



Town of Sudbury

Housing Trust

HousingTrust@sudbury.ma.us

Flynn Building
278 Old Sudbury Road
Sudbury, MA 01776
978-639-3387
Fax: 978-639-3314
www.sudbury.ma.us/housingtrust

AGENDA

Thursday April 11, 2024

8:00 AM

Virtual Meeting

Pursuant to Chapter 2 of the Acts of 2023, this meeting will be conducted via remote means. Members of the public who wish to access the meeting may do so in the following manner:

Please click the link below to join the virtual Housing Trust Meeting:

<https://us02web.zoom.us/j/85164326118>

For audio only, call the number below and enter the Meeting ID on your phone keypad:

Call In Number: 978-639-3366 or 470-250-9358

Meeting ID: 851 6432 6118

No in-person attendance of members of the public will be permitted and public participation conducted during this meeting shall be by remote means only.

Board Operations

- Minutes: Review and approve meeting minutes of March 14, 2024 if presented
- Financial Update
 - Review of financial transactions if presented

Housing Trust Initiatives

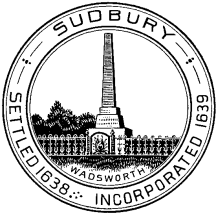
- Small Grants Program
 - Discussion/Vote - Applicant 125 – additional information; carry over from 3-14-24
- Letter sent to the Governor from a tenant at Cold Brook Crossing
- The annual AMI numbers and rent increase cap
- Support for Planning Board's Multi-Family Overlay District (MBTA Communities Zoning)
- 67-73 Nobscot update
- Status of Housing Production Plan
- Discussion - Future Community Preservation Act funding request/s
- New/renewal of committee members

Other or New Business

Administrative Report

Public Comment

These agenda items are those reasonably anticipated by the Chair which may be discussed at the meeting. Not all items listed may in fact be discussed and other items not listed may also be brought up for discussion to the extent permitted by law.



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DRAFT MINUTES

March 14, 2024 AT 8:00 AM

VIRTUAL MEETING

Housing Trust Members Present: Chair Carmine Gentile, Vice Chair Robert Hummel, Jessica Cerullo Merrill, Kelley Cronin, Janie Dretler, Cynthia Howe, John Riordan, and Jack Ryan

Absent: None

Others Present: Community Preservation Coordinator Ryan Poteat, Director of Planning, Community Development Adam Burney

Mr. Gentile began the meeting at 8:02 AM

Board Operations

Review of February 8, 2024 meeting minutes:

Mr. Ryan made a motion to approve the February 8, 2024 meeting minutes. Mr. Hummel seconded the motion. Roll Call Vote: Mr. Gentile – Aye, Mr. Hummel – Aye, Ms. Cerullo Merrill – Aye, Ms. Cronin – Aye, Ms. Dretler – *Not yet present, Ms. Howe – Aye, Mr. Riordan – Aye, and Mr. Ryan – Aye

Financial Update

Ms. Rust was unable to attend the meeting; the financial update was tabled until 4-11-2024.

At this time Ms. Dretler Joined the meeting.

Review Small Grant Application 125

Applicant 125 is requesting \$4,700 for the removal of carpeting that was beyond its useful life, creating a hazardous situation for an elderly resident and an asthmatic child living in the home. The floor has been replaced with vinyl plank flooring, not hardwood. The work has been completed and paid for. Mr. Ryan raised his concern about why the work was completed without prior approval. The owners have applied for assistance before and have never applied prior to having work completed. It is likely they were unaware it is normal practice to do so. Mr. Riordan encouraged the RHSO and town staff to follow all regulation.

Mr. Riordan made a motion to approve applicant 125's request for \$4,700. Mr. Ryan seconded the motion.

Under discussion Ms. Cronin was concerned about approving this application, it's validity and setting a precedent should this application be approved. Ms. Howe echoed concern and encouraged the RHSO and

town staff to ensure all applications are carefully vetted prior to them being brought to the Housing Trust. Ms. Dretler was also concerned and did not believe that this was a true emergency. She suggested changing the policy or practice for everyone or denying this application.

Mr. Riordan reluctantly withdrew his motion and expressed concern about how slowly government process can become. He encouraged a more skeptical approach when applications are reviewed. Ms. Dretler stated she would have voted no. Ms. Howe stated she believed a 7-year-old carpet to be cosmetic and not an emergency; she added that the process is very clear and stated in many places. Ms. Howe suggested an update to the policy if this application were to be approved. There was much confusion over this application and why it was being considered.

Ms. Howe made a motion to Table applicant 125's request for \$4,700. Ms. Dretler retrospectively seconded the motion. Roll Call Vote: Mr. Gentile – Aye, Mr. Hummel – Aye, Ms. Cerullo Merrill – Aye, Ms. Cronin – Aye, Ms. Dretler – Aye, Ms. Howe – Aye, Mr. Riordan – Nay, and Mr. Ryan – Aye

67-73 Nobscot update

Mr. Riordan stated that there is additional work going on. Beals and Thomas has met with the Housing Authority. There was a sense that the driveways or “loop” had not been sufficiently designed. Mr. Riordan explained that an 8% grade is necessary for safety and that the elevation increase is greater than 50' making this project in need of more research

Amy Lepak spoke about additional work required needed to further research the site. The original estimate for the lower driveway was \$900,000, this was then considered to be incorrect and closer to \$235,000. The additional cost to research this fully, would be \$8,000.

Ms. Cronin made a motion to use the funds granted at Town Meeting in May 2023 to pay the entire \$8,000 (ATM 23-41) directly to pay consultants. Ms. Dretler seconded the motion. Roll Call Vote: Mr. Gentile – Aye, Mr. Hummel – Aye, Ms. Cerullo Merrill – Aye, Ms. Cronin – Aye, Ms. Dretler – Aye, Ms. Howe – Aye, Mr. Riordan – Aye, and Mr. Ryan – Aye.

Housing Production Plan

Mr. Poteat stated that there will be a virtual only meeting on March 21, at 6:30 PM. Mr. Riordan added that it will be interactive and discussed a number of sites that that are town owned and being considered for development and added that 67-73 Nobscot will likely be excluded as it is not currently town owned.

Mr. Gentile asked Ms. Lepak if the Housing Authority was under any actual negotiations with the Boy Scouts. She was unaware at this time but Mr. Gentile and Ms. Lepak will request this information through the chair.

There was a discussion about MBTA Communities. Mr. Hummel asked if the Avalon was a 40B project, Mr. Burney stated it was approved and built with a comprehensive permit. Mr. Burney also stated that the MBTA Communities law had been explained as a zoning exercise. Mr. Hummel stated he was disappointed that the Town of Sudbury has not identified or planned to build a transformative development.

Future Community Preservation Act Funding requests

Ms. Dretler expressed her gratitude that the Housing Production Plan has been discussing future Community Preservation Act funding requests. Mr. Ryan stated he was willing to work with staff to develop a more cohesive request this year. Mr. Gentile offered to work with Mr. Ryan to accomplish this.

Other or new Business

There was no other or new business discussed at this meeting

Administrative Report

There was no administrative report given at this meeting

Public Comment

There were no public comments

Mr. Ryan made a motion to adjourn. Ms. Dretler seconded the motion. Roll Call Vote: Mr. Gentile – Aye, Mr. Hummel – Absent, Ms. Cerullo Merrill – Aye, Ms. Cronin – Aye, Ms. Dretler – Aye, Ms. Howe – Aye, Mr. Riordan – Aye, and Mr. Ryan – Aye

The meeting ended at 9:22 AM

**Sudbury Housing Trust
FY24 Transactions**

Date	Post MO	Amount	Balance	Account	Description	Payer/Payee
7/1/23	Jul-23	\$297,939.60	\$297,939.60		Carryover \$297,939.60	
8/1/23	Aug-23	\$0.00	\$282,946.69		Balance to \$282,946.69	
9/1/23	Sep-22	\$0.00	\$247,730.59		Balance to \$247,730.59	
10/1/23	Oct-22	\$0.00	\$244,616.34		Balance to \$244,616.34	
11/1/23	Nov-23	\$0.00	\$258,369.67		Balance to \$258,369.67	
12/1/23	Dec-23	\$0.00	\$254,366.85		Balance to \$254,366.85	
12/14/24	Dec-23	(\$831.94)	\$253,534.91	Salary	Payroll	Town of Sudbury
1/1/24	Jan-24	\$0.00	\$249,826.31		Balance to 249,826.31	
1/11/25	Jan-24	(\$831.94)	\$248,994.37	Salary	Payroll	Town of Sudbury
12/1/24	Jan-24	\$2,000.00	\$250,994.37	Fee	Turn in #18	Holliston Village
1/25/25	Jan-24	(\$831.94)	\$250,162.43	Salary	Payroll	Town of Sudbury
12/28/24	Jan-24	(\$1,900.19)	\$248,262.24	MAP	Mortgage Assistance	Various
1/1/22	Feb-24	\$0.00	\$248,262.24		Balance to 248,262.24	

**Sudbury Housing Trust
Financial Projection - Detail**

Description	Line#	FY23	FY24			FY25	Total
		Actual	Actual	Remaining	Projected	Planned	
Housing Unit Creation							
Cumulative #units created	1	14					
Cumulative per unit subsidy of created units	2	\$181,812					
Annual #Trust Created Units	3	0					
Annual \$Trust Created Units	4	0					
Total subsidy of created units	5	\$2,545,366					
#Trust Assisted Units	6	126					
\$Trust Assisted Units	-86,510	\$650,000					
Cumulative per unit subsidy of assisted units	8	\$5,159					
Detailed Statement of Revenues and Expenditures							
Carry Forward	10	\$305,025.35	\$297,939.60			\$297,940	\$156,500
Fees - 712543/430000	20	\$45,847.00	\$43,079.04	\$46,840.00	\$89,919.04	\$94,100	\$75,000
Resales	21	\$8,465	\$810	\$3,190	\$4,000	\$4,000	\$4,000
External Contracts (sum of below)	22	\$37,382	\$42,269	\$43,650	\$85,919	\$90,100	\$1,009,501
<i>Bedford Woods/Concord Millrun</i>	23	\$0	\$9,800	\$8,000	\$17,800		\$33,200
<i>Harvard - Pine Hill Village</i>	24	\$5,000	\$2,500	\$12,500	\$15,000		\$31,700
<i>Natick Graystone Lane</i>	25	\$5,000	\$1,500	\$0	\$1,500		\$7,500
<i>Medford Wellington Woods</i>	26	\$6,000	\$9,000	\$4,000	\$13,000		\$35,000
<i>Holliston - Village Green</i>	27	\$0	\$2,000	\$11,000	\$13,000		\$15,000
<i>Rental Recertification: Messenger, Corey St</i>	28	\$3,750	\$1,750	\$2,000	\$3,750		\$47,900
<i>Monitoring - MassHousing, Cold Brook, Avalon</i>	29	\$17,632	\$14,719	\$4,150	\$18,869		\$81,503
<i>Misc</i>	29	\$0	\$1,000	\$2,000	\$3,000		\$4,000
Completed		\$0		\$0	\$0		\$750,198
CPA and Other Financing - 712549/497000	30	\$77,518	\$0	\$730,000	\$730,000	\$730,000	\$380,000
SHA Nobscot (CPA)	31	\$2,518	\$0		\$0		\$18,920
CPA 2024 ATM	36	\$0	\$0	\$292,000	\$292,000	\$292,000	\$380,000
Nobscot CPA 2024 ATM				\$438,000	\$438,000	\$438,000	\$438,000
State ARPA - Mortgage Assistance	32	\$75,000	\$0		\$0	\$0	\$75,000
Interest - 712548/482000, 712548/489000	41	\$7,898	\$0		\$0	\$1,000	\$85,235
State Earmark - Mortgage Assistance payments	45	-\$20,889.66	-\$9,110	-\$43,406	-\$52,517	-\$52,517	-\$75,000
Expenditures - 712557/522100/earmark	50	-\$98,931.96	-\$71,167	-\$484,735	-\$555,902	-\$549,255	-\$417,000
Legal/Insurance	52	-\$1,910.00			\$0	\$0	-\$5,510
RHSO/Contract Assistance	54	-\$40,946.00	-\$43,255	\$0	-\$43,255	-\$43,255	-\$45,000
Programs - sum of below	56	-\$45,406.00	-\$19,727	-\$480,920	-\$500,647	-\$494,000	-\$360,000
<i>Nobscot Feasibility (CPA)</i>	561	<i>-\$8,467.50</i>		<i>-\$12,647</i>	<i>-\$12,647</i>	<i>-\$6,000</i>	<i>-\$53,920</i>
<i>Nobscot (CPA)</i>	561b			<i>-\$438,000</i>	<i>-\$438,000</i>	<i>-\$438,000</i>	<i>-\$438,000</i>
<i>Small Grant Program</i>	562	<i>\$0.00</i>	<i>-\$9,600</i>	<i>-\$20,000</i>	<i>-\$29,600</i>	<i>\$0</i>	<i>\$40,000</i>
<i>Home Preservation Grants/HFH</i>	563	<i>\$0.00</i>	<i>-\$10,127</i>	<i>-\$10,273</i>	<i>-\$20,400</i>	<i>-\$50,000</i>	<i>-\$127,137</i>
<i>Rental Assistance #1 - ERAP (Trust funded)</i>	564	<i>\$0.00</i>			<i>\$0</i>		<i>-\$39,850</i>
<i>Rental Assistance #2 - SRRP (CPA funded)</i>	565	<i>-\$26,938.50</i>			<i>\$0</i>		<i>-\$188,705</i>
<i>H4H, Dutton Road</i>	566	<i>-\$10,000.00</i>			<i>\$0</i>		<i>-\$58,249</i>
Lottery Expense (sum of below)	58	-\$10,669.96	-\$8,185	-\$3,815	-\$12,000	-\$12,000	-\$251,084
<i>Advertising/Insurance</i>	581	<i>-\$10,669.96</i>	<i>-\$8,185</i>	<i>-\$3,815</i>	<i>-\$12,000</i>	<i>-\$12,000</i>	<i>-\$190,156</i>
Trust portion of Salaries - 712551/511100	60	-\$18,526.95	-\$12,479	-\$42,521	-\$55,000	-\$55,000	-\$294,987
Ending Trust Balance	70	\$297,939.60	\$248,262	\$206,178	\$156,500	\$518,785	\$139,500
Rental Assistance #3 - ARPA SRRP	80	-\$155,724.09	-\$43,257	-\$1,019	-\$44,276		-\$200,000
Small Grant - ARPA Funded	81	-\$29,067.00	-\$21,127	-\$24,806	-\$45,933		-\$75,000

Hardship Mortgage Assistance

To Sudbury Housing Trust,

As I have lost my job for the last six months and both my children are attending their respective colleges, I have been experiencing financial hardship due to my income being reduced and expenses mounting. I have attached all the required documents you have requested of me in the application form. Kindly, let me know if there is anything else needed from me and I will be more than happy to fulfill your requirement. Feel free to contact me or leave a message at any time.

Contact number: [REDACTED]

Email: [REDACTED]

Thank you!
[REDACTED]

Applicant 125:

Replacement of LR/DR carpet with hardwood

Number in Household: 5 – ages 92, 56, 50, 21, 18

Income: \$158 420, 98% AMI

Senior Household: Yes

Disabled: No

Deed Restricted: Yes, Home Preservation Unit

Assessed Value of House: \$244,750, Mortgage: \$64,650, Equity of \$180,100

Amount Requested: \$4700

Estimates Received:

Completed the work already by Empire Today

The carpet were became very old , and had lots of stains on it. The 90-year old could hardly walk on it with her walker. Plus children have asthma.

The carpet – with a standard useful life of 7 years – was existing when the house was purchased in 2010.



PROJECT #/ORDER #: PRI002418245 / SO02020583

WORK TYPE: Install

PRODUCT: Hardwood

Installed At: [Redacted]

Customer: [Redacted]

PRIOR TO BEGINNING WORK

Yes / No

- Did the Installer call prior to arrival and show credentials upon arrival?
- Did the Installer show you the materials to be installed (color/style) and confirm they are correct?
- Did the Installer walk you through all areas of the home to be installed?
- Did the Installer review any pre-existing damages or other installation area problems with you?
- Did the Installer review what could & couldn't be moved safely as part of the installation?

Moisture Readings (for Hard Surface Installations) Name of Moisture Meter

	1	2	3	4	5	6	7	8	Rel Humidity
Room									
#									

Site Issues (if any): _____

Customer Initials: [Redacted]

Installer Initials: [Redacted]

JOB COST & BALANCE

Job Price: \$4,423.53 Deposit: \$0.00 COD Amount: \$0.00
 Sales Tax: \$276.47 Balance: \$4,700.00 Amount Financed: \$4,700.00
 Total Price: \$4,700.00

Personal Check: \$ [][][][][][] . [][] Auth #: [][][][][][][]

Money Order, Certified: \$ [][][][][][] . [][] Check#: [][][][][][][]

Financing: [][][][][][][] \$4,700.00

Credit Card: \$ [][][][][][] . [][] Auth #: [][][][][][][]

Credit Card: \$ [][][][][][] . [][] Auth #: [][][][][][][]

AFTER INSTALLATION

Yes / No

- Did your installer walk through and review the entire job with you?
- Were all areas cleaned appropriately?
- Are there any additional comments, or any open items still to be completed? _____

ACKNOWLEDGEMENT OF COMPLETION

The installation of the order, updated by any/all change orders previously emailed, has been completed to my satisfaction, subject to the open items above. I acknowledge that by signing my name & submitting it electronically, digitally, by facsimile or PDF as a copy, my signature has the same effect as if I, the Customer & the Installer respectively, signed this Certificate of Completion in ink on paper, & this signature shall be binding on Customer, Installer & Empire.

Customer Signature: [Handwritten Signature]

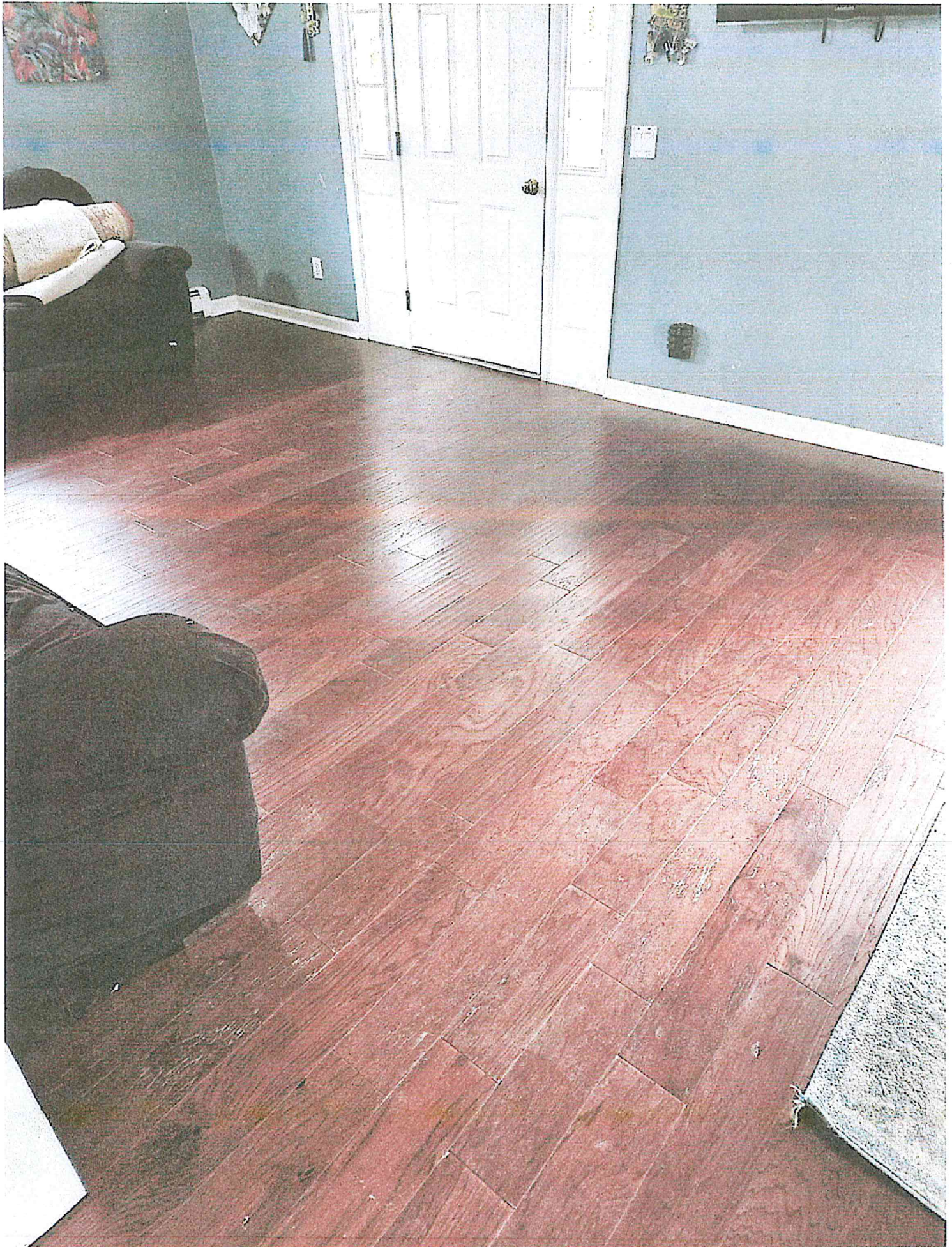
Date: [11][01][2023]

Installer Signature: [Redacted]

Date: [][][][][][][]

Juan Carlos Pulla(10436)

M M D D Y Y



Home Preservation Homes

	Homes Purchased									
	Home #1, 4 Longfellow	Home #2, 20 Maplewood	Home #3, 8 Howell	Home #4, 68 Oakwood	Home #5, 18 Pinewood	Home #6, 8 Eddy St	Home #7 162 Pratts Mill	Home #8 58 Robbins	averages	2024 possible
Asking Price	\$359,900	\$349,500	\$349,900	\$365,000	\$338,000	\$414,000	\$384,900	\$425,000	\$373,275	\$650,000
Purchase Price	\$340,000	\$339,000	\$300,000	\$356,500	\$325,000	\$414,000	\$384,900	\$425,000	\$360,550	\$650,000
Inspections/Repairs	\$22,130	\$12,000	\$10,024	\$855	\$32,000	\$10,000	\$3,700	\$10,000	\$12,589	\$50,000
Taxes	\$0	\$1,250	\$4,251	\$3,200	\$1,700	\$1,500	\$2,250	\$1,900	\$2,006	\$3,000
Total cost	\$362,130	\$352,250	\$314,275	\$360,555	\$358,700	\$425,500	\$390,850	\$436,900	\$375,145	\$703,000
Buyer Price	\$175,000	\$158,000	\$150,000	\$186,000	\$190,000	\$199,700	\$198,200	\$210,000	\$183,363	\$300,000
Purchase Subsidy	\$187,130	\$194,250	\$164,275	\$174,555	\$168,700	\$225,800	\$192,650	\$226,900	\$191,783	\$403,000
Closing Date	2/21/2008	8/27/2008	3/27/2009	9/8/2010	8/25/2011	7/15/2013	8/15/2014	12/18/2015		
fy closed	fy08	fy09	fy09	fy11	fy12	fy14	fy15	FY16		
Capital										
At Purchase	\$22,130	\$12,000	\$10,024	\$2,000	\$32,000	\$10,000	\$3,700	\$10,000		\$50,000
Post Purchase	\$14,000	\$1,000	\$6,500	\$21,400	\$2,700	\$67,200	\$4,600	\$35,881		\$130,000
Needed	\$75,000	\$25,000	\$20,000							
	\$111,130	\$38,000	\$36,524	\$23,400	\$34,700	\$77,200	\$8,300	\$45,881		\$180,000
SQUARE_FEET	1392	1162	960	1568	1632	1564	1224	1500		
ACRE	0.53	0.21	0.49	0.115	0.23	0.9	0.5	0.46		
NO_ROOMS	6	5	4	8	7	8	6	7		
NO_BEDROOMS	3	3	2	3	3	3	3	3		
NO_BATHS	1.5	1.5	1	2	1	2	1.5	1		
YEAR_BUILT	1956	1962	1952	1995	1954	1958		1960		
REPAIRS (at purchase)	Windows	Burner	Back Door	No Repairs	Itchen Sink/Count	meter move	fridge	Roof Saddle		
	Roof	Gas	Plumbing		2nd floor bath	bumer	stove	Insulation		
	Water Heater	Electric	Trim Work		Electrical Panel	sill	DW	Bulkhead work		
	Painting	Exterior	Pest		Pipes leaking	deck	pest plan	Sump Pump		
					Bulkhead		Paint	Misc		
					Misc					

From: [Reyelt, William \(EOHLC\)](#)
To: [Elizabeth Rust](#)
Cc: [Montoya, Roy V. \(EOHLC\)](#); [Jee, Christopher \(EOHLC\)](#); [Burney, Adam](#); jody@rhsousing.org
Subject: RE: FW: Letter to Governor's Office from tenant of Apt. 303 @ Cold Brook Crossing - Sudbury
Date: Tuesday, March 26, 2024 2:04:07 PM

Thank you for looking into this Liz and the detailed response which is extremely helpful.

To be honest, I am not 100% clear on what the protocol is for HLC when something like this is forwarded to us from the Governor's Office, but I will likely circle back with them and provide a draft response letting the tenant know that the administration/EOHLC has been in contact with the project's Monitoring Agent and confirmed that despite the significant rent increases, the new rent is unfortunately nonetheless in compliance with the current rent restrictions, acknowledge the problem/concerns, etc.

I may also reach out to the tenant directly, and try to address any confusion around the relevance of salary/income information. If so, can I reminder her that project has a monitoring agent and refer her to RHSO if she has additional/future questions?

Lastly, while not to at dismiss this general issue which HLC certainly agrees is a concern or the overall context (rising costs more generally that put pressure on percentage devoted to housing), you mention that, "if her income is similar to what it was in 2022, she is paying 30.8% of her income for rent" which is still pretty close to the conventional 30% standard for affordability. The tenant also indicates part-time employment in her letter. I don't suppose you know if her 2022 income was associated with full-time employment?

In any event, thank you again for responding so quickly and thoroughly!

Bill

Bill Reyelt
617.564.3105

From: liz@rhsousing.org <liz@rhsousing.org>
Sent: Monday, March 25, 2024 6:49 PM
To: [Reyelt, William \(EOHLC\) <william.reyelt@mass.gov>](mailto:william.reyelt@mass.gov)
Cc: [Montoya, Roy V. \(EOHLC\) <Roy.V.Montoya@mass.gov>](mailto:Roy.V.Montoya@mass.gov); [Jee, Christopher \(EOHLC\) <christopher.jee@mass.gov>](mailto:christopher.jee@mass.gov); BurneyA@sudbury.ma.us; jody@rhsousing.org
Subject: FW: FW: Letter to Governor's Office from tenant of Apt. 303 @ Cold Brook Crossing - Sudbury

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Bill,
Here are our comments below.

We also have been concerned about the increases in HUD income limits and the resulting rent increases – year after year. These increases are increasingly burdensome on the tenants. Please see the letter we sent a few years ago urging HLC to put a cap on rent increases.

Sincerely,

Liz Rust
Director, Regional Housing Services Office
978-287-1090

From: Reyelt, William (EOHLC) <william.reyelt@mass.gov>

Sent: Monday, March 25, 2024 12:06 PM

To: Elizabeth Rust <liz@rhsousing.org>

Cc: Montoya, Roy V. (EOHLC) <Roy.V.Montoya@mass.gov>; Jee, Christopher (EOHLC) <christopher.jee@mass.gov>

Subject: Letter to Governor's Office from tenant of Apt. 303 @ Cold Brook Crossing - Sudbury

Hi Liz,

Hope that this email finds you well.

EOHLC was contacted by the Governor's Office which received the attached letter/inquiry from the tenant of Apt. 303 at the Cold Brook Crossing 40R. While the inquiry indicated the amount of the rent increase and not the actual respective rents, based on the project's 2023 Monitoring Report that we received from RHSO, our assumption is that the tenant's rent is in compliance with the program restrictions and that the issue is the broader one caused by the current formula and the significant rise in AMIs in recent years (which I know RHSO detailed in its letter to DHCD in October of 2022). That said, just wanted to officially confirm if possible. **Yes, the rent charged is in compliance. Her rent as of 10/1/2022 was \$1897. Her rent was raised by \$200 (by her account - to \$2097) upon her lease renewal on 10/1/2023. The maximum approved rent for a 1 bedroom apt on 10/1/2023 was \$2173 (net). Both years the rent was slightly below the HUD maximum. Cold Brook was one of the first rent approvals that we completed, and we did not break it out for existing tenants and new leases. We did caution the management to review a tenant's income before instituting a rent increase. The rent increase is 10% for this tenant, and if her income is similar to what it was in 2022, she is paying 30.8% of her income for rent.**

The tenant raises a somewhat separate issue in the second to last paragraph, alleging that when first applying for the housing, she (and other parties) were told that salary determined rent but in conjunction with the first rent increase were subsequently told salary was not a factor. My guess is that there is just some confusion caused by the fact that while rents are not adjusted according to each individual household's salary/income, there are of course general income limits (that of course include wages/salary) in order to qualify for the restricted units as well as perhaps any reasonable, approved minimum income guidelines established by the

management company to ensure that otherwise eligible households can afford the approved/allowed rent. Some management companies have policies on minimum income. This is not a bad policy, since if a tenant is paying 50% of their income for rent, the chances of them falling behind and getting evicted is higher. But that is up to the individual owner/management co. If we see a pattern of evictions or even many move-outs in our annual monitoring, we ask about minimum income policies. But this development is new so I haven't seen a pattern yet. Also, tenants are required to recertify annually which involves submitting income and financial information. This might be part of the confusion.

As the tenant is now reaching out to the Governor's Office, I'm also guessing that your office may have already had some communication with this tenant and perhaps tried clarify this distinction; however, if you have a moment to provide any relevant information in that regard, would certainly appreciate. We have not been made aware of this situation by either the tenant or the Town. This development did receive approval for a rent increase in June of 2023. We began to see that the HUD income limits were creating significant rent increases (some close to 20% if the management company did not request an increase each year), so as the summer went on we developed (in conjunction with the towns we work with) a policy of only allowing the rent increase for existing tenants to go to 8% of their existing level. New leases could start at the then-current HUD number. In 2024, we will be instituting this for all developments. The policy will be no greater than 8%, or the % increase of the HUD increase, whichever is less.

More broadly, as you might suspect, it does seem that the 40R Program/EOHLC is seeing an increase in such inquiries/concerns in recent years, and I was recently invited to a meeting with LIP staff and legal to discuss proposals that would hopefully help to address these issues, at least for new projects. Opportunities for addressing these issues with existing projects may be more of a challenge/different, but my guess is that we will continue to explore as well. As you know from our letter to DHCD in 2022, we are advocating for all new Regulatory Agreements to limit rent increases to 5% for existing tenants. But EOHLC can also put this policy into effect by issuing Guidance similar to what was done during the pandemic. We also notified property managers in 2023 of the effects of raising rents to the HUD maximum limits (letter attached).

Thanks in advance if you have a moment to provide any additional information pertaining to this inquiry. We would be happy to participate in any future discussions about this issue with EOHLC staff.

Bill

Bill Reyelt (he/him/his)
Principal Planner, Smart Growth Programs
Executive Office of Housing and Livable Communities (EOHLC)
Division of Livable Communities
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--

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Regional Housing Services Office

Serving Acton, Bedford, Concord, Lexington, Lincoln, Maynard, Sudbury, Wayland, and Weston

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Phone: (978) 287-1092

Website: WWW.RHSOhousing.org
Email: INFO@RHSOhousing.org

TO: Rieko Hayashi, DHCD

FROM: Elizabeth Rust, RHSO Director

With Concurrence from:

Kristen Guichard, Acton Planning Director
Jeffrey King, Bedford Housing and Economic Development Director
Marcia Rasmussen, Concord Planning and Land Management Director
Carol Kowalski, Lexington Assistant Town Manager for Development
Abby McCabe, Lexington Planning Director
Paula Vaughn-MacKenzie, Lincoln Director of Planning and Land Use
Meagan Zamutto, Maynard Assistant Town Administrator
Bill Nemser, Maynard Planning Director
Adam Duchesneau, Sudbury Planning Director
Imaikalani Aiu, Weston Town Planner
Robert Hummel, Wayland Town Planner

DATE: October 31, 2022

RE: LIP Rent Increases

Our communities collectively represent over 900 LIP regulated rental units (and over 2700 total units) on the DHCD Subsidized Housing Inventory which are subject to Regulatory Agreements containing provisions for annual rent increases. We are sending this memorandum to express our concern with the annual allowable rent increases.

Prior to 2019, rent increases in line with the HUD maximum income levels were typically approved by our communities, although some developments created policies which considered each tenant's income before determining rent levels. Some of the developments that did not create rent policies and utilized the HUD maximum levels experienced larger turn-over rates, evictions, and vacancies. The 2020 DHCD policy to stay rent increases during the pandemic was a substantial benefit to tenants; however, the subsequent increase in 2022 has created financial difficulties for many of our low- and moderate-income households. While the HUD maximum rents have risen approximately 11% this year, the rents on lease renewals in our region's rental communities could rise as much as 23% if the HUD maximum levels are approved. This is alarming and we think a better solution must be forged for LIP projects in the future.



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During the rent approval process this fall, we have worked with the property managers and certifying agents in our communities, asking them to consider appropriate rent increases for existing tenants that will not substantially cost-burden these vulnerable households. Several developments have voluntarily capped these rents at 5-7% of the current net rent level, as you can see in the chart below.

Development	% increase from previous	# Low/Moderate units
Avalon Bay – Lexington Hills and Avalon @ Lexington	5%	153
Avalon Sudbury	5%	63
Avalon Acton	5%	22
Avalon at Bedford Center	5%	35
The Prescott, Concord	5%	88
Warner Woods, Concord	7%	16
Maynard Halstead (Vue)	<10% (varies)	22
Village at Taylor Pond, Bedford	7%	50
Maynard Point	5% (in RA)	6
Village at Concord Road, Bedford	7%	3

We applaud SEB Housing, Avalon Bay and all the other communities listed above for their consideration in this matter. To date, over 450 low- and moderate-income households in existing rental housing have had their 2022 rent capped at these moderate levels. We are hoping that many more will follow this lead.

Our proposal is to request DHCD add a new provision in all new Regulatory Agreements allowing a maximum 5% increase in rents for lease renewals each year, and to increase the notice to tenants from 30 to 60 days. We know this requirement on rent increases has been implemented in some recent Regulatory Agreements with the concurrence of the developer. One such development, Maynard Point, is in our service area and adheres to this standard. One other development in our service area, 100 Plank Street in Bedford, has not yet recorded a Regulatory Agreement, and we will work with the Town to encourage a rent increase limitation at the appropriate time. We strongly believe that this should be the standard for all LIP regulated units. **Further, we recommend that guidance on rents for lease renewals be issued annually by DHCD allowing only a 5% increase for units in developments with existing Regulatory Agreements which are in the Boston-Cambridge-Quincy MA-NH HUD Metro FMR Area.**

We welcome the opportunity to discuss these issues with you. Thank you for your consideration.

From: [Jody Kablack](#)
To: [Abby McCabe](#); [Aiu, Imaikalani](#); [Amanda Loomis](#); [Bill Nemser](#); [Burney, Adam](#); [Carol Kowalski](#); [Hummel, Robert](#); [King, Jeffrey M](#); [Kristen Domurad-Guichard](#); [Megan Zammuto](#); [Paula Vaughn](#); ssilverstein@townofmaynard.net
Cc: [Elizabeth Rust](#); [Christine McKenna Lok](#); [Jenicia Pontes](#); [Ibrahim Kazibwe](#)
Subject: 2024 LIP Rent Increases
Date: Thursday, April 4, 2024 11:38:19 AM

Dear Community Leaders,

HUD has recently issued the 2024 income limits, indicating a slight decrease in the 100% area median income (AMI) for the Boston metro region. However, the 80% AMI has increased by 10%. This impacts all the RHSO communities that have LIP rental units because the LIP rents are based on the 80% level. As per the Regulatory Agreements, each property can now request that the rents be approved for the next year. If requested at the maximum level, this will correspond to a 10% increase in rent, which we feel could be burdensome to many tenants. Both the COLA and the CPI Index for the Northeast region increased by only 3.2% in the last 12 months. 1 bedroom units could be increased by \$235/month to \$2,605; 2 bedroom units by \$265/month to \$2,931; and 3 bedroom units by \$295/month to \$3,256.

The increase was 6% last year, however in 2022 it was an 11% increase. The RHSO discussed this internally and developed a policy last year (however later than the rent approvals were issued for many communities), that the rent increase should be no higher than 8%, or the HUD percentage increase, whichever was less.

We feel that a similar policy should be in place for this year's rent increases, and **will be recommending that a bifurcated approach be taken, allowing a 5% increase for lease renewals, and allowing the maximum rent for new tenants.**

The RHSO has flagged this as an issue in the affordable housing industry, and has been advocating for this type of policy with the state for several years. DHCD instituted a limitation on rent increases in 2021 during the pandemic, but in 2022 reverted back to allowing the maximum rents for all tenants. We have heard from several tenants over the last 2 years about the high cost of "affordable" rental units at lease renewal. In the end, when tenants complain about large increases, the property managers typically say that the town allowed or required them.

Rent requests are already being submitted, so we wanted to get out in front of the issue. We will be processing them in the next 30 days using this policy, and sending them for town approval. Please review this information, and respond back with any questions.

Thank you for your time and consideration!

--

Jody Kablack, RHSO Specialist
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4700C: MULTI-FAMILY OVERLAY DISTRICT

A. PURPOSE.

The purpose of the Multi-family Overlay District (MFOD) is to allow multi-family and mixed use housing as of right in accordance with Section 3A of the Zoning Act (Massachusetts General Laws Chapter 40A) to accomplish the following purposes, to the maximum extent feasible:

1. Encourage the production of a variety of housing sizes and typologies to provide equal access to new housing throughout the community for people with a variety of needs and income levels.
2. Locate housing within reasonable distance of public transit to promote general public health, reduce the number of vehicular miles travelled, support economic development, and meet community-based environmental goals, including reducing greenhouse gases and improving air quality.
3. Preserve open space in a community by locating new housing within or adjacent to existing developed areas and infrastructure.
4. Support public investment in public transit and pedestrian- and bike-friendly infrastructure.
5. Increase the municipal tax base through private investment in new residential developments.

B. ESTABLISHMENT AND APPLICABILITY.

Overlay District. The MFOD is an overlay district is an area of land approximately 52 acres in size that superimposed over underlying zoning districts and overlay districts as shown on the Zoning Map. The regulations for use, dimension, and all other provisions of the Zoning Bylaw governing the respective underlying zoning districts and overlay districts shall remain in full force, except for uses allowed as of right in the MFOD. Uses that are not identified in Section 4700C are governed by the requirements of the underlying zoning districts and overlay districts. Any MFOD project shall comply with Section 4200 Water Resource Protection Overlay District to the maximum extent practicable.

The MFOD shall consist of the following parcels of land:

Assessor Map K07, Parcel 0023
Assessor Map K07, Parcels 0024
Assessor Map C12, Parcel 0100

1. **Sub-districts.** The MFOD consists of the following sub-districts, all of which are shown on the MFOD Boundary Map- which can be found _____:
 - a. MFOD 1

b. MFOD 2

2. **Exclusions.** Non-applicable sections of the Zoning Bylaw. To comply with the requirements and guidelines for M.G.L. Chapter 40A Section 3A, the following sections of the zoning ordinance do not apply to any multi-family housing or mixed-use development uses allowed by right in the MFOD

a. Section 5600 Inclusion of Affordable Housing

C. PERMITTED USES.

1. **Uses Permitted as of Right.** The following uses are permitted as of right within the MFOD.

a. Multi-family residential

b. Mixed-use development as follows:

Ground Floor

Community space.

Educational uses.

Personal Service Establishment.

Retail Stores and service establishments not elsewhere set forth.

Restaurant.

Business or professional office.

Artists' studios, maker space, and small-scale food production no more than 5,000 SF, and retail associated with each use.

Any Floor

Residential (required component).

c. **Open Spaces Uses.**

i. All areas unoccupied by buildings or structures, may be used for the following uses on a temporary basis, including, without limitation, areas containing utilities and/or stormwater infrastructure; paths; outdoor ice rinks, farmers' markets, music festivals, and other seasonal outdoor uses and facilities; and green, landscaped, and open space areas. Parking areas are not considered open space.

2. **Accessory Uses.**

Parking, including surface and parking within the primary structure such as a first-floor or underground parking garage on the same lot as the principal use is an accessory use allowed by right in the MCOB.

3. **Prohibited Uses.** Any use(s) not expressly allowed either under Section 4700C or within the underlying zoning districts and overlay districts shall be prohibited.

D. DIMENSIONAL STANDARDS AND OTHER REQUIREMENTS.

1. Table of Dimensional Standards.

	Multi-family Overlay District I	Multi-family Overlay District II
<u>Maximum Lot Coverage (%)</u>	50	50
<u>Maximum Building Coverage (%)</u>	30	35
<u>Maximum Height</u>	3 stories, 45 feet	3 stories, 45 feet
	4 stories or 60 feet may be permitted by Planning Board	4 stories or 60 feet may be permitted by Planning Board
<u>Front Setback (feet)</u>	30	100
<u>Side Setback (feet)</u>	20	20
<u>Rear Setback (feet)</u>	30	30

2. Density requirements. New residential development or residential components of mixed-use development shall be constructed at a maximum density of 15 units per acre.

3. Two or More Buildings on One Lot. Notwithstanding anything to the contrary in this Zoning Bylaw, more than one (1) building or structure, including those intended solely for use as residential dwellings, shall be permitted on any lot within the MFOD.

4.

E. OFF-STREET PARKING.

These parking requirements are applicable to development in the MFOD.

1. Number of parking spaces. The following off-street parking space numbers shall be permitted by use, either in surface parking or within garages or other structures:

Use	Required Spaces
Residential uses	A maximum of 2 spaces per dwelling unit
Non-residential uses	See Section 3100 Parking Standards

2. Parking Calculation. Developments in the MFOD may be approved to have a number of parking spaces less than the maximum, if the Site Plan Review Authority finds the proposed

parking to be adequate for the development's requirements. In making such a determination, the Site Plan Review Authority shall assess factors like complementary uses, transportation demand management (TDM) measures, shared parking arrangements, vehicle-share arrangements, the provision of a shuttle service, electric vehicle charging stations, and access to alternative modes of transportation.

3. **Number of bicycle parking spaces.** The following **minimum** numbers of covered bicycle storage spaces shall be provided by use:

Use	Minimum Spaces
Residential uses	1 space per every two (2) dwelling units
Non-residential uses	1 space for every 10 parking spaces

4. **Bicycle storage.** For a multi-family development of 10 units or more, or a mixed-use development of 25,000 square feet or more, required residential bicycle parking spaces shall be enclosed within the structure of the primary building(s).
5. **Shared Parking within a Mixed-Use Development.** Parking requirements for a mix of uses on a single site may be adjusted through the Site Plan Review process, if the applicant can demonstrate that shared spaces will meet parking demands by using accepted methodologies.
6. **EV charging stations.** For all uses within the MFOD, at least 10% of the parking spaces shall be made EV-Ready, with Electric Vehicle Supply Equipment (EVSE) in place for future development of charging stations. The appropriate count and type(s) of charging stations shall be determined at the discretion of the Planning Board during the Site Plan Review Process.
7. **Transit/Shuttle Service** The site shall contain an appropriate number of locations for a bus and/or shuttle to stop, pick up/unload passengers, and not impede traffic and will provide a commuter shuttle from the development to the geographically closest Commuter Rail Station during peak AM and PM commuter hours.

a. These location(s) must:

1. Include a shelter structure with at least three (3) sides, large enough to provide coverage for a minimum of five (5) individuals.
2. Provide an accessible pedestrian access path from all adjacent buildings,
3. Be cleared of snow and ice during inclement weather, and
4. Be maintained for the life of the development.

F. GENERAL DEVELOPMENT STANDARDS

1. These standards are components of the Site Plan Review process for development permitted under Section 4700C.
2. **Site Design.**
 - a. **Connections.** Sidewalks shall provide a direct connections among building entrances, the public sidewalk or right-of-way, bicycle storage, and parking.
 - b. **Vehicular access.** Curb cuts shall be minimized and driveways shared, where feasible.
 - c. **Open Space.** Open space uses include parks, playgrounds, landscaped areas, athletic fields, and areas left in their natural condition.
 - d. **Screening for Parking.** Surface parking adjacent to a public sidewalk or residential use shall be screened by a landscaped buffer of sufficient width to allow the healthy establishment of trees, shrubs, and perennials, but no less than six (6) feet. The buffer may include a fence or wall of no more than three feet in height unless there is a significant grade change between the parking and the sidewalk.
 - e. **Plantings.** Plantings will be only species native to this region. Those plants listed on the Massachusetts Prohibited Plant List, as amended, will be prohibited.
 - f. **Lighting.** Light levels shall meet or exceed the minimum design guidelines defined by the Illuminating Engineering Society of North America (IESNA) and shall provide illumination necessary for safety and convenience while preventing glare and overspill onto adjoining properties and reducing the amount of skyglow. Where applicable, lighting shall be Dark Sky compliant (directed downward and using full cut-off fixtures).
 - g. **Mechanicals.** Mechanical equipment at ground level shall be screened by a combination of fencing and evergreen plantings. Rooftop mechanical equipment shall be screened if visible from a public right-of-way.
 - h. **Dumpsters.** Dumpsters shall be screened by a combination of fencing and evergreen plantings. Where possible, dumpsters or other trash and recycling collection points shall be located within the building.
 - i. **Stormwater management.** Strategies that demonstrate compliance of the construction activities and the proposed project with the most current versions of the Massachusetts Department of Environmental Protection Stormwater Management Standards, the Massachusetts Stormwater Handbook, Massachusetts Erosion Sediment and Control Guidelines, Article V(F) of Sudbury's General Bylaws, and, if applicable, additional requirements under the Sudbury MS4 Permit for

projects that disturb more than one acre, and an Operations and Management Plan for both the construction activities and ongoing post-construction maintenance and reporting requirements.

3. Buildings: General.

- a. **Position relative to principal street.** The primary building shall have its principal façade and entrance facing the principal street. See also Section G.7. Buildings: Corner Lots.
- b. **Entries.** Entries shall be clearly defined and linked to a paved pedestrian network that includes the public sidewalk.

4. Buildings: Multiple buildings on a lot.

- a. For a mixed-use development, uses may be mixed within the buildings or in separate buildings.
- b. Parking and circulation on the site shall be organized so as to reduce the amount of impervious surface. Where possible, parking and loading areas shall be connected to minimize curb cuts onto public rights-of-way.
- c. A paved pedestrian network shall connect parking to the entries to all buildings and the buildings to each other.
- d. The orientation of multiple buildings on a lot should reinforce the relationships among the buildings. All building façade(s) shall be treated with the same care and attention in terms of entries, fenestration, and materials.
- e. The building(s) adjacent to the public street shall have a pedestrian entry facing the public street.

5. Buildings: Mixed-use development.

- a. In a mixed-use building, access to and egress from the residential component shall be clearly differentiated from access to other uses. Such differentiation may occur by using separate entrances or egresses from the building or within a lobby space shared among different uses.
- b. Paved pedestrian access from the residential component shall be provided to residential parking and amenities and to the public sidewalk, as applicable.
- c. Materials for non-residential uses shall be stored inside or outside within an enclosure, screened from view, and secured.

- d. Parking and circulation on the site shall be organized so as to reduce the amount of impervious surface. Where possible, parking and loading areas shall be connected to minimize curb cuts onto public rights-of-way.
6. **Buildings: Shared Outdoor Space.** Multi-family housing and mixed-use development shall have common outdoor space that all residents can access. Such space may be located in any combination of ground floor, courtyard, rooftop, or terrace.
7. **Buildings: Corner Lots.** A building on a corner lot shall indicate a primary entrance either along one of the street-facing façades or on the primary corner as an entrance serving both streets.
 - a. Such entries shall be connected by a paved surface to the public sidewalk, if applicable.
 - b. All façades visible from a public right-of-way shall be treated with similar care and attention in terms of entries, fenestration, and materials.
 - c. Fire exits serving more than one story shall not be located on either of the street-facing façades.
8. **Buildings: Infill Lots.** If the adjacent buildings are set back at a distance that exceeds the minimum front yard requirements, infill buildings shall meet the requirements of Section 4700C Subsection D. Dimensional Standards and Other Requirements. Otherwise, infill buildings may match the setback line of either adjacent building, or an average of the setback of the two buildings to provide consistency along the street.
9. **Buildings: Principal Façade and Parking.** Parking shall be subordinate in design and location to the principal building façade.
 - a. Surface parking. Surface parking shall be located to the rear or side of the principal building. Parking shall not be located in the setback between the building and any lot line adjacent to the public right-of-way.
 - b. Integrated garages. The principal pedestrian entry into the building shall be more prominent in design and placement than the vehicular entry into the garage.
 - c. Parking within a building: Buildings with parking within the building envelope shall have shall have programed screening on the primary façade and architectural screening on the remaining sides.
10. **Waivers.** Upon the request of the Applicant and subject to compliance with the Compliance Guidelines, the Site Plan Review Authority may waive the requirements of this Section 4700C Subsection F. General Development Standards, in the interests of design flexibility and overall project quality, and upon a finding of consistency of such variation with the overall purpose and objectives of the MFOD, the Sudbury Master Plan as amended, and the overall benefit of the residents of the Town of Sudbury.

G. SITE PLAN REVIEW.

1. **Applicability.** All projects developed using the MFOD shall be subject to the Site Plan Review procedures as detailed in Section 6300. The Site Plan Review and Approval Authority for the MFOD shall be the Planning Board.
 - a. **Project Phasing.** An Applicant may propose, in a Site Plan Review submission, that a project be developed in phases subject to the approval of the Site Plan Review Authority, provided that the submission shows the full buildout of the project and all associated impacts as of the completion of the final phase. However, no project may be phased solely to avoid the provisions of Section 4700C Subsection H. Affordability Requirements, or any other local, state, or federal permitting process.
 - b. **Issuance of Building Permit.** Following the issuance of a site plan review approval, the Applicant shall submit a building permit application and such other materials and fees as may be required to the Building Inspector and a building permit may thereafter be issued for the approved project or any individual component thereof. Building permits may be sought and issued for individual components of an approved project.
 - c. **Water Resources Protection District.** Any MFOD project shall comply with Section 4200 Water Resource Protection Overlay District to the maximum extent practicable. The Planning Board shall review for such compliance through site plan review. Projects in the MFOD are exempt from any Special Permitting processes required in Section 4200.

H. AFFORDABILITY REQUIREMENTS.

1. **Purpose.**
 - a. Promote the public health, safety, and welfare by encouraging a diversity of housing opportunities for people of different income levels;
 - b. Provide for a full range of housing choices for households of all incomes, ages, and sizes;
 - c. Increase the production of affordable housing units to meet existing and anticipated housing needs; and
 - d. Work to overcome economic segregation allowing Sudbury to be a community of opportunity in which low and moderate-income households have the opportunity to advance economically.
2. **Applicability.** This requirement is applicable to all multi-family and mixed-use developments with ten (10) or more dwelling units, whether new construction, substantial rehabilitation, expansion, reconstruction, or residential conversion (Applicable Projects) in the MFOD. No project may be divided or phased to avoid the requirements of this section.

3. **Affordability requirements.** All units affordable to Eligible Households earning 80% or less of AMI created in the MFOD under this section must be eligible for listing on EOHLC's Subsidized Housing Inventory. The affordability of such units shall be assured in perpetuity, or to the extent allowed by law, by an affordable housing restriction.
4. **Provision of Affordable Housing.** In Applicable Projects, ten percent (10%) of housing units constructed shall be Affordable Housing Units. For purposes of calculating the number of units of Affordable Housing required within a development project, a fractional unit shall be rounded down to the next whole number. The Affordable Units shall be available to households earning income up to eighty percent (80%) of the AMI.
5. **Development Standards.** Affordable Units shall be:
 - a. Integrated with the rest of the development and shall be compatible in design, appearance, construction, and quality of exterior and interior materials with the other units and/or lots;
 - b. Dispersed equitably throughout the development;
 - c. Located such that the units have equal access to shared amenities, including light and air, utilities (including any bicycle storage and/or Electric Vehicle charging stations), storage, and views within the development;
 - d. Located such that the units have equal avoidance of any potential nuisances as market-rate units within the development;
 - e. Distributed proportionately among unit sizes; and
 - f. Distributed proportionately across each phase of a phased development.
 - g. Occupancy permits may be issued for market-rate units prior to the end of construction of the entire development provided that occupancy permits for Affordable Units are issued simultaneously on a pro rata basis.

I. SEVERABILITY.

1. If any provision of this Section 4700C is found to be invalid by a court of competent jurisdiction, the remainder of Section 4700C shall not be affected but shall remain in full force. The invalidity of any provision of this Section 4700C shall not affect the validity of the remainder of the Town of Sudbury's Zoning.

OTHER SECTIONS TO AMEND WITHIN SUDBURY’S ZONING CODE

Add the following definitions to “Section 7000. Definitions”

Applicant. A person, business, or organization that applies for a building permit, Site Plan Review, variance or Special Permit or who files an administrative appeal.

As of right. Development that may proceed under the Zoning Bylaw without the need for a special permit, variance, zoning amendment, waiver, or other discretionary zoning approval.

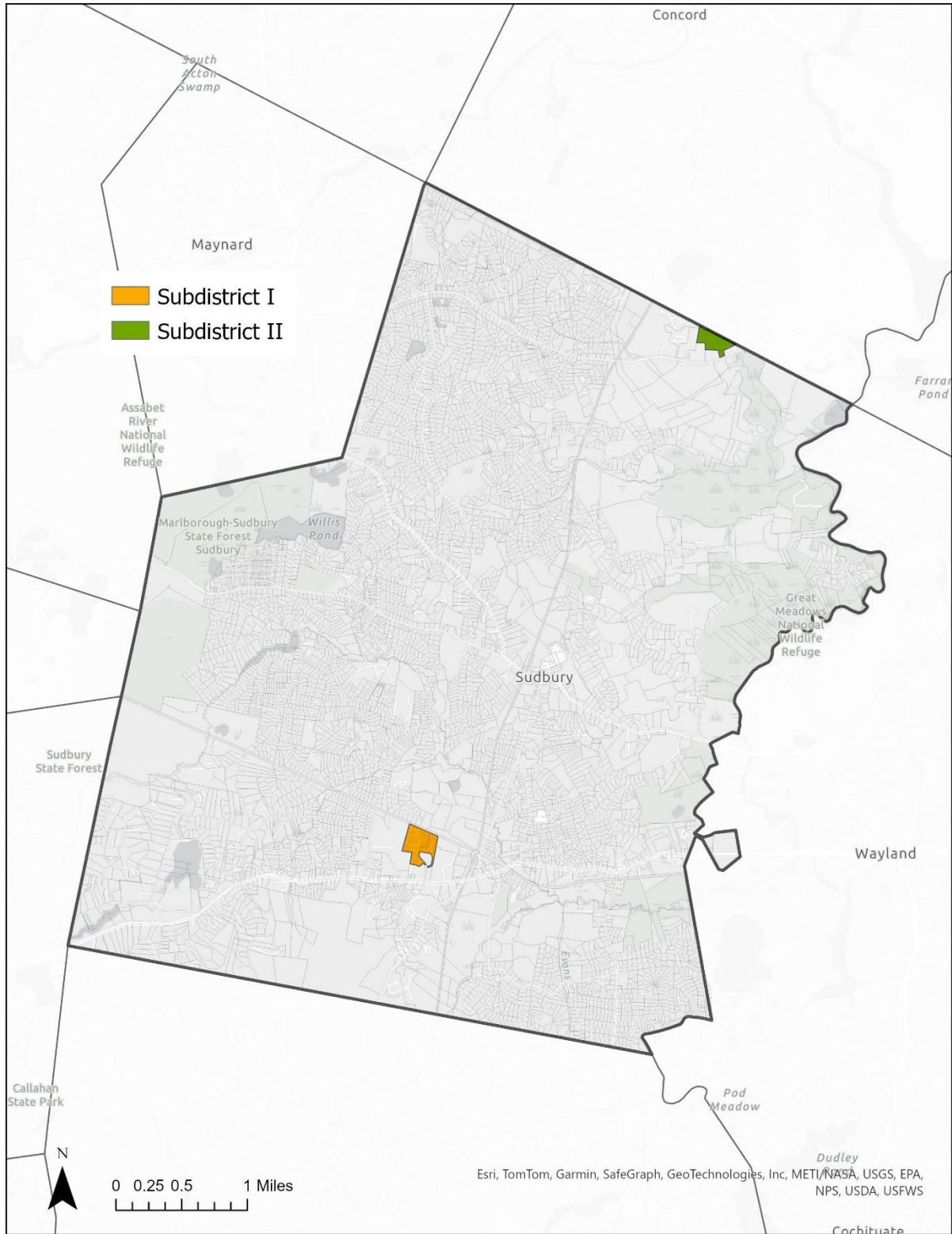
Mixed-use development. Development containing a mix of residential uses and non-residential uses, including, commercial, institutional, industrial, or other uses.

'Multi-family housing', a building with 3 or more residential dwelling units or 2 or more buildings on the same lot with more than 1 residential dwelling unit in each building.

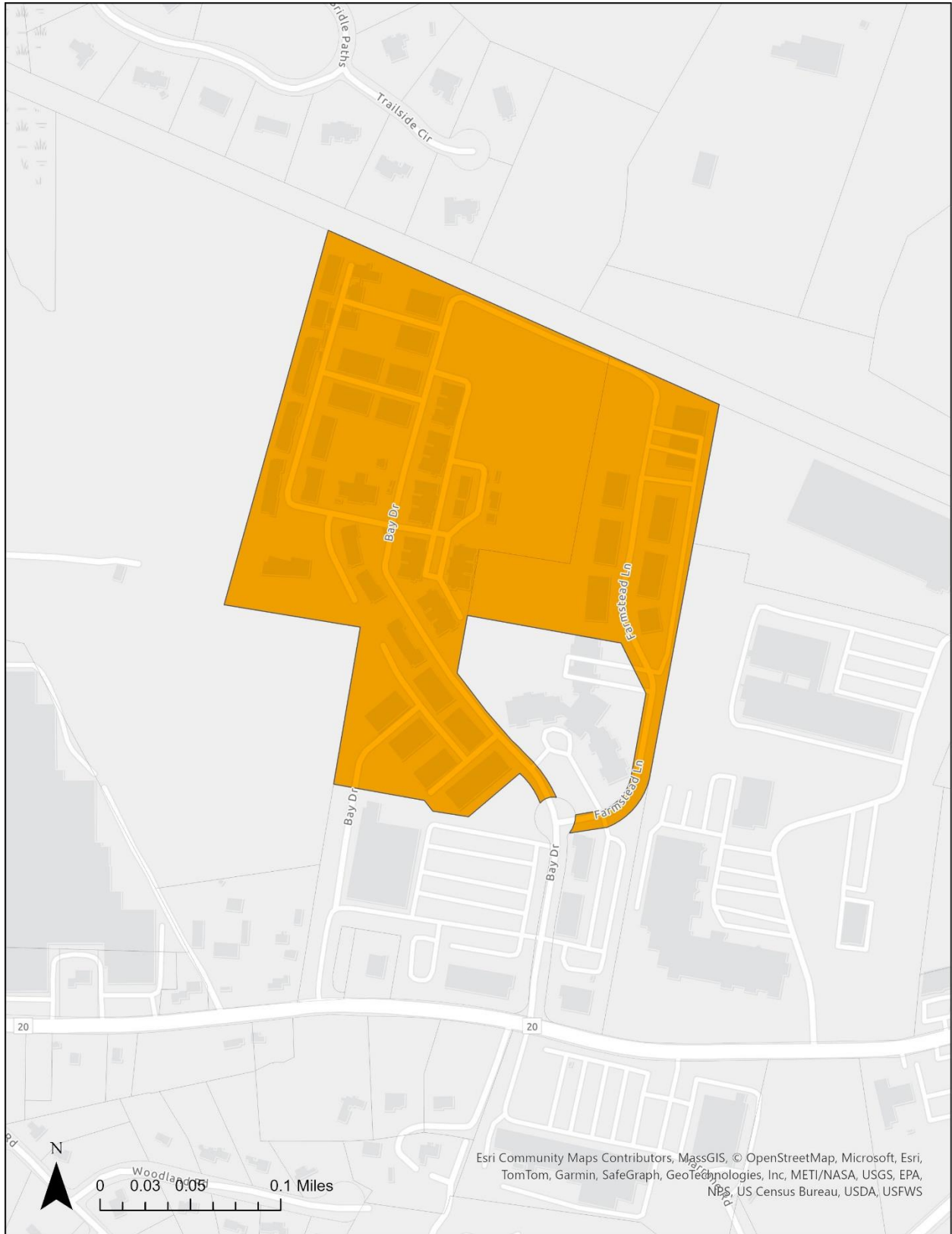
Section 3A. Section 3A of the Zoning Act.

MAPS

Multi-family Overlay District



Multi-family Overlay District (Sub-District I)



Multi-family Overlay District (Sub-District II)

