



November 16, 2022

Ms. Natasha Espada, Co-Chair, Needham Housing Plan Working Group
Ms. Jeanne McKnight, Co-Chair, Needham Housing Plan Working Group

Dear Ms. Espada and Ms. McKnight:

Thank you for the opportunity to comment on the Working Group's draft housing plan and for the in-depth work done to this point. We value the detail provided that describes the present housing circumstances in Needham. We also appreciate the wide-ranging ideas for improvements as shown in the implementation roadmap. At the state and national levels, past League of Women Voters studies of housing have resulted in a position to support access to decent housing and a suitable living environment affordable for all. As a local League, our past studies have resulted in positions to support:

- affordable housing;
- zoning in residential districts to prevent lots with minimal frontage and irregular shapes;
- meeting elderly needs in areas of moderate-income housing, health care, transportation, and companionship; and
- using the Stephen Palmer building and/or site for purposes such as rental housing that is affordable for seniors and others of moderate income, among other uses.

We are pleased with the working group's recommendations as they generally align with our positions. The plan's focus on increasing affordable housing options would allow those who work here to live here, enable residents to remain here as they age, and provide housing for individuals with special needs. In response to your draft, we present the following high-level comments based on the League positions listed above. [Note: numbers in brackets refer to the related item numbers in the implementation roadmap.]

1. **MBTA Communities guidelines** - We support fully meeting the MBTA Communities Guidelines and appreciate the innovative thinking, e.g., rezoning for apartments in select spots. [IV.A.1a]
2. **Town-wide inclusionary zoning** - We support requiring all new housing or mixed-use developments of 6 or more units to provide 12.5% of their units as affordable units. [IV.A.2]
3. **Affordable Housing Trust Fund (AHTF)** - We believe the AHTF is an important—and underutilized—resource. We propose restructuring the trust to enable the committee to take advantage of state programs and new legislation. Local options to increase funds should be considered, such as implementing a proportionate affordable housing fee payment to the AHTF for projects with fewer than 6 units. The Needham League of Women Voters is performing preliminary work in preparation for a League study on the AHTF over the next year. [IV.A.2]
4. **Accessory dwelling units (ADUs)** - We support broadening the requirements for ADUs to remove family member/caretaker restrictions and allow occupancy of ADUs as rental property. Additionally, we encourage making detached ADUs also by right. We believe this allows the best option for increasing diversity in town. [IV.A.3]
5. **Energy efficiencies in housing** - We fully support promoting greater energy efficiencies in housing through the Climate Action Plan Committee's efforts, including actions that

might ease zoning and permitting requirements to incentivize energy-efficient and environmentally sustainable housing development. [IV.A.4]

6. **Options to better control teardown activity** - Because of the impact both on the environment and availability of lower-cost housing, we are concerned that many smaller houses are being demolished and replaced with larger houses. We encourage options that would reduce this activity through zoning and suggest considering how other nearby towns have been successful. Further, we support exploring establishing a revolving fund managed by the AHTF to buy and manage entry-level homes that are prime “tear-down” candidates and then renting them at a portion of the area median income. [IV.A.6]
7. **Deeply-affordable housing** - We support the Needham Housing Authority Preservation and Redevelopment Initiative to upgrade all public housing conditions. [IV.B.1]
8. **Use of Community Preservation Act funds** - We support committing 22% of CPA funds for creating and retaining affordable housing in Needham. We support targeting these funds for deeply affordable housing. [IV.B.3]
9. **Promote housing for special needs populations** - We support integrating handicapped accessibility and supportive services into new development, which is helpful for seniors and residents with disabilities. [IV.B.4]
10. **Renovate/replace the Stephen Palmer Building** - We support considering options to “maximize its reuse for affordable or moderate rate housing.” [IV.B.5]

We are pleased with the comprehensive nature of the plan put forth by the Housing Plan Working Group. However, to ensure the plan is implemented, we suggest the following.

1. Consider hiring an affordable housing specialist with an understanding of federal and state funding opportunities to monitor implementation of the plan. In addition, this individual could oversee the Affordable Housing Trust Fund.
2. Consider using the data in your report to develop measurable guidelines for increasing housing at all affordability levels.

Thank you for the opportunity to provide comments. We appreciate the working group’s efforts over the last several months to pull together this plan and advocate for improving Needham’s housing conditions.

Sincerely,



Carol L. Patey, President
League of Women Voters of Needham