

Nantucket Affordable Housing Trust
Strategic Plan

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Nantucket Affordable Housing Trust

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Our Mission

The Nantucket Affordable Housing Trust Fund (NAHT) supports the creation and preservation of affordable year-round housing for low- and moderate-income residents. We do this by:

- ***Investing*** in projects and programs that help people afford safe, decent, modestly priced homes that will remain affordable for the next generation;
- ***Acquiring*** property for affordable housing;
- ***Educating*** our community about Nantucket's affordable housing needs;
- ***Building*** support for creation of affordable housing; and
- ***Helping*** Nantucket work toward the state's 10 percent affordable housing goal under Chapter 40B.

The Situation

Problem Statement

Town Meeting established the Nantucket Affordable Housing Trust Fund (NAHT) in 2009 to create and preserve affordable housing. NAHT's powers and duties are broadly defined in G.L. c. 44, § 55C, the Municipal Affordable Housing Trust Fund law, which encourages cities and towns to create a local source of funding for affordable housing and a board of trustees to oversee the fund.

Although Town Meeting adopted the state enabling law to address Nantucket's housing needs, it has not been easy for the board of trustees to secure support for its programs and initiatives. Not everyone on Nantucket understands the island's need for affordable housing, and people do not always agree about the kinds of affordable housing Nantucket needs to provide. Furthermore, some residents question whether affordable housing is even a local responsibility. The purpose of this Strategic Plan is to help the NAHT work more effectively as a facilitator of

affordable housing and overcome obstacles that have hampered its success.

■ A PLACE LIKE NO OTHER

Nantucket's housing barriers are unlike those of any other town in the Commonwealth. An island 30 miles from the southern coast of Cape Cod, Nantucket is the only geographic area in Massachusetts controlled by three overlapping jurisdictions: a municipality, an entire county, and a regional planning commission. About the only thing Nantucket has in common with most Massachusetts communities is that it falls far below the 10 percent statutory minimum for low-income housing under the state affordable housing law, known by its short title, Chapter 40B.¹

Today, despite efforts by the Town of Nantucket and NAHT, and others, just 2.5 percent of Nantucket's year-round housing units are eligible for the Chapter 40B Subsidized Housing Inventory (SHI).² The 121 SHI-eligible units pale in comparison to the estimated 870 low- and moderate-income households living year-round on Nantucket in dwellings they cannot afford.³

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¹ G.L. c. 40B, §§ 20-23.

² Massachusetts Department of Housing and Community Development (DHCD), Subsidized Housing Inventory, Updated December 2017.

³ U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) Data, from

Nantucket ranks seventh out of 351 cities and towns statewide for percentage of seasonal or vacation homes, so it joins several communities on Martha's Vineyard and Cape Cod in hosting affluent households who spend their summers on the Massachusetts coast. However, Nantucket is also a year-round settlement. It has a larger economy than the higher-ranked resort towns, yet geographic isolation severely constrains Nantucket's ability to support local employment.

It is unrealistic for people with a job on Nantucket to commute from the mainland every day. For off-island residents trying to keep a job on Nantucket, the solution during the work week is often a spare bedroom or basement couch in an islander's home. Nantucket needs more housing for workers at all wage levels, and while the need is especially acute for people with year-round jobs, the seasonal workers have to be housed, too. Otherwise, Nantucket will continue to struggle with the problem of too many markets competing for the same inadequate supply.

Nantucket's unique geography limits the options available to pursue other affordable housing possibilities by the Town or with other communities. Located far from the mainland, Nantucket has to provide affordably priced housing within its own borders - if not for social fairness, then for the practical need to maintain a local economy. With some 60 percent of the entire island rendered undevelopable by natural and man-made constraints, Nantucket has exceptionally high land costs. This, paired with relentless seasonal housing demand, drives housing prices far beyond the reach of ordinary Nantucket workers.

Today, the median sale price of single-family homes on Nantucket ranks with Boston's most prestigious close-in suburbs: Brookline, Weston, Wellesley, Lexington, and Lincoln. The difference is that Boston-area suburbs can and do draw on a wider labor market area and participate in a regional exchange of goods and services. Nantucket has no neighbors.

■ DIFFICULT LOCAL INITIATIVES

Nantucket shares with the state's most affluent towns the high risk

Nantucket has too many markets competing for the same inadequate supply.

that approvals of affordable housing development will be appealed by residents (year-round or seasonal) who can afford a lengthy litigation process. A recent example involves Town-owned property at 6 Fairgrounds Road, which Town Meeting rezoned for higher-density development. The Select Board agreed to convey the property under a long-term ground lease following a competitive developer selection process.

The proposed project would have allowed Nantucket's Housing Production Plan (2016) to be certified by DHCD, thereby enabling the Zoning Board of Appeals to deny a large, unwanted Chapter 40B development. The selected developer wanted to build a 64-unit mixed-income rental project known as Ticcoma Green and

obtained a special permit from the Planning Board for it, only to be blocked by a neighborhood appeal. The project remains stalled in court.

There has been related unrest since then, including citizen petitions to stop Ticcoma Green and institute a seven-year moratorium on the use of Town land or funding for new affordable housing. Town Meeting rejected both petitions. Meanwhile, a privately sponsored Chapter 40B project less than a mile from 6 Fairgrounds Road has further energized mid-island residents.

Even an affordable housing success story like **Sachem's Path** has contended with naysayers. Located on land formerly owned by the Nantucket Housing Authority, Sachem's Path was almost thirty years in the making. In 1985, Nantucket voted to give the land to the Nantucket Housing Authority for the purpose of developing affordable housing. In 2011, the housing authority selected a developer to oversee the project, and construction began three years later.

Sachem's Path includes 40 mixed-income homes off Surfside Road, developed by the Housing Assistance Corporation of Cape Cod, the regional non-profit in Barnstable County, in partnership with developer Kevin McGuire. Designed to respect Nantucket's look and feel, Sachem's Path consists of traditional single-family homes for homebuyers with incomes between 80 and 150 percent of Area Median Income (AMI) - a number that on Nantucket exceeds that of all other metro and non-metro areas in Massachusetts. To help Nantucket renters buy a house on Sachem's Path, the NAHT has offered down payment and closing cost assistance to eligible buyers. Hotel housekeeping staff could not afford a home there,



but teachers, plumbers, and interior designers could, and that was the intent.

Issues

With many more demands on Nantucket's housing than the supply can possibly meet, the Town finds itself with some critical problems:

- Low-wage workers in the hospitality, tourism, and retail industries are frequently forced to live in overcrowded, substandard units concentrated in some mid-island neighborhoods. Without realistic options for them to find better affordable housing on Nantucket, island authorities hesitate to press for code enforcement and residents hesitate to report violations. People with the greatest housing needs on Nantucket are the hardest ones to help.

Nantucket struggles with misinformation, lack of knowledge, and uneasiness about (if not resistance to) race, class, poverty, and cultural diversity . . . There is more to the HPP than striving to create 24 low- and moderate-income units per year.

- Town government and other employers frequently lose qualified job applicants because potential hires cannot find modestly priced housing on Nantucket.
- Nantucket needs a wider range of homeownership and rental options if the island hopes to keep people over the long term. However, before the public even knows that homes have been put on the market, developers and homebuilders often move quickly to acquire them, making it impossible for first-time or move-up homebuyers and renters to compete.
- Homes once occupied by year-round residents frequently convert to seasonal use upon resale. The supply of year-round housing is diminishing.
- If Nantucket could create at least 24 new low- or moderate-income units each year, the Town would be eligible for “certification” of its DHCD-approved Housing Production Plan. The Nantucket Select Board has made it an official Town goal to create 24 affordable units per year. Without a site like 6 Fairgrounds Road, a 24-unit target requires multiple small projects - known in the housing field as scattered-site affordable housing - which is more complicated than carrying out one development and vulnerable to more sources of appeal. If this is Nantucket’s preferred approach, the NAHT and others interested in affordable housing cannot wait until potentially suitable properties are listed for sale. And, for the Town to acquire *any* property for affordable housing development, state procurement laws come into play.
- Successful partnerships between conservation and housing groups exist in some Massachusetts towns and communities elsewhere in the U.S., but there is limited rapport between groups like the Nantucket Land Bank or Nantucket Conservation Foundation and the NAHT, Housing Nantucket, and others. There is currently an agreement to look for joint venture opportunities, yet partnership acquisitions can be difficult. The Land Bank’s funding far surpasses what is available to the NAHT, so a realistic conservation project may not be a realistic affordable housing project.
- Nantucket seems to see Chapter 40B comprehensive permits as intrinsically problematic. The Town prefers - at least by custom - to work with its own zoning and other regulations to control affordable housing development. However, the comprehen-

sive permit comes with advantages that need to be considered before the Town embarks on more local initiative developments.

- Nantucket struggles with misinformation, lack of knowledge, and uneasiness about (if not resistance to) race, class, poverty, and cultural diversity even though island employers depend heavily on immigrant minorities for lower-wage jobs. It may be true that no amount of public education will materially change public attitudes about affordable housing. However, the housing organizations and Town leaders need to speak with a common voice and a shared commitment to implementing the Housing Production Plan. There is more to the HPP than striving to create 24 low- and moderate-income units per year.
- There is some expectation that the NAHT should facilitate the creation of 24 units per year, i.e., the minimum required to qualify for HPP certification. However, the state's most well-resourced, well-staffed municipal housing trusts do not develop 24 affordable housing units in a single year; even 24 units in two years would be a stretch. While increasing the supply of affordable housing is NAHT's main purpose, the most important near-term steps for NAHT involve building capacity and becoming a more effective organization.

Strategic Plan Focus Areas

■ IDENTITY

Although housing “insiders” and most Town officials know what the NAHT is, the community at large does not. Many people have trouble distinguishing NAHT from groups such as Housing Nantucket, a private, non-profit 501(c)(3) that administers Nantucket's covenant program, Habitat for Humanity, or the Nantucket Housing Authority. NAHT is relatively unknown compared with Housing Nantucket and ReMain Nantucket.

■ RELATIONSHIPS

NAHT needs to establish better rapport with other Nantucket entities, especially Town government entities, because it needs to work with them in order to operate effectively. There is a lack of clarity about the NAHT's job, how the NAHT's roles and responsibilities relate to the job of the Town's Housing Specialist, and how NAHT's work differs from groups such as Housing Nantucket or the Community Preservation Committee.

Nantucket has residents, both seasonal and year-round, with significant experience in real estate development and finance whose involvement in NAHT projects could help to make the group more successful. There is some sense in Town that engaging these people on an advisory basis would help to build NAHT's capacity and improve its standing in the community. Planning sessions with the trustees brought to light how important it is for them to think strategically and understand how to reach a variety of audiences. Establishing deeper connections in the community could be very helpful in this regard.

■ INFORMATION

Knowledge of the island's housing needs is remarkably weak on Nantucket. When people say they want to implement the Housing Production Plan, it seems that more often than not, they simply mean Nantucket should create 24 affordable units per year. However, the Housing Production Plan contains many more recommendations and identifies many more issues than the minimum production number for certification. Furthermore, additional or better data may be available today, notably because of access to the new Nantucket Data Platform.

There are critical needs for public education about affordable housing and a broader corps of advocates. It will be difficult for NAHT to accomplish any significant degree of housing production without extended community support, i.e., support beyond "usual suspects."

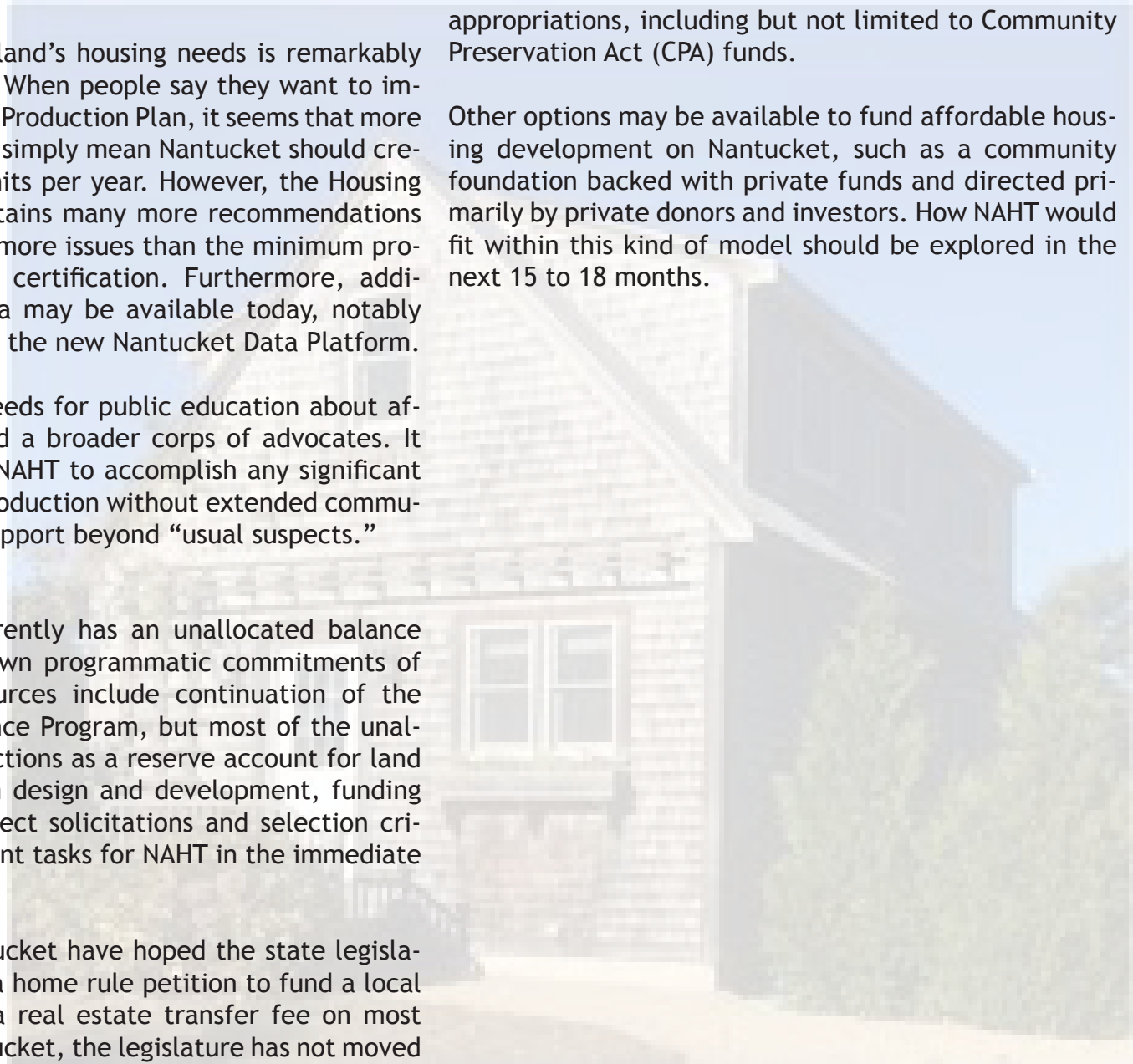
■ TRUST FUND

The Trust Fund currently has an unallocated balance of \$1.7 million. Known programmatic commitments of NAHT's future resources include continuation of the Closing Cost Assistance Program, but most of the unallocated balance functions as a reserve account for land acquisition. Program design and development, funding guidelines, and project solicitations and selection criteria will be important tasks for NAHT in the immediate future.

While many in Nantucket have hoped the state legislature would support a home rule petition to fund a local Housing Bank with a real estate transfer fee on most transactions in Nantucket, the legislature has not moved the bill forward. Thus, it will likely fall to Nantucket taxpayers to continue supporting the NAHT with local

appropriations, including but not limited to Community Preservation Act (CPA) funds.

Other options may be available to fund affordable housing development on Nantucket, such as a community foundation backed with private funds and directed primarily by private donors and investors. How NAHT would fit within this kind of model should be explored in the next 15 to 18 months.



Strategic Plan Toolbox

What does the NAHT have to work with in order address the focus areas outlined in the Strategic Plan and carry out programs that further its mission? What steps will it take, and toward what ends?

Resources Needed	For These Activities	To Support Output of This Type/Extent
	STRATEGIES	
	NAHT Operations	
Board Action	Formulate Budget for FY Requests	Programs and Administration
Collaboration with Town Manager, SB	Define roles for existing town staff (Tucker/Megan)	Programs and Administration
Funding	Collect data to inform decision making; Data Platform project	Information
Communications	Initiate outreach/liaison with other Town boards/depts	Effective Relationships
Communications	Initiate outreach to community organizations/groups	Effective Relationships
Board Subcommittee	Develop communications plan - website/community input	Public Education
Board Subcommittee	Establish calendar of annual events/deadlines	Public Education
Board Action	Engage consultants as needed to support operations	Capacity Building
Board Officers	Establish Board of Advisors to capitalize on available expertise	Capacity Building
Board Subcommittee	Explore funding mechanisms outside annual budget (Short term rental tax; CPC Bonding; Housing Bank)	Long-Term Financial Plan
Collaboration with Town Manager, SB	Identify future staffing needs to manage increased NAHT activity/functions	Programs and Administration

Resources Needed	For These Activities	To Support Output of This Type/Extent
Board Action; Staff Support	Solicit broad community input on goals for housing	Public Education
	<i>Define Program for Land Acquisition</i>	
Board Action; Staff Support	Develop criteria for RFI(s) for parcels to purchase with input from Planning Dept	Programs and Administration
Collaboration with Town Administration	Coordinate procurement process with Finance Department	Programs and Administration
Staff; Consultants	Explore site control and ownership models (leasehold; Community Land Trust, etc.)	Information
Board Officers	Pursue acquisition partnerships with Land Bank	Capacity Building
Board Action; Staff or Consultants	Develop criteria for partnerships with private developers	Capacity Building; Programs and Administration
	<i>Explore use of existing Town-owned property for housing</i>	
Staff Support	Identify list of existing town property	Programs and Administration
Staff Support; Board Subcommittee	Review Fire Department property as requested by Select Board	Programs and Administration
Collaboration with Town Administration	Collaborate with Select Board and Administration on overall plan for town properties	Long-Term Financial Plan
	<i>Establish down-payment assistance pilot program</i>	
Staff Support or Consultants	Determine AMI levels to be included	Programs and Administration
Staff Support or Consultants	Determine loan vs. NAHT equity position	Programs and Administration
Staff Support or Consultants	Determine amount of assistance	Programs and Administration

Resources Needed	For These Activities	To Support Output of This Type/Extent
Staff Support or Consultants	Determine necessary deed restrictions/covenants	Programs and Administration
Board Action	Solicit feedback from other Town boards/departments (Select Board/Finance)	Programs and Administration
Staff Support or Consultants	Investigate impact on buyer mortgage qualification	Programs and Administration
	<i>Buy back: Acquisition of existing housing stock into affordable rental program (serves as a “safe harbor” insurance policy)</i>	
Staff Support or Consultants	Seek input from Town Counsel/DHCD on how to ensure SHI list eligibility at various AMI levels	Programs and Administration
Staff Support or Consultants	Establish procurement procedures - RFI criteria	Programs and Administration
Collaboration with Town Administration	Seek input from Finance Department on best financing plan	Programs and Administration
Collaboration with Town Administration	Establish criteria for RFP for property management	Programs and Administration
	<i>Year-Round Rental Incentive Program</i>	
Staff Support or Consultants	Establish criteria to SHI-List existing rental properties (length of covenant; income levels)	Programs and Administration
Staff Support or Consultants	Create calculator for landlords to evaluate seasonal vs. year-round revenue	Programs and Administration
Staff Support or Consultants	Develop financial incentives to convert seasonal to year-round or affordable rentals (e.g., tax rebates; rent subsidy; low-interest loans/grants to bring substandard units up to code, etc.)	Programs and Administration

Resources Needed	For These Activities	To Support Output of This Type/Extent
	<i>Buy-Down Program</i>	
Staff Support or Consultants	Determine criteria process for purchasing covenants on existing housing to convert them to SHI-eligible units	Programs and Administration
Staff Support or Consultants	Determine if current occupants can stay under fair housing guidelines	Programs and Administration
	<i>Subsidy program for private developments</i>	
Staff Support or Consultants	Determine criteria process for per-unit cash in exchange for permanent affordable covenants	Programs and Administration
Staff Support or Consultants	Rental vs. ownership models	Programs and Administration
Staff Support or Consultants	Subsidy through low-cost ground lease of land (6 Fairgrounds Rd. model)	Programs and Administration

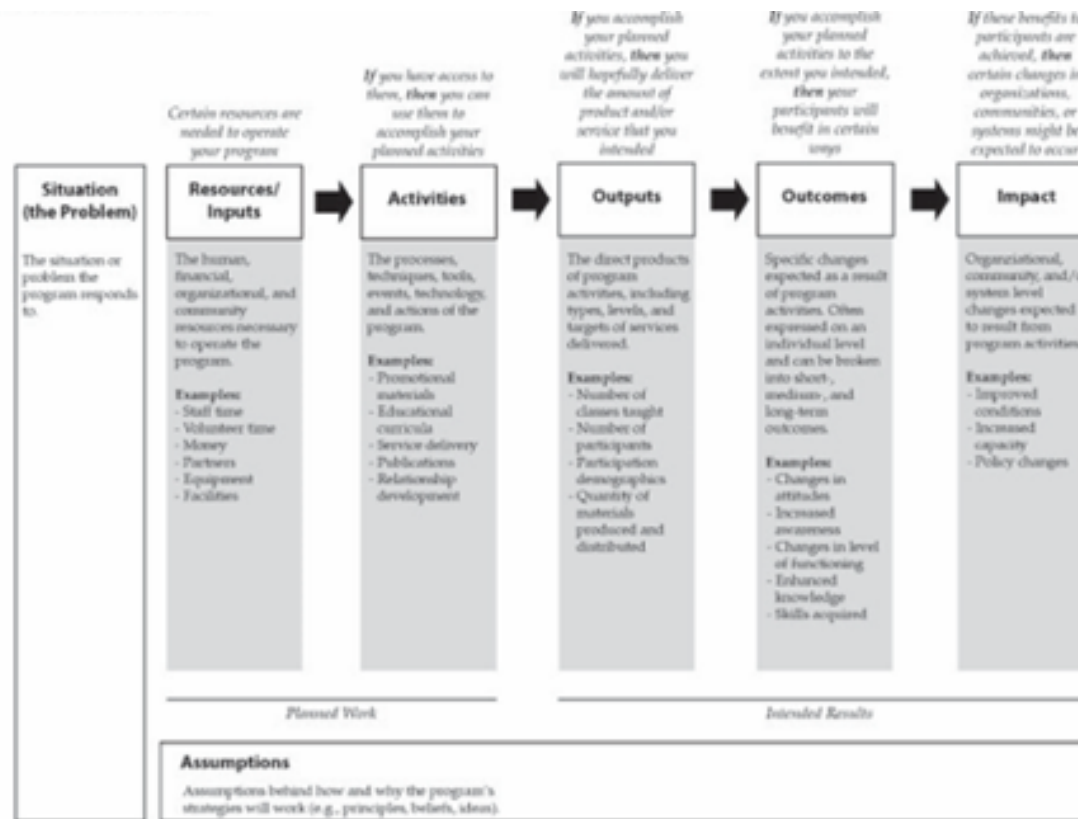
Appendix

Appendix A: The Strategic Planning Process

The NAHT’s strategic planning process included both internal and external assessments. The trustees worked through five plan development sessions, closely following the logic model developed by the W. K. Kellogg Foundation and refined by the U.S. Environmental Protection Agency (EPA) to design and evaluate programs, communicate purposes and objectives, and make resource allocation decisions.

The logic model framework is based on a **theory of change**, i.e., if the NAHT has enough resources to carry out a particular program or project, there will be a measurable, long-term benefit to a target population and housing affordability, or if the NAHT operates a successful first-time homebuyer program, year-round employers in Nantucket will have a more stable base of qualified workers. In short, the model calls for if/then relationships and the willingness to challenge them.

Outreach to various Town officials, other housing organizations, and business leaders occurred in the form of face-to-face interviews by the NAHT’s consultant and online surveys directed to similar audiences. The goal



Modified from W.K. Kellogg Foundation, "Logic Model Development Guide," 2004.

was to understand how people active in the community see the NAHT, what they think the NAHT should work on in the near future, and what they think could make the NAHT effective as an agent of affordable housing. Together, the internal assessment and external consultations clarified that the Strategic Plan should focus on four problem/opportunity areas.

Appendix B: Powers and Duties of Municipal Affordable Housing Trust Fund

G.L. c. 44, Section 55C

(a) Notwithstanding section 53 or any other general or special law to the contrary, a city or town that accepts this section may establish a trust to be known as the Municipal Affordable Housing Trust Fund, in this section called the trust. The purpose of the trust is to provide for the creation and preservation of affordable housing in municipalities for the benefit of low and moderate income households and for the funding of community housing, as defined in and in accordance with the provisions of chapter 44B. Acceptance shall be by majority vote of the municipal legislative body under section 4 of chapter 4.

(b) There shall be a board of trustees, in this section called the board, which shall include no less than 5 trustees, including the chief executive officer, as defined by section 7 of chapter 4, of the city or town, but where the chief executive officer is a multi-member body, that body shall designate a minimum of 1 of its members to serve on the board. Trustees shall be appointed in a city by the mayor or by the city manager in a Plan D or Plan E municipality, subject in either case, to confirmation by the city council, and in a town by the board of selectmen, shall serve for a term not to exceed 2 years, and are designated as public agents for purposes of the constitution of the commonwealth. Nothing in this subsection shall prevent a board of selectmen from appointing the town manager or town administrator as a member or chair of the board, with or without the power to vote.

(c) The powers of the board, all of which shall be carried on in furtherance of the purposes set forth in this act, shall include the following powers, but a city or town may, by ordinance or by-law, omit or modify any of these powers and may grant to the board additional powers consistent with this section:--

(1) to accept and receive real property, personal property or money, by gift, grant, contribution, devise or transfer from any person, firm, corporation or other public or private entity, including but not limited to money, grants of funds or other property tendered to the trust in connection with any ordinance or by-law or any general or special law or any other source, including money from chapter 44B; provided, however, that any such money received from chapter 44B shall be used exclusively for community housing and shall remain subject to all the rules, regulations and limitations of that chapter when expended by the trust, and such funds shall be accounted for separately by the trust; and provided further, that at the end of each fiscal year, the trust shall ensure that all expenditures of funds received from said chapter 44B are reported to the community preservation committee of the city or town for inclusion in the community preservation initiatives report, form CP-3, to the department of revenue;

(2) to purchase and retain real or personal property, including without restriction investments that yield a high rate of income or no income;

(3) to sell, lease, exchange, transfer or convey any personal, mixed, or real property at public auction or by private contract for such consideration and on such terms as to credit or otherwise, and to make such contracts and enter into such undertaking relative to trust property as the board deems advisable notwithstanding the length of any such lease or contract;

(4) to execute, acknowledge and deliver deeds, assignments, transfers, pledges, leases, covenants, contracts, promissory notes, releases, grant agreements and other instruments sealed or unsealed, necessary, proper or incident to any transaction in which the board engages for the accomplishment of the purposes of the trust;

(5) to employ advisors and agents, such as accountants, appraisers and lawyers as the board deems necessary;

(6) to pay reasonable compensation and expenses to all advisors and agents and to apportion such compensation between income and principal as the board deems advisable;

(7) to apportion receipts and charges between incomes and principal as the board deems advisable, to amortize premiums and establish sinking funds for such purpose, and to create reserves for depreciation depletion or otherwise;

(8) to participate in any reorganization, recapitalization, merger or similar transactions; and to give proxies or powers of attorney with or without power of substitution to vote any securities or certificates of interest; and to consent to any contract, lease, mortgage, purchase or sale of property, by or between any corporation and any other corporation or person;

(9) to deposit any security with any protective reorganization committee, and to delegate to such committee such powers and authority with relation thereto as the board may deem proper and to pay, out of trust property, such portion of expenses and compensation of such committee as the board may deem necessary and appropriate;

(10) to carry property for accounting purposes other than acquisition date values;

(11) to borrow money on such terms and conditions and from such sources as the board deems advisable, to mortgage and pledge trust assets as collateral;

(12) to make distributions or divisions of principal in kind;

(13) to comprise, attribute, defend, enforce, release, settle or otherwise adjust claims in favor or against the trust, including claims for taxes, and to accept any property, either in total or partial satisfaction of any indebtedness or other obligation, and subject to the provisions of this act, to continue to hold the same for such period of time as the board may deem appropriate;

(14) to manage or improve real property; and to abandon any property which the board determined not to be worth retaining;

(15) to hold all or part of the trust property uninvested for such purposes and for such time as the board may deem appropriate; and

(16) to extend the time for payment of any obligation to the trust.

(d) Notwithstanding any general or special law to the contrary, all moneys paid to the trust in accordance with any zoning ordinance or by-law, exaction fee, or private contributions shall be paid directly into the trust and need not be appropriated or accepted and approved into the trust. General revenues appropriated into the trust become trust property and to be expended these funds need not be further appropriated. All moneys remaining in the trust at the end of any fiscal year, whether or not expended by the board within 1 year of the date they were appropriated into the trust, remain trust property.

(e) The trust is a public employer and the members of the board are public employees for purposes of chapter 258.

(f) The trust shall be deemed a municipal agency and the trustees special municipal employees, for purposes of chapter 268A.

(g) The trust is exempt from chapters 59 and 62, and from any other provisions concerning payment of taxes based upon or measured by property or income imposed by the commonwealth or any political subdivision thereof.

(h) The books and records of the trust shall be audited annually by an independent auditor in accordance with accepted accounting practices.

(i) The trust is a governmental body for purposes of sections 23A, 23B and 23C of chapter 39.

(j) The trust is a board of the city or town for purposes of chapter 30B and section 15A of chapter 40; but agreements and conveyances between the trust and agencies, boards, commissions, authorities, departments and public instrumentalities of the city or town shall be exempt from said chapter 30B

Appendix C: Resources for Affordable Housing Production

- NANTUCKET HOUSING PRODUCTION PLAN (2016)

www.nantucket-ma.gov/DocumentCenter/View/12794/Nantucket-Housing-Production-Plan-as-Approved-by-DHCD-October-2016?bidId=

- MASSACHUSETTS HOUSING PARTNERSHIP, MUNICIPAL AFFORDABLE HOUSING TRUST GUIDEBOOK

www.mhp.net/writable/resources/documents/municipal_affordable_housing_trust_guidebook.pdf

- 40B FACT SHEET: A GUIDE TO THE STATE'S AFFORDABLE HOUSING LAW PREPARED BY THE CITIZEN'S HOUSING AND PLANNING ASSOCIATION.

www.chapa.org/sites/default/files/Fact%20Sheet%20on%20Chapter%2040B%202011%20update.pdf

- CHAPTER 40B REGULATIONS

www.mass.gov/regulations/760-CMR-5600-comprehensive-permit-low-or-moderate-income-housing

- COMMUNITY LAND TRUSTS

community-wealth.org/strategies/panel/clts/index.html

cltnetwork.org/tools/

centerforneweconomics.org/apply/community-land-trust-program/

- INCOME LIMITS

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs. HUD develops income limits based on median family income estimates and fair market rent area definitions for each metropolitan and non-metro area.

www.huduser.gov/portal/datasets/il.html