Estimate: \$229,128
- 47 Westfield Dr. on the west side, a 1,843 square foot 3 bedroom, 2 bath house. Foreclosure Estimate: \$282,546
- 9 Ridgeway Ct., a 1,916 square-foot, 4 bedroom, 2 bath 1 1/2 floor two-family house, just south of downtown. Foreclosure estimate: \$253,299
- 321 Rockland St, a 1,406 square-foot, 2 bedroom, 2 bath 1 ½ floor house next to Rte. 24. Foreclosure Estimate: \$253.299 "as is".

These are just a few of the estimated 70-plus foreclosed houses shown by Zillow and Lucia, with many more in a pre-foreclosure status.

In all, Brockton offers a good range of moderate-size houses at seemingly moderate prices. However, these might still be too expensive for many low income households. This suggests that the need for

affordable housing is related to prices and incomes as much as to available supply and conditions, that is to say it is a cost problem as much as a supply problem.

Section Five: Affordability

A precise definition of housing affordability can be ambiguous. The conventional public policy indicator of housing affordability in the United States is the percent of income spent of housing. Housing expenditures that exceed 30 percent of household income have historically been viewed as an indicator of a housing affordability problem. The conventional 30 percent of household income that a household can devote to housing costs before the household is said to be "burdened" evolved from the United States National Housing Act of 1937. The National Housing Act of 1937 created the public housing program, a program that was designed to serve those "families in the lowest income group." Income limits rather than maximum rents were established for family eligibility to live in public housing; that is, a tenant's income could not exceed five to six times the rent.

By 1940, income limits gave way to the maximum rent standard in which rent could not exceed 20 percent of income – in practice, the same as the predecessor income limit standard. The Housing Act of 1959 maintained maximum rents, but it also gave local public housing authorities more autonomy in establishing them. By 1969, the escalation of rents by public housing authorities struggling to meet spiraling operation and maintenance costs nearly nullified the purpose of the public housing program



established in 1937 to serve the nation's neediest. To reverse this, the Brook Amendment (1969) to the 1968 Housing and Urban Development Act, established the rent threshold of 25 percent of family income; that is, a family would be required to pay one-quarter of its income in rent. By 1981, this threshold had been raised to 30 percent, which today remains the rent standard for most rental housing programs.

One measure of a community's affordability is cost burden. Cost burden is the ratio of housing costs to household income. For renters housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. The proportion of the

population paying more than 30% of their median gross income for housing are termed "cost-burdened" while those paying more than 50% are termed "severely cost burdened." According to the 2009-2013 Office of Policy Development and Research (PD&R), of the 32,865 households residing in Brockton, 21.9% of those households were extremely low income, reporting incomes less than 30% of the area median income (AMI). Those households reporting incomes of greater than 30% AMI but less than 50% AMI were 15.70% of the total households in Brockton. Households reporting income greater than 50% AMI but less than 80% AMI were 18.35% of the total household population.

Table 22 Housing Cost Burden, Brockton Owners and Renters

Housing Cost Burden, Brockton,	Owner	Percent	Renter	Percent	Total	Percent
MA						
Not Cost Burden <30% AMI	10,660	32.43%	6,190	18.83%	16,850	51.27%
Cost Burden >30% to <50% AMI	4,570	13.91%	3,335	10.14%	7,905	24.05%
Severely Cost Burden >50% AMI	3,530	10.75%	4,230	12.87%	7,760	23.61%
Cost Burden Not Available	75	0.23%	275	0.84%	350	1.07%
Total	18,835	57.32%	14,030	42.68%	32,865	100%
Income Distribution	Owner		Renter		Total	Percent
Household Income <30% AMI Extremely	1,795		5,405		7,200	21.90%
Low Income						
Household Income >30% to <50% AMI	1,915		3,245		5,160	15.70%
Very Low Income						
Household Income >50% to <80% AMI	3,455		2,575		6,030	18.35%
Low Income						
Household Income >80% to <100% AMI	2,460		1,085		3,545	10.79%
Household Income >100% AMI	9,205		1,725		10,930	33.26%

Source: 2009 – 2013 Office of Policy Development and Research (PD&R) CHAS Data Query Tool - HUD

C. Findings & Recommendations of Recent Housing Related Studies

Recent studies about Brockton housing needs or affecting related recommendations include:

- 1. The Brockton Plan, An 8 Point Action Plan for Brockton's Revitalization 1997
- 2. City of Brockton Comprehensive Policy Plan 1998
- 3. The adopted Old Colony Strategic Framework Plan -2011
- 4. The 2014 Draft Old Colony Regional Housing Plan 2014
- 5. Brockton Downtown Action Strategy- 2016
- 6. A Blueprint for Brockton and separate related Master Plan Elements 2017
- 7. The 2002 Brockton Housing Strategy Report

1. The Brockton Plan, An 8 Point Plan for Brockton's Revitalization- 1997

One of the eight points in the Brockton Revitalization Plan was to encourage live/work loft housing through adaptive re-use of vacant and underutilized industrial buildings.

2. City of Brockton Comprehensive Policy Plan -1998

The policy plan indicates what a community would do or should do in various situations more than the underlying values or intended final land use pattern, although in practice these are sometimes included in a policy plan. The following shows the policy intentions of this plan.

Housing Related Policies:

- 1. To protect older stable neighborhoods, which are assets, from unsympathetic encroachment (e.g. high density development and non-residential uses). The implied policy is to zone those out and to encourage sympathetic uses.
- 2. To salvage older residential structures by renovation. The implied policy is to avoid demolition and seek means to rehabilitate and re-use such structures.
- 3. In contrast, to reduce densities through selective demolition "in neighborhoods with substandard lot sizes and which lack off street parking".
- 4. To prevent non-local traffic from passing through residential neighborhoods.
- 5. To respond to the potential of selected neighborhoods through a Comprehensive Neighborhood Renaissance Program /Neighborhood Improvement Strategy.
- 6. To increase home ownership while working with diverse agencies to rehabilitate older housing stock and revitalize neighborhoods.
- 7. To maintain community facilities in all neighborhoods where possible.
- 8. Strictly regulate condominium conversion.
- 9. To encourage diverse housing in mixed use centers Downtown and near MBTA commuter rail stations.

3. The Adopted Old Colony Strategic Framework Plan -2011

This plan reviewed past regional land use plans and policy plans including the OCPC 1968 Future Land Use Plan, the Metropolitan Area Planning Council's Metro Plan 2000, and the OCPC's 2000 Regional

Policy Plan. It considered these in the light of present land use patterns, population and employment projections, and infrastructure patterns and needs; drawing heavily on the OCPC Regional Transportation Plan. It reviewed local comprehensive plans and master plans in comparison with Smart Growth Principles and the state's Sustainable Development Principles. This information and the area's development concerns were applied in outlining the Strategic Planning Framework for future more detailed regional and local planning.

The framework allocated land to general growth areas, primary commercial/industrial growth areas, and primary residential growth areas, with the remaining low density/preservation areas recommended for low density development and open space/agricultural land preservation.

The major general growth area for the region is Brockton as well as another in Plymouth Center and North and West Plymouth along with and much of adjacent Kingston. The Primary Commercial /Industrial Growth Areas are generally present in commercial concentrations in highly accessible locations. The only Primary Residential Growth Area is a Smart Growth project in South Plymouth. The Plan does not yet include the recent additions to OCPC, Duxbury and Hanover.

The Plan's effect on Brockton is to encourage some growth from the low density /preservation areas to the general growth areas including in the city.

4. The 2014 Draft Old Colony Regional Housing Plan - 2014

This plan reviews:

- The housing needs of various groups
- The present supply by type and purpose
- Consumption patterns
- Obstacles to production and fair housing
- Tools and resources for affordable development

It then makes recommendations regarding:

- Growth rates, probable added households
- Housing management and development
- Housing finance and regulation

And goes on to recommend an action plan with:

- Overriding Goals
- Five Year Objectives
- Ten Year Objectives

The five year objectives added having persons now paying less than 30% of income for housing (or less than 35% for equity accumulating owners) and the homeless live in affordable, sound, standard housing in safe environments while not paying greater than 30% of income.

The ten year objective was to ensure that the low income portion of the growing population remained housed at under 30% of income. It calculated that growth to 2030 at MAPCs higher "Smart Region" rate would need an added 8,762 affordable units region-wide, while not defining needs in individual communities. However, Brockton has an 18.6% poverty level compared to the County's 8.2%, and a median household income of \$47,557 compared to the county's \$75,459. This suggests that the bulk of the effort would be local even given goals to increase incomes generally and to pursue state and regional goals to lessen the local concentration of low income households.

The proposed Recommended Action Plan was to increase housing opportunities in all communities through:

- Zoning revisions including selective increased densities, Ch. 40R Smart Growth zoning; encouraging upper floor housing in the CBD; accessory/in-law apartments, duplex conversion provisions; inclusionary zoning; support of sustainable development and allowing expansion of modest houses.
- Institutional changes including a regional housing trust; regional housing rehab and house sharing programs; fair housing efforts; equity buy-down and transferable development rights programs, accelerated tax title takings; allocating HUD and DHCD funds in proportion to community needs, and adopting/using the Community Preservation Act.
- Program activities included ensuring sufficient affordable housing; creating enough units with 3-plus bedrooms; responding to expiring uses; monitoring rent burdens; upgrading substandard plumbing, heating and cooking facilities; using infill sites consistent with open space preservation; reviewing /applying development implications of the Upper Taunton River Regional Waste Water Evaluation Study and the Taunton River Watershed Management Plan; allowing SRO buildings while favoring more private studio apartments; and inventorying trailer parks for possible LIP improvements and tenant ownership.

Regarding Growth Rates:

- Direct residential development to the Framework Plan's Primary Residential Growth Areas (See Table 23).
- Adopt and using inclusionary and incentive zoning to direct affordable development to framework areas.
- Increase as-of right-densities in community centers and highly accessible areas using the Ch,40R standards of 8/units/acre for single family detached houses; 12 units/acre for 2-3 family buildings, and 22 units/acre for larger multi-family buildings.
- Develop a regional Transferable Development Rights (TDR) system.
- Facilitate mixed-use development drawing on the Whitman and Abington CBD Districts, and mapped in CBDs and in key accessible parts of Priority Development Areas (PDAs)
- Enacting duplex conversion provisions.

Regarding Housing Management and Development:

• Increase the present (11% Federal; 13.5% State) limits on non-elderly disabled tenants in elderly/handicapped developments to 15%.

- Explore use of well-located tax title lands and other public holdings consistent with overall locational policies.
- Acquire marginally developable areas near PDAs to frame development and provide nearby open space and habitat areas.
- Improve housing stock through acquisition, rehabilitation and resale with affordability limitations. This would be a variation on equity buy-down, to be done by non-profits or public agencies.
- Encourage owner-occupancy of small multi-unit buildings, e.g. three-deckers with resident landlords.
- Allow moderate expansion of modest owner-occupied houses.
- Facilitate renting of rooms. Set up local or regional Home Share Programs to facilitate safe private home room rentals as opposed to the use of more expensive motels.
- Monitor and respond to expiring uses.
- Develop a system to monitor vacant and/or tax delinquent properties before foreclosure or demolition in order to allow groups such as housing trusts, Brockton Interfaith Community or Housing Solutions for Southeastern Massachusetts (the former South Shore Housing Development Corp.) to respond and assemble packages for financing and rehabilitation.
- Conversely, work with the communities' assessors and tax officials to speed up the tax foreclosure process for vacant but salvageable properties so that they may be responsibly managed before deterioration or vandalism makes them eyesores thus lessening the chance of rehabilitation and re-sale. If still available, draw on HUD technical assistance funding to the Local Initiatives Support Corporation (LISC) to help communities to manage the tax-title process. At the same time adopt policies and practices giving owners under a hardship sufficient time to redeem their properties and manage them responsibly.
- Related to the above, develop a standardized, responsive process for deciding the disposition of City-owned properties in accordance with housing policies, community master plans, open space plans and related strategies, and neighborhood concerns. Preferably use an RFP process to elicit the most neighborhood-appropriate actions.
- Adopt an in-law apartment /accessory apartment amnesty program like the one in Barnstable.

Regarding Housing Finance:

- Establish a small scale equity buy-down program in one community
- Expand Section 8 and MRVP vouchers to subsidize new and old units enough to hold rents below 30% of income and mortgages below 38%, and to give people less expensive, longer-term alternatives to shelters and motels/hotels.
- Create further single or multi-community housing rehabilitation loan and grant programs and expand the Bridgewater/Norwood Program and Avon/West Bridgewater programs.
- Encourage and solicit good Friendly 40B projects like Champion Builders/SSHDC projects in Pembroke.
- Encourage 40R projects and Local Initiative Projects with significant local input.

- Support adoption and use of the Community Preservation Act to create and preserve sound housing.
- Encourage creation of further local and regional non-profit housing trusts.
- Work with banks and advocacy groups to limit foreclosure through loan modification, or responses such as purchase and resale to original owners as done by the non-profit group Boston Capital, or other approaches.
- Explore and if feasible, enact a regional land bank to hold valuable sites.
- Create and capitalize a multi-purpose Affordable Housing Trust.
- Assist buyers in getting Section 203K "Purchase and Rehabilitation" mortgages through private lenders, MassHousing or other sources.
- Develop a rehabilitation and finance program to encourage and facilitate owner-occupancy of small multi-unit buildings, especially three-deckers.

Regarding Housing Regulations:

- Review the region's zoning for policies supporting the above proposals and supporting:
 - Sustainable development principles, then propose appropriate common provisions reflecting the framework plan and local aspirations.
- Enact flexible in-law and accessory unit provisions.
- Enact duplex conversion provisions when available.
- Review the region's zoning policies affecting the above proposals and its sustainable development principles; and propose provisions reflecting the Framework Plan and local aspirations.
- Develop a house sharing program.

The Plan reviews the 2030 population increases under the two MAPC scenarios (SQ, Status Quo and SR, Smart Region) and uses the higher SR projections resulting in a need for 8,762 to 9,182 new units depending on household size, although recent growth and building permits would suggest greater growth.

The Plan recommends distributing the new units as shown in Table 23.

Table 23 Proposed Distribution of New Units

Area	% of Increase	Total new units 8,762 @ 2.735 persons/unit or 9,182 @ 2.61 persons /unit	Emphasis
------	---------------	--	----------

Northern General Growth Area(GGA)	45%	3,943/4,132	Family, Elderly and Disabled
Southern GGA	25%	2,191/2,296	Family, Elderly and Disabled
Bridgewater Center GGA	10%	876/918	Small Units
E. Bridgewater Center GGA	10%	876/918	Small Units
South Hanson GGA	5%	438/459	Family, Elderly and Disabled
River Run and related areas	3%	263/275	Family
Low Density/ Preservation areas	2%	175/184	Family
Totals		8.762/9,182	

Source: Old Colony Regional Housing Plan, 2014

The proportion of the increase in Brockton will depend on available land, redevelopment possibilities, and local development policies.

5. Brockton Downtown Action Strategy- 2016

The Brockton Downtown Action Strategy stresses the interdependence of Downtown amenities, retail and entertainment resources, parking, streetscape, and attractive housing for Downtown vibrancy and attracting a growing selective population. Accordingly, it recommends many improvements to these resources and added housing. The plan notes that more people will choose to live in a lively Downtown and that the population will support these amenities. The difficulty is in "priming the pump", because the Downtown has been losing stores and amenities. However, the success of three mill conversions: The Station Lofts, the SOCO Lofts and the converted building on Court Street, all close to the BAT Centre and the commuter rail station, shows the potential for added population and development given good transit access alone.

This Strategy includes a complementary series of infrastructure and streetscape improvements, new housing and retail space, and a creative marketing program with many public events.

The core strategies are to:

- Increase residential densities
- Re-establish the feel of a vibrant Downtown
- Continue to improve public safety
- Continue efforts to create a Downtown Brockton Higher Education Collaborative
- Encourage entertainment venues and Downtown cultural organizations
- Promote community diversity
- Actively target new small business entrepreneurs
- Improve connectivity

- Upgrade the infrastructure
- Actively market the Downtown region

These lead to quick first steps followed by six "catalytic actions;"

The first steps are to:

- Adopt the Urban Renewal Plan (URP) and District Improvement Financing (DIF) program
- Transfer tax-foreclosed properties to the Brockton Redevelopment Authority
- Establish a Downtown Manager
- Develop a business plan for a restaurant incubator on Frederick Douglas Avenue
- Permit and promote sidewalk dining and food trucks
- Establish a cultural and entertainment task force
- Add more programing and events
- Set up a "Clean, Green, and Safe" Ambassadors Program
- Re-establish the homelessness task force

Overall, the strategy proposes a ten-year phased program consisting of:

- Years 1-3: Rehabilitation of the Petronelli Building, construction of 135 new housing units on Petronelli Way, rehabilitation of the Standard Furniture Building at 93 Centre Street for 60 units, and creation of 243 permanent and temporary surface parking spaces.
- Years 3-5: Building the Enterprise Project's Phase Two with 102 housing units, building a 400 space municipal parking garage, and adding a 3,000 gross square foot pharmacy
- Years 5-10: Mixed use development on Montello Street with 130 housing units, 9,000 square feet of retail space and a 150 space one-level parking structure
- Years 10 Onward: Mixed-use development on Commercial Street between the railroad station and the BAT Centre with 150 housing units, 9,000 square of retail space and a 260 space two level parking structure.
- In all, the program calls for 522 units of new housing and 60 units in the rehabilitated 93 Centre St. building, 31,000 square feet of new retail space including a pharmacy and 843 permanent parking spaces. There is no discussion of rent or sales prices or degree of affordability. As noted above, in comparison to the 582 units of proposed new housing; two of the three nearby mill conversions, the Station Lofts and the SOCO Lofts, and the completed new housing at the Enterprise Block totaling 192 units along with more in the completed Strathmore Building at 148 Court Street.

6. A Blueprint for Brockton- Draft Comprehensive Master Plan 2017

This draft plan, developed with extensive community participation includes all the subjects of a Comprehensive Plan in a separate document. It proposes "concerted actions to enhance the City's strengths as a place to live, work, and visit so that it may "benefit from the transformation of urban communities that is underway in our 21st Century cities."

This Master Plan document is complemented by the *Master Plan Elements Report*, which has a more detailed analysis and expanded recommendations. The following summarizes the key housing related findings and recommendations from the report.

The "Vision for Brockton" calls for a strong, safe, prosperous, highly accessible, and well balanced community. In terms of housing, it will provide increased housing choice for our residents with a range of types and densities suited to the changing needs of the middle class and its young adults, families, and residents who will "age in place in Brockton." The plan's four overall objectives are to:

- Restore Land Use Balance by combining needed new development with preservation of stable neighborhoods and historic resources.
- Be a great community for the middle class-holding that population within the community with continuing education and employment opportunities while recruiting new residents with its affordable high quality of life.
- Expanding Stewardship with a growing circle of stewards who are committed to advancing Brockton's future, drawing on many organization and parts of its diverse population.
- Providing Equity to all parts of the diverse population in all neighborhoods doing so in terms of
 access to City services, transportation, various amenities and the benefits of a sound
 infrastructure.

Other Objectives are:

- Focusing on both Preservation and Development: In developing underused industrial sites, strengthening the downtown, focusing on TOD sites, redeveloping local neighborhoods serving commercial strips, and integrating mixed use development into the community, all of which will take careful sensitive planning.
- Retaining, retraining and recruiting a middle class population: With varied affordable housing meeting middle class life styles in safe walkable neighborhoods, high quality public facilities, and cultural events, and education/training programs to remain competitive in the hanging economy.
- Building Community: With local neighborhood focused volunteers on boards and civic organizations, and civic contributions from business and institutions, working cooperatively.
- Focus on Services, Amenities, and Infrastructure: With high level of services, transportation, infrastructure, programs and amenities in all neighborhoods.

Housing Related Observations and Recommendations:

- The city has maintained a large relatively affordable housing stock in family- oriented neighborhoods attracting a relatively young, increasingly diverse and predominately middle class population.
- Downtown is being directed to a new role as a mixed-use business, civic and residential area as favored by many enterprises and residents.
- The plan's housing element considers present and future needs and the city's role in meeting them.
- Focus on multi-use, residential-commercial, and civic uses in the transit-rich Montello, Campello and Downtown areas
- Preserve and enhance existing neighborhoods with public services and amenities helping to hold present residents and potentially attract new housing.
- Under Economic Development, support the mixed-use Downtown and neighborhood centers, rather than expanding auto-oriented corridors. This suggests that the Neighborhood Commercial Corridors on the map of Land Use Recommendations need not be mixed housing and businesses but could have neighborhood-serving commercial nodes adjoining intact neighborhoods.
- Promote mixed-uses of under-utilized sites and continue revitalizing the Downtown with mixed-uses implicitly including housing, meeting contemporary needs and demands.
- Under housing goals, emphasize market rate housing (as with the HDIP program) through various incentives and neighborhood improvements.
- Provide for varied housing needs allowing "aging in place" or moving to more suitable local
 housing for empty nesters or young singles thereby encouraging long term residence in the
 city.
- Maintain relatively affordable rental and sales housing attractive to the middle class depending on the housing and neighborhoods; potentially through neighborhood open space preservation efforts.
- Promote homeownership by requiring some sales units in new developments and maintaining supportive financing programs.

7. The 2002 Brockton Housing Strategy Report

These strategies propose creating or preserving affordable housing in many locations though varied programs, resources and institutional changes and related changes in regulations. These strategies fall under four broad categories:

- Planning and Regulatory Strategies
- Housing Preservation Strategies
- Housing Creation Strategies
- New Housing Resources

Planning and Regulatory Strategies:

- 1. Fully implement the city GIS System for housing. Note other approaches to regional or local GIS systems offering similar flexible benefits at lower costs than the expected \$150,000/year for possible application in later years.
- 2. Fast tracking the tax title process by identifying parcels of particular interest, hiring consultants to monitor their progress through the system and expedite the city's portion of the process to speed up site control before the properties deteriorate. This is needed given present backlog of 1,000 cases over 20 years in this initially three-year process.
- 3. Standardizing the process for disposing of city-owned parcels and making it more responsive to varied City needs by involving the City Planner, City Solicitor, Housing Specialist, if any, Chief Procurement Officer, and the 21st Century Corp.; and choosing between auctions or focused RFPs or other means.
- 4. Creating a Building Permit taskforce to accelerate the Building Permit approvals, possibly through centralizing now physically scattered approving bodies, coordinating joint site plan reviews before Water Department signoffs, and correcting inconsistent public information on the required process.
- 5. Consider adding new historic districts downtown, protecting historic properties from major change, and increasing access to historic preservation financing.
- 6. Hire a consultant to work with the town's regulatory bodies to review the zoning ordinance and propose revisions to support production of affordable housing with more diverse housing types and in varied locations.

Housing Preservation Strategies:

- 1. Modify housing rehab and Home Buyer Assistance programs to have a greater impact nearer to downtown, improve small multi-unit buildings suitable for owner-occupant landlords, increase potential benefits beyond \$10,000/applicant, include absentee owners with low-income tenants, and combine purchase and rehab.
- 2. Create a program to support exterior painting and landscaping in target neighborhoods since such cosmetic improvements do much to improve overall neighborhood appearance and morale, to protect properties, and to upgrade vacant lots.
- 3. Substantively rehabilitate deteriorated 1-4 unit dwellings primarily for sale to owner-occupants with work by the CDC and developers and support from DHCD, with HOME funds and City funds providing key needed subsidy and land donations before completion and sale.
- 4. Create rehab options for larger 5-plus unit properties to stabilize distressed neighborhoods and provide better housing with owner-occupancy options. To be done through the CDC with Cityowned parcels and \$15,000 to \$25,000 in HOME funds /unit and/or a revolving loan fund.
- 5. Establish a similar rehabilitation program for vacant and deteriorated houses in distressed neighborhoods and improve the capacities of non-profit and for profit developers through varied public-private efforts. Note: Strategies 3, 4, and 5 have much in common and might be treated as one for reporting purposes.
- 6. Protect the long term affordability of expiring use projects: ones whose mortgages requiring affordability are close to being paid off with monitoring by city staff, and work for protective refinancing.

7. Legalize existing and proposed accessory units with a two-year amnesty period for present units to meet codes, and with zoning provisions for permitting and regulating new ones.

Housing Creation Strategies:

- 1. Construction of four owner-occupied duplexes and two single-family houses in the Pleasant /Prospect area supported by City land donations, \$100,000 in City HOME funds ,\$400,000 in State Housing stabilization funds, CDBG block grant funds for roads, trees, and sidewalks, and favorable mortgage terms from Brockton Housing Partnership member banks.
- 2. Establish opportunities to develop City-owned land through a new broad-based Property Review and Disposition Process with land later released for development through subsequent RFPs focusing on community and neighborhood impacts, not just short term returns. Then work with other resources such as Youth Build, South Shore Habitat for Humanity and Brockton Interfaith Community on new development like New York's Nehemiah program for new affordable housing on City land.
- 3. Promote adaptive reuse of commercial and industrial buildings through an RFP process in the case of municipal buildings with access to BRA-managed HOME funds.
- 4. As per an ordinance passed in 2002, promote a market rate Senior Residential Community consisting of small scale single family and duplex buildings at five units/acre with a sensitive site design on parcels of five acres or more, possibly at the unused Freight yards.
- 5. Supporting the above, begin master planning and land acquisition for a large scale mixed -use development on the former freight yards.

New Housing Resources:

- Create a broad-based, multi-purpose new tax-exempt organization to produce and preserve housing and promote neighborhood revitalization. This would be a new CDC to assist in achieving housing strategy goals while the 21st Century Corporation focuses on economic development.
- 2. Create a new Brockton Housing Trust fund to raise money from various sources; linkage fees per square foot of new development, inclusionary zoning, sale of City-owned property, private sector grants and loans, its own project revenues and Community Preservation Act funds if CPA is adopted. Once established it could support or initiate a wide variety of affordable housing endeavors.

Summary of the Housing Related Plans:

These seven reports and studies generally seek a return to a balanced middle class community with improved affordable housing and enhanced services and amenities without expecting to return to the past's industrial base or level of Downtown retail activity. They call for specific interventions supporting proposed developments and improving community facilities, but do not call for large scale urban renewal as in the past.

Important aspects and commonalities between the reports worth siting are:

- The concern that low income person households not pay more than 30% of income for standard housing or 35 % for housing purchase.
- The little concern about the size or condition of housing occupied by low income households and families.
- The view of Brockton as a middle class rather than working class community.
- The goal to hold and attract a middle class population.
- The goal to increase home-ownership.
- The goal to retain rental housing by regulating condominium conversion.
- The concern for maintaining Downtown's strengths and restoring it as a vibrant commercial, residential, civic, and institutional center and the heart of the community.
- The view that the three commuter rail stations are the heart of diverse, thriving mixed use centers.
- The strongly favored mixed—use development as a means to meet many needs with complementary, not conflicting uses.
- The little concern with conflicting mixed uses (gas stations next to houses, industries in neighborhoods, etc.) except for one mention about stopping such encroachment in the 1998 Policy Plan.
- The stress placed on preservation and rehabilitation of existing houses over demolition except for un-defined density reduction in areas with very small lots and little parking.
- The stress placed on the potential to restore the traditional owner-occupant resident landlord in three-deckers and other small multi- unit buildings.
- The stress placed on maintaining neighborhood community facilities and increasing and preserving local amenities to help to hold or attract a local population.
- The positive view of zoning changes allowing for selective increased densities.
- The favorable view towards direct intervention in the housing stock through acquisition, rehabilitation and resale of deteriorated housing with affordability requirements.
- The encouragement for Downtown entertainment and cultural organizations and venues.
- The emphasis on recruiting new small business entrepreneurs to the downtown.
- The view to adopt a multi-faced Downtown renewal strategy with an Urban Renewal Plan, a
 Downtown Manager, a Clean, Green, and Safe Ambassadors program, a homelessness task force,
 and various enhanced amenities.

D. Housing Actors & Their Contributions

The City of Brockton has a wide range of housing programs in place to meet the needs of its residents. These programs are operated by City agencies as well as various private and non-profit organizations. The housing actors in the area and their current programs and initiatives are summarized in this section. Most non-governmental actors also gave their opinions on what they believed were the additional housing needs of the community and what should be done to improve the overall housing situation in Brockton, which were summarized at the conclusion of each actor's individual section.

The efforts of these public, private, and non-profit organizations; and their assessments of the city's housing needs and deficiencies will be factored into decision-making for the goals and strategies recommended in this plan.

Section One: Government Actors

Commonwealth of Massachusetts

Housing and particularly affordable housing has been an issue of great importance for the state going back several decades now. Boston, the greater Boston area, and cities across the Commonwealth are confronting the issues of housing scarcity for their residents and the problem of housing affordability as housing prices continue to rise at a greater rate than inflation. In many areas of the state, residents face the possibility of being priced out of their homes and apartments and forced to move to areas where housing is more affordable. The state is attempting to combat these problems through innovative housing policies and programs that seek to assist home-owners, renters, landlords, developers, and municipalities to build and maintain appropriate housing for low and middle class income individuals and families. The housing programs offered by and/or funded by the Commonwealth are as follows:

Housing Development Incentive Program (HDIP)

HDIP provides gateway cities with tools to develop market rate housing through two kinds of tax incentives. These incentives can be used by developers for either housing construction or housing rehabilitation for multi-unit market rate residential housing structures. The two tax incentives are:

- A local-option real estate tax exemption on all or part of the increased property value resulting from improvements (the increment), and
- State tax credits for Qualified Project Expenditures (QPEs) that are awarded through a rolling application process

Developers can apply for up to \$2 million for QPEs of market rate residential units. There is no size restriction for building or rehabilitation projects.

For additional information on HDIP, contact Bill Reyelt, Principle Planner, Smart Growth Programs, at (617) 573-1355 or Rebecca Frawley Wachtel, HOME Director, at (617) 573-1318, or visit their website at: http://www.mass.gov/hed/community/planning/housing-development-incentive-program-hdip.html

Homebuyer Education Initiatives

Through multiple actors and regional partnerships the state offers a variety of assistance programs and initiatives for homebuyers. The state lists the following three organizations as statewide groups with one or more of their goals as assisting Massachusetts homebuyers.

- Citizens' Housing and Planning Association (CHAPA) is a non-profit entity working with state agencies and other non-profits groups on the issues relating to Massachusetts Housing policy. CHAPA connects people to homeowner counseling agencies and hosts homebuyer education workshops throughout the state including the Brockton area. For more information on CHAPA and its housing workshops contact (617) -742-0820 or visit their website at https://www.chapa.org/looking-for-housing/homebuyer-workshops
- MassHousing Homebuyer Counseling provides an eight step guide for potential homebuyers to
 make the best decision regarding their housing options and avoid common mistakes new
 homebuyers often make. This guide covers items such as determining affordability, mortgaging,
 home inspections, etc. The complete guide as well as more information on the MassHousing
 Homebuyer Counseling Program can be found at:
 https://www.masshousing.com/portal/server.pt/community/home/217
- Housing Consumer Education Centers of Massachusetts provides Massachusetts residents with an extensive list of homeowner counseling and education programs across the state. This organization acts as a directory for programs like homeowner workshops, step by step guides, online classes, etc. This organization works with regional partners to assist Massachusetts homebuyers; Housing Solutions for Southeastern Massachusetts is its partner in the Brockton region. Housing Consumer Education Centers of Massachusetts can be reached at (800) -224-5124 or by visiting their website at http://www.masshousinginfo.org/resources?resource=19

MassHousing Get the Lead Out Program

MassHousing, in partnership with the Department of Public Health and Department of Housing and Community Development, offers financial assistance to owner-occupants and investor-owners to remove toxic lead paint from homes. Owner-occupied properties are offered 0% deferred loans, which remains deferred until after the sale or refinance of the property. Investor-owned properties being rented to income eligible tenants are offered 3% amortized loans with 5-15 year repayment terms. Non-profit organizations renting to income eligible tenants are offered 0% amortized loans with 5-15 year repayment terms. Borrowers must meet certain income requirements that vary depending on the type of home being occupied.

For more information on MassHousing's *Get the Lead Out* Program, contact MassHousing at (617) - 854 - 1000, or visit their website at:



https://www.masshousing.com/portal/server.pt/community/home_owner_loans/228/get_the_lead_out

Massachusetts Rental Voucher Program (MRVP)

This program, formerly known as Chapter 707, assists low income individuals and families with tenant and project based rental subsidies. Tenant-based vouchers assist low income individuals who qualify for the program and live in a housing unit that meets the state's sanitary code standards. Project-based vouchers are assigned to specific housing developments, the owner of which rents out his/her units to eligible tenants. The program is administered through non-profit agencies or cooperating local housing authorities throughout the state. Massachusetts individuals and families benefit from long-term stabilization amid unstable housing conditions and an uncertain financial future. Applicants whose household income does not exceed 50% of the area's median income are eligible to apply to MRVP.

For more information on MRVP please contact the Bureau of Rental Assistance at (617) 573-1150 or visit http://www.mass.gov/hed/housing/rental-assistance/mrv.html

Alternative Housing Voucher Program (AHVP)

This program provides disabled applicants, who are not elderly, and are eligible for Chapter 667 Housing with government sponsored rental vouchers to remain in their home or afford a new home they will be renting out. Tenants accepted into the program pay 25% or 30% of their income to their landlord and the state covers the remainder of the rental cost. This program is administered by DHCD's Division of Public Housing and Rental Assistance.

For more information contact the Bureau of State Rental Assistance for more information at (617) -573-1150 or visit http://www.mass.gov/hed/housing/rental-assistance/ahvp.html

HomeBase Program

HomeBase is an emergency family assistance and shelter program to assist those who qualify in finding housing and ending their homelessness. Each family in the program is assigned a caseworker to assist in accessing agency and community resources and other support services to help new tenants remain in their home. HomeBase can help participants by covering or partially covering the costs of a security deposit, rent, apartment furniture, and other expenses. This program is administered by the Department of Housing and Community Development Division of DHS.

For more information please contact DHCD at 617-573-1100 or visit http://www.mass.gov/hed/housing/stabilization/homebase.html

McKinney Shelter Plus Care Program

This program assists homeless families, the disabled, mostly those with mental illness, those with chronic substance abuse problems and/or HIV/AIDs with rental assistance and other support services. Tenants pay a maximum of 30% of their adjusted income towards housing costs while support services are provided by a network of public and private entities. Rental assistance can be tenant-based or building-based. This program distributes approximately 350 Shelter Plus Care Subsidies throughout the state by DHCD.

For more information please contact the Bureau of Federal Rental Assistance at DHCD at (617) 573-1150 or visit http://www.mass.gov/hed/housing/rental-assistance/mspc.html

Section 8 Housing Choice Voucher Program

This program is a federally administered by the Department of Housing and Urban Development (HUD) and is run by the individual states. Section 8 provides subsidies to very low income families and households to assist them in paying their rent. Accepted applicants will have a portion of their rent paid for, the percentage depending on the household's income and the median income in the area in which they live. The housing agency pays the tenant's landlord directly and the tenants are responsible for what portion of the rent remains. HUD has established income limits for the program while a minimum of 75% of issued voucher subsidies must go to households whose income does not exceed 30% of that area's median income.

For more information contact DHCD's Division of Public Housing and Rental Assistance at (617) -573-1150 or visit http://www.mass.gov/hed/housing/rental-assistance/s8hvc.html

Chapter 40 R / 40 S Housing

The Smart Growth Zoning Overlay District Act or Ch. 40 R Housing encourages development of new housing structures to increase an area's overall housing supply. Ch. 40 R encourages municipalities to develop additional housing in strategic locations, like in close proximity of transit stations, with at least 20% of new units established as affordable housing and preferably the new structure supporting mixed-use occupancy. Municipalities must set up specific zoning procedures for areas of the City they would like to place Ch. 40 R developments. The state will provide the municipality with between \$10,000 to \$600,000 for establishing a process for creating 40 R districts and \$3,000 for each new home built in the district.

Under Ch. 40 S the state will also provide the municipality where a 40 R project has been developed with additional funds to help cover the additional costs of any school-age children that move into a 40 R housing project. This additional money covers the cost of sending a child to public schooling that the municipality would otherwise be forced to pay for itself.

For more information contact the Department of Housing and Community Development at (617) -573-1100 or visit: http://www.mass.gov/hed/community/planning/chapter-40-r.html

Family Low Income Housing

This program provides housing for low-income families throughout the state. With this program's funds local housing authorities can purchase or construct housing developments for low income families who pay 25% or 30% of their total income for the cost of rent while the remaining rent is paid for by funds from this program. Applicants' total income cannot exceed 80% of their area's median income to be eligible to apply.

For more information contact your local housing authority, the Bureau of Housing Management at (617) – 573-1150 or visit http://www.mass.gov/hed/housing/ph-manage/flih.html

Housing Stabilization Fund (HSF)

This program assists in the production and preservation of housing units through bonds distributed to eligible private developers, non-profit organizations, or local municipalities working in conjunction with private and/or non-profit developers. Loans to borrowers will be on two year terms, by which time the new or redeveloped housing units should be sold to first-time homebuyers. DHCD will award a maximum of \$750,000 per project and a maximum of another \$50,000 per unit that is HSF assisted and in a HOME consortium community.

For additional information contact HOME/HSF at (617) -573-1300 or visit http://www.mass.gov/hed/housing/affordable-own/housing-stabilization-fund.html



Section Two: Municipal/Regional Government Actors

Brockton Housing Authority (BHA)

The Brockton Housing Authority is a dynamic professional organization committed to providing the best quality of life for its residents. With employee development, growth and participation the dedicated staff will continue to meet the challenges of the ever-changing world in which we live.

The BHA manages 1,951 apartments in 16 public housing developments throughout Brockton as well as 1000 rent-assisted apartments/houses. The approximately 85 employees of the BHA serve about 7,000 residents, or about 7.0% of Brockton's population. They also manage the Section 8 rental assistance program and help develop affordable private homes for ownership and rentals that enable families to move beyond public assistance and become self-sufficient. The BHA owns and operates the following properties:

Ann L. Ward Congregate House – 23 apartment units

Belair Heights – 100 apartment units (six handicapped accessible units)

Belair Tower – 269 apartment units (11 handicapped accessible units)

Caffrey Towers – 318 elderly apartment units

Campello High Rise – 398 elderly apartment units

Crescent Court – 121 family apartment units

Crosby Gardens – 74 apartments (four handicapped accessible units)

Golden Circle – 19 two- and three-bedroom apartment units

Hillside Village – 100 apartment units (five 1-bedroom handicapped accessible units)

Kennedy Drive – 120 apartment units

Manning Tower – 96 elderly/disabled 1-bedroom apartment units

Rainbow Terrace – 64 apartment units

Roosevelt Heights – 102 family apartment units

Sullivan Tower – 121 elderly/disabled 1-bedroom apartment units

Walnut-Crowell – 18 apartment units

Washburn Heights – 50 apartment units

In addition to maintaining multiple public housing developments as well as various rental subsidies, the BHA is also responsible for different housing initiatives including:

Family Self-Sufficiency Program

The Family Self-Sufficiency Program, initiated in 1998, is an assistance program through the BHA that provides low-income families with training, education, and counseling to achieve homeownership and become free of government housing assistance. It is one of the most successful programs in the region, giving residents an opportunity to learn, to earn, and to save through an escrow program that potentially leads to homeownership. In 2015, the FSS established or maintained escrow accounts for 111 of the BHA's 150 participants. By the end of 2015, the accounts totaled \$295,119, which is an average of \$2,658 per family. For many of the program participants, the accounts were dedicated to their growing mortgage down-payments. For others, the money provided a ready reserve for other necessities, such as car repairs or for educational classes to help land a better paying job. Seven families graduated from the FSS program in 2015, five earned enough in salary to remove themselves from housing assistance, and two bought their own homes.

For more information on the programs and services provided by the Brockton Housing Authority, call (508) 588-6880.

Brockton Redevelopment Authority (BRA)

The Brockton Redevelopment Authority (BRA) is a quasi-public agency contracted by the City of Brockton, whose main mission is community development and economic revitalization, specifically for the benefit of low- and moderate-income households and areas of Brockton. The BRA works with the Mayor, the Planning Department, and other City departments to develop and achieve a strategic development vision. The BRA also works in partnership with other organizations like the Brockton 21st Century Corporation, Metro South Chamber of Commerce, private businesses, and developers to further the strategic development vision.

As part of the BRA's contract with the City of Brockton, it manages the City's Community Development Block Grant (CDBG) funding from the US Department of Housing and Urban Development (HUD). The principal purpose of the funding is to improve the lives of low and moderate-income Brockton residents through economic development, affordable housing, and social programs.

The BRA's housing objective is to maintain, support, and preserve the existing housing stock; prevent housing deterioration and vacancies; and prevent neighborhood deterioration due to foreclosures and vacancies. Its programs increase the overall availability of affordable permanent housing through the creation of new units and the return to habitable status of vacant and deteriorated units. The BRA's housing programs strive to preserve the quality of life in existing neighborhoods while accommodating smart growth, and support a well-conceived balance between housing development, transportation, open space, and recreational facilities, and appropriate commercial development opportunities. BRA's main activities include:

- Administering redevelopment grants
- Operate/ fund many CDBG/HOME supported programs e.g.
- Home Owner Emergency Rehabilitation program for basic sanitary Code related repairs up to \$30,000 with deferred Rehab loans which must be paid
- First Time Home Buyer Assistance program offering up to \$10,000 to buyers making < 80% of the regional median income
- CDBG- funded Commercial Area Façade Improvement Programs
- Overseeing receivership programs for the court ordered taking, repairing of sanitary code defects and sale of seriously distressed/abandoned properties. This is under Ch. 11 and the Attorney General's Receivership Program
- Programing CBDG grants (up to 15% of fund) to social agencies for staffing, property improvement, and police foot patrols
- Overseeing new construction such as the Walkover Commons Housing Development and infill housing for first time buyers
- Managing construction of the planned parking structure in the Enterprise Block/Trinity

HOME Investment Partnerships Program

The HOME Program is one of BRA's major funding resources. It is the largest federal block grant program. The HOME program is the largest federal block grant to state and local governments designed exclusively to produce affordable housing for low-income families. Some of the current projects that the BRA is assisting with include the rehabilitation of 16 N. Belcher Ave. to be sold to a first time homebuyer; the renovation of 932 Main Street to create 2 affordable rental units for low-income families, and the rehabilitation of a vacant building located on the campus of the VA Medical Center to create 14 units of affordable housing for homeless veterans.

The Brockton Redevelopment Authority (BRA), as administrator of the HOME Program for the City of Brockton, receives federal HOME Program funds on an annual basis from the U.S. Department of Housing and Urban Development (HUD) to support the development and preservation of affordable housing units for low and moderate-income individuals, families, the elderly, and people with special

needs. Federal requirements mandate that 100% of the HOME funds be used to assist low-income households.

The gross annual household income for homebuyers or occupants of owner occupied properties of HOME assisted units cannot exceed 80% of the area median income for the local Metropolitan Statistical Area (MSA) and can be restricted to a lower amount either through regulations or local preference. The gross annual household income for tenants of HOME assisted rental units cannot exceed 60% of the area median income for the local Metropolitan Statistical Area (MSA) and can be restricted to a lower amount either through regulations or local preferences.

The HOME program's goals are to:

- Provide decent affordable housing
- Expand capacity of nonprofit housing providers
- Strengthen ability of state and local governments
- Leverage private sector participation

Homeowner Rehab Program

The BRA has been funded by the U. S. Department of Housing and Urban Development to administer a housing rehabilitation program. This provides financial assistance to owner occupied single family or owner occupied two family low income homeowners to perform necessary home repairs and improvements. Financial assistance is offered in the form of a 0% interest, deferred payment loan, that is payable when the property is sold, transferred, or refinanced.

To qualify for the program, there are three qualifications that must be met:

- City of Brockton Resident and Homeowner
- Owner Occupied Single or Two Family Home
- Low- and Moderate-Income Household (see table below)

Table 24 Income Threshold to Qualify for Homeowner Rehab Program

Household Size	Maximum Income
1 Person	\$46,100
2 People	\$52,650
3 People	\$59,250
4 People	\$65,800
5 People	\$71,100
6 People	\$76,350
7 People	\$81,600
8 People	\$86,900

Source: Homeowner Rehab Program Pre-Application

First Time Homebuyer Program (FTHP)

The FTHP offers financial assistance to first time eligible homebuyers for down payment and closing cost assistance though a zero-interest deferred loan. The loan is repayable in the event of a transfer or

change in property ownership, refinance, or if the property ceases to be the buyer's primary residence. The program is funded by the U.S Department of Housing & Urban Development (HUD) HOME Investment Partnerships Program.

Eligible buyers will be considered for funding of up to 3.5% of the purchase price for a maximum of \$12,500 financial assistance though a zero-interest deferred loan, repayable in the event of property transfer of ownership or loan refinancing (except for rate and term of the loan). The funds are subject to availability. Loan payments on both loans will be deferred until there is a change in ownership or the property ceases to be the homebuyer's primary residence.

For more information on the programs and services provided by the Brockton Redevelopment Authority, call (508) 586-3887.

BRA's Identified Housing Needs:

- Further Improvement to the tax title process
- Adoption of the Community Preservation Act to fund housing, open space, historic preservation and recreation activities
- More focus on emergency rental assistance

Old Colony Planning Council (OCPC)

As the regional planning agency for the 17-community area from Stoughton to Plymouth, OCPC does many housing-related studies both as freestanding efforts and as part of master plans, and prepared a Regional Housing Plan in 2015. The



Council continues to support local planning boards, non-profits and other housing related entities with preparation of Section 8 Utility Allowance standards for local Housing Authorities. In addition it is the Metropolitan Planning Organization (MPO) for the region and an Economic Develop District (EDD) for work with U.S. Economic Development Administration (EDA) and an Area Agency on Aging which review s and supports many programs with Elder American Act funds. The related Ombudsman Program monitors conditions in nursing homes as an advocate for patients as a whole and individually. It makes frequent visits to the homes.

The main on-going activity is the annual preparation of Utility Allowances for the Section 8 programs at the various housing authorities.

Continuing needs noted by the Council are:

- Housing with or without supportive services for developmentally delayed young people aging out of homes or other resources.
- Expanded Section 8 and MRVP vouchers for use in communities where housing supplies are adequate but prices for standard housing are prohibitive.

Section Three: Non-Government Actors

Brockton Area Multi-Services, Inc. (BAMSI)

BAMSI (Brockton Area Multi-Services, Inc.) is a private, non-profit human services organization providing services to adults and children with developmental disabilities, mental illness, behavioral health, and public health needs. BAMSI transforms lives by building the capacity of individuals, families, organizations, and communities to learn, thrive, and achieve their goals. BAMSI believes all individuals and families have the ability to learn, grow, and succeed.

Some of the programs offered by BAMSI include:

Housing Related Activities -

- Direct supervision of housing in approximately 20 BASMI owned and staffed state –supported group homes for the developmentally delayed
- Provision of Housing Support Service Coordination, housed in four developments but available for all tenants

Other Services -

- Behavioral Health and Substance Abuse Services services include HIV/STD testing services, the COPE Center, Peer Recovery Support, Clubhouse Services, Narcan, Adult Day Treatment Center, Individual and Family Counseling, and Community Based Flexible Supports.
- *Development/Intellectual Disabilities & Autism Services* services include In-Home Support, Residential Services, Day Habilitation, Adult Companionship, and Employment Services.
- *Brain Injury Services* services include In-Home Support, Pre-Vocational Services, New Start Brain Injury Community Center and Enrichment Centers.
- Public Health & Community Resources services include BAMSI's Helpline, Brockton Housing Support/Service Coordination, WIC (Women, Infants, & Children), HIV Case Management, and Dorn Davies Senior Center.
- Behavioral Health Services services include Brockton After School Enrichment Program, the
 FIRST Program, Community Service Agency of Brockton, Individual and Family Counseling, the
 COPE Center, HIV/STD Testing Services, and Home Based Team.
- Education Support & Services services include Road to Succeed, Wraparound Coaching and Educational & School Consultation.
- Family Support Services services include Intensive Flexible Support (IFFS), Parents of Transitional Aged Youth, the Family Support Center, and Parent Information Network (PIN).
- Public Health & Community Resources services include Brockton Early Intervention, BAMSI's
 Helpline, Local Systems of Care, WIC (Women, Infants, & Children), and Children's Advocacy
 Center.

For more information on the programs and services provided by BAMSI, call (508) 580-8700.

BAMSI's Identified Housing Needs:

- Overall there is a need for more affordable housing
- More affordable housing for developmentally delayed young people aging out of family homes and alternative youth housing
- More units that are modified to accommodate handicapped residents

Housing Solutions for Southeastern Massachusetts

This is a regional non-profit seeking to improve the quality of life through housing-related actions including:

- Housing development and assistance
- Rental assistance through managing Section 8 and MRVP vouchers
- The Family Self Sufficiency educational, counseling and equity accumulation program (FSS)
- Development/management of 313 varied affordable units
- Homeless assistance/prevention through the Shelter Plus Care, Home Base and RAFT programs and related prevention measures

Identified Housing Needs:

- Improved, clearer, systematic City property disposition practices to focus results on desired recipients through an RFP process rather than risking the results of an auction
- More use of manufacturing houses where suitable for moderate size multi-unit buildings
- Minimal carbon footprint in projects even if not LEED certified
- A focus on affordable housing for one to three unit buildings
- More rent assistance to the public when the issue is cost rather than supply

Old Colony YMCA

The Old Colony YMCA is a charitable, non-profit association committed to the development of strong spirit, mind, and body, guided by Judeo-Christian principles, to enrich the quality of life of those in the community. Their Mission is to assist all people to develop to their fullest potential and to respond to ever-changing community needs with a focus on youth development, healthy living, and social responsibility.

The Old Colony YMCA serves 31 communities in Southeastern Massachusetts with programs for all ages and abilities, designed to build healthy spirits, minds and bodies. Services provided by the Old Colony Y include health/fitness/competitive sports programs, swimming instruction, youth asset building activities, leadership and character development training, childcare, after school programs, literacy training, tutoring, mentoring, and summer camping programs. The Old Colony Y is one of the largest human service providers in Southeastern Massachusetts, serving over 135,000 children and families each year. The Family Services branch of the YMCA operates three family shelters in Brockton, totaling 60 units which are generally full. One of the beneficial programs offered for young adults by the Old Colony YMCA is YouthBuild Brockton.

YouthBuild Brockton

The Old Colony YMCA YouthBuild Brockton Program is a ten-month community based youth development program serving young men and women, 16- 24 years of age, who have not completed high school. Students spend half of their time in the classroom working towards their GED and half on a construction site in Brockton gaining transferable on-the-job work skills. Through collaboration with the Brockton Housing Authority, students build and renovate housing units in Brockton for rental or home ownership. Over the past ten years, the students of YouthBuild Brockton have built 12 single-family, three-bedroom, Energy-Star certified homes. Students also learn valuable skills that will help them in the workplace through a wide-ranging life skills program. Career and Post-Secondary placement is an integral part of the student's experience in the program. Students earn a stipend while attending the program based on their attitude and performance.

For more information on the programs and services provided by the Old Colony YMCA, call (508) 583-2155.

Father Bill's Mainspring House – Brockton Coalition for the Homeless



The Mainspring House, located at the 54 North Main Street in

NOBODY SHOULD BE HOMELESS

Brockton, is a homeless shelter for men and women. In addition to providing housing for 47 men and 18 women on a daily basis, the Mainspring House offers the following services:

- Substance abuse counseling;
- 3 meals per day;
- Clothing;
- Medical care by referral;
- Day programs;
- Transportation;
- Advocacy; and
- A soup kitchen located at the shelter open from 10 AM-noon.

All persons seeking housing and services at the shelter must be sober, must arrive at the shelter by 7:00 pm, and are required to leave the shelter at 7:00 am the following morning.

For more information on the Mainspring House and the services that they provide, call (508) 587-5441.

Identified Housing Needs:

- Space for young, developmentally delayed person aging out of family homes or protective housing
- More receptive zoning as some projects can be done only through Chapter 40B
- Earmarking a portion (15%) of resources like HOME funds for extremely low income people making less than 30% of median income
- Addition of more mixed income communities
- A housing resource center with dynamic activities, referral services, and other services beyond a bed for the night
- Preventative programs like job training so people can avoid homelessness

Brockton Housing Partnership (BHP)

As an alliance of lenders and other housing activists the BHP connects the City with organizational, financial, technical and issue-oriented partners to support efforts in:

- Rehabilitation of City-owned properties
- First time home-buyer training
- Credit management and enhancement
- Operating the Buy Brockton loan and mortgage program
- Giving technical/financial support to Housing Solutions for Southeastern Massachusetts' Family Life Center for Family Reunification

Identified Housing Needs:

Strengthening and expanding existing institutions like a larger well-staffed Planning and
Development Department rather than creating a new entity like the former CDC or Housing
Trust. This would complement the work of the Housing Authority and Redevelopment Authority.

Catholic Charities /Catholic Charitable Bureau

A multi-purpose interfaith group serving 20,000 people in 26 communities. Its former site is being cleared for a Father Bill's/ MainSpring affordable development.

Continuing activities are:

- Nutrition support
- Parental support
- Elderly services

Past activities included running the Ann Ward Congregate House for assisted living and planning appropriate reuse of the former Wales (Retirement) Home, but there now are no direct housing activities.

For more information on the programs and services provided by Catholic Charities please contact their office at 508-587-0815.

NeighborWorks Southern Massachusetts

This regional non-profit seeks to improve housing and to support neighborhood revitalization through:

- A low cost housing rehabilitation Program
- First time buyers counseling
- Foreclosure Prevention

- A down payment assistance loan/grant program and use of HOME funds to further support first time ownership
- Funding local lead paint removal efforts
- Collaborative real estate development of affordable housing for the homeless, battered children and adults, and the developmentally delayed

Identified Housing Needs:

- More long-term family shelter spaces like that at MainSpring in the spirit of housing first
- Continued and expanded new owner-occupant landlord training as required by some lenders
- Housing services for young, developmentally delayed persons aging out of family homes or institutions

Self Help Inc.

This major regional community action (Anti-poverty) agency serves 31 Plymouth, Bristol, and Norfolk counties with many social, health and educational programs but the only housing related programs are.

- Fuel Assistance.
- Energy Conservation including heating system improvements.

Identified Housing Needs:

- Emergency rent assistance.
- Lead Abatement because of the risks to children in the many Brockton houses with original lead paint even when covered by more recent painting. The agency is getting more HUD de-leading funds through the City of Brockton and will continue to use inspectors and sub-contractors, with some of the cost paid by the property owners.
- Responses to opioid crisis –enough affordable safe sober houses and related facilities.
- Additional housing for seniors.
- Need for Long term appropriate housing for Developmentally Delayed young adults aging out of family homes.

E. Housing Policies of Nearby Communities

During the preparation of this report, five municipalities in the region were contacted to determine how other communities are responding to housing related issues and to identify policies as well as solutions that might have some applicability to the housing situation here in Brockton. These cities were selected because they share a number of characteristics with the City of Brockton; being older manufacturing cities with concentrations of poverty and an older, denser housing stock all located in Massachusetts.

These five communities were Lynn, Taunton, Lowell, Fall River, and New Bedford. Below is a list of each City's current housing policies and programs as well as a summary consisting of the policies most commonly shared among the different cities that could provide useful insights for future housing policies and procedures for Brockton.

Section One: City of Lynn

- <u>Housing Preservation Grant Program</u>: Provides owner-occupants of one to six unit residential buildings with a 50% grant reimbursement of up to \$3,000 of the cost of eligible exterior painting, repairs, and improvements through CDBG and HOME funds.
- <u>De-lead Grant Program</u>: Offers owner-occupants and investor-owners of one to six unit residential buildings with 100% grant reimbursement of up to \$5,000 for the costs of de-leading, funded through CDBG and Home funds.
- <u>Target Area Grant Program</u>: Provides owner-occupants and investor-owners of one to six unit residential buildings with a 100% grant of up to \$3,000 for the cost of exterior painting repairs and improvements within designated target areas with CDBG and HOME funds.
- Emergency Repair Grant Program: Provides owner-occupants of one to six unit residential buildings with emergency repair funds of up to \$3,000 with no match or repayment requirement if the owner's income is 50% less of the area's median income and there is no other means to fund the repairs; funded through CDBG.
- <u>Direct Rehabilitation Loan Program</u>: Provides owner-occupants of one to six unit residential properties with a low interest loan of up to \$20,000 for the cost of eligible repairs.
- <u>Single-Family Rehabilitation Loan Program</u>: Provides owner-occupants of single family homes in which the owner is at least 62 years of age and/or is a person with disabilities with a 0% deferred loan of up to \$10,000 for interior and exterior repairs; funded through HOME.
- Target Area Investor Direct Rehabilitation Loan Program: Offers investor-owners of two to six unit residential buildings with a low-interest loan of up to \$10,000 for the costs of eligible repairs. The property must be within the target boundaries identified by the city and is funded by CDBG.
- <u>Single-Family Homebuyer Assistance Program</u>: Through coordination with MHFA & MHP Soft Second Program, first time homebuyers who complete the Homebuyer Seminar and have incomes

- within 80% of the median are provided with a no interest loan funded through the HOME Program.
- <u>First-Time Homebuyer Assistance Program:</u> Through coordination with MHFA & MHP Soft Second Program, provides a loan of up to \$10,000 at no interest to purchase a two- to four- unit home and repair all code violations. All participants must attend the first-time homebuyer seminar; program funded through CDBG.
- <u>Family Self-Sufficiency Program:</u> Provides up to \$5,000 in matching grant funds to help tenants achieve the goal of becoming homeowners; funded through CDBG and HOME.
- <u>Single-Family New Construction & Rehab Program:</u> Expands the supply of affordable housing through the construction and rehabilitation of one to two unit residential buildings for sale to first-time homebuyers; funded through HOME.
- <u>Multi-family New Construction & Rehab Program:</u> Expands the supply of affordable housing
 through the construction and rehabilitation of two to four unit residential buildings for sale to
 first-time homebuyers; funded by CDBG.
- <u>Neighborhood Outreach Specialist/Code Enforcement Program:</u> Ensures residents are informed about the housing programs and services available to improve their properties, particularly in target areas.
- <u>Infill and Housing Recovery Support Program:</u> Expands the supply of affordable housing through private construction financing to cover acquisition and hard construction costs while city CDBG and HOME funds cover soft costs.
- <u>Get the Lead out Program:</u> Provides owner-occupied properties with a 0% deferred interest loan to cover the cost of lead abatement; funded by HUD and MassHousing.
- Acquisition and rehabilitation of two and three family properties that are then sold to first time homebuyers by *the Lynn Community Development and Housing Corporation*; funded through either CDBG or HOME.

Section Two: City of Taunton

- First-time homebuyer assistance program, home buyers counseling, home owners counseling, and foreclosure counseling provided to the people of Taunton through CDBG funding.
- Housing legal services through South Coast Counties Legal Services, funded by CDBG.
- Emergency repair program covering costs up to \$10,000, funded by CDBG.
- Section 108 for AH and PH initiatives to leverage for demolition and replacement projects.
- Pro-Home (local non-profit operating in the region):
 - o Pro-Home works with communities under the greater Attleboro/Taunton Consortium to acquire abandoned housing properties, repair them, and sell to private homeowners.
 - Pro-Home hosts first-time homebuyer workshops to assists homebuyers and is funded in part through the mayor's office and CDBG.
- Housing rehabilitation program through construction contracts funded through HOME.
- CHDO affordable rental housing development funded through HOME.

Section Three: City of Lowell

- Housing development incentive program providing tax exemptions and credits for building/improving diverse low-market housing.
- Lead paint abatement with 0% interest forgivable loans for low to moderate income owner-occupied buildings.
- HOME rehabilitation program offering deferred 0% interest loans to resolve required health and safety code issues and add needed handicapped accessibility.
- First-time homebuyers provided with loans of up to \$10,000 depending on eligibility under the HUD guidelines to repair residential buildings.
- Community Choice Power Program for all basic services unless household chooses to opt out.

<u>Section Four</u>: City of Lawrence

- Rehabilitation and de-leading program providing owner-occupants and investor/developers of one to four unit properties to eliminate building and sanitary code violations to decrease instances of lead paint poisoning in children. The city offers subsidizes in the form of deferred loans or direct grants of up to \$10,000 per unit for rehab and \$3,000 per unit for lead paint hazards.
- A First Time Home Buyer Assistance Program provides funds to cover some of the costs associated with the down payment and closing costs for those purchasing their first home. The subsidy is provided by a 0% deferred loan forgiven in five years for 3% of the home's purchase price for single to four family homes. The program is funded through HOME.
- Infill Construction Program provides low to middle income residents with affordable housing options through the construction of new, typically two family homes, sold to first time homebuyers. The program is run through CHDO in partnership with private developers in the city.
- The City of Lawrence is the lead agency for the Massachusetts High Risk Consortium, coordinating HUD funding for the Lead-Based Paint Hazard Control Program to high risk communities in the region, including Brockton.
- Lawrence Community Works provides additional housing options through the improvement of housing infrastructure and acquisition of vacant lots to build housing units and playgrounds.
- The city works to attract private development using tax credits funded through HOME and through Coordination with the Greater Lawrence Community Action Council and its weatherization and fuel assistance programs.

Section Five: City of New Bedford

• <u>Financial Assistance Program</u>: is available to owner-occupied properties of up to four units to correct building code violations in the form of 3% fully amortizing loans, secured by a mortgage,

- however, a deferred loan may be provided in the case of serious hardship. The program is funded through CDBG funds with all participants having incomes within 80% of the median income.
- <u>Senior at Home Program</u>: provides funds for correcting serious code violations at the homes of senior citizens in an effort to enable them to remain in their homes. Eligible participants are owner-occupants over the age of 65 and earning within 80% of median income. This program has the same financial terms as the Financial Assistance Program.
- Neighborhoods First Time Home Buyer Program: assists first time homebuyers with the costs of purchasing a one to three family home as well as gap financing for the costs of needed improvements, including lead paint abatement. The program offers 0% deferred loans, secured by a mortgage and forgiven after ten years. For single and two family homes, the program provides 2% of the required 5% down payment and a portion of closing costs, the subsidies not to exceed \$5,000. For a three unit property, the applicant must have 5% of the required 10% down payment. The program also offers rehabilitation assistance of up to \$10,000 per unit and is funded through HOME.
- <u>Handicap Accessibility Program</u>: provides funds to remove or alter architectural barriers and make the structure handicap accessible. The program uses direct grants of up to \$4,000 to owner-occupants and also renters who have authorization from their landlords. The program is limited to those earning within 80% of the median income and is CDBG funded.
- <u>Lead Paint Reimbursement Program</u>: provides a direct grant of up to 50% of the approved deleading cost with a maximum of \$2,000 per building. Owner-occupied and investor-owned properties are eligible to apply; single family and multi-family properties can also apply and are funded through CDBG.
- Rental Housing Rehabilitation Program: assists owners of properties that require moderate rehabilitation to support lead paint de-basement, energy conservation measures, and exterior renovations. The program is funded through a 3% fully amortized loan of up to 30 years and \$20,000 per unit with a maximum of \$60,000 per building by HOME.
- Housing Development Incentive Program: provides local and state tax exemptions and tax credits
 to encourage rehabilitation of property for rent or sale as market rate housing in selected housing
 development zones.
- <u>Buy New Bedford Program</u>: assists low income buyers with a fixed rate mortgage done under flexible underwriting guidelines and reduced, city assisted down payments. The Fall River-New Bedford Housing Partnership coordinates the lottery and pre-approval process.
- New Bedford Receivership Program: coordinates with the Attorney General's Receivership Program to appoint local receivers of abandoned and distressed properties for rehabilitation and sale to first time homebuyers or for rehabilitation by owners due to related enforcement efforts. These properties are not subject to tax title.
- The city provides homebuyer counseling services and local banks offer workshops for first-time homebuyers.
- The city works with a number of non-profit organizations on projects to build new affordable housing units and rehabilitate dilapidated units. These organizations help reduce the cost burden to residents in the city and have proved useful in neighborhood revitalization projects in the past.

Section Six: Summary of Major Findings

The housing policies and programs of these five nearby communities showcase the current priorities and challenges facing cities similar to Brockton. Though these five cities have many different housing policies that vary in size and scope, there are major similarities in their housing policies and programs that are worth noting. The City of Brockton can take notice of what others are doing in regards to housing and choose to adopt similar initiatives or improve existing programs already in place.

The programs and initiatives listed below were the most commonly noted housing strategies from these other communities in Massachusetts deemed to be most effective and applicable to Brockton. These will be used to inform the goals and strategies as part of the overall recommendations for this report. An analysis each city's housing initiatives revealed nine commonalities that are as follows:

- 1. <u>Lead De-Basement Initiatives</u>: At least one program put in place to pay for or reduce the cost to homeowners or landlords of lead paint removal from homes and residential units.
- 2. <u>Assistance to First Time Homebuyers</u>: Programs that include counseling, grants, loan deferments, and funds to rehabilitate/construct new homes with the purpose of selling to first time homebuyers.
- 3. <u>Non-Profit Partnerships</u>: Building relationships and coordinating with local non-profits in the region who provide housing related services to the public.
- 4. <u>Target Area Grants/Loans</u>: Utilizing financial incentives such as grants and low fixed loans to bring about new construction and re-development in certain targeted areas, usually in economically depressed ones.
- 5. <u>Loans with Little to No Interest for Cosmetic Fixes</u>: Affordable loans that owner-occupants in one to four unit homes and apartment units can use to improve the exterior physical appearance; ex. paint, glass, cracked brick, etc., of these units, thus improving the quality of the housing stock and the desirability of the homes and apartments.
- 6. Expanding Affordable Housing Stock: Using multiple initiatives, many funded their HOME and/or CDBG to build/rehabilitate housing units with the purpose of selling/renting to low income individuals and families.
- 7. <u>Grant/Loan Program to Address Code Violations</u>: Offering owner-occupants and landlords financial incentives to fix code violations in their homes/residential units.
- 8. <u>Acquisition and Rehabilitation Programs</u>: General initiatives to acquire either vacant land for the purpose of housing construction or acquisition of existing dilapidated housing units to renovate and place back on the housing market.

9. <u>Developer Incentives</u>: Use of tax credits to bring more private developers into the City/certain areas of the City that could benefit from additional housing development; whether it be low-income or middle-income housing.

Important Points to Consider:

- 1. The need for affordable housing is related to prices and incomes as much as to available supply and conditions, that is to say it is a cost problem as much as a supply problem.
- 2. The overriding Goal is "to provide sound, standard housing in a suitable environment at affordable prices for all income groups."
- 3. Expand Section 8 and MRVP vouchers to subsidize new and old units enough to hold rents below 30% of income and mortgages below 38%, and to give people less expensive, longer-term alternatives to shelters and motels/hotels.

IV. Summary of Proposed Goals and Strategies

Goal 1: Support legislation "An Act to Promote Housing Choices" to encourage affordable housing and district revitalization opportunities by reducing the voting threshold to a majority vote for zoning amendments that support specific zoning best practices and diversify housing choice.

Strategies:

- 1. Support legislation that respects the role of local decision-making while lowering the voting threshold to a majority vote for zoning amendments that support the production of housing choices. Explore "Housing Choice Community" designation to coordinate technical assistance and sustainable development of affordable housing production.
- 2. Explore opportunities to create additional "Chapter 40R" smart growth areas, mixed-use, multifamily and transit-oriented development in town centers, near transit and in other smart growth locations.
- 3. Adopt an Inclusionary Zoning Ordinance and consider incentives to include accessible and adaptable housing units in new developments that provide affordable options for people with low or moderate income, seniors, veterans, or disabled persons.
- 4. Operationalize and Capitalize a Municipal Affordable Housing Trust to explore, analyze and implement opportunities in support of affordable housing production and oversee housing-related issues.
- 5. Consider the adoption of zoning ordinances that promote Supportive Senior Housing development for persons aged 60 or over. Assess areas served by existing infrastructure for opportunities to amend zoning to facilitate affordable active-senior and/or Supportive Senior Housing development.
- 6. Adopt zoning amendments to allow Open Space Residential Development (OSRD) design elements that support reduced dimensional requirements including lot sizes, setbacks and parking ratios to encourage construction of affordable housing units with increased densities that facilitate more flexible developments on smaller footprints.
- 7. Support aging in the community through increased multi-generational housing options, progressive senior facilities, exploration of allowing for alternative housing arrangements: Small Efficiency Dwelling Units (SEDUs) and Accessory Dwelling Units (ADUs).
- 8. Consider incentives for continuation of Downtown re-development efforts including incentives for construction of new housing developments strategically located near transit hubs to promote the development of land and sites that are underutilized within the City.

Goal 2: Promote home ownership throughout the City with greater local capacity to produce affordable housing in order to encourage and facilitate housing development for low/middle income persons and families.

Strategies:

1. Explore opportunities to increase education and awareness of first-time homebuyer programs to provide financial support for low and moderate-income housing investment.

- 2. Maintain and advance capacity to implement local housing initiatives and continue local planning, education, and advocacy to promote achievement of local affordable housing goals. Build local awareness of housing demand, issues and activities.
- 3. Maximize local preference in unit capacity.
- 4. Provide incentives to stimulate housing investment and increase economic development in targeted areas.
- 5. Consider incentives for property-owners to use their rental units as long-term rather than short-term rentals.

Goal 3: Partner with developers to leverage other public and private resources.

Strategies:

- 1. Leverage other public and private resources in the preservation and production of affordable housing to the greatest extent possible. Explore participating in regional collaborations addressing housing development.
- 2. The City of Brockton should consider and explore the adoption of the Community Preservation Act
- 3. Access Housing Resources.
- 4. Utilize Local Initiative Program and develop local partnerships with developers to utilize the State's Local Initiative Program (LIP) as a means to develop "Friendly 40B" development projects.
- 5. Review private properties for housing opportunities and consider Chapter 61 properties as potential affordable housing opportunities in the future.

Goal 4: Strategically dispose of surplus property to support economic development and neighborhood stabilization.

Strategies:

- 1. Conduct screening analysis of city-owned land to unlock large parcels for additional development.
- 2. Review existing city-owned or foreclosed properties for investment, rehabilitation and sale to prequalified borrowers.
- 3. Create a registry and/or explore opportunities to support legislation at the state level, which promotes the creation of a land bank of foreclosed and/or city-owned properties and explore other low interest loan opportunities for low and moderate-income homebuyers for workforce housing investment of previously foreclosed and/or town-owned properties.

Goal 5: Rehabilitation of the existing housing stock.

Strategies:

1. Preserve the existing affordable housing stock including its diversity of prices, building types, lot sizes, and restriction on existing affordable units. Promote a diversity of housing options to meet the needs of a changing and aging population and promote a more socio-economically and diverse population, including construction new units and preserving existing dwellings.

- 2. Study opportunities for re-use of existing buildings or use previously developed or city-owned sites for new community housing.
- 3. Seek housing rehabilitation funds.
- 4. Consider the establishment of new programs to assist owner-occupants and rental property owners in bringing their homes up to code, funding exterior cosmetic fixes to their properties subsidized through low interest loans, tax incentives, or grant money.
- 5. Increase the percentage of homes that are owner-occupied rather than rented through rental property-owners.

Goal 6: Divide the city into different districts for analysis.

A. Housing Goals

Based upon the research and outreach completed in Section III which included gathering information from various housing actors, similar communities in the state, an analysis of past reports, and a needs analysis of the City; the following have been established as the set of housing goals the City of Brockton should strive for and work to pursue. In the following section, individual strategies for achieving each goal have been laid out and thoroughly explained with an attached timetable to implement each strategy.

Brockton Housing Strategy Report Goals:

- 1. Promote greater local capacity to produce affordable housing in order to encourage and facilitate housing development for low/middle income persons and families.
- 2. Amend zoning to promote affordable housing and smart growth development.
- 3. Partner with developers to leverage other public and private resources.
- 4. Strategically dispose of surplus property to support economic development and neighborhood stabilization.
- 5. Rehabilitation of the existing housing stock.
- 6. Divide the City into different districts for Analysis.

B. Implementation Strategies

Housing production is contingent not only on actual development projects but on the planning and regulatory tools that enable localities to make well informed decisions to strategically invest limited public and private resources on housing creation. To most effectively and efficiently execute the strategies included in this Housing Strategy and meet production goals, greater flexibility will be needed in the Zoning Ordinance, new tools will be required to capture more affordable units and better guide new development to specific "smarter" locations.

The City of Brockton should explore and consider the following planning and zoning related strategies to promote the creation of additional affordable units and to direct new development in appropriate locations. These actions can be considered tools that the City will have available to promote new housing opportunities, each applied to particular circumstances and providing a powerful group of resources when available in combination. The strategies enable new affordable unit creation that is more responsive to local needs and priorities.

The Old Colony Planning Council has defined the following implementation strategies to accomplish the affordable housing goals, as outlined in this section. In order to carry out the strategies included in this Housing Strategy and meet production goals, it will be important for the City of Brockton to build its capacity to promote affordable housing activities. This capacity includes gaining access to greater resources – financial and technical – as well as building local political support, developing partnerships with public and private developers and lenders, and creating and augmenting local organizations and systems that will support new housing production. Specific actions to help build local capacity to meet local housing needs and production goals are detailed below. While these strategies do not directly produce affordable units, they provide the necessary support to implement a proactive housing agenda that ultimately will produce new units.

The strategies outlined below are derived primarily from the priority housing needs identified in Section III, 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 five specific goals.

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

- 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 developments
- 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

There are instances where housing initiatives might be promoted to meet the range of local needs that will not necessarily result in the inclusion of units in the Subsidized Housing Inventory (examples include promotion of accessory apartments and mixed-income housing that includes "community housing" or "workforce housing" units. More commonly, housing affordability is being referred to as either little "a" affordability, meaning that the units do not meet all state 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 City of Brockton will also encourage developers to incorporate universal design and visit ability standards, particularly given the high and increasing number of older adults in the community, in addition to enhanced energy efficiency standards.

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 City to prioritize and process, each through appropriate regulatory channels.

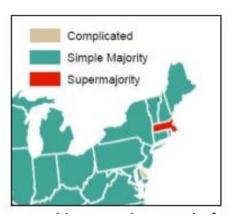
GOAL 1: Support legislation "An Act to Promote Housing Choices" to encourage affordable housing and district revitalization opportunities by reducing the voting threshold to a majority vote for zoning amendments that support specific zoning best practices and diversify housing choice.

Strategy 1: Support legislation which represents the role of local decision-making while lowering the voting threshold to a majority vote for zoning amendments that support the production of housing choices. Explore "Housing Choice Community" designation to coordinate technical assistance and sustainable development of affordable housing production.

Responsible Parties: The Planning Board and the Zoning Board of Appeals should work together to develop a permitting process with the support of the Mayor and City Council that facilitates affordable housing production and promotes pending legislation to eliminate barriers to building housing by reducing the required vote from 2/3 "supermajority" to a simple majority for certain zoning changes.

Short Term Strategy: 1-2 Year Implementation

State law bars cities in Massachusetts from adopting changes to zoning laws unless the municipality is able to secure a 2/3 "supermajority" vote of its legislative body. Pending legislation allows cities and towns to adopt local zoning by majority vote of their legislative bodies that will encourage housing production. This legislation would allow communities to adopt by a vote of a simple majority of all members of the city council, zoning ordinances or bylaws that support smart growth zoning principles for housing production and remove barriers to the adoption of zoning amendments that promote sustainable, appropriate housing production.



In order to meet the need for affordable housing, Brockton should develop a predictable and consistent permitting process that facilitates affordable housing production, increasing efficiency and stock by adopting best practices that promote sustainable housing development. This Act will eliminate barriers to building new housing and improve land use while making Massachusetts more consistent with current practice in most states.

Recommended Action: The Planning Department and Zoning Board of Appeals, with the support of the Mayor and City Council will draft consistent permitting processes and zoning amendments that would support pending legislation, "An Act to Promote Housing Choices" by adopting smart growth principles that encourage housing production.

Understanding Impediments to New Development

A concurrent approach to zoning and construction review improves the permitting process. The development community has a generally favorable view on permitting concurrency, but the process can be difficult to organize across City agencies. Update the zoning ordinances, development review processes and permitting policies so they are clear and consistent. Coordinate the permitting work of City boards and departments and the Brockton Housing Authority in order to achieve consistency in the interpretation and administration of affordable housing requirements.

Identify specific sites for which the municipality will advance housing goals and encourage the filing of private affordable housing developments. The City of Brockton should work with developers to help create projects that construct housing that is affordable across a wide range of incomes while protecting the critical resources and community character of Brockton.

Strategy 2: Explore opportunities to create additional "Chapter 40R" smart growth areas, mixed-use, multi-family and transit-oriented development in town centers, near transit and in other smart growth locations.

Responsible Parties: Planning Department and Zoning Board of Appeals with support from the Mayor and City Council.

Short Term Strategy: 1-2 Year Implementation

The City of Brockton should consider the creation of zoning overlay districts to promote 40R and 40S housing developments in targeted areas of the City to increase housing production to meet the needs of underserved populations.

Brockton has a demand for additional housing choices to meet the needs of varying populations
and is determined to support the production of new housing through the adoption of smart growth
principles. By supporting the construction of housing under the state's 40R and 40S programs the
City can utilize state funds for affordable housing choice to ease the cost burden on development
while creating the type and character of options that meet the housing requirements of the
targeted populations.

In the context of good City planning and smart growth, the likely location for denser development, certainly for providing housing for smaller households and seniors, is in commercial areas and near town centers and transportation stations. The adoption of additional Chapter 40R Smart Growth Overlay Districts would provide additional incentives and resources and make development more attractive and feasible in these areas.

The key components of 40R include:

- Allows local option to adopt Overlay Districts near transit, areas of concentrated development, commercial districts, town centers, and other suitable locations;
- Allows "as-of-right" residential development of minimum allowable densities;
- Provides that 20% of the units be affordable;
- Provides two types of payments to municipalities (one based on the number of projected housing units and another for each unit that receives a building permit); and
- Encourages open space and protects historic districts.

Recommended Action: The City of Brockton, through the Planning Office and/or with the support of a private consultant, should review areas that are within ½ mile of a transit station for consideration of adopting a Chapter 40R Overlay District to encourage compact residential and mixed-use development which may increase housing production while providing Brockton with financial incentives and control over design by creating zones pre-approved for high density development that will attract developers as it does not impose profit limits or other financial restrictions.

The City should explore areas that meet location and procedural standards set out in the statute to become eligible for a density bonus payment of \$3,000 per unit if and when units are constructed. These payments can be helpful in obtaining local support for the zoning change. There are no restrictions on how the City can use their 40R payments.

Districts must be in "smart growth" locations near transit or commercial centers, in areas with existing infrastructure or otherwise suitable for



What is 40R?

- Eligible locations
- · As-of-right, including densities...
 - > Single-family: 8 units/acre
 - > 2-3 family: 12 units/acre
 - > Multifamily: 20 units/acre
- · Affordability requirement (20%)
- Direct funding:
 - \$10K-\$600K Zoning Incentive Payment upon based on District size
 - > \$3,000/unit Density Bonus Payment
 - > Eligibility for school-cost reimbursement \$ (Chapter 40S)

high density mixed-use development. The overlay district must allow housing to be built as of right at densities of at least 8 to 20 units per acre depending on the type of housing, at least 20% of the new units must be affordable. If the zoning for the 40R district indicates that 25% of the units will be affordable, all units in rental housing developments, including market ones, can be counted as part of the SHI. Other benefits can also be tapped including becoming more competitive for MassWorks infrastructure funds and higher levels of financial assistance from the Massachusetts School Building Authority for new schools.

The designation allows the City to set detailed design standards for projects built within the overlay district and reject applicants that don't meet the standards. The companion designation, "Chapter 40S" offers "school cost" insurance to address fears of local school impacts.

A zoning overlay district allows affordable workforce housing developments where consensus exists for developing housing that meets local needs. The advantage of this approach is that the City can regulate the amount and type of development that may occur on its land. Adjacent neighborhoods can have input into the process to protect the investment in their home. For any sites the City wishes to seek housing

proposals, the Planning Board will formulate a zoning overlay district that specifies Brockton's objectives.

Another potential option is to explore the development opportunities through the state's Growth Districts Initiative that was recently announced as a means of expediting commercial and residential development. Under this Initiative, the state's Executive Office of Housing and Economic Development (EOHED) will partner with municipalities that identify one or more areas as appropriate for significant new growth. Within these areas, EOHED will work with the community and property owners to make the district "development ready" regarding local permitting, state permitting, site preparation (including potential Brownfields remediation work), infrastructure improvements, and marketing. Successful growth districts wills hare the following goals and characteristics:

- Create an inventory of development-ready sites for new and expanding businesses, especially in key industry clusters;
- Promote the distribution of new economic growth throughout all regions of the state;
- Create a range of new workforce housing opportunities throughout all regions of the state;
- Promote new commercial and residential growth that is consistent with the state's sustainable development principles;
- Act as a catalyst for the revitalization of mid-size cities; and
- Provide a focal point for coordinated action by various state, regional, and local entities involved in land use and development.

Required Resources: Staff time of the Planning Department and Zoning Board of Appeals with potential additional professional support from a consultant or regional planning agency to assist with the planning involved in creating a 40R District or participate in the Growth Districts Initiative. State funding for this technical assistance could potentially be covered by the state's *Planning Assistance Toward Housing (PATH) Program* or through technical assistance grants available to *Housing Choice Communities*. Such professional support would also be an eligible activity under the Community Preservation Act (should the City adopt the Act) or the Housing Trust Fund.

Strategy 3: Adopt an Inclusionary Zoning Ordinance and consider incentives to include accessible and adaptable housing units in new developments that provide affordable housing options for people with low or moderate-income, seniors, veterans or disabled persons.

Responsible Parties: Planning Department and Zoning Board of Appeals with assistance from the Veterans Agent, Council on Aging and support from the Mayor and City Council.

Short Term Strategy: 1-2 Year Implementation

The Zoning Ordinance neither mandates, nor provides any incentive for the private sector to produce affordable housing. Therefore, the City continues to experience residential growth primarily through the

creation of expensive single family subdivisions. This type of development could impact the City's character as well as impact the cost of home ownership in the community.

Single family housing is a critical component of Brockton's housing stock; however, the current zoning does not include provisions for the creation of affordable single family housing. There are limited affordable housing options appropriate for seniors or veterans on limited incomes or for those wishing to downsize from larger homes. Encouraging the development and

Benefits of Inclusionary Zoning

- Expands housing opportunities
- Increases economic, demographic, and cultural diversity
- · Prevents sprawl
- Improves transparency in development process
- Distributes affordable housing equitably
- Improves economic competitiveness of Massachusetts

Smart Growth / Smart Energy Toolkit

Inclusionary Zoning

maintenance of housing that is accessible and adaptable should be a priority. The City should consider a zoning ordinance that provides density bonuses to developers including senior and/ or handicapaccessible units as part of the overall mix of their general developments. Moreover, community supportive housing services should be integrated into or connected with residential development.

Therefore, the City of Brockton should adopt "Inclusionary Zoning" provisions for the Residential District in order to promote home ownership throughout the City. This may be done either by adopting an Inclusionary Zoning Ordinance or by incorporating the requirement for affordable units within an Open Space Residential Design (OSRD) zoning ordinance.

The Inclusionary Zoning Ordinance has been an important means of integrating affordability into new development, and some consideration should be made to adopt this zoning in the future to better promote additional income tiers to provide benefits to a broader range of households. Should the City vote to adopt the Community Preservation Act there would be opportunity to explore the use of CPA funds to further subsidize these projects, once again creating housing opportunities for several income tiers within a single development where feasible.

Inclusionary zoning is another tool to create affordable housing and helps to ensure that production of new affordable units keeps pace with the overall rate of new development of market rate units in the community, thereby helping to ensure continued compliance with the State's 10% affordable housing goal. An Inclusionary Zoning Ordinance would require a developer to set aside a certain percentage of housing units for low and moderate income residents.

An Inclusionary Zoning Ordinance is an effective and predictable way to increase affordable housing stock in the community without requiring significant outlays by the community and ensures that new sizeable market-rate developments will not adversely affect the cities SHI percentage. It should be noted that the ordinance can also allow in-lieu payments that reflects the price of affordable housing and land availability in Brockton. The fee will be calculated based on a formula that will be detailed within the Zoning Ordinance. Many variations of inclusionary zoning ordinances have been adopted throughout the Commonwealth with varying degrees of success. It is important that Brockton craft an ordinance that is custom to the City of Brockton to ensure its success.

- Consider adopting inclusionary zoning to ensure that any new residential development in Brockton provides a percentage of affordable units or cash in lieu of units.
- The City zoning regulations could be amended to require that any new subdivisions with 4 or more housing units have 25% of the units designated as permanently affordable (1 of every 4 units must be affordable).
- The Planning Board could review an Inclusionary Zoning Ordinance proposal. After detailed review and analysis with public comment, the Planning Board could bring an Inclusionary Zoning Ordinance to the City Council for review and approval.

Many communities also allow density bonuses in connection with their inclusionary zoning provisions. Studies on inclusionary zoning indicate that mandatory provisions coupled with strong incentives are most effective in promoting affordable housing. It is 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.

Goals under this Plan suggest that the City promote greater housing diversity and affordability by providing units to those earning a wide range of incomes who are priced out of the private market. Inclusionary zoning can be a useful tool for doing so; and, by providing an alternative to targeting all units to those earning at or below 80% AMI such that when developers provide at least half of the required affordable units for households with income at or below 50% AMI, the remaining affordable units may be sold or rented to households with incomes up to 100% AMI, adjusted for household size and subject to approval by the Planning Board.

Recommended Action: Learning from the approaches of other communities that have recently adopted Inclusionary Zoning and goals of this Housing Plan, Brockton should consider adoption of an Inclusionary Zoning Ordinance that addresses the following policy objectives:

- Requiring home ownership units as part of redevelopment where practical to better promote a wider range in affordability and to create affordable units along a range of incomes.
- Consider different requirements for rental and ownership developments in recognition of addressing different target populations with rentals directed to lower income tiers.
- Provide more stringent zoning requirements in larger developments where economies of scale generate greater feasibility for cross-subsidizing higher numbers of affordable units. This would include mandates for on-site units.
- Consider greater affordability requirements in areas that are more conducive to high density development near transit and the downtown.
- Require some inclusion of 3-bedroom units in developments.
- Reduce the minimum project size that triggers inclusionary requirements to include smaller development projects.
- Support home ownership assistance financing programs.

Other considerations for the Inclusionary Zoning Ordinance may include:

- Adding a requirement that at least 10% of all units include 3 bedrooms, whether for rental or homeownership, to address the range of housing needs in Brockton, which includes family housing.
- Consider a formula for calculating a payment-in-lieu of affordable units and make sure fees are equitably distributed across the City.

Communities that provide options for developers as part of inclusionary zoning typically realize greater use of the ordinance. However, it is essential that the formula for calculating the cash-out fee provide sufficient proceeds to fully subsidize the required number of affordable units despite changes in market conditions and to ensure that the funding will be dedicated to supporting affordable housing. The cash-out fee should be tied in some way to the value of the affordable unit. From a theoretical standpoint that value is commonly considered to be the difference between a unit's market-rate price and the affordable one. This means that the value of the cash-out fee relates to the losses the developer would suffer by building affordable units. Stronger fees typically match the value of the affordable unit not built, allowing the fee to subsidize the same number of units in a separate project.

It may be instructive to invite local and regional developers, both for profit and non-profit, to a special meeting to obtain their input into revised zoning options. It will be important to insure that changes will better promote the use of inclusionary zoning in Brockton, culminating in more affordable units along several income tiers and reflecting the economic context of development.

The City of Brockton should study potential for a policy to offer flexible options and other incentives to develop affordable housing options for local veterans, seniors or people with disabilities. Work with State agencies and other stakeholders to develop group homes to provide supported, supervised living arrangements for citizens with mental and physical disorders.

Document the specific needs for Brockton's veterans and construct affordable veterans housing units that meet those needs. Work with local organizations and the Veterans Agent to obtain input on the specific housing needs of veterans that will allow them to live independently.

Strategy 4: Operationalize and Capitalize a Municipal Affordable Housing Trust to explore, analyze and implement opportunities in support of affordable housing production and oversee housing-related issues.

Responsible Parties: Planning Department with support from the Mayor and City Council

Short Term Strategy: 1-2 Year Implementation

The City of Brockton should explore the process of establishing a Municipal Affordable Housing Trust pursuant to MGL Chapter 44, Section 55C that will manage funding and/or opportunities to raise funds in support of local housing efforts. A Municipal Affordable Housing Trust will serve as the implementing authority with respect to efforts by the City of Brockton to create affordable housing opportunities.

The state enacted the Municipal Affordable Housing Trust Fund Act on June 7, 2005, which simplified the process of establishing housing funds that are dedicated to subsidizing affordable housing. The law provides guidelines on what trusts can do and allows communities to collect funds for housing, segregate them out of the general budget into an affordable housing trust fund, and use these funds without going back to City Council for approval. It also enables trusts to own and manage real estate, not just receive and disburse funds. The law further requires that local housing trusts be governed by at least a five-member board of trustees. Per statute, the chief elected official must be one of the members of the Trust. While the trusts must be in compliance with Chapter 30B, the law which governs public procurement as well as public bidding and construction laws, it is likely that most trusts will opt to dispose of property through a sale or long-term lease to a developer so as to clearly differentiate any private affordable housing project from one constructed by the public-sector.

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. 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 City-owned property by issuing Requests for Proposals (RFP). The RFP articulates the City's terms and conditions for the development as well as criteria for selecting a development team and proposal that best meets local priorities and provides 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.

If the Housing Trust is able to actively explore and analyze development opportunities, it will be able to handle a number of activities simultaneously. Many communities have decided to maintain a single housing board or committee to oversee housing-related projects and issues. The City of Brockton should consider 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.

Recommended Action: The City Council should consider establishing a Municipal Affordable Housing Trust and the Mayor should appoint members to the Board of Trustees. The Planning Department will provide support to the Housing Trust in fulfilling its mission.

The following steps will be required to operationalize the Housing Trust:

- City Council Approval The City Council should approve the statute followed by the ordinance
 to create a Housing Trust with a clearly defined role and specific responsibilities to insure the
 effective and efficient coordination of housing development.
- Appoint Trustees The Mayor will appoint members to the Housing Trust with City Council's confirmation. At least five (5) members must be appointed, including the Mayor. It is helpful to recruit trustees that will include a board representation from the public and private sectors such as those with expertise with real estate law, housing finance, residential development, and advocates in addition to members from other relevant municipal boards or committees.
- Organize the Trust Once established, the Trust should determine its meeting schedule, designate
 officers, establish an account to hold the funding (separate bank account of municipal account),
 and review procedures.
- Conduct Necessary Planning This Housing Strategy Plan provides guidance for the Housing Trust regarding key strategies for proactively promoting affordable and mixed-income housing, which the Trust will need to review, prioritize and implement.
- Create a Budget The Trust should create a one or five year budget that correlates to the key strategies in the Housing Plan including operating costs (legal fees, title searches, recording fees, administrative costs, advertising, postage, supplies, etc.) and program costs related to special affordable housing programs and projects.
- Secure Necessary Resources Resources for operations and special initiatives will be required to implement key strategies in this Housing Strategy Plan.
- Prepare Housing Guidelines It is advisable to establish guidelines for the disbursement of
 Housing Trust Funds that articulate funding priorities, eligible activities, funding guidelines
 (types and amounts of assistance), the application process, selection criteria and other
 administrative issues.

Required Resources:

- The City of Brockton should approve the annual capitalization of the Housing Trust through adoption of the Community Preservation Act which would provide funding in an amount at least equivalent to the minimal annual allocation for affordable housing at 10%. This funding would also require City Council approval.
- Other opportunities to capitalize the Housing Trust should also be explored including private donations (funding and property), negotiations with developers, special fundraisers, grants, etc.

It will be important for the various municipal entities that are involved in housing development and policy – including the Housing Trust, the Planning Board and Zoning Board of Appeals – to work cooperatively to achieve mutual goals and key strategies included in this Plan. Zoning is also an important component of this Housing Plan, and it will be essential that the Housing Trust support zoning changes that involve affordable housing and work closely with the Planning Board to prepare zoning amendments and advocate for their approval.

Permitting of new development is also an extremely important part of the municipal operations and the Housing Trust should establish a sound working relationship with both the Planning Board and the ZBA on developments that include affordable housing, providing technical and financial support and advocacy

as appropriate. Given some likely technical capacity of appointed Housing Trust members, the involvement of the Housing Trust in relevant Planning Board and ZBA decision-making can boost the City's capacity to make judicious decisions on proposed housing-related zoning and permitting. Joint meetings of the Housing Trust with the Planning Board and ZBA should be scheduled to bolster ongoing coordination and cooperation in regards to residential permitting that includes affordable housing.

Strategy 5: Consider the adoption of zoning ordinances that promote Supportive Senior Housing development for persons aged 60 or over. Assess areas served by existing infrastructure for opportunities to amend zoning to facilitate affordable active-senior and/or Supportive Senior Housing development.

Responsible Parties: Planning Department with support from the Planning Board, the Mayor and the City Council

Short Term Strategies: 1-2 Year Implementation

Identify zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating affordable Supportive Senior Housing developments for populations aged 60 or over to meet its production goal. Identify specific sites for which the municipality

Over 90 communities in MA have affordable housing trusts that are often capitalized with CPA funds Trusts are municipal entities that are able among other things, purchase, sell, and develop property

will encourage the filing of age restricted comprehensive permit projects. This Housing Strategy Plan includes a number of strategies that are directed to reforming local zoning regulations and making them "friendlier" to the production of age restricted affordable housing and smart growth development, including support of proposed legislation "An Act to Promote Housing Choices". These strategies include adopting an Active Adult Residential Development (AARD) ordinance, amending the Zoning Ordinance to promote affordable assisted living and Supportive Senior Housing developments by using the

"friendly 40B" process through the state's Local Initiative Program (LIP).

The Department of Housing and Community Development (DHCD) runs the Supportive Senior Housing Initiative that serves 27 communities in Massachusetts, including Brockton. Services offered to seniors living in these housing developments include case management services, 24 hour staff on hand, daily meals, medication reminders, and more. Brockton should look into expanding the existing Supportive Senior Housing program in the city to serve more of the elderly population.

• 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.

HUD provides interest-free capital advances to private, nonprofit sponsors to finance the construction, rehabilitation or acquisition with or without rehabilitation of structures, that will serve as supportive housing for very low-income elderly persons, including the frail elderly, and provides rent subsidies for the projects to help make them affordable in order to expand the supply of affordable housing with supportive services for the elderly. The capital advance does not have to be repaid as long as the project serve very low-income elderly persons for 40 years.

Supportive Housing provides very low-income elderly with options that allow them to live independently but in an environment that provides support activities such as cleaning, cooking, transportation, etc. Project rental assistance funds are provided to cover the difference between the HUD-approved operating cost for the project and the tenants' contribution toward rent. Project rental assistance contracts are approved initially for 3 years and are renewable based on the availability of funds.

Required Resources: Private nonprofit organizations and nonprofit consumer cooperative that meet the threshold requirements are the only eligible applicants under this program. Neither a public body or tribe nor an instrumentality or agency of a public body is eligible to participate in the HUD program.

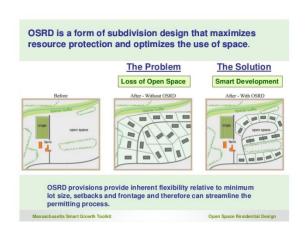
Strategy 6: Adopt zoning amendments to allow Open Space Residential Development (OSRD) design elements that support reduced dimensional requirements including lot sizes, setbacks and parking ratios to encourage construction of affordable housing units with increased densities that facilitate more flexible developments on smaller footprints.

Responsible Parties: The Planning Board, Zoning Board of Appeals, Conservation Commission and Open Space Committee with support from the Mayor and City Council.

Short Term Strategies: 1-2 Year Implementation

Open Space Residential Design (OSRD) is a tool to protect natural resources and open space by linking low underlying densities with compact patterns of development so that significant amounts of land can be permanently protected and forever available for agriculture, forestry, recreation, water supply protection, and wildlife habitat. OSRD includes elements of conservation subdivision regulations in a manner that maximizes the protection of natural resources (wetlands, forest, agriculture lands, open space) while providing for new construction and adequately compensating landowners. OSRD helps mitigate suburban sprawl impacts by addressing both open space and natural resource preservation through

subdivision design that maximizes resource protection while providing flexibility to allow various lot sizes, setbacks, and frontage requirements within the development.



The use of OSRD will concentrate development on to smaller areas of a site than what would generally happen under conventional zoning practice. It also provides flexibility to combine civic, educational, and recreational activities with open space and homes while protecting land and water resources and promotes recharge to underlying aquifers. OSRD bylaws can expand housing opportunities in a community where diverse housing types and allowed in a subdivision or when used in conjunction with inclusionary zoning.

Recommended Action: Because zoning and subdivision regulations deal specifically with the site design process, the City of Brockton should review and amend other local provisions (wetlands bylaws and regulations, Board of Health regulations, etc.,) to avoid conflicts among boards, commissions and departments. In addition, the City of Brockton will benefit from close cooperation between other committees involved in natural resource based planning including Agricultural Commissions and Open Space Committees. Ideally density bonuses will be directly linked to goals discussed in municipal planning documents such as Open Space and Recreation Plans, Master Plans and Housing Production Plans. The City of Brockton Planning Board should be comfortable with the site analysis and conservation findings process and may need to prioritize or make suggestions to a proponent for alternative layout schemes and should be open to a flexible design process that allows various lot sizes, frontages and setback requirements within the site design, rather than the usual "one size fits all" approach.

Strategy 7: Support aging in the community through increased multi-generational housing options, progressive senior facilities, exploration of allowing for alternative housing arrangements: Small Efficiency Dwelling Units (SEDUs) and Accessory Dwelling Units (ADUs).

Responsible Parties: The Planning Department with support of the Mayor and City Council

Short Term Strategies: 1-2 Year Implementation

The City of Brockton should consider making the necessary amendments to City zoning and building codes to allow for smaller apartment sizes and accessory units alongside residential homes

- Create an application system for residents and developers to apply for building SEDUs and ADUs
- Partner with private developers to build SEDUs in appropriate locations

- Measure effects and effectiveness of pilot programs over a determined period of time to be used in recommending whether the policies should be continued, altered, or terminated
- Create a permanent partnership between the City and non-profit housing organizations to assist in housing development and placement of low income families into new homes
 - Select and support at least one non-profit organization the City can partner with to build additional one to four unit residential structures.
- Maximize existing community resources to enable seniors to continue living in the housing of their choice, and provide education about a range of housing options.
- Provide multi-generational community housing opportunities that give priority to local residents, veterans, town employees, and families of students enrolled in the Brockton public schools.

Distribute and diversify new production and ensure that new housing creation is harmonious with the character of the existing neighborhood.

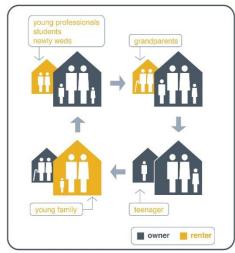
- Spread new affordable housing development geographically throughout the City to avoid substantial impacts in any one residential neighborhood.
- Create housing in neighborhoods that currently have little or no affordable housing.
- Develop a number of project alternatives in recognition of a range of housing needs in Brockton including rental and homeownership options as well as housing for seniors, veterans, families, and those with special needs.
- Help eligible homeowners and home buyers access housing assistance.
- Encourage the creation of workforce-housing units that are affordable to middle income households making between 80% and 120% of AMI.
 - O Workforce households, both local municipal employees and employees of local businesses, earn slightly over the 80% income limits, and cannot afford market rate housing. Enabling people who work in Brockton to live in Brockton creates a sustainable community and helps to reverse the trend of exporting professionals during the day, and importing service workers.

Accessory apartments have been a fundamental part of New England's historic approach to affordable

housing – whether as a way to accommodate children, aging parents and hired help, or for supplemental income. Accessory apartments can be incorporated into traditional carriage houses or in small flats on top of two-car garages. They can also be built in walk-out basements, attics, or as free-standing buildings (sometimes called "granny flats" in back yards.)

Accessory apartments help meet a number of public policy objectives including:

 Provide homeowners with additional income, which is particularly important for elderly homeowners, single parents, and others who are spending too much of their income on housing and for whom such income may be critical to remaining in their homes. Also, without the flow of income from the rent of an accessory



Life Cycle Diagram: for family and housing needs

apartment, some young families or moderate-income households might not be able to afford homeownership.

- Offer appropriately sized units for growing numbers of smaller households.
- Provide a fairly inexpensive means of increasing the supply of year-round rental units at lower cost than new construction and without significant impact on the surrounding neighborhood.
- Create housing units that do not require additional City services such as new streets or utilities and involve little or no loss of open space.
- Potentially provide companionship, security and services for the homeowner.
- Generate increased tax revenue in a locality because accessory units add value to existing homes.
- Offer a way of preserving historic properties given the rental stream available to help maintain the property.

Recommended Action: The City of Brockton should evaluate the impacts of allowing developers to construct SEDUs (micro-apartments) and amending the existing accessory apartment ordinance to better promote the creation of such units and to prevent owners from developing illegal units.

Strategy 8: Consider incentives for continuation of Downtown re-development efforts including incentives for construction of new housing developments strategically located near transit hubs to promote the development of land and sites that are underutilized within the City.

Responsible Parties: The Planning Department, the Zoning Board of Appeals with support from the Mayor and the City Council

Short Term Strategy: 1-2 Year Implementation

The City of Brockton should consider incentives to developers for increased production of residential rental units in the Downtown area through tax credits/low interest loans as part of a larger effort to revitalize the Downtown economically. Promote and encourage transit-oriented development in areas around the existing commuter rail stations.

- Utilization of abandoned factories to provide for innovative use of historic, commercial or other vacant buildings, to create mixed-use developments that would increase the area's housing stock and improve the attractiveness of the community as a place to live.
- Additional residential units in the Downtown will bring businesses back to the area (restaurants, grocery stores, retailers, even recreational marijuana dispensaries, etc.)
- Consider special area planning, new zoning and leveraging public land and infrastructure investment to complete Brockton's transformation into a 21st century mixed-use district to provide for long term residency and the benefits of a stable community.

The City of Brockton should encourage mixed-use development in the Downtown and other urban sections of the City and amend City zoning ordinances to allow for more mixed-use developments in targeted areas of the City rather than expanding auto-oriented corridors. The City should promote

development by partnering with private developers and retailers and explore state and/or federal funding opportunities to develop residential units above retail/office space on the first floors and provide incentives to developers to invest in mixed used development projects. The City of Brockton should consider adopting incentives which promote housing development or building rehabilitation near transit areas through tax credits/low-interest loans. The implementation of these strategies could change public perception of the Downtown and continue the revitalization of the Downtown as a mixed-use district that combines all the uses and amenities associated with contemporary needs and market demand. It will also promote the development of land and sites that are underutilized within the City to extend opportunities with housing catering to varying economic and family circumstances.

Recommended Action: Public, private and institutional stakeholders should partner on the implementation of large-scale housing and economic development initiatives for the Downtown area that expand the Downtown affordable housing market, foster business growth, mixed-use housing developments, and innovation while promoting training and education programs that will enhance the employment opportunities for Brockton residents. The City of Brockton should consider adopting local selection preferences which will include existing Brockton residents and municipal employees.

Required Resources: Assistance from the Assessors' Office, Planning Department, Town Counsel, Mayor, and City Council.

Goal 2: Promote home ownership throughout the city with greater local capacity to produce affordable housing in order to encourage and facilitate housing development for low/middle income persons and families.

Strategy 1: Explore opportunities to increase education and awareness of first-time homebuyer programs to provide financial support for low and moderate-income housing investment.

Responsible Parties: The Planning Department with support from the Mayor and City Council in coordination with the Planning Board

Short Term Strategy: 1-2 Year Implementation

The City of Brockton should promote home ownership throughout the City by requiring home ownership units as part of redevelopment where practical, and supporting home ownership assistance financing programs. The Massachusetts Housing Partnership program offers first-time home buyers who fall into the low to moderate-income category the "One Mortgage" program. This program began in 1989 as the "SoftSecond" loan program to address common obstacles facing lower-income, first-time home buyers such as high down payments and costly private mortgage insurance. MHP has transformed the program from a two-mortgage structure to the One Mortgage Program. This program offers the same affordability and financial security as the SoftSecond in a new, simpler structure.

There are approximately 25 lenders that participate in the program who offer first-time home buyers a *discounted* 30-year, fixed-rate mortgage with no points charged by the lender. Homebuyers must provide a minimum down payment of 3% of the purchase price rather than the 5% normally required by lenders. The program does not require home buyers to purchase costly private mortgage insurance, saving hundreds of dollars every month and thousands over the first several years of the loan. Buyers may also qualify for a subsidized monthly payment in the initial years of ownership that is automatically applied to the homeowner's monthly mortgage statement by the lender to pay a portion of the mortgage payment during the first seven years of homeownership.

Required Resources: Largely staff time from the Planning Department and Housing Authority as well as potential funding for advertising and outreach or meeting materials.

Strategy 2: Maintain and advance capacity to implement local housing initiatives and continue local planning, education, and advocacy to promote achievement of local affordable housing goals. Build local awareness of housing demand, issues and activities.

- Increase resident awareness of unmet housing needs and demand and the meaning of affordable housing.
- Engage the local real estate community and property owners to increase understanding of and foster development/redevelopment opportunities.
- Conduct ongoing community outreach and education & offer training opportunities to municipal boards and staff

Responsible Parties: Planning Department with support of sponsors of Affordable Housing Initiatives

Short Term Strategy: 1-2 Year Implementation

Because most of the housing strategies in this Housing Strategy Plan rely on local approvals, including those of City Council, community support for new initiatives has and will continue to be essential. Continued and strategic efforts to inform residents and local leaders on the issue of affordable housing and specific new initiatives builds support by generating a greater understanding of the benefits of affordable housing, reducing misinformation and dispelling negative stereotypes. These outreach efforts are mutually beneficial as they provide useful information to community residents and important feedback to local leaders on concerns and suggestions.

The presentation of this Housing Strategy Plan offers an important opportunity to bring attention to the issue of affordable housing, providing information on housing needs and proposed strategies that can help attract community support for affordable housing initiatives. In fact, a major objective of this planning process was to generate greater civic engagement on the issue of housing and a broad constituency to advocate for the implementation of this plan.

Provide and encourage affordable and fair housing education/training opportunities to municipal Board/Committee members and staff, to take advantage of ongoing training and educational programs related to affordable housing and ensure compliance with the Fair Housing Act, the Americans with Disabilities Act (ADA), and other legal housing requirements. Increase public awareness of and support for affordable housing through increased outreach and public education.

Some members of the public hold negative stereotypes of what affordable housing is and how it might change the character of their community. To combat these negative stereotypes, the City should embark on an ongoing education campaign. Such a campaign should consist of the distribution of literature on affordable housing definitions and terminology, successful examples of affordable housing, the positive impact of new development, and the unmet housing need that currently exists in Brockton. Through the provision of accurate information, the City can build support for and respond to opposition to affordable housing.

Additionally, the City should promote opportunities for board and committee members to take advantage of ongoing training and educational programs related to affordable housing. The University of Massachusetts Extension's Citizen Planner Training Collaborative (CPTC) offers classes periodically throughout the year and may provide customized training sessions to individual communities. The Massachusetts Housing Partnership (MHP) conducts the annual Massachusetts Housing Institute "a workshop that actively engages participants in discussion and problem solving around issues related to the development of affordable housing". Other organizations, such as Department of Housing and Community Development (DHCD), Citizens Housing and Planning Association (CHAPA), and the Community Preservation Coalition (CPC) also provide conferences, training sessions and publications on a wide variety of housing issues.

Other education and engagement opportunities should continue to be pursued and could include:

- Special forums on all new housing initiatives,
- Housing summits,
- Public information on existing programs and services,
- Use of public access television,
- Regular updates on the City's website, and
- Educational opportunities for board and committee members as well as professional staff.

Recommended Action: The Planning Department will coordinate with state housing agencies and other affordable housing organizations to conduct housing forums. These may include informational sessions on available affordable units, accessing first-time homebuyer programs through the state, or other resources in order to ensure the community is aware of available programs not provided by the City or have opportunities to weigh-in on new initiatives.

Another important aspect of community outreach is to continue to reach out to local and regional stakeholders for guidance and help in advocating for the implementation of housing strategies.

Required Resources: Largely staff time from the Planning Department as well as potential funding for advertising and outreach or meeting materials.

Strategy 3: Maximize Local Preference in Unit Occupancy.

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. The City of Brockton should partner with major employers in the public, institutional, and private sectors to develop programs that provide assistance to employees seeking a home in Brockton.

Short Term Strategy: 1-2 Year Implementation

Recommended Action: The City of Brockton should 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 local 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 local preference and it will not be approved as part of any Affirmative Fair Housing Marketing Plan or use restriction.

The Housing Trust should work with developers and their marketing/lottery agents in updating and augmenting the information 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 will take the loan in particular developments for which they are the project sponsors.

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

Strategy 4: Provide Incentives to Stimulate Housing Investment and Increase Economic Development in Targeted Areas.

Responsible Parties: The Planning Department and the Zoning Board of Appeals with support from the Mayor and the City Council.

Short Term Strategy: 1-2 Year Implementation

The City of Brockton should consider the use of tax incentives to attract housing developers to build in certain areas of the City at a reduced cost to the company/business

- Use of low interest/fixed-rate loans, tax credits, deferrals or abatements to entice developers to build residential units in targeted areas of the City
- Utilize appropriate areas for increased economic development with market-driven planning, public/private partnerships and zoning amendments to stimulate housing and economic development opportunities

Brockton's emerging new development districts, including its Downtown, offer opportunities to diversify the housing choices in concert with new businesses, amenities, and other improvements. This type of mixed-use development helps bring complementary businesses and jobs to the area.

The City of Brockton should:

- Continue to pursue land use and zoning policies that promote an equitable distribution of the regional affordable housing supply and help streamline the local development process.
- Develop and/or expand the use of Inclusionary Zoning to other high-cost jurisdictions in the Brockton region which would create a more equitable distribution of housing options for lowwage workers.
- Support walkable housing development in areas close to the core Downtown in order to create a vibrant, livable Downtown with access to City services, commuter rail, and commercial retail.

The Downtown Action Strategy is the central component for implementing this strategy, along with expanded redevelopment plans, zoning, funding and financing measures.

Recommended Action: Engage the Commonwealth of Massachusetts, local institutions, private employers and the real estate community to participate in planning strategies and housing programs that benefit a growing regional economy and incentive development.

Required Resources: Assessors Office, City Council, Mayor, Planning Board support.

Strategy 5: Consider incentives for property-owners to use their rental units as long-term rather than short-term rentals.

Responsible Parties: The Planning Department, the Zoning Board of Appeals with support from the Mayor and the City Council

Short Term Strategy: 1-2 Year Implementation

Short term rentals reduce the available housing stock and make already scarce and competitive housing more expensive for renters. A program should be designed to financially incentive property-owners to use long-term leases or financially penalize those who make no effort to utilize their units as long term rentals.

Recommended Resources: Assistance from the Housing Authority staff, Planning Department and Zoning Board of Appeals.

GOAL 3: Partner with developers to leverage other public and private resources.

Strategy 1: Leverage other public and private resources in the preservation and production of affordable housing to the greatest extent possible. Explore participating in regional collaborations addressing housing development.

Responsible Parties: The Planning Department with support of the Mayor and City Council

Medium Term Strategies: 3-5 Year Implementation

Many communities are reaching out to residents for private donation of land or funds to promote housing affordability. Such contributions and the bargain sale of real estate could become a part of Brockton's land ethic, but donations need to be promoted, nurtured, and facilitated. Inclusionary zoning, if passed, may also provide cash resources of a wider range of possible development that can help capitalize the Affordable Housing Trust Fund if the developer decides to pay cash in lieu of constructing actual affordable housing units. Developers may also contribute to the Housing Fund through negotiations on comprehensive permit projects or other local developments. Developers make additional contributions to these funds if the purchase prices for the market units are higher than the prices that were projected in their comprehensive permit applications and profits are more than the 20% allowed under Chapter 40B.

Recommended Action: The Executive Office of Housing and Economic Development (EOHED) prioritizes economic opportunity for residents, collaborative leadership in communities, and an environment that supports job creation and business growth. EOHED also supports new housing for residents through targeted investments. Old Colony Planning Council, the regional planning agency, studies the amount, quality, affordability, and geographic distribution of housing among local governments in the region and proposes the statement of regional goals, policies, and guidelines for housing, including forecasting of housing need for the region, especially affordable housing, and the preparation of a long-range program of implementation describing actions that various agencies can take to meet those housing needs.

Strategy 2: The City of Brockton should consider and explore the adoption of the Community Preservation Act.

Responsible Parties: Planning Department and Assessors Department with support from the Mayor and City Council.

Short Term Strategies: 1-2 Year Implementation

The City of Brockton would find this resource invaluable in paying for upfront pre-development costs and feasibility analysis, staff and consultants, as well as leveraging additional subsidies. The Community Preservation Act (CPA) is a Massachusetts law that allows participating cities and towns to adopt a real estate tax surcharge of up to 3% in order to fund the four community preservation purposes of open space, historic preservation, affordable housing, and recreation. In addition to the community tax surcharge, the state provides matching funds that are not less than 5% and not more than 100% of the funds raised by the community. The actual percentage varies from year to year dependent on the health of the Commonwealth's Community Preservation Trust Fund, which is funded by a surcharge on Registry of Deeds transactions.

The Community Preservation Committee (CPC) annually solicits proposals for the use of the funds, ranks the submissions, and makes a recommendation for the best use of program funds. By law, a minimum of 10% of the CPA money must be spent on affordable housing. The CPC has been a strong advocate of affordable housing and will continue to offer financial assistance to worthwhile projects.

The City of Brockton needs to be creative in how it can leverage both public and private resources to make affordable housing development possible. State agencies recognize the importance of municipalities doing their fair share in housing lower income households and want to be supportive of affordable housing initiatives. Nevertheless, the City needs to be strategic in how it invests its limited resources towards the production of new housing opportunities.

Strengthen Brockton's capacity to support creation of affordable housing, preserve existing affordable units through both local and regional resources, and monitor existing units to ensure compliance with restrictions.

- Work collaboratively with non-profit housing developers and other entities to advance housing production.
- Allocate local resources to advance affordable housing production.
- Look for opportunities to obtain privately owned land or other resources for free or at below market values as tax-deductible gifts.
- Leverage public and private resources to the greatest extent possible. Reach out to private, public and non-profit entities to secure additional housing resources technical and financial in support of efforts to produce affordable housing.

Housing needs do not respect political boundaries and regional collaboration may lead to innovative solutions. Brockton should cooperate with its neighboring towns to devise regional solutions to common problems. Brockton will be a willing participant in regional housing planning studies and will cooperate with neighboring communities in applying for state funding if regional housing planning becomes a priority at the state level. Making inroads in the large regional deficit of affordable housing will benefit all communities.

The implementation of this Housing Strategy will likely require support and assistance from a variety of resources. The City of Brockton should consider establishing or strengthening partnerships with housing providers, funding agencies and other housing experts to achieve the goals of this Plan. These organizations can provide technical assistance, resources, funding and development services to help the City of Brockton achieve its housing goals. Participating municipalities benefit in preserving their investments in affordable housing through proactive monitoring and leveraging regional expertise. There

are benefits on all sides for this collaboration. The member communities receive high-level service on an as-needed basis without individual procurement process or staffing expense.

Recommended Action: A municipality adopts CPA through passage of a ballot question at the voting booth. There are two ways that the question to adopt CPA can be placed on the ballot. The first method, used by roughly 2/3 of the current CPA communities, is a vote by the municipality's legislative body (City Council) to put the adoption question on the ballot. The second method requires a petition to be signed by at least 5 percent of the community's registered voters, requesting that the question be placed on the ballot. In either case, CPA must subsequently be approved by a simple majority of the voters in the community. The legislative body must accept CPA and submit the CPA ballot question to the municipal clerk at least 35 days prior to a regularly scheduled municipal election or, if a state election, to the Secretary of State at least 60 days prior to the election date. Municipalities cannot submit a CPA ballot question for placement on an election ballot until after the vote has taken place by the local legislative body.

Strategy 3: Access Housing Resources.

Responsible Parties: The Planning Department, the Zoning Board of Appeals with support from the Mayor and the City Council

Medium Term Strategies: 3-5 Year Implementation

The affordability of most housing development projects typically involves multiple sources of financing including both private and public loans and grants. Even Chapter 40B Comprehensive Permit projects rely on what is referred to as "internal" subsidies where the market rate units support the costs of the affordable ones in tandem with increased density. It will be important for the City to encourage the establishment of partnerships with other interested parties including non-profit organizations, lenders, public agencies, and developers to secure the necessary financial and technical resources to create affordable units.

Strategy 4: Utilize Local Initiative Program and develop local partnerships with developers to utilize the State's Local Initiative Program (LIP) as a means to develop "Friendly 40B" development projects.

Responsible Parties: The Planning Department and the Zoning Board of Appeals with support from the Mayor and City Council.

Timeframe: Initiated by interest of a landowner or developer

The City of Brockton should review and adopt Local Initiative Program criteria to develop a cooperative relationship with private developers of affordable housing. Too often comprehensive permit developments create adversarial contests with neighbors, who may feel high density proposals are detrimental to the value of their single family home. A LIP proposal, however, sometimes referred to as a

"Friendly 40B" creates a different dynamic. The Town can negotiate with the developer to help realize a project that will benefit the community with an appropriate scale, better design, open space and other amenities, and sensitivity to neighborhood concerns. Affordable units created through this process are eligible for the SHI.

Recommended Action: Support legislative and/or regulatory reforms at the state level that recognize the efforts of communities like Brockton to proactively provide "workforce housing" to serve households at 80-120% of the area median income (AMI), in addition to current efforts supporting households earning below 80% of the AMI. *Workforce Housing is a term commonly used to describe "housing for the occupations needed in every community, including teachers, nurses, police officers, fire fighters, and many other critical workers." Both for-profit and non-profit developers may use the LIP program in concert with a city, as the municipality and developer jointly submit the application.

Strategy 5: Review private properties for housing opportunities and consider Chapter 61 properties as potential affordable housing opportunities in the future.

Responsible Parties: The Planning Board and the Zoning Board of Appeals with support from the Mayor and the City Council.

Medium Term Strategies: 3-5 Year Implementation

Timeframe: Initiated by interest of a landowner

The City reviews private parcels for affordable housing development when the opportunity arises. Some private properties of interest include Chapter 61 (Forestry), Chapter 61A (Agriculture) and 61B (Recreation) property. These properties are under special designated tax status to the benefit of both the City and the landowners. Many of the parcels enrolled in this program are of interest for preservation of open space and conservation. Some parcels would also be suitable for a small number of housing units in addition to the larger open space use. These are explored in detail when those properties are sold or converted and the City considers exercising its Right of First Refusal.

Recommended Action: The City of Brockton will review any property under Chapter 61, 61A or 61B for suitability for affordable housing, when considering exercising its Right of First Refusal.

GOAL 4: Strategically dispose of surplus property to support economic development and neighborhood stabilization.

Strategy 1: Conduct screening analysis of City-owned land to unlock large parcels for additional development.

Responsible Parties: The Planning Board and the Zoning Board of Appeals

Medium Term Strategies: 3-5 Year Implementation

Many parcels of City land are dedicated to park and conservation purposes, and thus are not available for development. Land that is not otherwise committed to a specific purpose may be suitable for a denser development than is currently allowed under conventional zoning. The screening analysis will filter out properties that are not suitable; factors to consider include environmental constraints, slope, soils, road access, and neighborhood compatibility. If one or more properties offer promise, the City will propose engaging professionals to perform a feasibility study, including soil testing to estimate septic capacity and installing test wells to judge the quantity and quality of ground water. For those sites with high development suitability, the Planning Board will reach out to the neighborhood and collaborate with other boards to seek and develop consensus on a preferred housing concept.

Recommended Action: The City of Brockton should conduct screening analysis of City-owned property to target other opportunities for developing affordable housing.

Strategy 2: Review existing City-owned or foreclosed properties for investment, rehabilitation and sale to pre-qualified borrowers.

Responsible Parties: Planning Department with support from the Mayor and City Council in coordination with the Planning Board

Medium Term Strategies: 3-5 Year Implementation

Foreclosures are at the forefront of issues affecting today's housing market. The volume of foreclosures has become a significant problem, not only to local economies, but also to the aesthetics of neighborhoods and property values therein. At the same time, middle to low-income families continue to be priced out of the housing market while suitable housing units remain vacant. When properties remain vacant for prolonged periods, they can fall into disrepair, become neglected, and eventually be abandoned by their owners. Abandoned properties pose significant fire and safety hazards, attract vandalism, and generate criminal activity. These properties create a ripple effect, lowering adjacent property values and

contributing to the decline of entire neighborhoods. Communities with a large number of tax-delinquent properties lose considerable revenue and further burden local government.

Recommended Action: The City of Brockton should consider new measures to ensure vacant buildings are first catalogued and then safeguarded against break-ins and squatters (security measures like stronger doors and reinforced windows) and systematically checked in on by the appropriate officials to ensure they are in fact vacant and their condition has not deteriorated.

Strategy 3: Create a registry and/or explore opportunities to support legislation at the State level which promotes the creation of a land bank of foreclosed and/or City-owned properties and explore other low interest loan opportunities for low and moderate-income homebuyers for workforce housing investment of previously foreclosed and/or Town-owned properties.

Responsible Parties: The Assessors' Office with support from the Planning Department, the Mayor and the City Council.

Longer Term Strategies: 5-10 Year Implementation

Land banks are governmental or non-profit entities that acquire, hold, and manage foreclosed or abandoned properties. Enabled by state legislation and enacted by local ordinance, these legal entities are typically governed by a Board of Directors that adhere to ordinances and articles of incorporation specifically tailored to meet the needs of individual communities. Funded with local government allocations or revenue from operations, they can be staffed by independent, full-time employees or by local government employees on a part-time basis.

The City of Brockton can explore opportunities to support state legislation which promotes the creation of a land bank to acquire and dispose of tax-delinquent properties, expedite the tax foreclosure process and allow tax abatements on these properties to provide incentives to expedite the redevelopment of foreclosed properties for affordable housing purposes. The City should consider drafting a registry of

foreclosed and tax-titled properties to promote redevelopment and rehabilitation of vacant and abandoned properties and consider the possibility of tax-increment financing or other incentives to support the construction of affordable and/or workforce housing.

Recommended Action: The Mayor and City Council should work with other City boards and committees, such as the Planning Board, Board of Assessors and Conservation Commission, to review the inventory of City-



owned property and determine which parcels might be most appropriate for affordable housing. After some initial environmental testing and other preliminary feasibility analyses (the costs of which could be covered by CPA funds), the City could declare these parcels surplus and convey them to a designated developer, following City Council approval and the issuance of a Request for Proposals (RFP).

The City may also decide to acquire privately-owned sites at some time in the future for the purpose of developing some amount of mixed-income 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. As the City becomes alert to opportunities for acquiring property that would be suitable for some amount of affordable or mixed-income housing (even tax-foreclosed properties) such properties would ideally meet a number of "smart growth" principles such as:

- The redevelopment of existing residential structures
- Mixed-use properties in downtown, near transit or along commercial corridors;
- Adaptive reuse;
- Infill site development; and
- Parcels large enough to accommodate clustered housing.

Additional smaller sites may become available as well to build affordable new starter homes, housing for empty nesters, or housing for special needs populations on an infill basis.

Required Resources: Planning Department and Assessors Office staff time.

GOAL 5: Rehabilitation of the existing housing stock.

Strategy 1: Preserve the existing affordable housing stock including its diversity of prices, building types, lot sizes, and restriction on existing affordable units. Promote a diversity of housing options to meet the needs of a changing and aging population and promote a more socio-economically and diverse population, including constructing new units and preserving existing dwellings.

Responsible Parties: Planning Department and the Zoning Board of Appeals

Short Term Strategy: 1-2 Year Implementation

Diversity in a community has been found to contribute to local health and vitality. Certainly the preservation and production of affordable housing is a proven method for promoting diversity, allowing those individuals and families with more limited means to afford to live in Brockton. Solutions need to be found to enable children who grew up in Brockton to return to raise their own families here, to offer City employees the opportunity to live in the community in which they work, to provide housing alternatives to elderly residents who have spent much of their lives in the community but now require alternatives to their large single-family homes, and to offer families the flexibility of moving to larger homes as their families grow.

The City of Brockton should consider and explore incentives or other methods to preserve affordability restrictions on existing affordable units for the longest period allowable under the law, fostering housing stability for low/moderate income households. It is important to ensure that all affordable housing units that are produced according to state requirements remain a part of the City's Subsidized Housing Inventory for as long as possible. Besides the reduction of the affordability percentage on the SHI, the loss would likely wreak havoc in the lives of those who live in these developments, potentially forcing them to search for other very limited affordable housing options elsewhere, perhaps having to move outside of the community.

Recommended Action: The Planning Department should continue to closely monitor developments with "expiring" affordable units, communicating directly with project owners regarding their intentions. It should intervene as necessary to maintain the units as affordable thorough attracting a new purchaser and refinancing if necessary, and even going through the court system if appropriate. There are a number of non-profit organizations that specialize in the acquisition and refinancing of these "expiring use" developments and state funding under Chapter 40T has provided a good mechanism for refinancing many of these projects. Other funding sources include CPA funds, Affordable Housing Trust funds, and Inclusionary Zoning funds.

Resources Required: Staff time from the Planning Department

Strategy 2: Study opportunities for re-use of existing buildings or use previously developed or City-owned sites for new community housing.

Responsible Parties: The Planning Board with support from the Mayor and the City Council

Medium Term Strategy: 3-5 Year Implementation

In the future, Brockton may have municipal structures that become abandoned, underutilized, or functionally obsolete. There may be opportunities to convert City-owned property to accommodate some affordable housing. Future tax title property may also provide the community with opportunities to construct affordable housing for its residents.

Rehabilitating historic buildings for housing purposes can help preserve a community's cultural heritage while bolstering its housing supply. The City of Brockton may have buildings of historical significance that are either vacant or underutilized. These buildings are often of good quality construction, utilize existing infrastructure, and contain ample floor space, making them ideal for affordable housing

development. The City of Brockton should consider regulatory incentives in the form of tax credits, grants and loans, aimed at encouraging rehabilitation of historic properties for affordable housing purposes. Consider adoption of an ordinance designed to encourage the conversion of older, underutilized commercial buildings into affordable multifamily and live/work units. Buildings of historic significance should be eligible for incentives such as density, reduced parking requirements and streamlined review processes.







BEFORE

IN-CONSTRUCTION

AFTER

Prioritize opportunities for new infill and major multifamily housing development in designated "Target Areas," notably in the Downtown area. Meeting current and future housing demand will require a development strategy that is tailored to the market opportunities in the Downtown and its surrounding neighborhoods, including strategic infill development in the Downtown area. A successful housing strategy must be intertwined with other components of economic development, including innovation and job creation, improved transportation linkages, open space development, food production and delivery systems, and ecological resilience.

- Prioritize affordable housing on infill development and abandoned and vacant properties.
- Adopt regulatory incentives to encourage redevelopment and infill on low-density properties such as an infill development ordinance.
- Target development projects to publically-owned properties where feasible to take advantage of
 parcels that will have discounted or nominal acquisition costs to make affordable housing more
 financially feasible.

- The City, along with the Housing Authority, can explore whether any publically-owned parcels or buildings could be developed as community housing, low-moderate income housing or special needs housing.
- Streamline permitting and waive/discount permitting fees for development of affordable housing units.

Recommended Action: The City of Brockton will study municipal land holdings to determine if any are appropriate for affordable housing. The City will study the potential for re-using these structures as the need arises. Reusing these properties as housing is a strategy that enables the community to accommodate growth in established locations instead of on green space and at the same time preserve or restore the architectural fabric of the community. The Housing Partnership could be tasked with overseeing this process.

In the future, whenever the community analyzes property for future municipal uses, affordable housing potential should be taken into consideration. If any parcel is determined to have potential, land planners or other consultants could be hired to conduct a more rigorous analysis of the property. If a property is deemed appropriate for the construction of affordable housing, the City could work with a non-profit developer and target the disposition of the property for the specific purpose of creating affordable housing. The City may retain control over the review process and could structure the deed in such a way as to protect the community and public interest.

Strategy 3: Seek Housing Rehabilitation Funds.

Responsible Parties: The Planning Department with support of the Mayor and City Council

Medium Term Strategy: 3-5 Year Implementation

Seek regional housing rehabilitation programs that provide grants to correct code violations, upgrade deficient systems, and make energy improvements. Eligible homeowners could earn no more than 80% of the AMI for the properties to qualify.

There remains a significant need for resources to help homeowners maintain their property, particularly given the prevalence of older, historic housing in many Brockton neighborhoods with significant levels of health and safety violations and occupancy of low- or moderate-income owners or tenants.

Recommended Action: In the absence of funding and given the existing need for housing improvement assistance, the City should allocate local funds to support a Housing Rehabilitation Program. Program terms and conditions should be fairly comparable to other such programs that operate in communities across the state, and could be introduced with few, if any, changes of program requirements, forms and procedures. In the interim, the City of Brockton should continue to apply to DCHD for funding to support the Housing Rehabilitation Program. DCHD has been revisiting some of its criteria for allocating this funding, and Brockton may find itself in a more competitive position in the future to receive this financial support.

Required Resources: Staff time from the Planning Department to administer the program and an annual subsidy fund of at least \$200,000.

Strategy 4: Consider the establishment of new programs to assist owner-occupants and landlords in bringing their homes up to code, funding exterior cosmetic fixes to their properties subsidized through low interest loans, tax incentives, or grant money.

Responsible Parties: The Planning Department with support of the Mayor and City Council

Medium Term Strategy: 3-5 Year Implementation

Recommended Actions:

- 1. Establishment of a new program to assist owner-occupants and rental property-owners in bringing their homes and rental units up to code.
- 2. Assessment of current lead removal programs for residential housing units; institute a revamped program to assist owner-occupants and landlords in the funding for lead removal efforts to expedite the process if current initiatives are proving insufficient.
- 3. Establishment of a new program to assist owner-occupants and rental property-owners in funding projects to make residential buildings handicapped accessible (entrance ramps and elevator access).
- 4. Establishment of a program to assist owner-occupants and rental property-owners with funding exterior cosmetic fixes to their homes.
- 5. Establishment of a program to assist owner-occupants and landlords to fund basic home repairs not covered by programs for cosmetic fixes or code updates. These repairs must be proven to improve home habitability, desirability, and the overall quality of the home. This program is not meant to update or upgrade home structures or appliances but rather fix the parts of a home that are in a state of disrepair.
- 6. An increased focus on repairs and cosmetic fixes to the City's neighborhoods in general that make the areas more attractive to homeowners and renters and increase the quality of the housing stock (sidewalk repairs, repair broken windows, cleaning vandalized structures, etc.).

Owner-occupants, renters, and rental property-owners must be aware of programs and funds available to assist them. A proper education and advertising campaign should be devised if any of these programs are established. Each program will require its own funding source and the City should look for partnerships with private/non-profit entities and examine its eligibility for state and federal funds to cover some or all of the costs associated with each program.

Required Resources: Planning Department staff to research programs to assist residents to upgrade properties.

Strategy 5: Increase the percentage of homes that are owner-occupied rather than rented through rental property-owners.

Responsible Parties: The Planning Department with support of the Assessors' Office, the Mayor and City Council

Long Term Strategy: 5-10 Year Implementation

Recommended Action: The City of Brockton should consider the establishment of a first-time homebuyer counseling and education program with the purpose of getting informational materials to first-time homebuyers on the programs/benefits available to them. The City should partner with a public/non-profit entity to assist with home-owner counseling and host educational sessions for these individuals. Brockton should also consider establishing a low-interest loan program aimed specifically towards first-time homebuyers with additional benefits to those who are owner-occupants to incentivize ownership.

Required Resources: Planning Department and Assessors' Office staff to research programs and opportunities that provide first-time homebuyers with counseling and educational support services.

GOAL 6: Divide the city into different districts for analysis

Implementation of the Plan: Apply the housing goals and attached strategies to individual sections of the City, creating a personalized plan for each area.

To best apply the goals and strategies laid out in this plan, it may be necessary to divide the City into different sections. The goals and strategies to be implemented could be applied with a wide swath to the entirety of the City, however to best implement the plan the focus should be on understanding what strategies apply best to the different sections of the City. Different areas may have different needs depending on their geographic location, the nature of the housing stock, and the amount of available developable space; so some goals may not apply to some areas but be very important to other parts of the City. These differences emphasize the importance of applying some policies more heavily than others depending on the section of the City you are examining.

Responsible Parties: City Planning Department with cooperation from local partners

Medium Term Strategy: 3-5 Year Implementation

Recommended Actions: The City Planning Department should create a map of the City, dividing it into distinct sections. This map could easily be adapted from an existing one used by the Planning Department or other city department, so long as it clearly lays out a set number of City sections with defined boundaries. To fast-track this process the City could opt to use the existing six wards in which Brockton is divided when implementing this housing plan.

The City should then conduct a study of each section of the City and determine its specific needs/areas for development. Once the study has been completed it should be determined which goals from this housing strategy plan best align with each section of the City. Once the goals have been weighed and have been assigned to each section of the City, the strategies to focus on for each section should be determined next. In some sections of the City most goals and strategies could apply which makes it important to rank the importance of goals and strategies and decide what level of emphasis should be placed on each one. The City Planning Department should then take the list of goals and strategies ranked by their level of importance to inform decision-making and spending priorities for each section of the City moving forward.

Breaking the City into different sections allows for more flexibility on the part of City Hall to meet the most pressing demands and implement the most effective changes for different areas. Without prioritizing the goals and strategies that can be most useful, there may be a noticeable disconnect between overall strategy for housing improvement for the city and what works best for each section of the City. Individualized policies for the different sections will result in greater success of this Plan's implementation than if each goal and strategy were treated equally as effective and necessary for all parts of the City.

Final Result: Having an individualized housing plan that focuses on the best goals and strategies for each specific section of the City as defined by the Planning Department.