



WestMetro HOME Consortium Analysis of Impediments to Fair Housing Choice

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Table of Contents

INTRODUCTION..... 1
 Background2
 Federal Laws Relating to Fair Housing3
 Massachusetts Laws 6
 Methodology.....7
 WHAT IS FAIR HOUSING?.....9
 WHO LIVES IN THE WESTMETRO CONSORTIUM?..... 13
 Population & Household Trends: Overview14
 Race and Ethnicity.....15
 immigration and Language16
 Disability17
 Households and Families with Children18
 Age.....19
 Veterans.....19
 Household Incomes20
 HOUSING QUALITY, AFFORDABILITY, AND CHOICE23
 Affordable Housing Supply25
 IMPEDIMENTS TO FAIR HOUSING CHOICE 27
 General Market Trends: low supply, no turnover, high prices27
 Municipal Policies, Procedures, Actions Contributing to Unequal
 Access to Housing Opportunities.....28
 What Needs to Happen to remove fair housing barriers? 31
 Greatest Fair Housing & Affordable Housing Needs32
 RECOMMENDATIONS: 2021-2025 35
 APPENDIX39
 APPENDIX A. COMPARATIVE DATA VIEW BY CITY OR TOWN 41

BEDFORD41
 BELMONT..... 44
 CONCORD 47
 FRAMINGHAM..... 50
 LEXINGTON..... 53
 NATICK..... 56
 NEWTON 59
 SUDBURY 62
 WALTHAM 65
 WATERTOWN 68
 WAYLAND 71
 BROOKLINE 74
 NEEDHAM.....77
 Appendix B. Summary: Responses to surveys81
 Appendix C. Officials and Organizations with Relationship to Fair
 Housing91
 REFERENCES 99

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Introduction

Fair housing is not a new issue for the WestMetro HOME Consortium. Several years ago, three organizations filed a civil rights complaint with the U.S. Department of Housing and Urban Development (HUD) after the City of Newton decided to withhold funds from a proposed supportive housing development for chronically homeless individuals. Supporters of Engine 6, Disability Law Center, Inc., and the Fair Housing Center of Greater Boston pursued their grievance with HUD, and in 2015, the City entered into an agreement with HUD to resolve the dispute. The City agreed to take several steps to meet its obligations to affirmatively further fair housing, among which was preparation of the regional fair housing assessment that this Analysis of Impediments to Fair Housing Choice (AI) is intended to update.

Well before Newton agreed to an eight-point action plan to prevent a recurrence of the Engine 6 problems, the City of Framingham entered into a settlement agreement with Southern Middlesex Opportunity Council (SMOC) to end litigation concerning the Planning Board's disapproval of two developments to house people with disabilities. Both projects eventually opened.

As work on this AI came to a close, the Framingham City Council imposed a moratorium on any new multifamily housing for nine months, despite opposition from the Mayor,



Black Lives Matter protest in Waltham, June 2020.

the Framingham Planning Board, downtown businesses, and the City's economic development agency. By contrast, Newton paved the way for a large mixed-use development with 600+apartments and commercial space at Riverside. The efforts of many community groups and advocates have helped to change the conversation about housing in Newton. In addition, over the past several years, eight new multifamily developments with a combined total of 1,268 units have been completed in Watertown. Still, the Boston Foundation's July 2020 release of "Qualified Renters Need Not Apply: Race and Voucher Discrimination in the Metro Boston Rental Housing Market" sent shock waves through many of the region's small cities and affluent suburbs when local officials learned that testing for the study "uncovered

evidence of discrimination based on voucher status in 86% of the tests.”¹

The work to secure fair and affordable housing does not end, whether in Newton, Framingham, or the other eleven cities and towns that comprise the WestMetro HOME Consortium. It requires capacity, resources, and community-based vigilance and advocacy. The purpose of this AI is to build upon the WestMetro HOME Consortium Regional Fair Housing Plan (2015) prepared by the Metropolitan Area Planning Council (MAPC) following closure of the Engine 6 dispute, yet with a greater focus on the responsibilities of all thirteen communities: Newton as the lead jurisdiction, and the cities of Waltham and Framingham and the towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, Watertown, and Wayland.

BACKGROUND

The Federal Fair Housing Act (FFHA) of 1968 establishes that all Americans, regardless of their race, color, national origin, religion, sex, familial status, or disability, deserve to live in homes and in neighborhoods of their choosing. It also directs recipients of federal funds to Affirmatively Further Fair Housing (AFFH). In 1995, the U.S. Department of Housing and Urban (HUD) issued the Fair Housing Planning Guide, which explains the AI planning requirements for states and entitlement grantees. The Fair Housing Planning Guide was the go-to resources for many years.

In 2015, the Obama administration implemented a new fair housing rule and issued guidance for a new planning process, the Assessment of Fair Housing or AFH. Many communities geared up to prepare a new fair housing plan following the AFH model. In 2019, however, HUD suspended the 2015 rule and directed grantees back to the AI planning process. Since then, HUD has proposed and now recently adopted a new rule, Preserving Community and Neighborhood Choice, that simplifies the requirements grantees need to follow in order to conduct fair housing planning.

The WestMetro HOME Consortium (Consortium) began working on this AI before HUD imposed its most recent rule. The Consortium recognizes that fair housing requires more than preventing discrimination, and that many factors contribute to having housing options that allow someone to grow and thrive freely in their neighborhood environments. This AI reflects much of the spirit of 2015 Rule and looks to assess access to housing from multiple dimensions.

The thirteen cities and towns that belong to the Consortium commit to taking meaningful and measurable actions to break down barriers to fair housing choice and affirmatively further fair housing for all protected classes. This document describes the specific actions the Consortium should take to do so.

¹ Boston Foundation, Suffolk University, Analysis Group, “Qualified Renters Need Not Apply” (2020), 6.

FEDERAL LAWS RELATING TO FAIR HOUSING

The **Federal Fair Housing Act (FFHA)** prohibits discrimination in the sale, rental, lease, or negotiation for real property based on race, color, religion, sex, national origin, familial status, and disability. The FFHA covers most housing. It specifically applies to:

- Multi-family dwellings with more than four units, including boarding, rooming, and lodging houses;
- Multi-family dwellings with four or fewer units if the owner does not live in one of the units;
- Single-family privately owned homes when a real-estate broker, agent, salesman, or any person in the business of selling or renting dwellings, is used, and/or discriminatory advertising is used to rent or sell the home; and
- Residentially zoned land and house lots for sale or lease.

Courts have interpreted the FFHA to prohibit state and local governments from exercising their land use and zoning authority, as well as their authority to provide residential services and benefits, in a discriminatory fashion. People with disabilities are entitled to request reasonable accommodations in rules, policies, practices, or services under the FFHA. Courts have also held that government policies that have a **disparate impact** on minorities are in violation of the FFHA, even without direct evidence of intentional discrimination.

² Partial list with summary descriptions. More complete information can be found in the full report. Sources for this section: U.S. Department of

■ Other federal civil rights laws²

- **Title I of the Housing and Community Development Act of 1974 (24 CFR 6).** Section 109 prohibits discrimination on the grounds of race, color, national origin, religion, or sex in any program or activity funded in whole or in part from HUD's Community Development Block Grant Program.
- **Executive Order 11063** prohibits discrimination on the basis of race, color, religion, creed, sex or national origin in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.
- **Executive Order 12892 (1994)** requires federal agencies to affirmatively further fair housing in their programs and activities. The order also establishes the President's Fair Housing Council, chaired by the Secretary of HUD.
- **Executive Order 12898 (1994)** requires each federal agency to practice environmental justice in its programs, policies, and activities. Developers and municipalities using federal funds for housing development must consider environmental justice in the project siting process.
- **Executive Order 13166 (2000)** eliminates, to the extent possible, Limited English Proficiency (LEP) as a barrier to full and meaningful participation by

Housing and Urban Development (HUD), Metropolitan Area Planning Council (MAPC), Citizen Planner Training Collaborative (CPTC), and Barrett Planning Group.

- beneficiaries in all federally-assisted programs and activities.
- **Executive Order 13217 (2001)** requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve availability of community-based living for people with disabilities. Zoning must support opportunities for community based housing for people with disabilities, such as group homes.
 - **Title VI of the Civil Rights Act of 1964** (42 U.S.C. § 2000d) prohibits discrimination in federally assisted programs on the basis of race, color, or national origin.
 - **The Age Discrimination Act of 1975** (42 U.S.C. § 6101-07) prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance. Age distinctions in a federal, state or local statute or ordinance providing benefits or assistance to people based on age are exempt.
 - **Community Reinvestment Act (CRA; 1977) (12 U.S.C. § 2901)** establishes a foundation for financial institutions, state and local governments and community organizations to work together to promote banking services equally to all members of the community. The Act prohibits redlining and encourages financial institutions to help meet the credit needs of the communities in which they operate.
 - **The Equal Credit Opportunity Act (ECOA)** (15 U.S.C. § 1691). The ECOA prohibits discrimination in the granting of credit, including discriminating against recipients of public assistance programs, such as food stamps and Social Security.
 - **The Home Mortgage Disclosure Act of 1975 (HMDA)** (12 U.S.C. § 2801) applies to depository institutions with total assets of \$10 million or more that operate a branch or home office in a metropolitan area. They must submit data to federal agencies (including HUD) on the number, total dollar amounts, and location of loans used for home purchase or home improvement.
 - **Implementation of the Fair Housing Act's Discriminatory Effects Standard (24 CFR Part 100)** establishes a three-part burden-shifting test for determining when a practice with a discriminatory effect violates the Fair Housing Act. Municipalities have to analyze and modify rules, policies, and practices that have potential discriminatory effects/disparate impact, as well as local preference practices.
 - **Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity** (24 CFR Parts 5, 200, 203, 236, 400, 570, 574, 882, 891, and 982). This rule guarantees that people will have equal HUD-assisted or insured housing without regard to actual or perceived sexual orientation, gender identity, or marital status.
 - **Section 504 of the Rehabilitation Act of 1973** prohibits excluding people from federally funded programs and services because of disability. Section 504 extends to new construction and rehabilitation in housing, public buildings, and public accommodation buildings that directly receive federal funding.

- **The Americans with Disabilities Act (ADA) of 1990**, as amended (42 U.S.C. 12101) extends civil rights similar to those previously available on the basis of race, color, religion, sex, and national origin, to people with disabilities. Buildings constructed or rehabilitated after March 2012 must use the ADA 2010 Standards for Accessible Design.
- **The Architectural Barriers Act of 1968 (ABA)**, as amended, (42 U.S.C. 4151) requires that specific buildings financed with federal funds be designed and constructed to be accessible to persons with disabilities.

MASSACHUSETTS LAWS

- Under **Article 106 to the Massachusetts Constitution**, equality under the law shall not be denied or abridged because of sex, race, color, creed, national origin. In addition, state laws categorically prohibit housing discrimination under G.L. c. 151B, §4; discrimination in public accommodations under G.L. c. 272, §§92A, 98, 98A; and discrimination based on disability through zoning, G.L. c. 40A, §3.
- The **Commonwealth's anti-discrimination law, G.L. c. 151B**, prohibits discrimination in housing based on race, religion, color, ancestry, national origin, sex, gender identity, sexual orientation, age, source of income, veteran status, and familial status. The protection given to familial status does not apply to one- to four-unit dwellings if one unit is occupied by an elderly or infirmed person for whom children would be a hardship.

■ Other state laws relevant to fair housing include:

- Massachusetts Lead Law (105 CMR 460.000): Massachusetts Architectural Access Board (MAAB) Regulations (521 CMR).
- Data Collection Act (Chapter 334 of the Acts of 2006) (760 CMR 61)
- Chapter 183C, the Predatory Home Loan Practices Act
- G.L. 184 §23B, relating to private agreements that limit access to housing to anyone due to race, color, religion, national origin, or sex.



Boston civil rights march for equal education (1965). Source: WGBH Open Vault.

METHODOLOGY

Barrett Planning Group LLC has led the Consortium's AI planning process with assistance from JM Goldson LLC. Together, the consultants used a multi-dimensional approach to research and develop this plan. The analysis relies on data from several public and private sources, general community input, targeted input from advocates, lenders, service providers, academic and professional publications, and ongoing assistance from the Consortium advisory committee and the planning and community development staff in each community.

The consultants interviewed a variety of stakeholders. Interviewees talked about their own experiences with fair housing and their knowledge of fair housing concerns experienced by others. While the AI presents major themes from the interviews, the identity of the respondents remains confidential.

In addition, the consultants surveyed over 100 community stakeholders identified by Consortium members. They were asked about barriers to building housing, the effectiveness of certain regulations and policies, and changes or reforms that would be the most beneficial. Appendix B includes a summary of the consultation process.

■ Notes on Data Sources

The data considered to develop this report came from public and proprietary sources. The Census Bureau's Decennial Census and American Community Survey (ACS), HUD's Comprehensive Housing Affordability Strategy (CHAS), and publications from market sources are staples for the kind of assessment prepared for this plan. There is no single, all-

encompassing source of information for a fair housing analysis, and all of the available sources have some limitations. Below is a summary of the most frequently used sources of data for WestMetro HOME Consortium's AI.

- **U.S. Census Bureau, Decennial Census, 1980-2010.** The decennial census is a "100 percent" count of population, population age, and race for all states, Washington, D.C., and Puerto Rico, in geographic areas as small as city blocks. Selected elements of this plan draw on Census 2010 data at the city- or town-wide and census tract levels.
- **U.S. Census Bureau, American Community Survey (ACS), 2018 Five-Year Estimates.** The ACS is a survey of randomly selected addresses at the census tract and block group levels for all states, Washington D.C., and Puerto Rico. Piloted in the late 1990s and publicly released in 2005, the ACS gathers data from approximately 300,000 households per month, or 3.5 million per year. The continuous monthly survey results are aggregated annually and reported as **estimates** for geographic summary areas as small as census block groups. Two estimate series are available: one-year tables and five-year tables. We customarily use the five-year series.

Since ACS estimates are based on sampling, there is some uncertainty in the data. The Census Bureau's standard **confidence level** is 90 percent, i.e., if a given survey was repeated, there is a 90 percent chance that the responses would be the same. The Census Bureau calculates and reports a **margin of error** (MOE) in all ACS tables. MOE is the maximum statistical difference between a sample and

the population the sample is intended to represent. In general, the smaller the geographic level, the greater margin of error is likely to be. As a result, the actual number may be higher or lower than the ACS reported estimate, and the MOE gives the analyst a sense of just how much higher or lower it could be. Of course, the same statistical error would likely occur in other geographies with similar population size.

- **Social Explorer, Environics Analytics, ESRI Business Analyst, and Demographics Now.** These licensed data retrieval services provide efficient access to government data sources that can be time-consuming to locate and organize if retrieved from the multitude of agencies that originally produce them. All provide access to Decennial Census and ACS tables, but in other respects they are quite different. Aside from content differences, these services report data at different geographic levels, a major reason for not relying on just one or two sources.
 - **Social Explorer** is the only subscription service that provides access to the Decennial Census from 1790 to the present. It also allows users to retrieve crime, environmental and public health data from federal agencies as well as the County Business Patterns database from the Census Bureau. And, users can obtain household income and housing cost data both in nominal and real dollars.
 - **ESRI Business Analyst** supports online and desktop mapping of demographic, housing, and economic data, and reports five-year population projections.
 - **Environics Analytics** is owned by a Canadian firm, Environics Research. It offers a series of Census-

based data reports and proprietary demographic projections that market researchers have used for years (previously published by Nielsen Claritas). Environics Analytics allows researchers to make near-term projections not only of population and households, but also household incomes and housing values.

What is fair housing?

Before exploring conditions in the Consortium that provide opportunities for and contribute to barriers to fair housing, it is important to set a common understanding of what fair housing actually means. It may be easiest to think about fair housing from one's own understanding of what one looks for in a home. When asked this question, people often respond with a list of desired features: good schools, friendly neighbors, easy access to work, parks and open space, amenities such as grocery stores and banks. In fact, the list is almost universal regardless of one's background or membership in a "protected class."

Fair housing exists when people can find safe, suitable housing within their economic means wherever they choose to live, and they do not face discrimination based on their membership in a protected class. When people do not have access to fair housing, they may face barriers that take different forms. They may experience personal discrimination, for example, in the form of a landlord who refuses to rent or show an apartment to a family with children, or systemic barriers, such as the lack of affordable rental units in wealthy, predominantly white communities.

The Federal Fair Housing Act does not directly identify income or economic situation as a protected class. Nevertheless, an Analysis of Impediments to Fair Housing

Choice must evaluate housing costs and access to affordable housing act as impediments to equity and inclusion. In HUD's Fair Housing Guidebook, grantees like the Consortium are required to conduct an AI that provides:

- A comprehensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices
- An assessment of how those laws, etc. affect the location, availability, and accessibility of housing
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

Impediments can include any of the following:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

It is not sheer coincidence that in the WestMetro Consortium, two cities have disproportionately large percentages of Black households and Latino households and that in both cases, Black and Latino household incomes are conspicuously low. The same cities – Framingham and

Waltham – offer the largest inventories of affordable and accessible housing.

Both public and private practices have contributed to a lack of fair housing and the segregated living patterns that many communities experience today. They include:

- Redlining
- Blockbusting/steering
- Segregated public housing
- Government policies
- Discriminatory advertising
- Restricted deeds/covenants
- Discriminatory lending
- Zoning restrictions
- Community opposition/NIMBYism
- Systemic racism

While people may think these practices no longer occur, that is not true. Some are still common while others may be less apparent. They can be identified through **fair housing testing**.

Often fair housing issues overlap with general community development concerns such as affordable housing and community investment. Fair housing issues can be distinguished by their relationship to one or more of several protected classes. For example, there may be a concern that people with low incomes cannot afford homes in a community. That may be a legitimate community concern, but it is not necessarily a fair housing issue. However, if a community adopts zoning to inflate the cost of housing in order to keep out people of a certain race or ethnicity (protected classes) who tend to have lower incomes than

Whites, that would be a fair housing issue. In short, if a housing issue infringes upon people because they fall within a protected class, it is a fair housing issue. It may still be a fair housing issue even if it unintentionally infringes upon people in a protected class when the impact on them is disproportionate.

The WestMetro HOME Consortium’s member communities have a legal obligation to conduct the analysis presented in the following pages and to address the issues it presents. To protect people from housing discrimination, communities must take steps to affirmatively further fair housing by identifying factors that contribute to housing discrimination and work to mitigate them. This document outlines fair housing concerns that disproportionately affect people in federally and state-identified protected classes in the Consortium’s thirteen communities.

- An **Analysis of Impediments** is an assessment of a state or local government’s bylaws, ordinances, statutes, and administrative policies and local conditions that affect the location, availability, and accessibility of housing.
- **Impediments** are any actions, omissions, or decisions by jurisdiction that effectively restrict a person’s housing choice or the availability of housing choice because of race, color, religion, gender, disability, familial status, or national origin.
- **Barriers to housing choice** are factors that limit a person’s ability to choose from a variety of housing types and may not constitute “housing discrimination.” Factors may include housing supply and location, physical accessibility of housing, zoning for group

homes, source of income, accessibility of financing, and limited English proficiency.

The AI assesses how conditions in a community contribute to housing discrimination and affect access to housing based on the factors listed above. The conditions can include laws, government policies, real estate practices, and local conditions that can impede fair housing choice.

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Who lives in the WestMetro Consortium?



The WestMetro HOME Consortium's 13 cities and towns have a combined population of about 510,100 people.³ They are quite different places in some ways, yet they share rivers, transportation systems, social and economic characteristics, and the Greater Boston labor market. The communities that belong to the Consortium form a continuous arch around three of the Commonwealth's wealthiest suburbs: Lincoln, Weston, and Wellesley. They also border a ring of affluent towns in the MetroWest/Route 2 region. Together, these places make Boston's west suburbs a center of economic and educational opportunity and a very desirable place to live.

To some extent, the Consortium communities are evolving in ways that have been predictable for a very long time. It would be hard to find a city or town master plan anywhere in the region that failed to foresee the surge in the older adult population that has happened since 2000. Market analysts, developers, and politicians saw it years before when they joined forces to loosen the rules for senior housing under the Federal Fair Housing Act (FFHA). The Housing for Older Persons Act of 1995 removed requirements for "significant facilities and

services" for the elderly in housing for people 55 and over, paving the way for a proliferation of new "active adult" retirement developments in high-cost suburbs and resort towns.⁴ Black Birch in Concord and Millwood Preserve in Framingham exemplify this trend.

Data profiles for each Consortium community can be found in Appendix A.

While regional demographers anticipated a decline in numbers of young people in the new millennium, the rate of out-migration to high-growth population and job centers in the South and Northwest exceeds expectations. Demand for labor in Greater Boston has been met in part by immigrants. The region's uptick in foreign-born residents has introduced opportunities and challenges for Consortium communities. Immigrant settlement patterns have followed White-defined racial and class boundaries. While the population of Massachusetts has gained diversity, it remains a highly segregated place for minorities, and this can be seen in the Consortium. People of color comprise a majority of the people living in Boston and 11 other Massachusetts cities. The Consortium does not include any of these communities.

³ U.S. Census Bureau, 2014-2018 American Community Survey Five-Year Estimates, B01001. (Cited hereafter as ACS 2018). Note. The Census Bureau's Population Division reports a higher 2018 estimate for these communities: 514,767. This AI adopts the ACS estimate because the ACS is the source of most household and housing data presented in here as well.

⁴ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity (FHEO), "The Fair Housing Act: Housing for Older Persons."

POPULATION & HOUSEHOLD TRENDS: OVERVIEW

The Consortium's population has grown 8.4 percent since 2000. In most cases, the same towns with the highest rates of population growth also experienced the highest rates of **household** growth – which makes sense – but there are some exceptions. Sudbury, Concord, Bedford, Natick, and Lexington all gained population at rates over 10 percent, yet as shown in Table 3.1, Lexington's household growth rate for the same period (2000 to 2018) was just 5.8 percent. Two communities that reportedly *lost* households - Brookline and Newton – nevertheless gained slightly in total population.

Households are changing region-wide. In 2000, the Consortium towns had a combined total of 52,471 one-person households. While many communities and the state as a whole have seen significant growth in single people living alone, some of the Consortium's communities have experienced a 20-year decrease, perhaps due to the general erosion in housing affordability throughout Greater Boston.



Significant gains in **nonfamily households** and single householders in particular can be seen in places that have attracted high-end active adult and senior residential projects since 2000, such as Concord, Sudbury, and Wayland. These places have had the highest rates of 65-and-over population growth – especially Sudbury, with an 80 percent increase in seniors. By contrast, dramatic drops in one-person households occurred in Brookline and Newton, and to a lesser extent in Needham and Belmont.⁵



Led by Sudbury, Watertown, Lexington, and Concord, the Consortium has also absorbed considerable growth in family

3.1. Consortium Change in Households, 2010-2018

City/Town	2000	2010	2018	% Chg.
Bedford	4,621	5,130	5,230	13.2%
Belmont	9,732	9,651	9,781	0.5%
Concord	5,948	6,484	6,751	13.5%
Framingham	26,153	26,173	28,189	7.8%
Lexington	11,110	11,530	11,757	5.8%
Natick	13,080	13,406	14,404	10.1%
Newton	31,201	31,168	30,849	-1.1%
Sudbury	5,504	5,771	6,355	15.5%
Waltham	23,207	23,690	23,631	1.8%
Watertown	14,629	14,709	15,498	5.9%
Wayland	4,625	4,808	4,943	6.9%
Brookline	25,594	25,092	24,541	-4.1%
Needham	10,612	10,341	10,765	1.4%
Total	186,016	187,953	192,694	3.6%

Source: ACS 2018, Census 2000, and Census 2010.

households, especially **married-couple families**. Unlike trends throughout the Boston metro area, the Consortium gained few **single-parent families**, and four communities – Wayland, Brookline, Lexington, and to a lesser extent Natick – experienced a decline.

⁵ Social Explorer, A10024, 2018 ACS Housing Units by Household Size, and T20, Census 2000 Households by Household Type.

RACE AND ETHNICITY

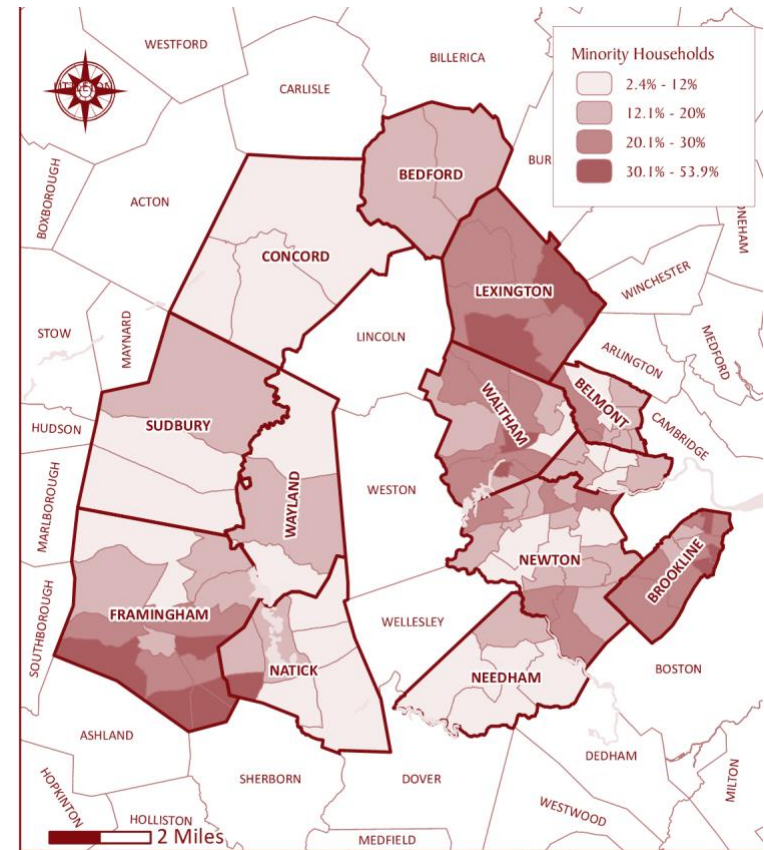
Approximately one-third of the Consortium’s residents are racial or ethnic minorities. Since 2000, the minority population in the Consortium has doubled from 73,273 to 140,917.⁶ Throughout the Boston metro area, the Black or African American population is the largest racial minority group, 8.9 percent, but the largest minority group overall is Latinx (including all races), comprising 12 percent of the region’s residents. The situation is vastly different in the Consortium, for Asians make up the largest minority group, 13 percent, while Blacks represent a very small share, 3.8 percent.

While none of the Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) census tracts identified by HUD fall within the Consortium’s boundaries, minority concentration areas clearly exist, as shown in Fig. 3.1. Overall trends in the Consortium show that minorities are increasingly segregated from Whites, and this is especially true of the region’s Black population (Table 3.2).

3.2. Racial/Ethnic Dissimilarity Index				
	1990	2000	2010	2015
Non-White/White	23.21	25.04	22.03	26.97
Black/White	28.03	31.38	29.07	37.85
Hispanic/White	36.99	42.01	37.74	41.10
Asian/White	22.92	23.17	21.87	26.41

The dissimilarity index of an area measures its racial/ethnic distribution by giving the percentage of a group’s population that would have to move to fully desegregate the community. An index of 0 indicates no segregation, and 100 indicates complete segregation.

The Latinx population is approximately 8 percent of the Consortium’s residents, but they are a significantly larger share



Source: West Metro HOME Consortium, HUD, United States Census Bureau, and MassGIS

Map 1. Racial and Ethnic Minority Households

of the population in census tracts within Framingham and Waltham’s South Side. State prisons in South Framingham and West Concord play a significant part in the minority concentrations found in these communities. Viewed overall, Waltham is the most diverse community in the Consortium and also the least segregated.

⁶ Social Explorer, 2018 ACS and Census 2000, Race and Hispanic or Latino Origin by Race,

IMMIGRATION AND LANGUAGE

There are 117,107 foreign-born residents in the Consortium, or 23 percent of the total population in the 13 cities and towns.⁷ The Consortium has a larger percentage of foreign-born residents than the Boston Metro Area as a whole (19.8 percent), and the make-up of the Consortium’s foreign-born population is different, too. For example:

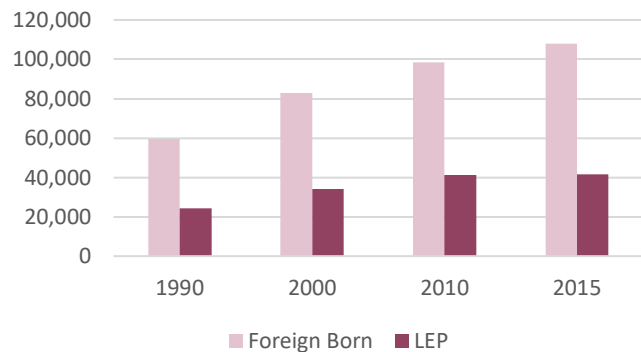
- A significantly larger percentage of immigrants in the Consortium hail from Asia – 46 percent compared with 32 percent in the Boston Metro Area – mainly from China, India, and Israel.
- Immigration from Southeast Asia to the Consortium’s towns is a much smaller share: 3 percent compared with 7 percent.
- Immigration from Africa also represents a much smaller share of the Consortium’s foreign-born residents: 5

percent versus almost 10 percent metro-wide.

The Consortium is roughly on par with the Boston Metro Area for immigration from South America, especially Brazil, the place of birth for about 8 percent of the Consortium. Most foreign-born

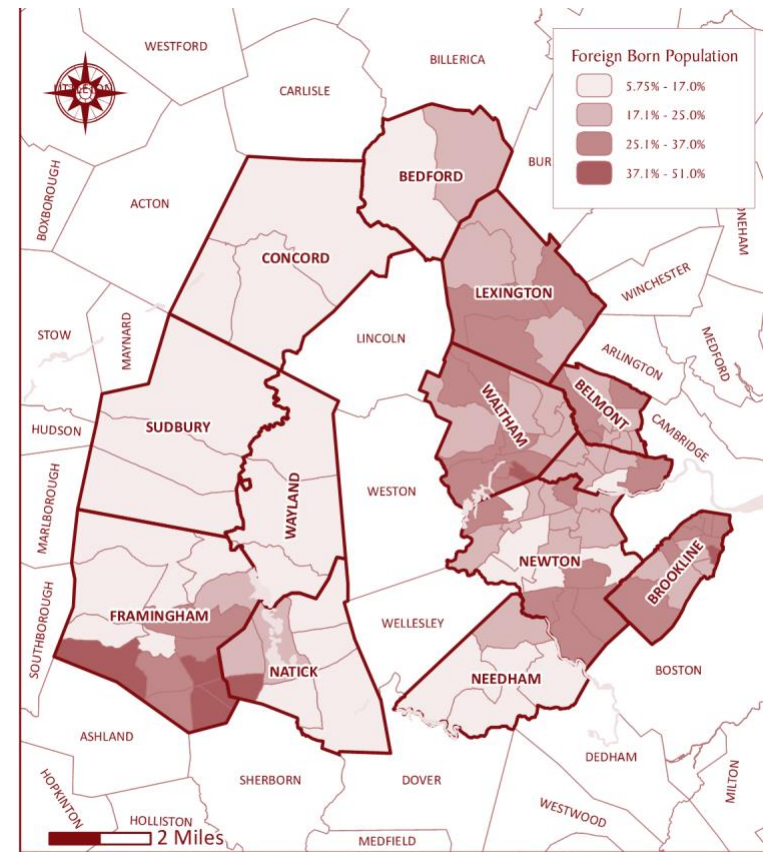
Trends in Foreign-Born, Limited English Proficiency Populations in WestMetro Consortium

(Source: HUD, AFFH)



⁷ 2018 ACS, B05006, retrieved from Social Explorer.

residents of the Consortium report limited or no difficulties with English.⁸



Source: West Metro HOME Consortium, HUD, United States Census Bureau, and MassGIS

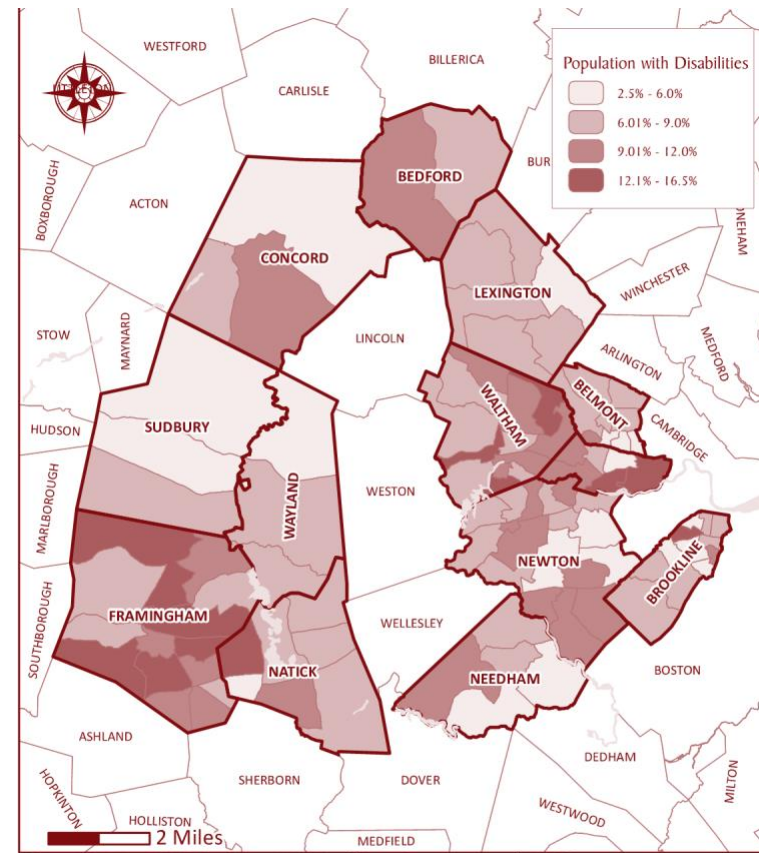
Map 2. Foreign-Born Residents

⁸ 2018 ACS, B05007, retrieved from Social Explorer.

DISABILITY

Approximately 9 percent of the Consortium’s residents, 43,243 people, have one or more **disabilities**. Framingham (11.2 percent) and Watertown (10.9 percent) have the largest proportion of people with disabilities in the Consortium.

3.3. Consortium Population with Disabilities		
Community	People with Disabilities	Population. Pct.
Bedford	1,314	9.5%
Belmont	1,855	7.2%
Concord	1,485	8.5%
Framingham	7,878	11.2%
Lexington	2,303	7.0%
Natick	2,793	7.8%
Newton	7,456	8.5%
Sudbury	1,106	5.9%
Waltham	6,059	9.7%
Watertown	3,823	10.9%
Wayland	916	6.7%
Brookline	4,115	7.0%
Needham	2,140	7.1%
Total	43,243	8.6%



Source: West Metro HOME Consortium, HUD, United States Census Bureau, and MassGIS

Map 3. Population with Disabilities

In most communities, well over half the population with disabilities is 65 or older. The exceptions are Waltham (48 percent) and Watertown (49 percent). In Wayland, the over-65 age group makes up an unusually high share of the disability population: 72 percent.

HOUSEHOLDS AND FAMILIES WITH CHILDREN

Communities largely control the makeup of their populations by the choices they make to control housing growth, and this applies to WestMetro Consortium cities and towns, too. The prevalence of single-family homes in places like Sudbury, Needham, Wayland, and Concord has a great deal to do with the types of households they attract. Overall, 66 percent of the Consortium’s households are **families**, defined as households of two or more people related by blood, marriage, adoption, or other operation of law.

3.4. Family Households in the Consortium			
Community	Households	Families	Pct. Families
Bedford	5,230	3,594	68.7%
Belmont	9,781	6,913	70.7%
Concord	6,751	4,894	72.5%
Framingham	28,189	18,096	64.2%
Lexington	11,757	9,336	79.4%
Natick	14,404	9,702	67.4%
Newton	30,849	22,228	72.1%
Sudbury	6,355	5,492	86.4%
Waltham	23,631	12,728	53.9%
Watertown	15,498	8,453	54.5%
Wayland	4,943	3,821	77.3%
Brookline	24,541	12,821	52.2%
Needham	10,765	8,370	77.8%
Total	192,694	126,448	65.6%

The overwhelming majority of families in the Consortium’s cities and towns are **married couples** – 84 percent – and couples comprise most of the families with dependent children (children under 18).

3.5. Families and Children in the Consortium				
Community	Families with Children	Pct with Children	Avg. No. Children	
			Married Couples	Single Parents
Bedford	1,866	51.9%	0.96	0.78
Belmont	3,580	51.8%	1.09	0.67
Concord	2,291	46.8%	1.04	0.88
Framingham	7,537	41.7%	0.91	0.81
Lexington	5,049	54.1%	1.02	0.68
Natick	4,790	49.4%	1.00	0.61
Newton	10,852	48.8%	1.01	0.78
Sudbury	2,841	51.7%	1.08	1.07
Waltham	4,708	37.0%	0.82	0.49
Watertown	3,108	36.8%	0.75	0.62
Wayland	1,972	51.6%	1.01	0.71
Brookline	5,912	46.1%	0.95	0.79
Needham	4,261	50.9%	1.04	0.79
Total	58,767	46.5%	0.97	0.72

Families with children are far more prevalent in owner-occupied housing than rental units. Census data show that just 24 percent of family renters have children under 18 compared with 47 percent overall. This is due, in part, to differences in the size of housing units. **Of the 114,583 occupied housing units with three or more bedrooms Consortium-wide, only 14 percent are rental units.**

AGE

Approximately 84,000 Consortium residents are 65 years or over, or 16 percent of the total population. Older adult householders comprise 27 percent of all householders and 20 percent of all renters in these 13 communities.

Most of the 65+ population in the Consortium are in family households, e.g., living with a spouse, adult children, or other family members. Compared with seniors in the Greater Boston region, many of the Consortium’s elders have significantly higher incomes. This is not universally so, however, because older women living alone have among the lowest household incomes of all household types.

3.6. The Consortium’s Older Adult Households					
Community	All Households	65+	Pct.	Median Income	Women Living Alone
Bedford	5,230	1,436	27.5%	\$74,375	\$42,458
Belmont	9,781	2,722	27.8%	\$63,242	\$34,821
Concord	6,751	2,292	34.0%	\$81,813	\$42,574
Framingham	28,189	6,431	22.8%	\$54,314	\$31,229
Lexington	11,757	3,618	30.8%	\$104,709	\$39,844
Natick	14,404	3,496	24.3%	\$57,446	\$29,763
Newton	30,849	9,599	31.1%	\$79,502	\$36,113
Sudbury	6,355	1,700	26.8%	\$82,885	\$24,583
Waltham	23,631	5,275	22.3%	\$52,379	\$27,518
Watertown	15,498	3,825	24.7%	\$57,616	\$33,281
Wayland	4,943	1,565	31.7%	\$84,665	\$38,750
Brookline	24,541	5,943	24.2%	\$88,906	\$33,507
Needham	10,765	3,417	31.7%	\$79,297	\$34,341
Total	192,694	51,319	26.6%	\$70,368	N/A

VETERANS

The Consortium is home to 16,248 veterans. About 66 percent of the region’s veterans are 65 years or over, so most are veterans of the Vietnam War. In most Consortium towns, veterans have somewhat lower personal incomes and a somewhat higher incidence of disability than the population as a whole. The disability ratio is higher among veterans under 65, but not among retirees.

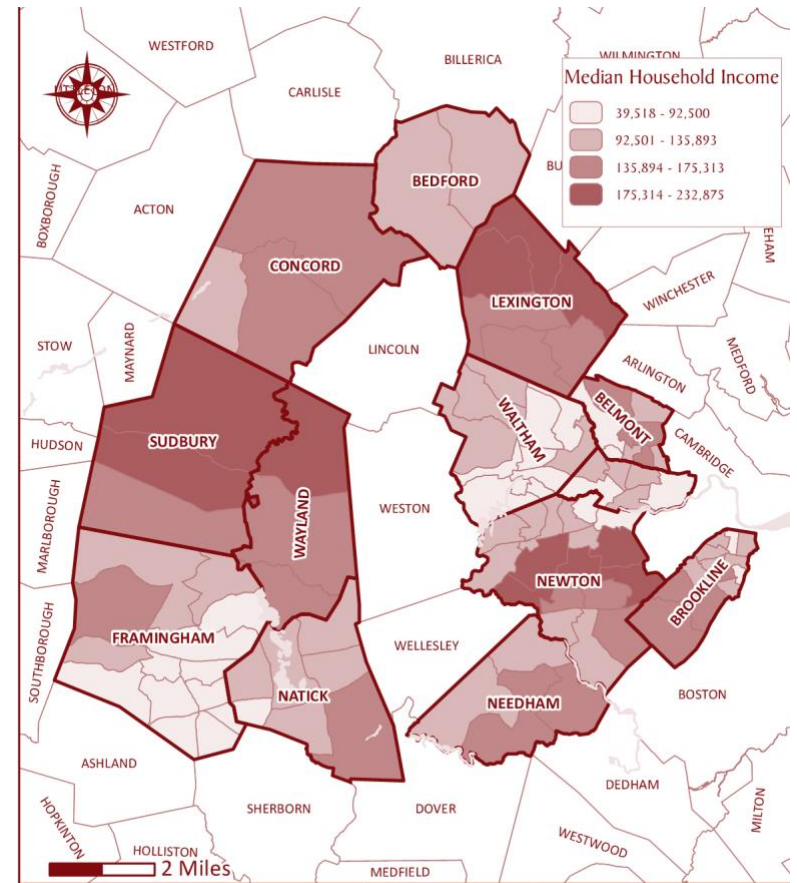
3.7. Veterans Population Profile					
Community	Veterans	Population Pct.	65+ Years	Median Veteran Income	Income Ratio*
Bedford	758	7.2%	54.9%	55,645	85.4%
Belmont	796	4.1%	73.2%	43,100	71.9%
Concord	718	4.9%	71.0%	42,222	62.7%
Framingham	2,486	4.3%	60.5%	43,605	115.2%
Lexington	993	4.0%	80.9%	66,712	87.5%
Natick	1,275	4.7%	53.3%	49,886	86.7%
Newton	2,566	3.7%	70.3%	65,486	117.8%
Sudbury	558	4.2%	74.9%	48,606	64.3%
Waltham	2,186	4.1%	63.8%	41,563	105.2%
Watertown	1,231	4.1%	65.9%	42,632	79.9%
Wayland	438	4.3%	79.2%	78,438	104.4%
Brookline	1,203	2.5%	67.5%	43,400	77.8%
Needham	1,040	4.6%	74.8%	65,000	103.5%
Total	16,248	4.0%	66.9%		
*Ratio of the locality’s median veteran income to that of Greater Boston.					

HOUSEHOLD INCOMES

Many Consortium families have fairly high incomes, consistent with Greater Boston’s economic profile and especially that of the west suburbs. Only 30 percent of all households in the Consortium have incomes low enough to qualify for subsidized housing. Still, vast differences exist between communities. For various reasons, some of the most affluent towns have high percentages of families with children in poverty. Twenty-five percent of Consortium households have incomes of \$200,000 or more, but almost the same percentage falls below \$50,000.

There are conspicuous differences in the incomes of racial and ethnic minority households. With few exceptions, Black and Latinx households have much lower incomes than White, non-Latinx households. There tends to be less income disparity in the communities with very high housing costs.

3.8. Race and Median Household Incomes in the Consortium				
Community	White, Non-Latinx	Black	Latinx	Asian
Bedford	\$129,726	\$55,167	----	\$128,250
Belmont	\$120,208	\$59,306	\$96,172	\$130,625
Concord	\$141,293	\$157,007	\$203,646	\$187,760
Framingham	\$79,136	\$50,156	\$46,010	\$105,222
Lexington	\$172,750	----	\$213,558	\$189,500
Natick	\$109,490	\$45,023	\$95,403	\$108,021
Newton	\$139,696	\$138,664	\$74,625	\$149,417
Sudbury	\$176,570	----	\$155,714	\$184,688
Waltham	\$85,677	\$62,833	\$63,365	\$92,776
Watertown	\$97,929	\$82,037	\$89,770	\$103,875
Wayland	\$174,330	----	\$219,107	\$248,125
Brookline	\$113,515	\$78,423	\$115,507	\$91,208
Needham	\$153,032	\$55,167	\$248,125	\$160,536



Source: West Metro HOME Consortium, HUD, United States Census Bureau, and MassGIS

Map 3. Median Household Income

There are also differences in household incomes between homeowners and renters, by householder age, and by sources of household income. These differences affect what people can afford to pay for housing and largely determine the communities and neighborhoods they can choose to live in. As the data below suggest, it would be very difficult for homeowners in Framingham or Waltham to choose a home in

another community in the Consortium, or for renters in Framingham, Needham, or Sudbury to relocate as well.

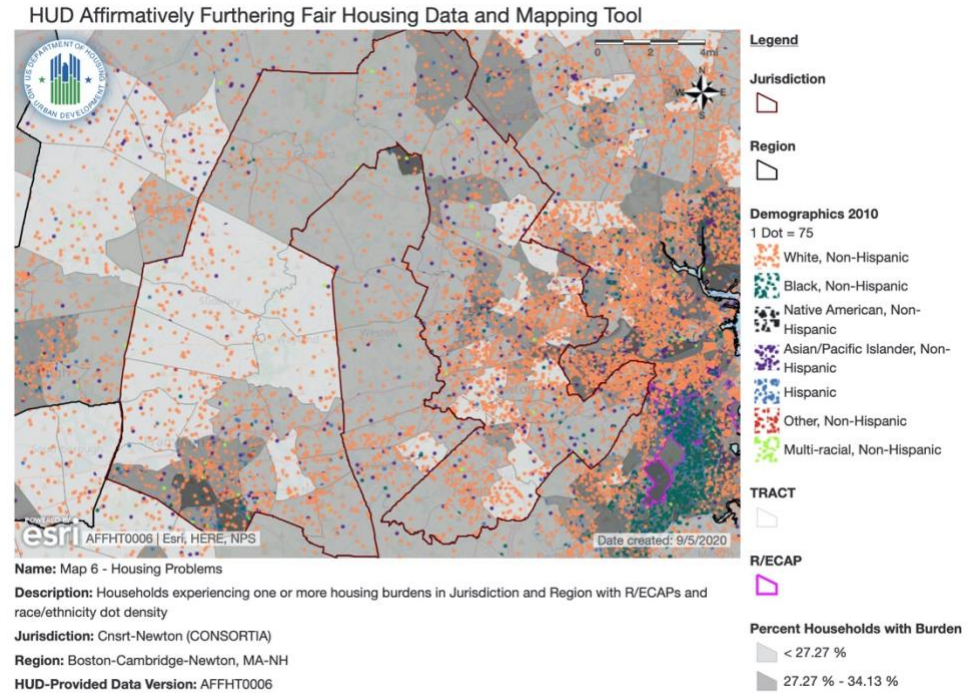
3.9. Median Income by Tenure Relative to Greater Boston				
Community	Homeowners	Income Ratio*	Renters	Income Ratio*
Bedford	\$162,201	1.407	\$79,792	1.621
Belmont	\$159,018	1.380	\$75,198	1.527
Concord	\$173,363	1.504	\$70,563	1.433
Framingham	\$114,961	0.997	\$44,710	0.908
Lexington	\$192,670	1.672	\$86,971	1.766
Natick	\$140,720	1.221	\$64,612	1.312
Newton	\$176,871	1.535	\$75,374	1.531
Sudbury	\$184,741	1.603	\$38,125	0.774
Waltham	\$114,444	0.993	\$64,494	1.310
Watertown	\$120,165	1.043	\$80,855	1.642
Wayland	\$188,136	1.632	\$60,375	1.226
Brookline	\$156,856	1.361	\$76,438	1.553
Needham	\$172,571	1.497	\$43,295	0.879
*Ratio of the locality's median homeowner income and median renter income to the comparison statistics for Greater Boston.				

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Housing quality, affordability, and choice

Households with **housing cost burdens** pay more than 30 percent of their income for housing and may have difficulty paying for basic necessities such as food, clothing, transportation, and medical care.” **Severe burden** is defined as paying more than 50 percent of one's income for basic homeowner costs (mortgage, insurance, and taxes) or rent and utilities.

In the Consortium, 60,119 or 31.5 percent of all households have low incomes (at or below 80 percent AMI). These households include 16,604 small families (2-4 people) and 2,398 large families (5+ persons). Low-income households have housing problems at a greater rate than households with higher incomes. Of all low-income households, 75 percent have at least one housing problem: substandard living, overcrowding, extreme overcrowding, housing cost burden or extreme cost burden. Throughout the Consortium, housing cost burden is the most commonly reported housing problem. Approximately 69 percent of the



Consortium’s lower income households are cost burdened and 43 percent, severely cost burdened.

The high percentage of low-income families with cost burdens points to the shortage of affordable housing in the WestMetro HOME Consortium. Less than one-third of all owner-occupied units in the 13 communities combined are affordable to low-income people. Rental housing supplies the majority of affordably priced units Long public housing waitlists, with wait times stretching up to 12 years in some communities, also indicate strains on the existing affordable housing inventory.

People with disabilities face greater challenges than the general population in finding appropriate housing and the Consortium lacks an adequate supply of accessible, affordable housing for them. Older adults with disabilities are the most cost burdened households Consortium-wide. The region has unmet needs for affordable, suitable housing that can bring seniors and people with a disability close to transportation, social and health services, and sources of healthy food. Through the Consolidated Plan process, the Consortium identified several unmet needs:

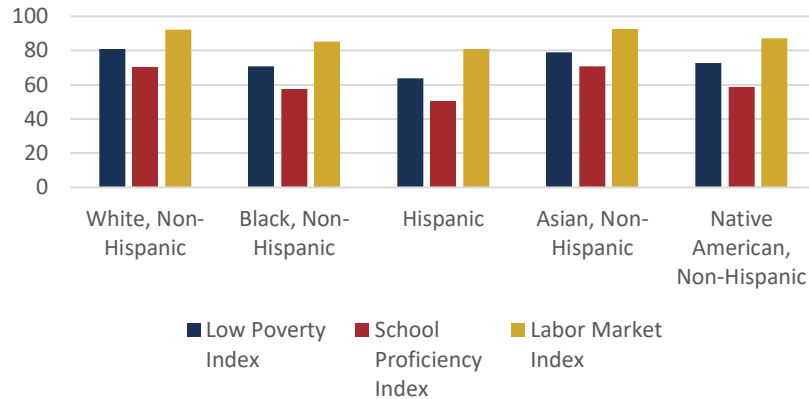
- Affordable rental units with supportive services for individuals and families at or below 60 percent, 50 percent, and 30 percent AMI, including units for one-person households and large family households.
- Affordable rental units with supportive services for extremely low-income to moderate-income seniors.
- Affordable, accessible units for very-low and extremely low-income people with disabilities.
- Affordable housing with access to transit and jobs.
- Emergency shelter and transitional housing for homeless individuals and families, with case management and supportive services.
- Affordable and available language translation services to help people and agencies in the affordable housing search process.
- Emergency tenant-based rental assistance.

In addition, minority households are more likely to have housing problems than White residents of the Consortium. Data published by HUD (Table 4.1) show that larger percentages of Black and Latinx households have housing

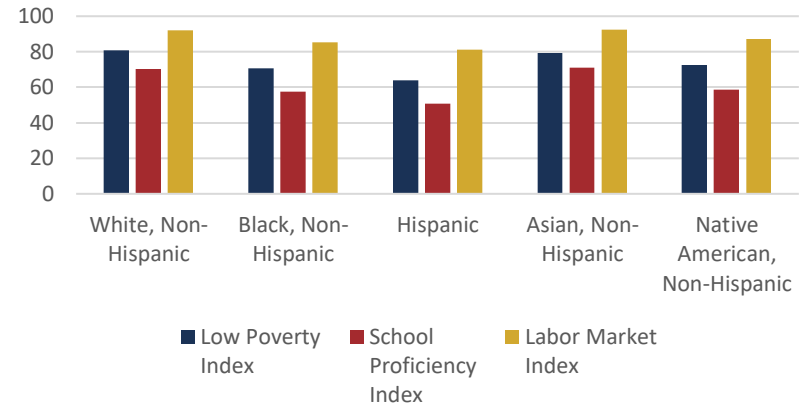
4.1. Housing Problems by Race and Ethnicity			
Households with any of 4 housing problems*	No. with problems	Total households	Pct. with problems
Race/Ethnicity			
White, Non-Hispanic	45,604	150,309	30.3
Black, Non-Hispanic	2,323	5,285	44.0
Hispanic	5,538	10,245	54.1
Asian or Pacific Islander	6,979	21,284	32.8
Native American	29	182	15.9
Other, Non-Hispanic	<u>1,292</u>	<u>3,246</u>	<u>39.8</u>
Total	61,715	190,530	32.4
Households with any of 4 severe housing problems	No. with severe problems	Total households	Pct. with severe problems
Race/Ethnicity			
White, Non-Hispanic	22,538	150,309	15.0
Black, Non-Hispanic	1,017	5,285	19.2
Hispanic	2,908	10,245	28.4
Asian or Pacific Islander, Non-Hispanic	3,942	21,284	18.5
Native American, Non-Hispanic	15	182	8.2
Other, Non-Hispanic	641	3,246	19.8
Total	31,014	190,530	16.3
*The four measured housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30%, and cost burden greater than 50% indicates severe housing problems.			

problems than White households, and Latinx households are far more likely to have severe housing problems. There is not the same degree of racial difference with housing affordability, but available evidence shows that Latinx

**Fig. 4.1. Access to Neighborhoods and Amenities:
All Households**



**Fig. 4.2. Access to Neighborhoods and Amenities:
Households below Poverty**



households are the most likely to have severe housing cost burdens of all minority groups.

Across the board, minorities in the Consortium do not have the same access to good schools and choice neighborhoods as Whites. Figs. 4.1 and 4.2 show that Black and Latinx families tend to have poor access to excellent schools, their wages are lower, and they have a comparatively high poverty rate. And, they are not as likely to be homeowners. White households are twice as likely to own a home than rent an apartment, but for Black and Latinx households, the ratio is reversed: they are twice as likely to rent than own a home.

AFFORDABLE HOUSING SUPPLY

By law in Massachusetts, all communities are supposed to have housing affordable to low-income households and that remains affordable even when home values appreciate under robust market conditions. Another type of affordable

housing - generally older, moderately priced dwellings without deed restrictions, and which lack the features and amenities of new, high-end homes - can help to meet housing needs, too, but only if the market allows. There are other differences as well. For example, any household - regardless of income - may purchase or rent an unrestricted affordable unit, but only a low- or moderate-income household qualifies to purchase or rent a deed restricted unit. Both types of affordable housing meet a variety of housing needs and both are important. The difference is that the market determines the price of unrestricted affordable units while a legally enforceable deed restriction determines the price of restricted units..

Approximately 9.5 percent of all year-round housing units in the Consortium qualify as affordable housing under the state law known as Chapter 40B. Table 4.2 shows that Newton, Framingham, Brookline, and Waltham have the largest

inventories of subsidized housing, but eight of WestMetro’s 13 communities have surpassed the 10 percent minimum under Chapter 40B due to the way the state “counts” housing on the Chapter 40B Subsidized Housing Inventory (SHI). As long as at least 25 percent of the units in an apartment development are affordable, all of the units in the development count on the SHI – even if up to 75 percent of the units are available at market rate. Because of this provision, many units listed in Table 4.2 are not really affordable. As a result, most communities in the Consortium have a much smaller affordable housing inventory than Table 4.2 implies. This helps to explain why so many households have housing cost burdens or severe burdens, despite a large percent of affordable units on the SHI.

4.2. Chapter 40B Subsidized Housing Inventory				
Town	Census 2010 Base	SHI Units	SHI Pct.	WestMetro Pct.
Bedford	5,322	979	18.40%	5.27%
Belmont	10,117	661	6.04%	3.29%
Brookline	26,201	2,626	10.02%	14.14%
Concord	6,852	721	10.52%	3.88%
Framingham	27,443	2,968	10.82%	15.98%
Lexington	11,946	1,331	11.14%	7.17%
Natick	14,052	1,477	10.51%	7.95%
Needham	11,047	1,394	12.62%	7.51%
Newton	32,346	2,474	7.65%	13.32%
Sudbury	5,921	669	11.30%	3.60%
Waltham	24,805	1,819	7.33%	9.80%
Watertown	15,521	1,171	7.54%	6.31%
Wayland	4,957	330	6.66%	1.78%

Impediments to fair housing choice

Development of the WestMetro HOME Consortium’s AI included numerous stakeholder interviews and an online survey in order to understand the social, market, and political dynamics that constrain housing supply and choice in the 13 member communities. The following summarizes the major impediments identified during the citizen participation process.

GENERAL MARKET TRENDS: LOW SUPPLY, NO TURNOVER, HIGH PRICES

Participants in the Consortium’s AI process lamented the rising housing prices and low turnover rates in their community, particularly for small and modest size homes. Several people mentioned the problem of teardowns and mansionization as a contributing factor, especially in the highest-cost communities. Needs exist for a variety of housing: smaller, accessible units for older residents looking to downsize in the community and larger, affordable options for low- and moderate-income families.

“Credit scores are a significant problem because leasing offices tend to require the same scores for applicants in both affordable and market rate units. The application of this threshold discriminates against the lower income households who may have student loan debt, medical debt, and/or poor rental history prior to receiving a voucher.”

-Survey Participant

■ “Affordable housing” and high housing costs

High housing costs are as a major barrier and discrimination tool. The cost both of rental and for-sale housing is a significant fair housing concern throughout the Consortium. Most participants in the consultation process for this AI said that low-income residents have trouble finding safe, decent, and affordable housing, and that “affordable housing” is not affordable to people who most need it, especially extremely low-income households, homeless populations, and people relying on vouchers to close the gap on housing costs. Needs exist for moderate-income housing and the working-age population that earns too much for deed-restricted “affordable” housing and not enough to buy market-rate units.

■ Economic discrimination

Consortium residents and social service agencies operating in the region identified economic hurdles that realtors and landlords use to weed out and discourage lower-income tenants. Examples include requiring three months of rent and charging a variety of fees: holding fees, administrative

“In my community and beyond, there is not enough accessible housing that is truly affordable, i.e. households with incomes at or below 50% AMI. Many people with disabilities are underemployed or unemployed and live on a SSDI or SSI and have to 'get lucky' in a lottery, and, even then, often there are not enough fully accessible rental units that are truly affordable with their low income.”

-Survey Participant

“Very low income people, even those with Section 8 vouchers, cannot pay rent, utilities, food and childcare from their limited income.”

-Survey Participant

fees, deposits, and realtor fees. Credit ratings are a hurdle, too.

■ Section 8

Across the focus groups and in comments in the online survey, participants specifically mentioned discrimination against Section 8 vouchers—and other housing vouchers—in their communities. Some organizations advise residents not to mention their vouchers until the last possible moment.

However, the Section 8 subsidy is often insufficient for the rising housing prices in Consortium communities. Many residents have had to move in order to find housing they can afford, even with a subsidy. Prohibitively long (several years) waiting lists for housing vouchers and public housing pose a significant challenge for many low-income residents.

■ Fair Housing as a right

Participants from every community said that their residents do not see housing as a civil rights issue and most residents do not understand their rights regarding fair housing. Leadership, boards, and committees in communities are on average more educated and aware about housing as a right but are still not thinking about it as a civil rights issue. Residents in communities may be on board with affordable housing generally but fall short when it comes to creating housing.

MUNICIPAL POLICIES, PROCEDURES, ACTIONS CONTRIBUTING TO UNEQUAL ACCESS TO HOUSING OPPORTUNITIES

Zoning regulations in WestMetro communities still support single-family houses and neighborhoods through large

minimum lot sizes and allowing this by-right. Many communities require discretionary **special permits** for two-family homes, townhomes, or other multifamily houses (generally defined as structures with three or more units). The special permit opens projects to a public review process that often favors strong and organized community groups. This often prolongs the development process and increases overall development costs. Good intentions around other issues, such as strict requirements for historical and sustainable building, also increase overall development costs. As overall costs increase, developers will have to provide more market-rate units to make the numbers work.

Communities that do have inclusionary zoning policies, such as Bedford and Concord, are not producing as many units as they need to address the shortage. Sometimes developers chose to build just below the number of units that triggers inclusionary zoning or more commonly, the number of units required under inclusionary zoning isn't enough to address the housing shortage.

Zoning is one of the major tools communities could use to address discrimination—particularly if combined with existing funding sources. One suggestion was to restructure zoning to support housing near transportation hubs and increase public transportation access. A lack of public transportation is a key barrier across communities. Low-income families who might not have access to a car cannot move to communities with no or low transportation connections. Housing developments may also be built in

areas of town that are far away from the town's transportation hubs.

■ Key Issues

Zoning that supports larger single-family dwellings.

Zoning regulations supports single-family houses and neighborhoods through large minimum lot sizes and allowing this by-right. Many communities require special permits for two-families, townhomes, or other multifamily houses. This opens up these projects to review which prolongs the development process and increases development costs. As overall costs increase, developers will have to provide more market-rate units to make the numbers work.

By contrast, zoning that discourages family-size apartments.

Where multifamily is allowed at all, it often comes with unit size restrictions. Especially for communities over 10 percent, they will sign onto a project so long as it has small units or an age restriction. There is vocal discrimination against families with children

Weak or no inclusionary zoning.

Several communities, Lexington and Sudbury, do not have any inclusionary zoning policy.⁹ Participants in communities with inclusionary zoning, Bedford and Concord, also said the policy is not producing as many units as they need. Sometimes developers chose to build just below the number of units that triggers inclusionary zoning or more commonly, the number of units required under inclusionary zoning isn't enough to address

⁹ Several months after the completion of focus groups and stakeholder interviews for this analysis, the Town of Sudbury approved an Inclusion of Affordable Housing Zoning Bylaw at Annual Town Meeting on September 12, 2020.

the housing shortage. They have been building many units, but the majority are market-rate or luxury units.

Public process favors vocal and organized community groups. There is a fear of density among residents across all communities—even in communities that have adopted housing-favorable policies, such as the Community Preservation Act (CPA) or a Housing Trust Fund. Residents do not want to see any more housing units than what can be done by right. Residents will bring up traffic even when it is not an issue (e.g., when the residents will have very few cars, as in senior housing) and use coded language to argue against school-age children (such as “impact to municipal services” or “good fit for the neighborhood”).

This attitude can be reflected in the permitting decisions at the board and committee level. City boards and committees, reflecting residents’ desires, seek to limit the number of units in the projects that they permit—which is reflective of broader community attitude. Fewer units overall leads to fewer family units. There is a need to support permitting larger units and family housing while also supporting smaller units for senior housing.

Bureaucratic procedures. Several participants noted that housing is moment and opportunity driven requiring flexible policies to be able to move funding quickly and respond to opportunities. But in many communities, bureaucratic procedures stall housing production, such as:

- Small communities that use Town Meeting to make decisions once or twice a year.
- Difficult-to-navigate permitting processes can slow down housing development. The desire to maintain

control and preserve elements of the neighborhood slows down the permitting process for anything that isn’t single-family.

- Excessive parking requirements that effectively discourage multifamily dwellings, mixed-use developments, and traditional downtown businesses.
 - Accessory dwelling units (ADUs) sometimes have restrictive policies put in place that limit the number of units it actually produces. In Needham, for example, units are limited to family members or caregivers (targeting seniors) and the owner has to renew the permit every 3 years.
- **Limited staff capacity.** Housing staff in Brookline and Waltham talked about how budget and staffing cuts have limited the amount of work they can do. They still run all the same programs as communities with larger housing staff, but it means that they don’t have time to do anything extra, such as education or outreach programs on fair housing.

Chapter 40B is a limited tool and the “we’re done” attitude. Several communities said that they relied on the 40B process to add units and being close to the 10 percent threshold can help drive production. However, once they reach 10 percent, there is an attitude among leaders that they are “done” with producing house. Participants also mentioned that they don’t have as many tools to effectively produce housing—particularly for extremely-low-income and moderate housing. Participants also said that communities with very few units on the SHI can feel discouraged and not want to try producing units.

“We’re special” attitude. Some interviewees reported that residents will say “discrimination doesn’t happen here.” Another participant noted that residents believe there is no discrimination when a community does not offer many housing options.

Lack of diversity on boards and committees. The majority of boards and commissions are professionals and lack community members, particularly lower-income residents and minorities on the boards.

Siloed departments, boards, and committees. Participants in this AI planning process say that in some communities like Brookline, Concord, and Sudbury, it can be difficult to get anything passed due to the fragmentation and competition between boards and committees. Departments and boards/commission do not want to work together or yield land that is under their control. Still, what appears to be fragmentation or competition for control may simply reflect jurisdictional divides that have little to do with local issues, e.g., that zoning, wetlands, and wastewater disposal fall under different authorities as a matter of state law. In addition, some towns retain elements of a decentralized government and this also has an impact on how permitting works.

Keep it local: No community in WestMetro wants to make the first move to open up their zoning and want to ensure that any affordable housing they build goes to their housing needs and their residents. Residents only want to see local preference projects.

Lack of infrastructure to support housing. Participants spoke in particular about increased density is not supported

by infrastructure. For example, in Concord, the wastewater treatment plant is at capacity.

Lack of services to support in-need populations. Many participants spoke about a need for additional resources for service provision programs to support chronically homeless, low-income, non-English speakers and others.

WHAT NEEDS TO HAPPEN TO REMOVE FAIR HOUSING BARRIERS?

Education and Outreach was mentioned by every focus group as the most important thing their community could do to further fair housing. There were a variety of reasons from participants about what they wanted to use these tools to accomplish:

- On why housing diversity is necessary.
- On the community’s changing demographics and school enrollment data.
- On what is considered affordable.
- around fair housing rights to residents and training for boards/committees/leadership
- That discrimination happens here
- to signal that their community is inclusive to all incomes/people
- to hear about the experiences of residents in public housing

Increase support for services. Communities have difficulty housing low-income populations or people through shelters, but the state doesn't provide resources to help these groups once they are in the community. Competition for grant funding in the program also creates a barrier to the local population.

“Affordable housing is not affordable to those who need it most, and public housing option waitlists are so long that it can take families over 5 years or more to be housed. In the meantime, families are continuing to experience extreme poverty while they wait for a stable option.”

-Survey Participant

Restructure zoning to support housing near transportation hubs/ increase public transportation access. A lack of public transportation was a key barrier across communities. Low-income families who might not have access to a car cannot move to communities with no or low transportation connections. Housing developments may also be built in areas of town that are far away from the town's transportation hubs.

Combine zoning and funding tools to maximize their use. Put zoning in place to support the creation of 50-80% housing and use funds to buy down to lower income affordability. It costs less to do that from this lower affordability level than from market-rate.

Adopt inclusionary zoning policy. Establish clear expectations so that everyone is consistent across the board.

Advocacy at the state-level to raise awareness on credit checks as a way to screen out certain residents and to change the law to include affordable housing as an acceptable use on federally-owned land. It could be as simple as you don't get to look at credit for Section 8 or other housing vouchers or establish a lower bar for those groups.

GREATEST FAIR HOUSING & AFFORDABLE HOUSING NEEDS

Families. Particularly a lack of larger units in the current housing supply and a resistance in communities to building more larger units/introducing more families with children.

Seniors looking to downsize and stay within the community. Particularly, there is a need for smaller, single-level, and accessible units for this group. Some participant also mentioned that some aging residents currently in larger affordable units won't move out even though their kids no longer live with them. This is due to the lack of smaller affordable units in the community—and that they may not get into those units (when the affordable units draw from a state-wide/regional list).

People with Section 8 or other housing vouchers, including SSDI vouchers. With rising housing costs across all communities in the region, a housing voucher often does not cover enough of the housing cost. Many participants said that families and individuals using a housing voucher have had to look to other neighboring communities with lower housing costs or more housing options.

Housing for people 50 percent AMI and below. In many communities there is a lack of options for people with extremely- and low-incomes. Developers cannot make the numbers work at this level of affordability and this deeply-subsidized housing will need additional funding/resources from the local, state, or federal level.

Populations that need strong social services support, such as non-English speakers, undocumented immigrants, and chronically homeless. Participants mentioned that when these groups are able to find housing in the community, they often need more robust services to support them in the community—and to support keeping them in their current housing. These groups, along with low-income and voucher holders, will have difficulty meeting credit thresholds required by many realtors/landlords.

Working class/moderate-income housing. Many participants talked about how increasing property values are leading to moderate-income households moving out of their communities. Workforce housing often does not count on the SHI, so it can be left off the table by communities trying to meet their 10 percent.

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Recommendations: 2021-2025¹⁰

STRATEGY AND ACTIONS	TIMEFRAME	DIFFICULTY	RESPONSIBLE PARTIES
<p>Each community in the Consortium will make a public commitment and develop and distribute information and educational resource/outreach materials to increase knowledge about fair housing. All materials shall be universally available (accessible to people with Limited English Proficiency and people with disabilities).</p> <ul style="list-style-type: none"> The WestMetro HOME Consortium will sponsor an annual fair housing training by the Citizen Planner Training Collaborative (CPTC) for municipal boards, commissions, and staff from all 13 Consortium communities, together with their non-profit partners, to educate them about the Federal Fair Housing Act and its application to land use policy and locally funded or initiated housing projects. Make resources available in an electronic format (e.g., webinars and website content) whenever possible.¹¹ See Appendix C for inventory of municipal boards, commissions, and staff and non-profit partners. 	Annual	Low May require funding	WMHC Staff
<ul style="list-style-type: none"> Hold an annual fair housing conference or “panel of experts” event in April to keep the subject of fair housing visible to the community. 	Every 2 years (Fair Housing Month)	Medium	WMHC Staff

¹⁰ This plan does not include an accompanying funding plan and it is assumed that the costs of implementing this plan will be from the HOME Consortium’s administrative funds and other program areas.

¹¹ CPTC has developed a Fair Housing course as part of its new, updated statewide curriculum. The Consortium can request the course for its membership through the “course on demand” option offered by CPTC.

STRATEGY AND ACTIONS	TIMEFRAME	DIFFICULTY	RESPONSIBLE PARTIES
<ul style="list-style-type: none"> Develop a series of fair housing public service announcements for distribution to local cable access channels. 	2 x year (spring, fall)	Medium – High (depending on community)	
<ul style="list-style-type: none"> Provide information on fair housing responsibilities to first-time landlords, small property owners, realtors, and public and private housing developers. Additionally, disseminate materials in collaboration with local and regional media including community access television, local print and digital media platforms, and local officials’ outreach channels. Make resources visible and readily available in municipal offices and other public spaces. 	Annually (April, Fair Housing Month)	Medium Requires funding	WMHC Staff
Identify and address discriminatory actions in the private real estate market			
<ul style="list-style-type: none"> Budget resources for fair housing testing and engage the Fair Housing Center of Massachusetts or another qualified organization to conduct testing in each Consortium community and other interested communities in the MetroWest/Route 2 region. Plan an on-going testing program throughout the 5-year plan period to allow for statistically significant data. 	5-Year Testing Program (to coincide with the 5-year plan schedule)	High Requires funding	Third-Party Testing Agency WMHC Staff
<ul style="list-style-type: none"> Hold an executive presentation to the Select Board or City Councils of the 13 WestMetro HOME Consortium communities. Additionally, hold a public education forum to present testing results to the public, recognizing that many people do not understand fair housing laws, or they believe discrimination does not happen in their town. (The latter could be done as part of the “annual fair housing conference” referenced above.) 	At the conclusion of the 5-year testing program	Medium	Third-Party Testing Agency WMHC Staff
<ul style="list-style-type: none"> Work with local/regional realtor® and property associations to offer training that specifically addresses top issues reported in fair housing complaints reported and filed with FHCG, MCAD, and 	Every 2 Years (April, Fair Housing Month)	High May require \$\$	Third Party Consultant WMHC Staff

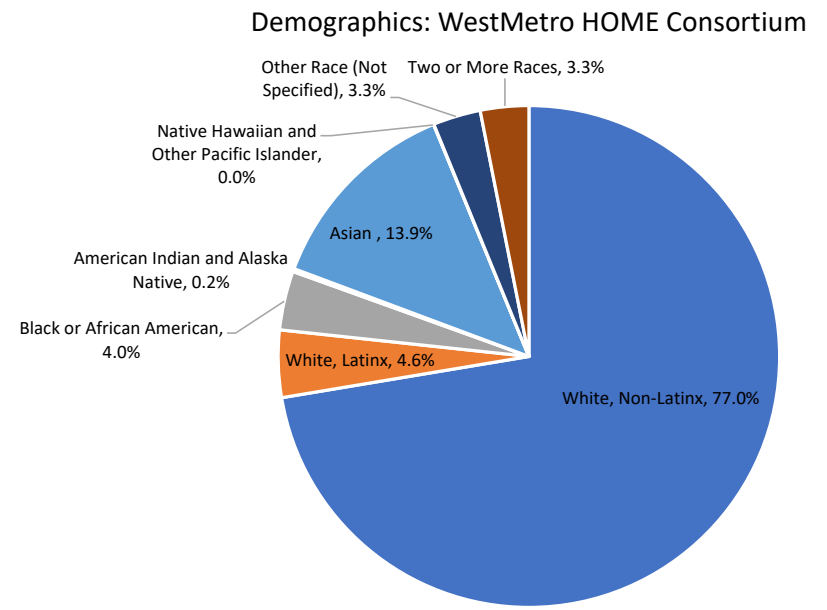
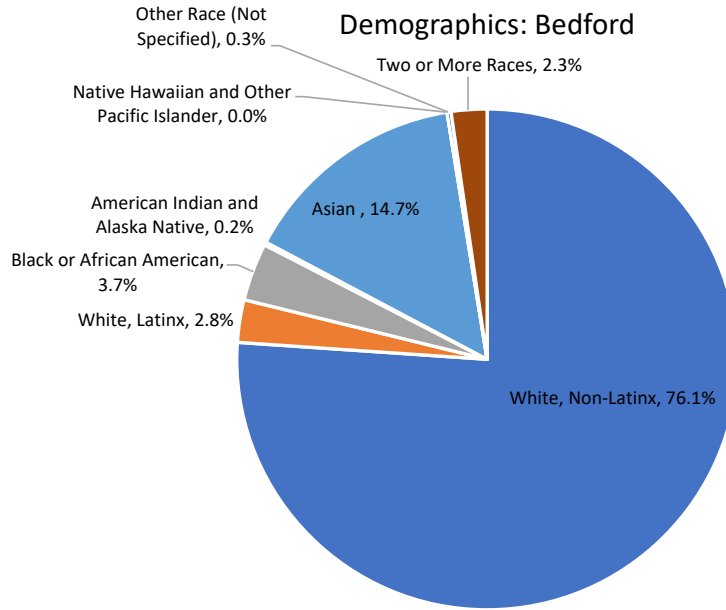
STRATEGY AND ACTIONS	TIMEFRAME	DIFFICULTY	RESPONSIBLE PARTIES
FHEO, as well as those identified through the five-year testing program.			
Increase the Consortium’s capacity to affirmatively further fair housing.			
<ul style="list-style-type: none"> The Consortium staff will include the implementation of this plan on its quarterly meeting agendas. 	Quarterly	Low	WMHC Staff
<ul style="list-style-type: none"> The Consortium will hold an annual meeting about fair housing planning and policy and the status of implementing this Plan. 	Annual	Low	WMHC Staff
<ul style="list-style-type: none"> As a condition of subgrantee agreements with the Consortium, each community will establish written processes detailing which local boards or committees are responsible for the intake process for fair housing complaints, and the subsequent referral to MCAD. These processes shall be published on the individual municipality websites. 	Annual	Low	WMHC Staff
<ul style="list-style-type: none"> Identify and publicize a list of Fair Housing Officers and/or Fair Housing Committees in each participating community and the organizational contacts who can be notified about issues or questions related to fair housing. 	Annual	Low	WMHC Staff
<ul style="list-style-type: none"> The Consortium will re-evaluate its criteria for review of housing proposals seeking funds as part of its annual competitive process to ensure that fair housing needs are met. 	Annual	Low	WMHC Staff
Each community will adopt policies and practices to support safe, diverse, affordable, accessible, and integrated housing			
<ul style="list-style-type: none"> Review zoning ordinances, bylaws, and practices to identify provisions that may encourage, unintentionally, discriminatory practices in permitting residential uses, e.g., requiring fiscal impact studies or excessive parking for multi-bedroom units, or age-restricted housing definitions that prohibit occupancy by people 	Ongoing (throughout 5-year period)	High May require \$\$	WMHC Staff, other municipal staff, local boards, and commissions

STRATEGY AND ACTIONS	TIMEFRAME	DIFFICULTY	RESPONSIBLE PARTIES
<p>under 18. The communities will identify ways to reduce the barriers they have imposed on multifamily residential development.</p>			<p>Third Party Consultant</p>
<ul style="list-style-type: none"> Each community that utilizes Local Preference will assess its impacts on affirmatively furthering fair housing in that community. Elements to be assessed include, but not limited to, lowering the Local Preference percentage and defining “local” to include any resident of the 13-community Consortium. The Consortium may consider working with a consultant to define a framework for this assessment. 			
<ul style="list-style-type: none"> Unless a community has already done so, each community will study, on its own or through a subregional compact, the suitability of reducing or eliminating single-family zoning by allowing two-family dwellings (at minimum) in all residential districts. 	<p>Throughout the 5-year plan period</p>	<p>High May require \$\$</p>	<p>WMHC Staff, other municipal staff, local boards, and commissions Third Party Consultant</p>
<ul style="list-style-type: none"> The Consortium and its individual members will assess the language access needs of people with Limited English Proficiency and disabilities, as well as its compliance with federal language requirements as it relates to housing activities across the Consortium, and develop and implement strategies to address those needs to ensure equal access to fair housing and other civil rights information. The Consortium will explore strategies for pooling resources to improve language access and accessibility for its housing programs. 	<p>Years 1 and 2</p>	<p>High May require \$\$</p>	<p>Third Party Consultant WMHC Staff</p>

APPENDIX

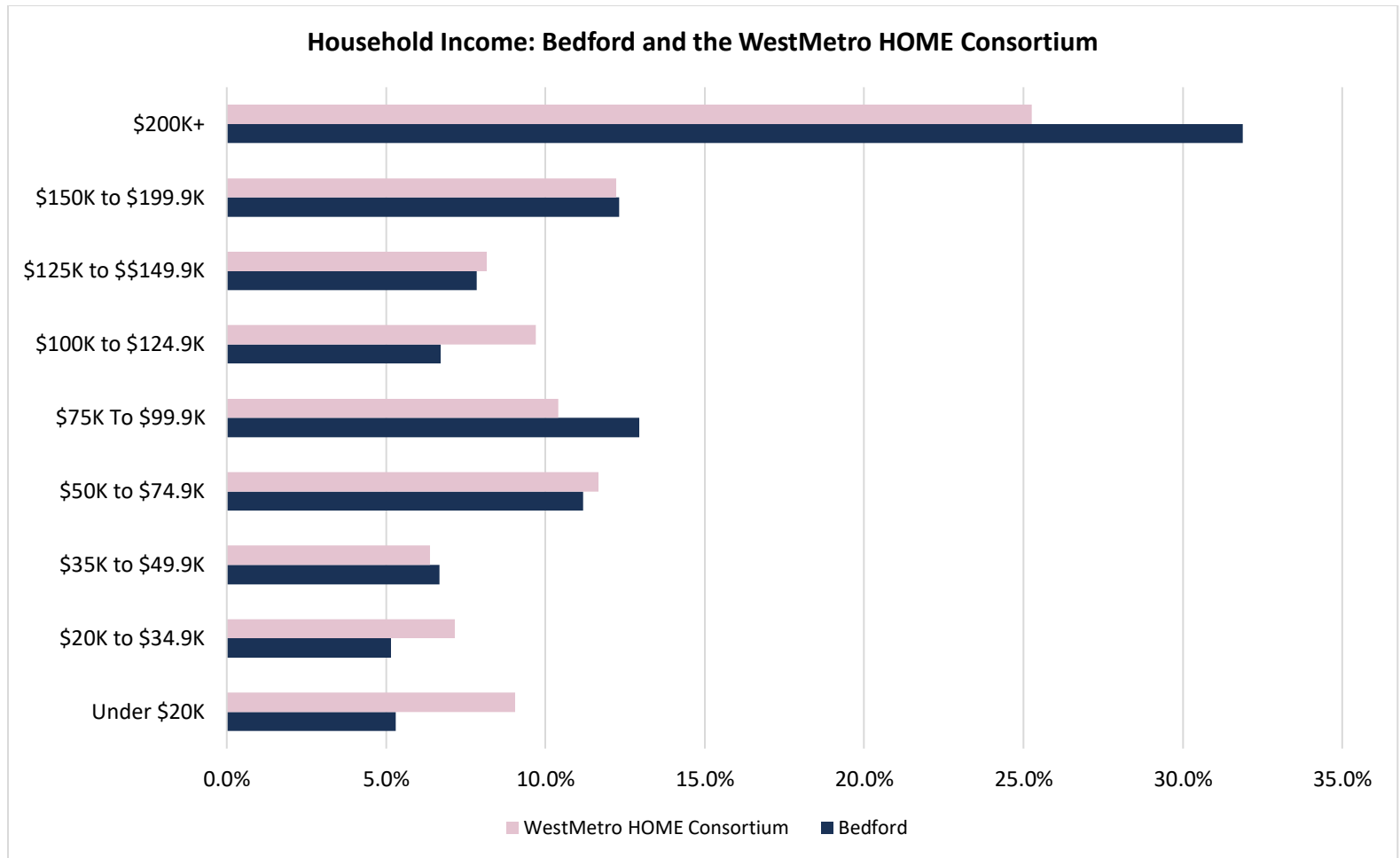
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APPENDIX A. COMPARATIVE DATA VIEW BY CITY OR TOWN
BEDFORD



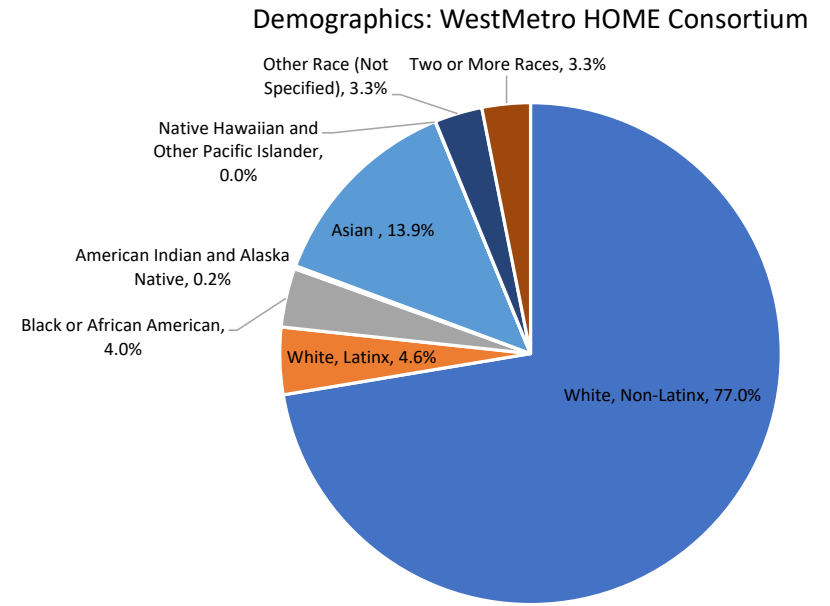
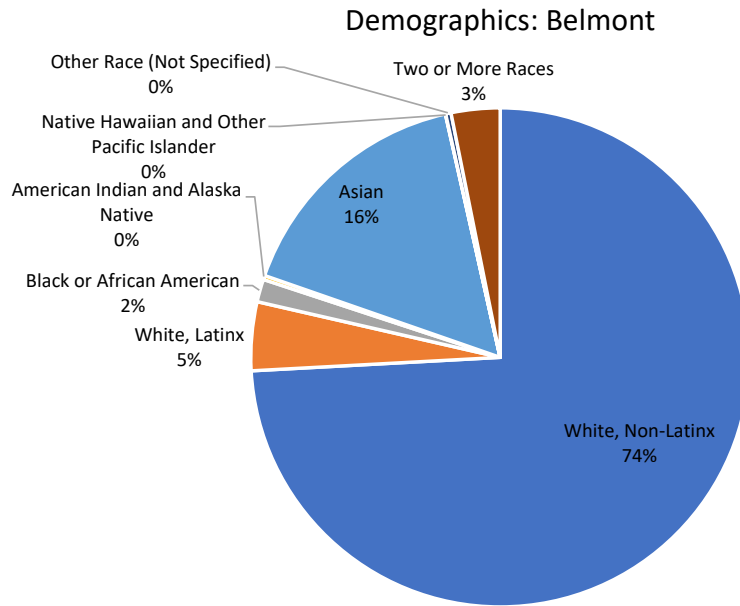
Limited English Proficiency (households)	Bedford	% of Bedford	Consortium	% of Consortium	Bedford % of Consortium
	English only	4,013	76.7%	132,175	68.6%
Limited English Speaking households	209	4.0%	10,449	5.4%	2.0%
Total households:	5,230	100.0%	192,694	100.0%	2.7%

Foreign-Born Population	Bedford	% of Bedford	WestMetro HOME Consortium	% of Consortium	Bedford % of Consortium
	Born in the US	11,641	82.4%	392,968	77.0%
Not born in the US	2,485	17.6%	117,107	23.0%	2.1%
total:	14,126	100.0%	510,075	100.0%	2.8%

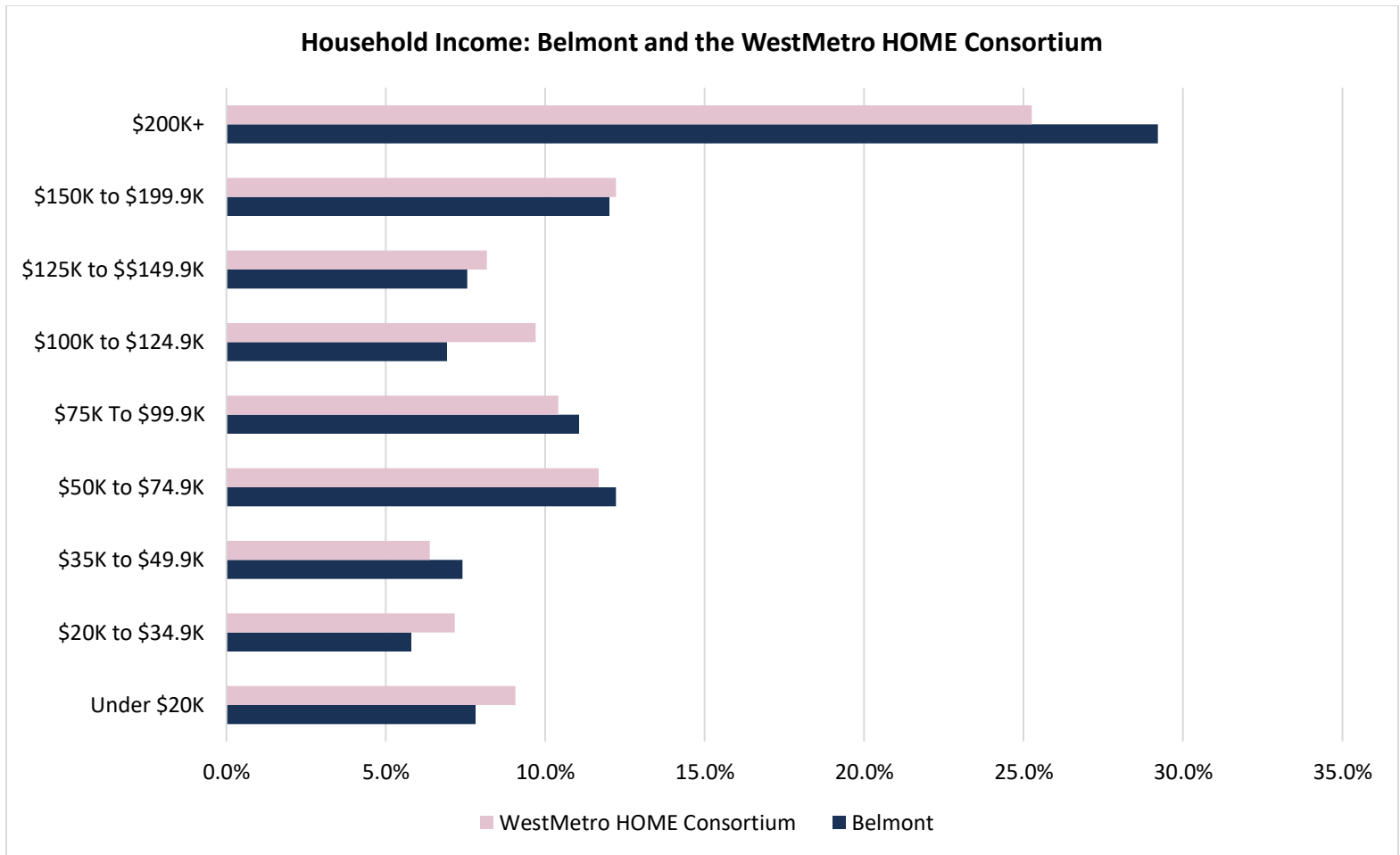


Households by Type	Bedford	% of Bedford	Consortium	% of Consortium	Bedford % of Consortium
Households	5,230	100.0%	192,694	100.0%	2.7%
Families	3,594	68.7%	126,448	65.6%	2.8%
Married Couples	3,128	59.8%	105,754	54.9%	3.0%
Single Parents	466	8.9%	20,694	10.7%	2.3%
Non-Family Households	1,636	31.3%	66,246	34.4%	2.5%
Single People	1,340	25.6%	51,426	26.7%	2.6%
Families by Type	Bedford	% of Bedford	Consortium	% of Consortium	Bedford % of Consortium
Families	3,594	100.0%	126,448	100.0%	2.8%
Single Parents	466	13.0%	20,694	16.4%	2.3%
Black	62	1.7%	2,048	1.6%	3.0%
Asian	44	1.2%	1,881	1.5%	2.3%
Latinx	0	0.0%	3,139	2.5%	0.0%
Senior Households	Bedford	% of Bedford	Consortium	% of Consortium	Bedford % of Consortium
Total Households	5,230	100.0%	192,694	100.0%	2.7%
Households with Seniors	1,609	30.8%	57,813	30.0%	2.8%
Seniors Living Alone	624	11.9%	22,687	11.8%	2.8%
People with Disabilities	Bedford	% of Bedford	Consortium	% of Consortium	Bedford % of Consortium
Total Population	13,774	100.0%	503,606	100.0%	2.7%
Disability Population	1,314	9.5%	43,243	8.6%	3.0%
Under 5	0	0.0%	266	0.1%	0.0%
5 To 17 Years	203	1.5%	2,879	0.6%	7.1%
18 To 34 Years	98	0.7%	5,446	1.1%	1.8%
35 To 64 Years	250	1.8%	12,210	2.4%	2.0%
65 To 74 Years	191	1.4%	6,872	1.4%	2.8%
75 Years and Over	572	4.2%	15,570	3.1%	3.7%

BELMONT



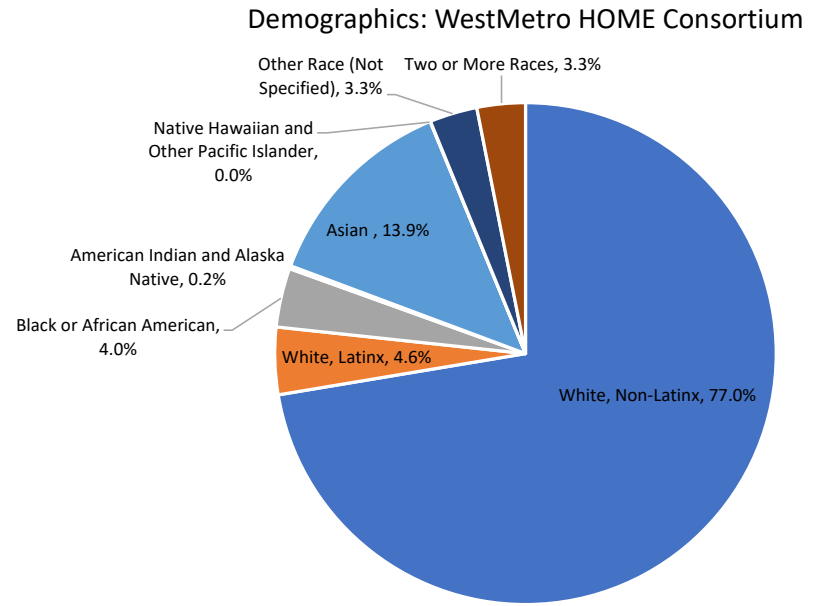
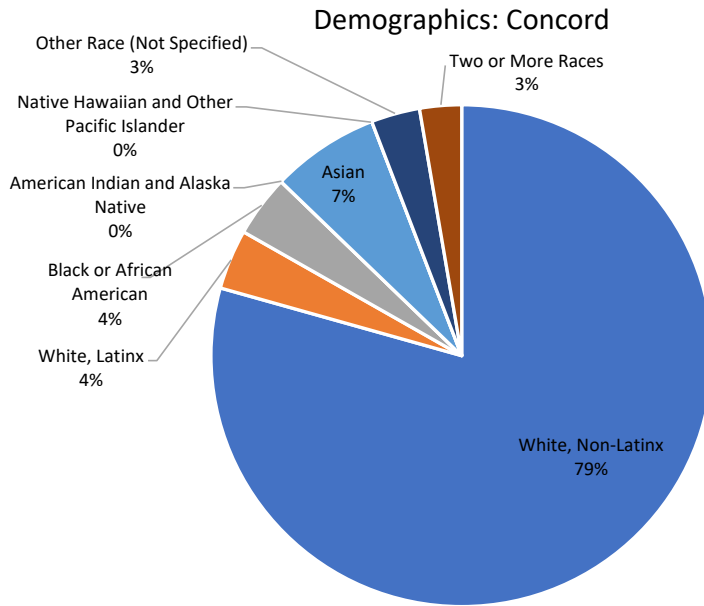
Limited English Proficiency (households)	Belmont	% of Belmont	Consortium	% of Consortium	Belmont % of Consortium
	English only	6,634	67.8%	132,175	68.6%
Limited English Speaking households	393	4.0%	10,449	5.4%	3.8%
Total households:	9,781	100.0%	192,694	100.0%	5.1%
Foreign-born Population	Belmont	% of Belmont	Consortium	% of Consortium	Belmont % of Consortium
	Born in the US	19,668	75.5%	392,968	77.0%
Not born in the US	6,375	24.5%	117,107	23.0%	5.4%
total:	26,043	100.0%	510,075	100.0%	5.1%



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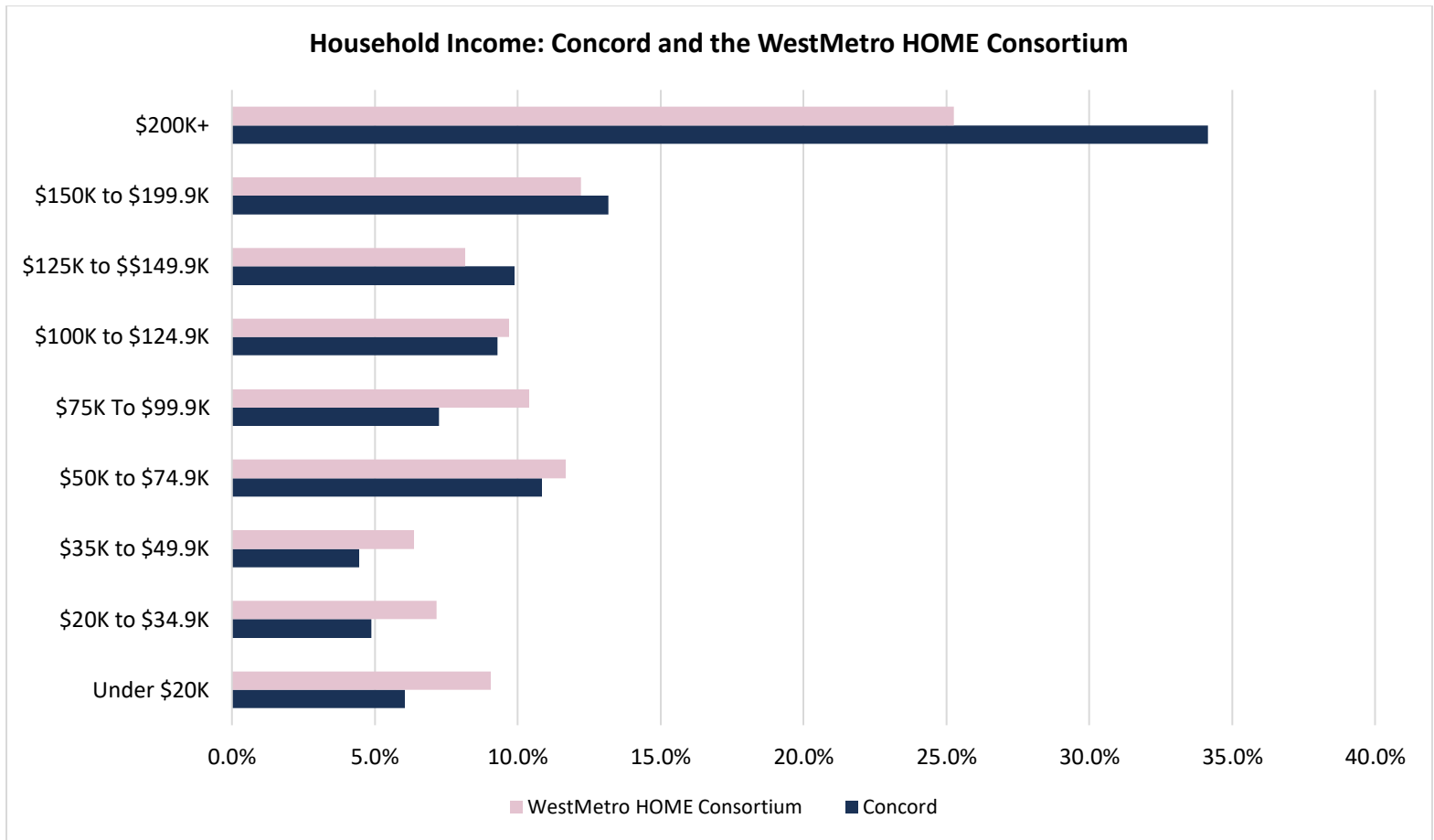
Households by Type	Belmont	% of Belmont	Consortium	% of Consortium	Belmont % of Consortium
Households	9,781	100.0%	192,694	100.0%	5.1%
Families	6,913	70.7%	126,448	65.6%	5.5%
Married Couples	5,768	59.0%	105,754	54.9%	5.5%
Single Parents	1,145	11.7%	20,694	10.7%	5.5%
Non-Family Households	2,868	29.3%	66,246	34.4%	4.3%
Single People	2,356	24.1%	51,426	26.7%	4.6%
Families by Type	Belmont	% of Belmont	Consortium	% of Consortium	Belmont % of Consortium
Families	6,913	100.0%	126,448	100.0%	5.5%
Single Parents	1,145	16.6%	20,694	16.4%	5.5%
Black	37	0.5%	2,048	1.6%	1.8%
Asian	128	1.9%	1,881	1.5%	6.8%
Latinx	74	1.1%	3,139	2.5%	2.4%
Senior Households	Belmont	% of Belmont	Consortium	% of Consortium	Belmont % of Consortium
Total Households	9,781	100.0%	192,694	100.0%	5.1%
Households with Seniors	3,031	31.0%	57,813	30.0%	5.2%
Seniors Living Alone	1,250	12.8%	22,687	11.8%	5.5%
People with Disabilities	Belmont	% of Belmont	Consortium	% of Consortium	Belmont % of Consortium
Total Population	25,809	100.0%	503,606	100.0%	5.1%
Disability Population	1,855	7.2%	43,243	8.6%	4.3%
Under 5	0	0.0%	266	0.1%	0.0%
5 To 17 Years	102	0.4%	2,879	0.6%	3.5%
18 To 34 Years	215	0.8%	5,446	1.1%	3.9%
35 To 64 Years	423	1.6%	12,210	2.4%	3.5%
65 To 74 Years	305	1.2%	6,872	1.4%	4.4%
75 Years and Over	810	3.1%	15,570	3.1%	5.2%

CONCORD



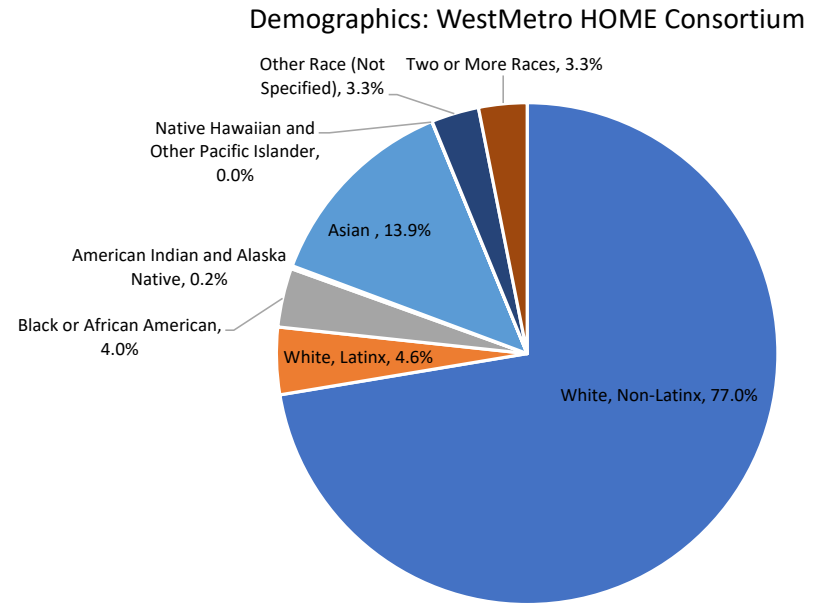
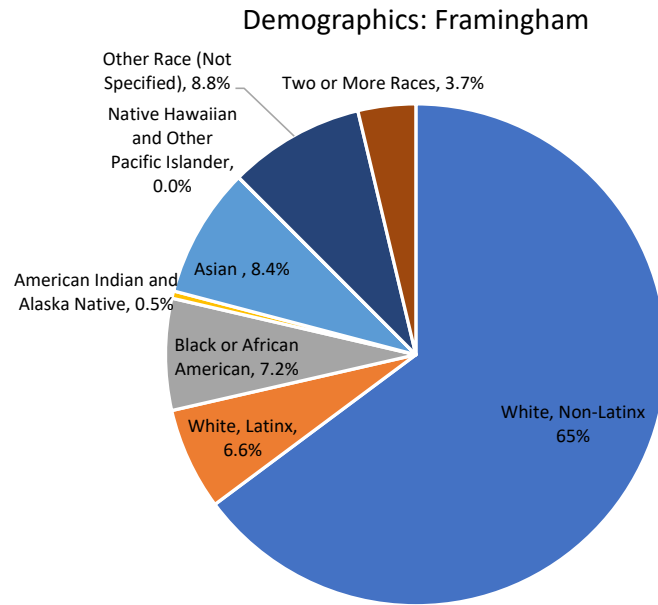
Limited English Proficiency (households)	Concord	% of Concord	Consortium	% of Consortium	Concord % of Consortium
English only	5,788	85.7%	132,175	68.6%	4.4%
Limited English Speaking households	69	1.0%	10,449	5.4%	0.7%
Total households:	6,751	100.0%	192,694	100.0%	3.5%

Foreign-born Population	Concord	% of Concord	Consortium	% of Consortium	Concord % of Consortium
Born in the US	17,202	89.0%	392,968	77.0%	4.4%
Not born in the US	2,121	11.0%	117,107	23.0%	1.8%
total:	19,323	100.0%	510,075	100.0%	3.8%



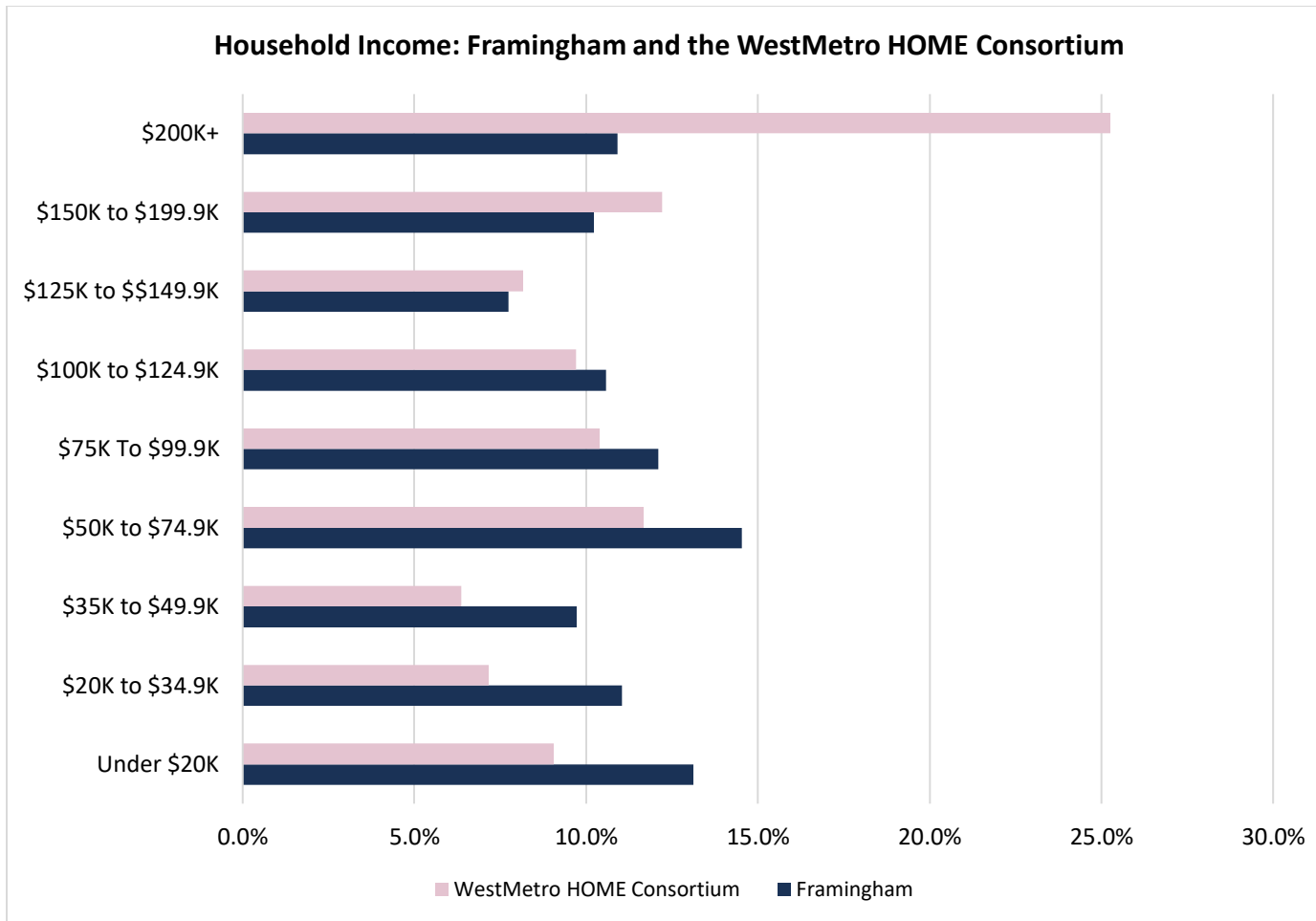
Households by Type	Concord	% of Concord	Consortium	% of Consortium	Concord % of Consortium
Households	6,751	100.0%	192,694	100.0%	3.5%
Families	4,894	72.5%	126,448	65.6%	3.9%
Married Couples	4,294	63.6%	105,754	54.9%	4.1%
Single Parents	600	8.9%	20,694	10.7%	2.9%
Non-Family Households	1,857	27.5%	66,246	34.4%	2.8%
Single People	1,654	24.5%	51,426	26.7%	3.2%
Families by Type	Concord	% of Concord	Consortium	% of Consortium	Concord % of Consortium
Families	4,894	100.0%	126,448	100.0%	3.9%
Single Parents	600	12.3%	20,694	16.4%	2.9%
Black	0	0.0%	2,048	1.6%	0.0%
Asian	13	0.3%	1,881	1.5%	0.7%
Latinx	12	0.2%	3,139	2.5%	0.4%
Senior Households	Concord	% of Concord	Consortium	% of Consortium	Concord % of Consortium
Total Households	6,751	100.0%	192,694	100.0%	3.5%
Households with Seniors	2,487	36.8%	57,813	30.0%	4.3%
Seniors Living Alone	1,007	14.9%	22,687	11.8%	4.4%
People with Disabilities	Concord	% of Concord	Consortium	% of Consortium	Concord % of Consortium
Total Population	17,548	100.0%	503,606	100.0%	3.5%
Disability Population	1,485	8.5%	43,243	8.6%	3.4%
Under 5	0	0.0%	266	0.1%	0.0%
5 To 17 Years	102	0.6%	2,879	0.6%	3.5%
18 To 34 Years	190	1.1%	5,446	1.1%	3.5%
35 To 64 Years	375	2.1%	12,210	2.4%	3.1%
65 To 74 Years	163	0.9%	6,872	1.4%	2.4%
75 Years and Over	655	3.7%	15,570	3.1%	4.2%

FRAMINGHAM



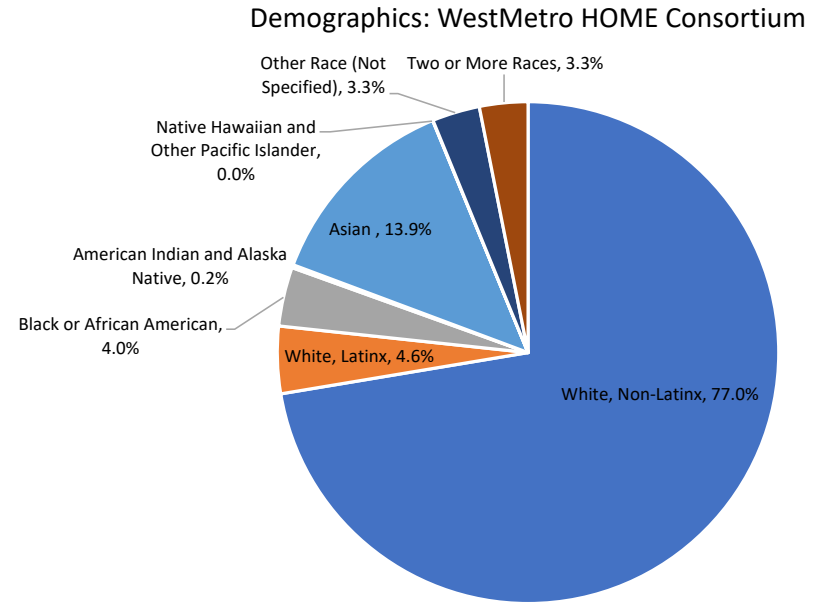
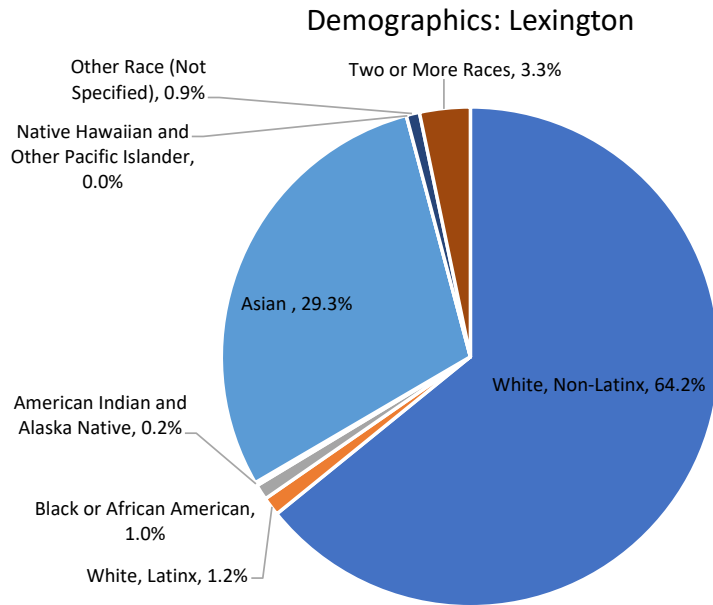
Limited English Proficiency (households)	Framingham	% of Framingham	Consortium	% of Consortium	Framingham % of Consortium
English only	16,805	59.6%	132,175	68.6%	12.7%
Limited English Speaking households	3,189	11.3%	10,449	5.4%	30.5%
Total households:	28,189	100.0%	192,694	100.0%	14.6%

Foreign-born Population	Framingham	% of Framingham	Consortium	% of Consortium	Framingham % of Consortium
Born in the US	51,297	71.6%	392,968	77.0%	13.1%
Not born in the US	20,352	28.4%	117,107	23.0%	17.4%
total:	71,649	100.0%	510,075	100.0%	14.0%



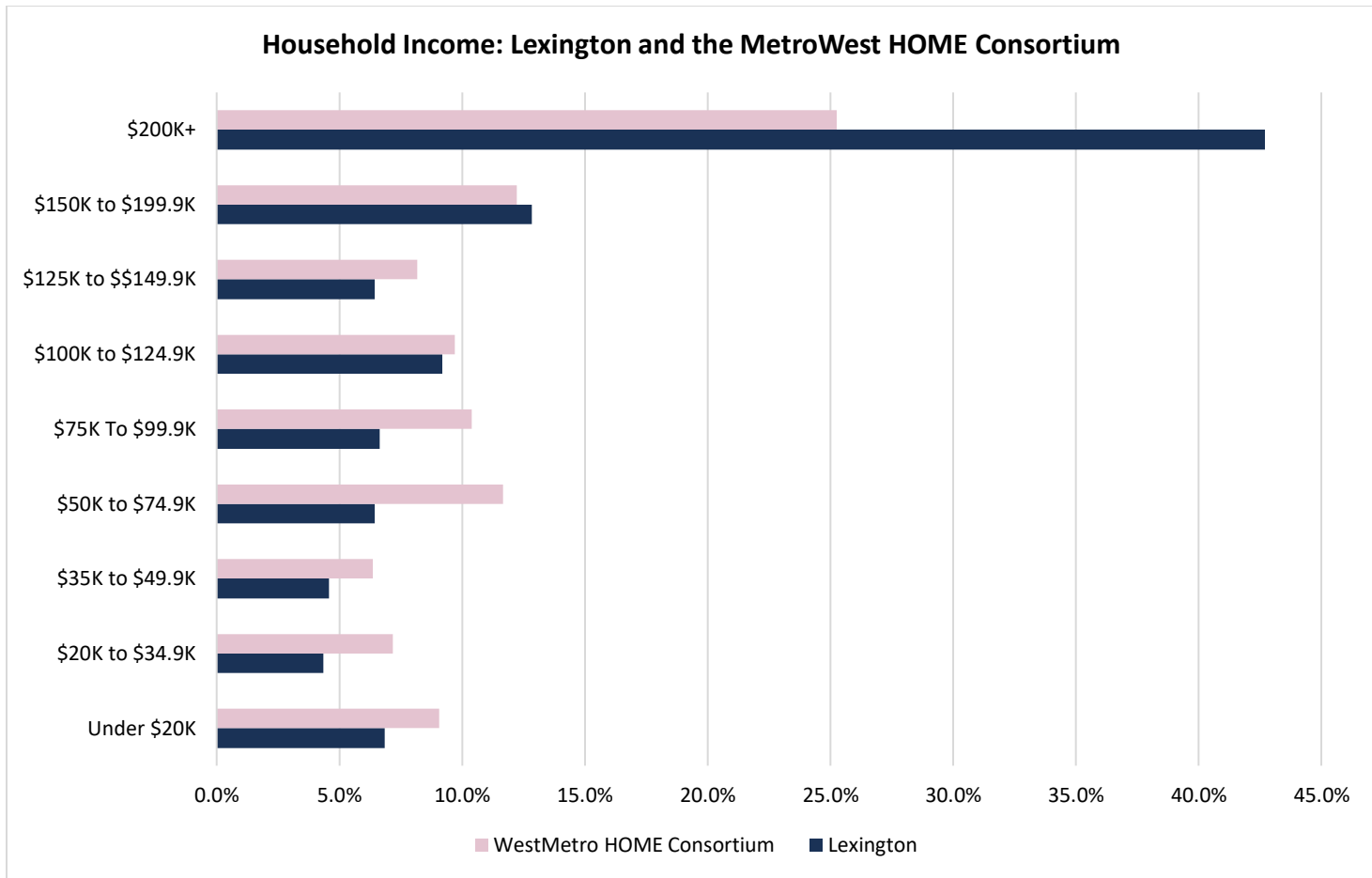
Households by Type	Framingham	% of Framingham	Consortium	% of Consortium	Framingham % of Consortium
Households	28,189	100.0%	192,694	100.0%	14.6%
Families	18,096	64.2%	126,448	65.6%	14.3%
Married Couples	13,899	49.3%	105,754	54.9%	13.1%
Single Parents	4,197	14.9%	20,694	10.7%	20.3%
Non-Family Households	10,093	35.8%	66,246	34.4%	15.2%
Single People	8,318	29.5%	51,426	26.7%	16.2%
Families by Type	Framingham	% of Framingham	Consortium	% of Consortium	Framingham % of Consortium
Families	18,096	100.0%	126,448	100.0%	14.3%
Single Parents	4,197	23.2%	20,694	16.4%	20.3%
Black	526	2.9%	2,048	1.6%	25.7%
Asian	157	0.9%	1,881	1.5%	8.3%
Latinx	1,388	7.7%	3,139	2.5%	44.2%
Senior Households	Framingham	% of Framingham	Consortium	% of Consortium	Framingham % of Consortium
Total Households	28,189	100.0%	192,694	100.0%	14.6%
Households with Seniors	7,290	25.9%	57,813	30.0%	12.6%
Seniors Living Alone	3,011	10.7%	22,687	11.8%	13.3%
People with Disabilities	Framingham	% of Framingham	Consortium	% of Consortium	Framingham % of Consortium
Total Population	70,348	100.0%	503,606	100.0%	14.0%
Disability Population	7,878	11.2%	43,243	8.6%	18.2%
Under 5	17	0.0%	266	0.1%	6.4%
5 To 17 Years	600	0.9%	2,879	0.6%	20.8%
18 To 34 Years	1,269	1.8%	5,446	1.1%	23.3%
35 To 64 Years	2,754	3.9%	12,210	2.4%	22.6%
65 To 74 Years	1,083	1.5%	6,872	1.4%	15.8%
75 Years and Over	2,155	3.1%	15,570	3.1%	13.8%

LEXINGTON



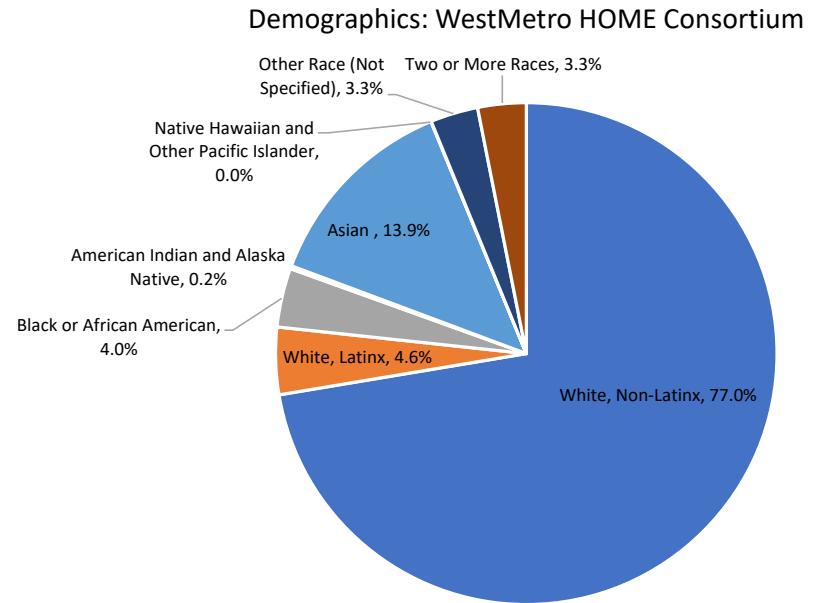
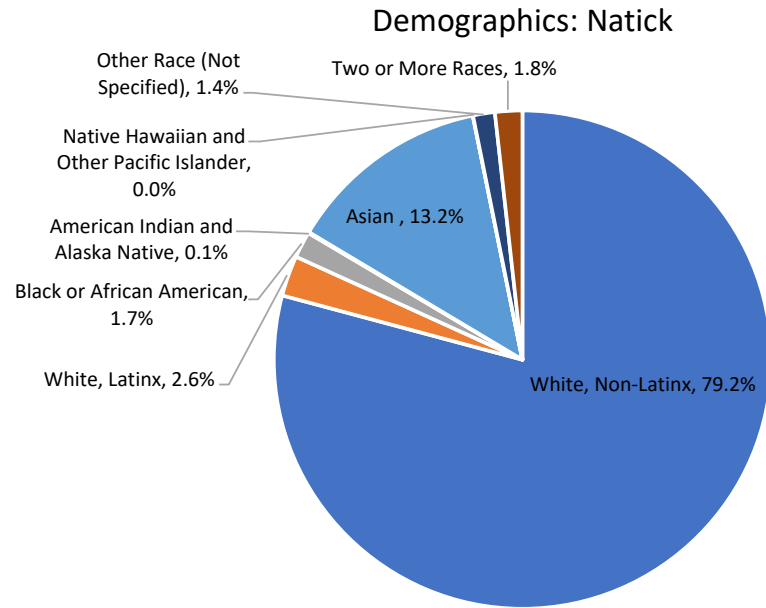
Limited English Proficiency (households)	Lexington	% of Lexington	Consortium	% of Consortium	Lexington % of Consortium
English only	7,630	64.9%	132,175	68.6%	5.8%
Limited English Speaking households	353	3.0%	10,449	5.4%	3.4%
Total households:	11,757	100.0%	192,694	100.0%	6.1%

Foreign-born Population	Lexington	% of Lexington	Consortium	% of Consortium	Lexington % of Consortium
Born in the US	24,400	72.9%	392,968	77.0%	6.2%
Not born in the US	9,080	27.1%	117,107	23.0%	7.8%
total:	33,480	100.0%	510,075	100.0%	6.6%



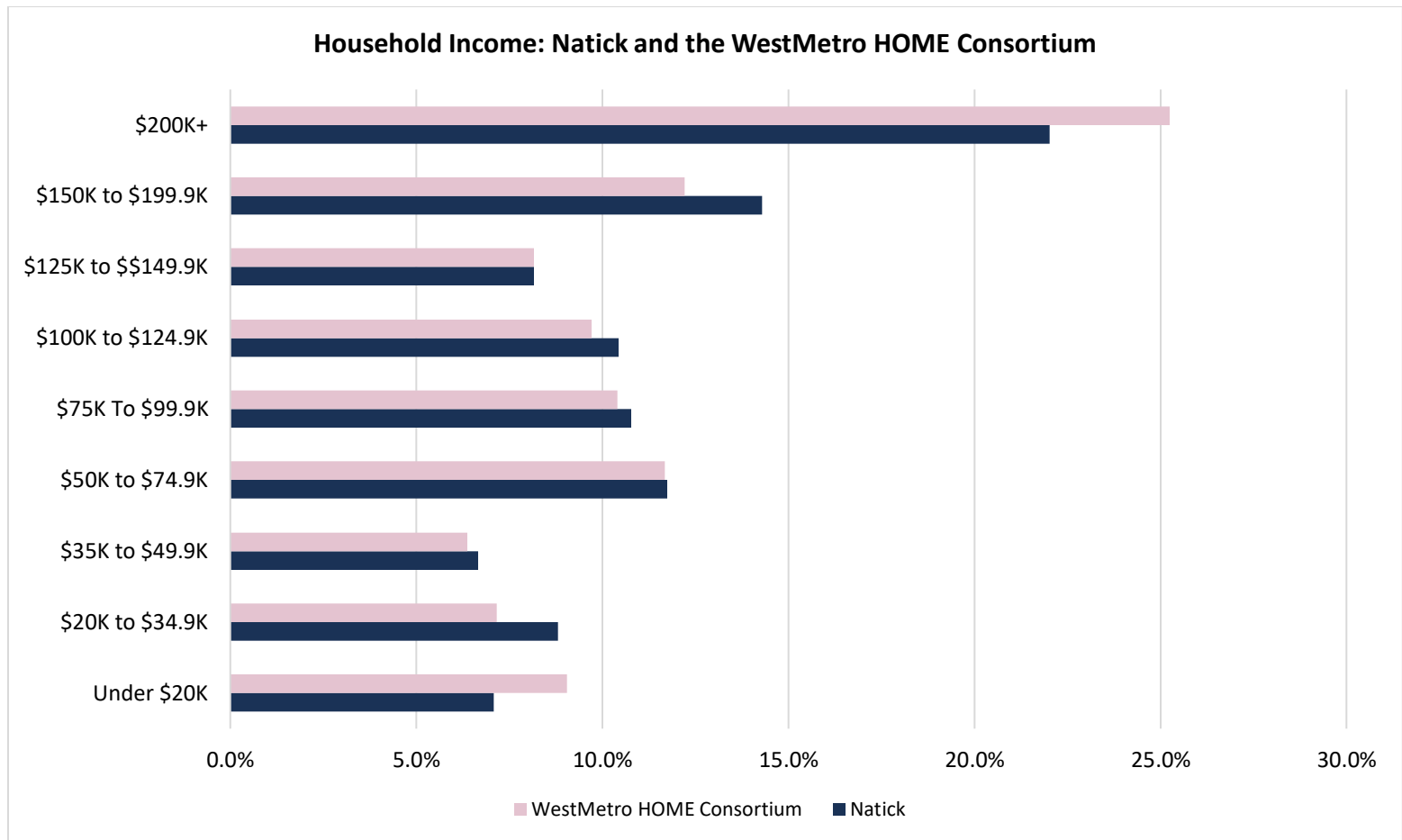
Households by Type	Lexington	% of Lexington	Consortium	% of Consortium	Lexington % of Consortium
Households	11,757	100.0%	192,694	100.0%	6.1%
Families	9,336	79.4%	126,448	65.6%	7.4%
Married Couples	8,392	71.4%	105,754	54.9%	7.9%
Single Parents	944	8.0%	20,694	10.7%	4.6%
Non-Family Households	2,421	20.6%	66,246	34.4%	3.7%
Single People	2,248	19.1%	51,426	26.7%	4.4%
Families by Type	Lexington	% of Lexington	Consortium	% of Consortium	Lexington % of Consortium
Families	9,336	100.0%	126,448	100.0%	7.4%
Single Parents	944	10.1%	20,694	16.4%	4.6%
Black	55	0.6%	2,048	1.6%	2.7%
Asian	255	2.7%	1,881	1.5%	13.6%
Latinx	9	0.1%	3,139	2.5%	0.3%
Senior Households	Lexington	% of Lexington	Consortium	% of Consortium	Lexington % of Consortium
Total Households	11,757	100.0%	192,694	100.0%	6.1%
Households with Seniors	4,200	35.7%	57,813	30.0%	7.3%
Seniors Living Alone	1,379	11.7%	22,687	11.8%	6.1%
People with Disabilities	Lexington	% of Lexington	Consortium	% of Consortium	Lexington % of Consortium
Total Population	33,115	100.0%	503,606	100.0%	6.6%
Disability Population	2,303	7.0%	43,243	8.6%	5.3%
Under 5	21	0.1%	266	0.1%	7.9%
5 To 17 Years	279	0.8%	2,879	0.6%	9.7%
18 To 34 Years	173	0.5%	5,446	1.1%	3.2%
35 To 64 Years	554	1.7%	12,210	2.4%	4.5%
65 To 74 Years	297	0.9%	6,872	1.4%	4.3%
75 Years and Over	979	3.0%	15,570	3.1%	6.3%

NATICK



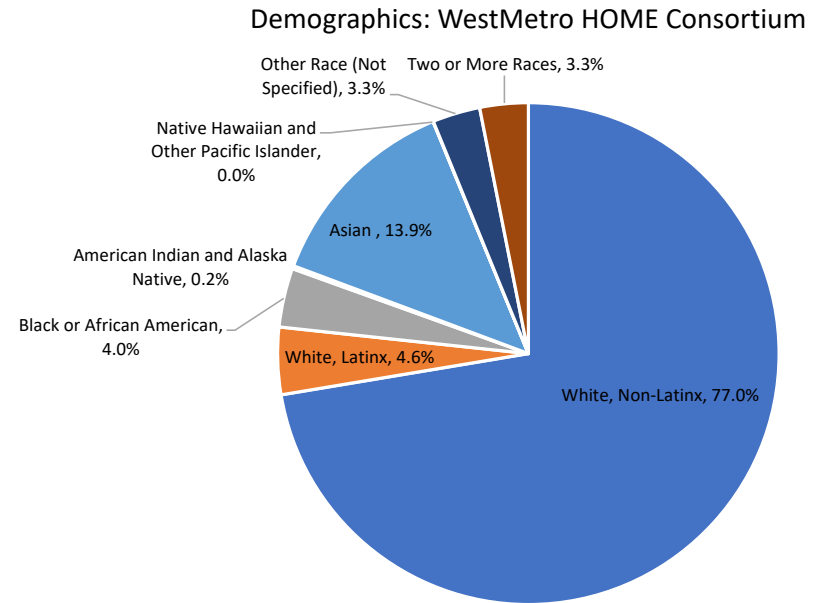
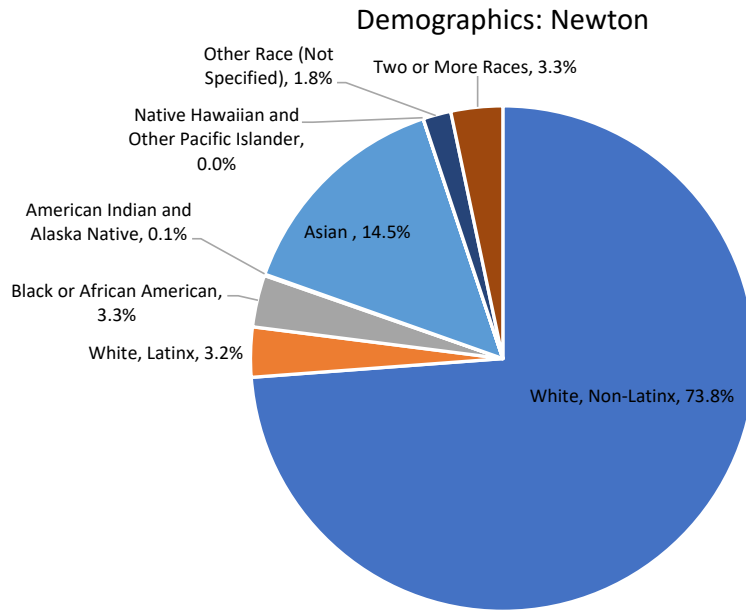
Limited English Proficiency (households)	Natick	% of Natick	Consortium	% of Consortium	Natick % of Consortium
	English only	10,927	75.9%	132,175	68.6%
Limited English Speaking households	486	3.4%	10,449	5.4%	4.7%
Total households:	14,404	100.0%	192,694	100.0%	7.5%

Foreign-born Population	Natick	% of Natick	Consortium	% of Consortium	Natick % of Consortium
	Born in the US	29,488	81.7%	392,968	77.0%
Not born in the US	6,595	18.3%	117,107	23.0%	5.6%
total:	36,083	100.0%	510,075	100.0%	7.1%



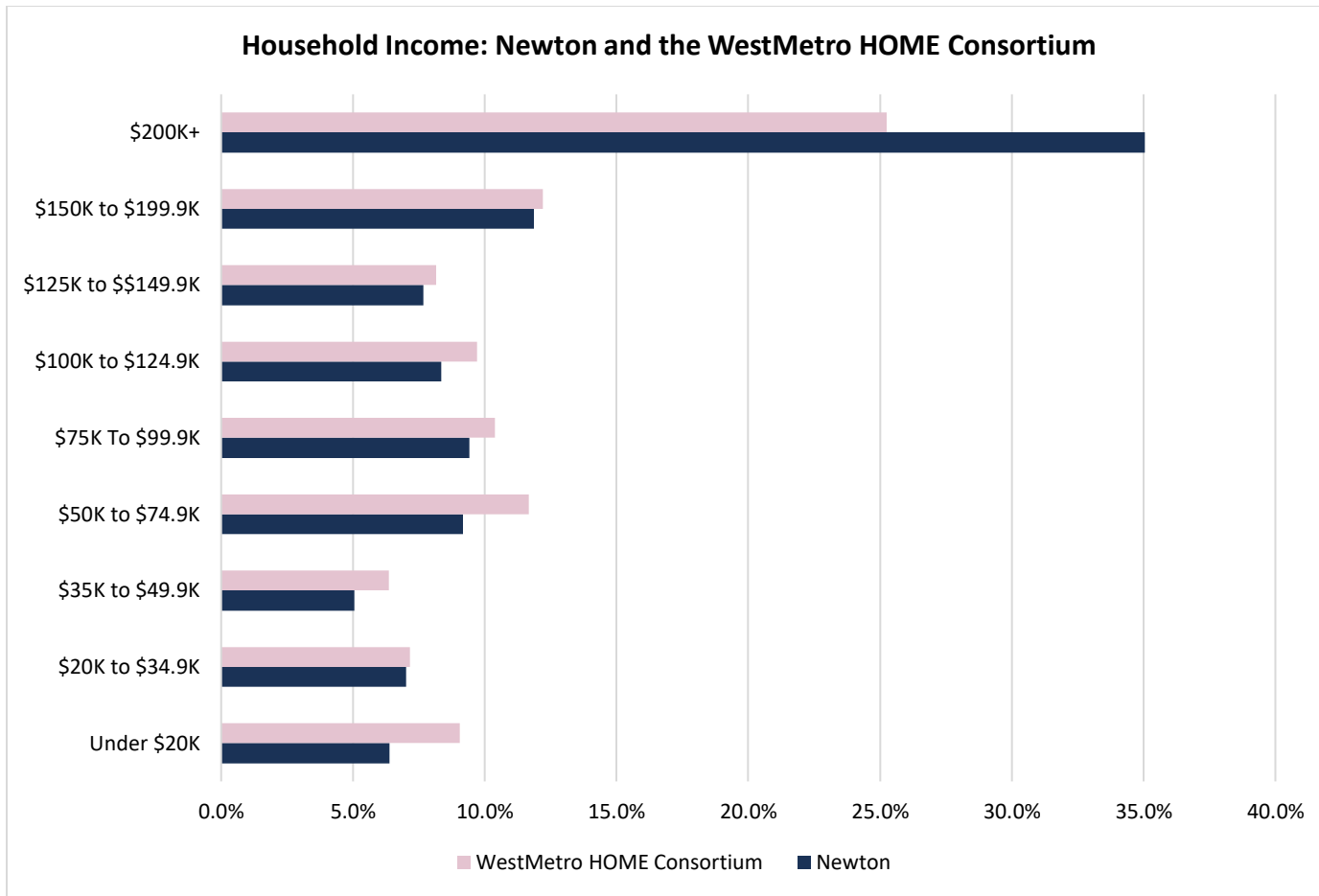
Households by Type	Natick	% of Natick	Consortium	% of Consortium	Natick % of Consortium
Households	14,404	100.0%	192,694	100.0%	7.5%
Families	9,702	67.4%	126,448	65.6%	7.7%
Married Couples	8,329	57.8%	105,754	54.9%	7.9%
Single Parents	1,373	9.5%	20,694	10.7%	6.6%
Non-Family Households	4,702	32.6%	66,246	34.4%	7.1%
Single People	4,199	29.2%	51,426	26.7%	8.2%
Families by Type	Natick	% of Natick	Consortium	% of Consortium	Natick % of Consortium
Families	9,702	100.0%	126,448	100.0%	7.7%
Single Parents	1,373	14.2%	20,694	16.4%	6.6%
Black	24	0.2%	2,048	1.6%	1.2%
Asian	101	1.0%	1,881	1.5%	5.4%
Latinx	69	0.7%	3,139	2.5%	2.2%
Senior Households	Natick	% of Natick	Consortium	% of Consortium	Natick % of Consortium
Total Households	14,404	100.0%	192,694	100.0%	7.5%
Households with Seniors	3,924	27.2%	57,813	30.0%	6.8%
Seniors Living Alone	1,618	11.2%	22,687	11.8%	7.1%
People with Disabilities	Natick	% of Natick	Consortium	% of Consortium	Natick % of Consortium
Total Population	35,746	100.0%	503,606	100.0%	7.1%
Disability Population	2,793	7.8%	43,243	8.6%	6.5%
Under 5	20	0.1%	266	0.1%	7.5%
5 To 17 Years	258	0.7%	2,879	0.6%	9.0%
18 To 34 Years	120	0.3%	5,446	1.1%	2.2%
35 To 64 Years	921	2.6%	12,210	2.4%	7.5%
65 To 74 Years	535	1.5%	6,872	1.4%	7.8%
75 Years and Over	939	2.6%	15,570	3.1%	6.0%

NEWTON



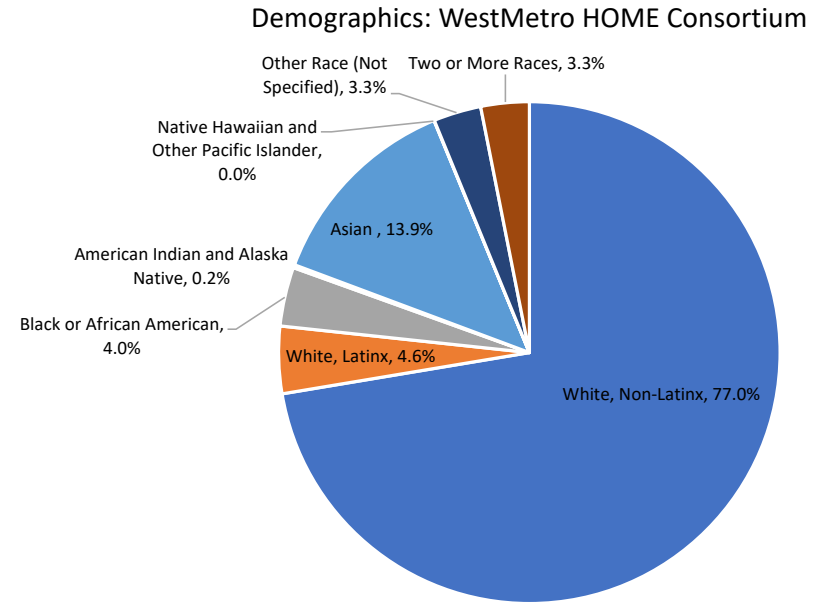
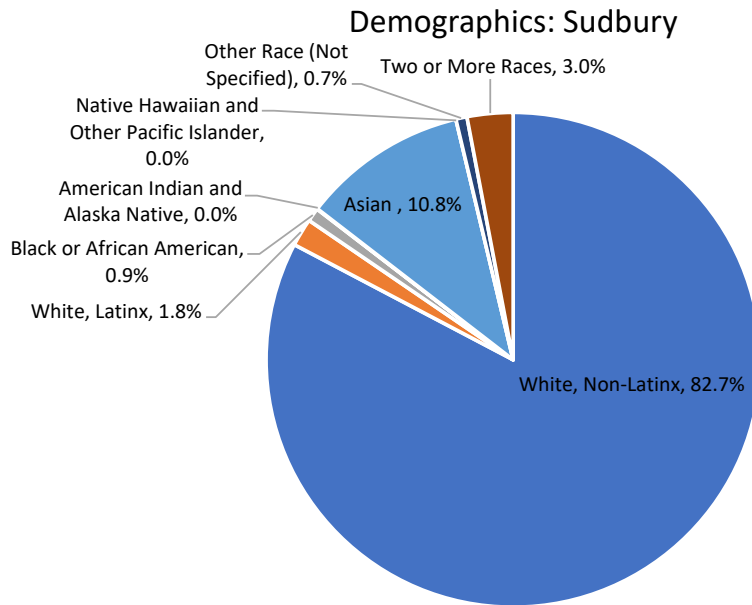
Limited English Proficiency (households)	Newton	% of Newton	Consortium	% of Consortium	Newton % of Consortium
English only	21,418	69.4%	132,175	68.6%	16.2%
Limited English Speaking households	1,306	4.2%	10,449	5.4%	12.5%
Total households:	30,849	100.0%	192,694	100.0%	16.0%

Foreign-born Population	Newton	% of Newton	Consortium	% of Consortium	Newton % of Consortium
Born in the US	68,918	77.7%	392,968	77.0%	17.5%
Not born in the US	19,742	22.3%	117,107	23.0%	16.9%
total:	88,660	100.0%	510,075	100.0%	17.4%



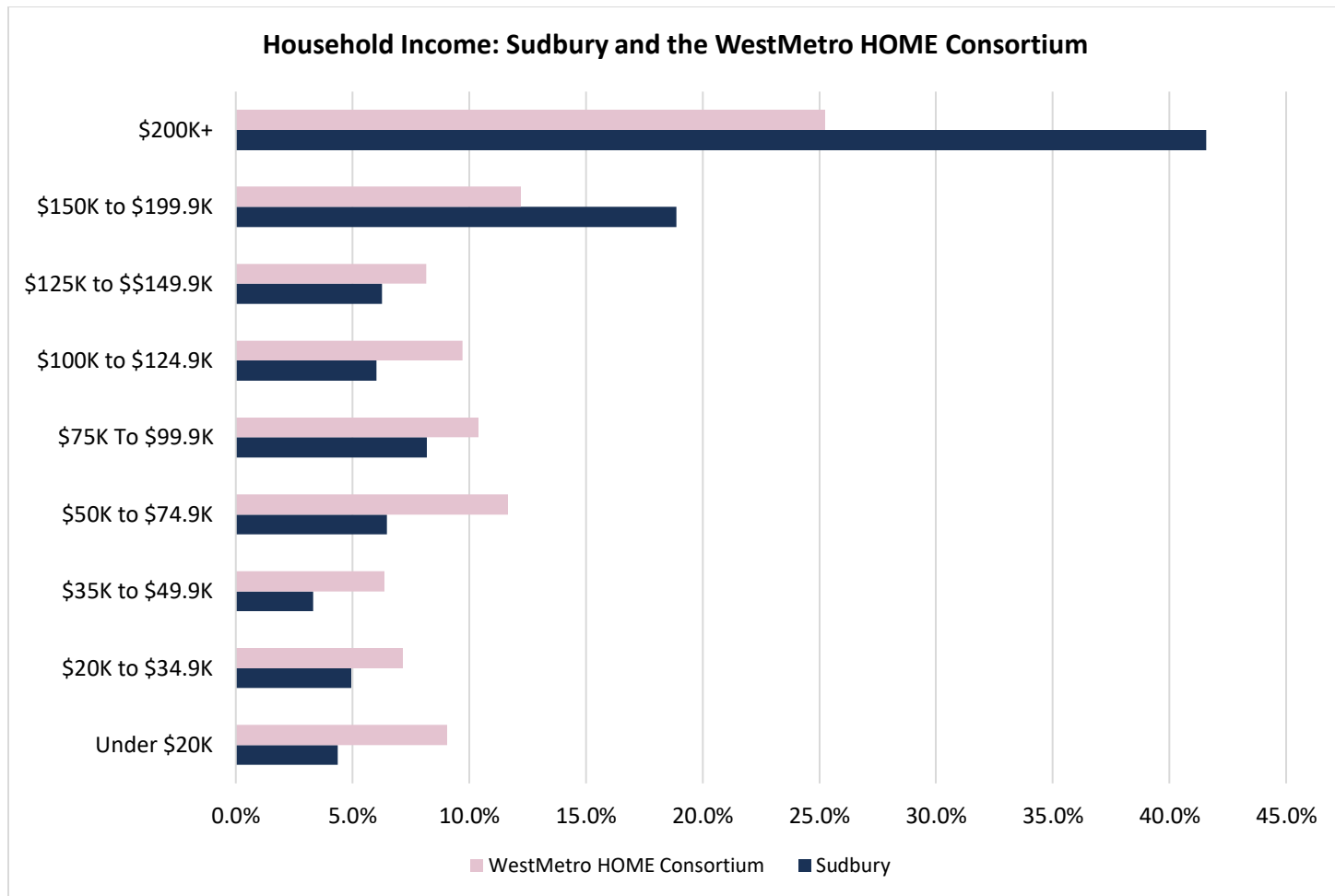
Households by Type	Newton	% of Newton	Consortium	% of Consortium	Newton % of Consortium
Households	30,849	100.0%	192,694	100.0%	16.0%
Families	22,228	72.1%	126,448	65.6%	17.6%
Married Couples	18,639	60.4%	105,754	54.9%	17.6%
Single Parents	3,589	11.6%	20,694	10.7%	17.3%
Non-Family Households	8,621	27.9%	66,246	34.4%	13.0%
Single People	6,829	22.1%	51,426	26.7%	13.3%
Families by Type	Newton	% of Newton	Consortium	% of Consortium	Newton % of Consortium
Families	22,228	100.0%	126,448	100.0%	17.6%
Single Parents	3,589	16.1%	20,694	16.4%	17.3%
Black	146	0.7%	2,048	1.6%	7.1%
Asian	401	1.8%	1,881	1.5%	21.3%
Latinx	270	1.2%	3,139	2.5%	8.6%
Senior Households	Newton	% of Newton	Consortium	% of Consortium	Newton % of Consortium
Total Households	30,849	100.0%	192,694	100.0%	16.0%
Households with Seniors	10,822	35.1%	57,813	30.0%	18.7%
Seniors Living Alone	4,002	13.0%	22,687	11.8%	17.6%
People with Disabilities	Newton	% of Newton	Consortium	% of Consortium	Newton % of Consortium
Total Population	88,115	100.0%	503,606	100.0%	17.5%
Disability Population	7,456	8.5%	43,243	8.6%	17.2%
Under 5	54	0.1%	266	0.1%	20.3%
5 To 17 Years	477	0.5%	2,879	0.6%	16.6%
18 To 34 Years	1,128	1.3%	5,446	1.1%	20.7%
35 To 64 Years	1,658	1.9%	12,210	2.4%	13.6%
65 To 74 Years	1,165	1.3%	6,872	1.4%	17.0%
75 Years and Over	2,974	3.4%	15,570	3.1%	19.1%

SUDBURY



Limited English Proficiency (households)	Sudbury	% of Sudbury	Consortium	% of Consortium	Sudbury % of Consortium
English only	5,197	81.8%	132,175	68.6%	3.9%
Limited English Speaking households	89	1.4%	10,449	5.4%	0.9%
Total households:	6,355	100.0%	192,694	100.0%	3.3%

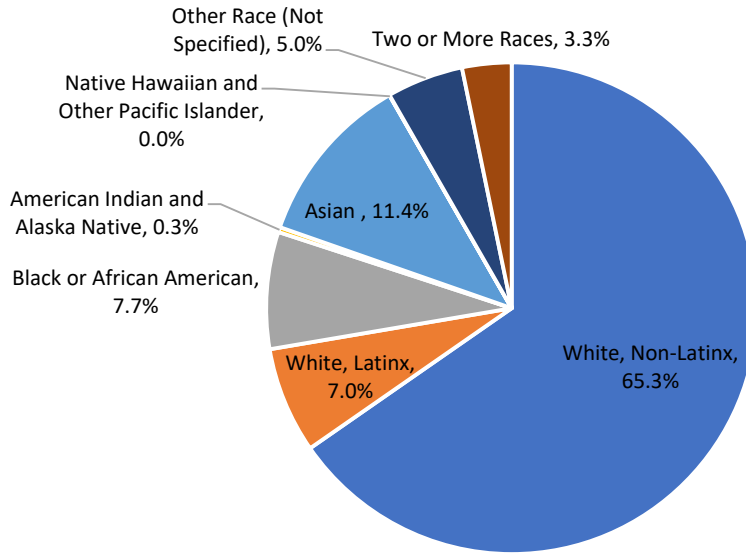
Foreign-born Population	Sudbury	% of Sudbury	Consortium	% of Consortium	Sudbury % of Consortium
Born in the US	16,579	87.5%	392,968	77.0%	4.2%
Not born in the US	2,361	12.5%	117,107	23.0%	2.0%
total:	18,940	100.0%	510,075	100.0%	3.7%



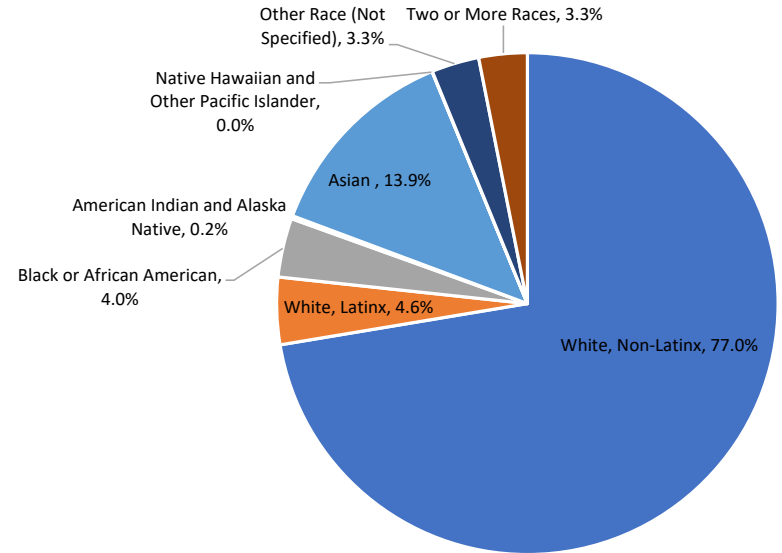
Households by Type	Sudbury	% of Sudbury	Consortium	% of Consortium	Sudbury % of Consortium
Households	6,355	100.0%	192,694	100.0%	3.3%
Families	5,492	86.4%	126,448	65.6%	4.3%
Married Couples	5,041	79.3%	105,754	54.9%	4.8%
Single Parents	451	7.1%	20,694	10.7%	2.2%
Non-Family Households	863	13.6%	66,246	34.4%	1.3%
Single People	733	11.5%	51,426	26.7%	1.4%
Families by Type	Sudbury	% of Sudbury	Consortium	% of Consortium	Sudbury % of Consortium
Families	5,492	100.0%	126,448	100.0%	4.3%
Single Parents	451	8.2%	20,694	16.4%	2.2%
Black	44	0.8%	2,048	1.6%	2.1%
Asian	37	0.7%	1,881	1.5%	2.0%
Latinx	17	0.3%	3,139	2.5%	0.5%
Senior Households	Sudbury	% of Sudbury	Consortium	% of Consortium	Sudbury % of Consortium
Total Households	6,355	100.0%	192,694	100.0%	3.3%
Households with Seniors	1,896	29.8%	57,813	30.0%	3.3%
Seniors Living Alone	477	7.5%	22,687	11.8%	2.1%
People with Disabilities	Sudbury	% of Sudbury	Consortium	% of Consortium	Sudbury % of Consortium
Total Population	18,760	100.0%	503,606	100.0%	3.7%
Disability Population	1,106	5.9%	43,243	8.6%	2.6%
Under 5	12	0.1%	266	0.1%	4.5%
5 To 17 Years	77	0.4%	2,879	0.6%	2.7%
18 To 34 Years	82	0.4%	5,446	1.1%	1.5%
35 To 64 Years	370	2.0%	12,210	2.4%	3.0%
65 To 74 Years	164	0.9%	6,872	1.4%	2.4%
75 Years and Over	401	2.1%	15,570	3.1%	2.6%

WALTHAM

Demographics: Waltham

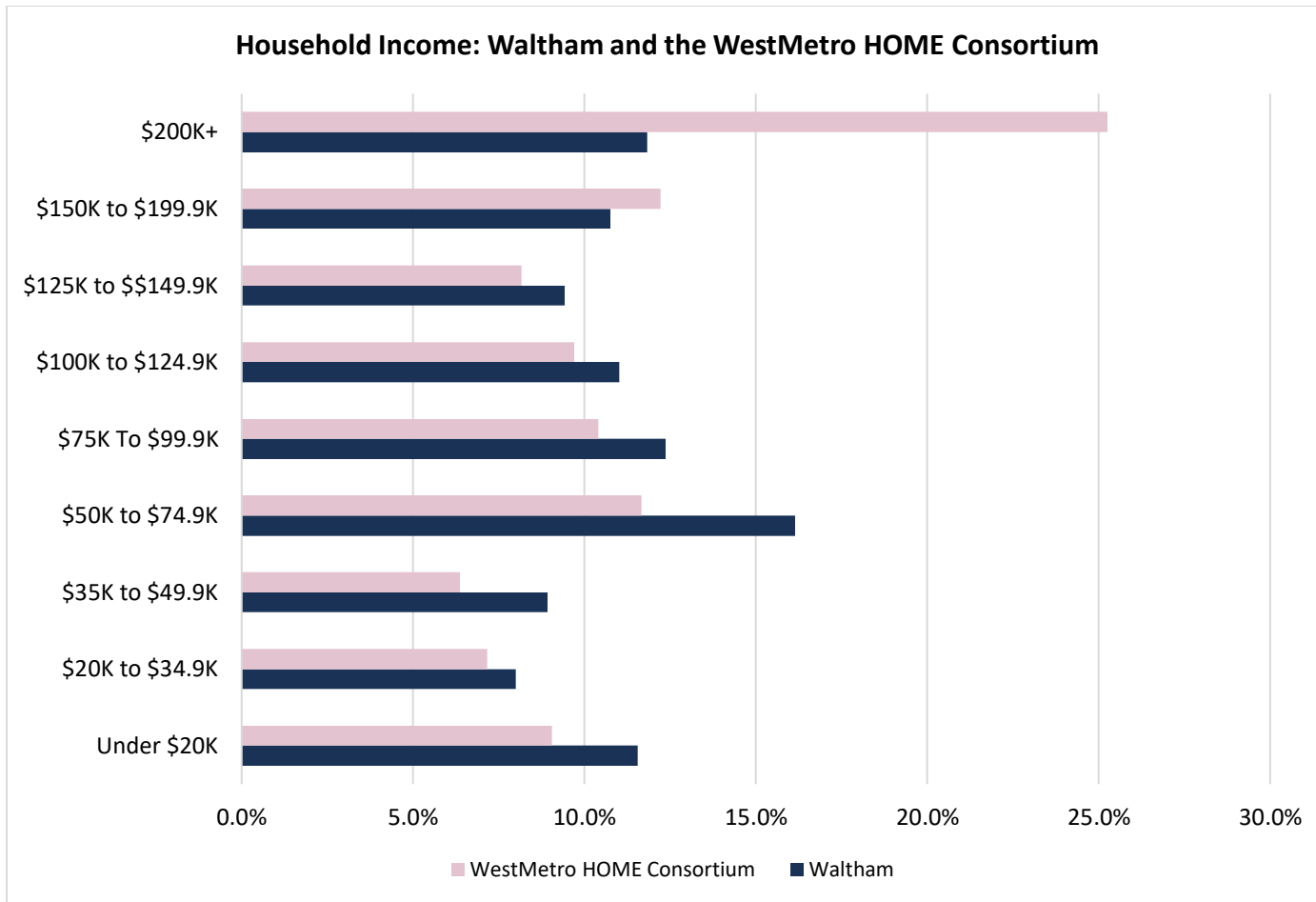


Demographics: WestMetro HOME Consortium



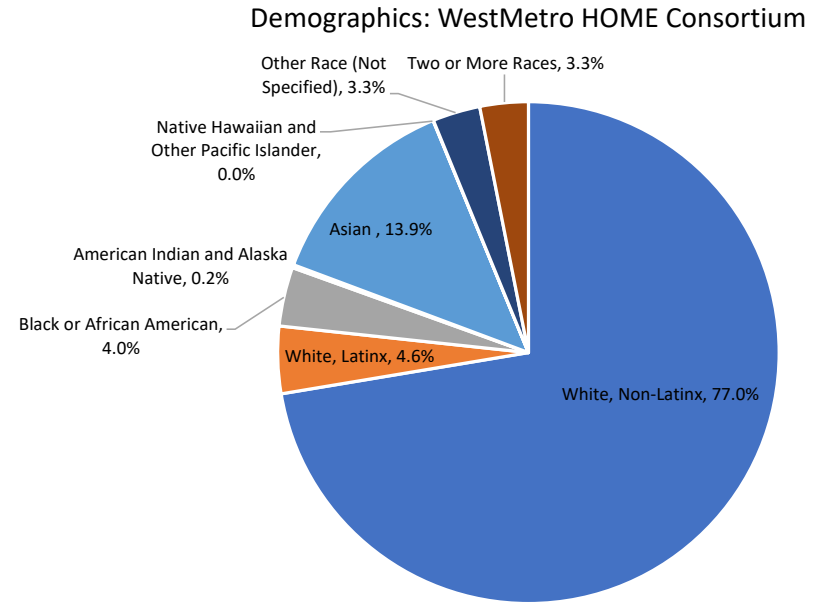
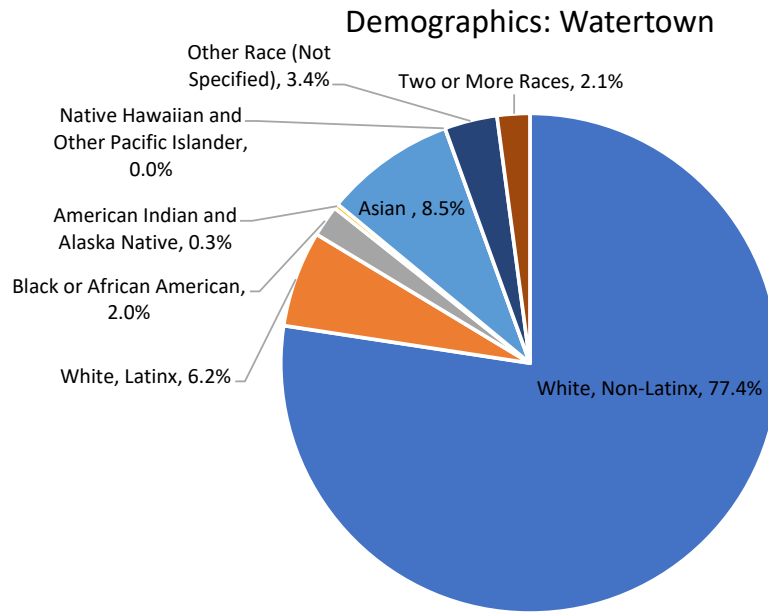
Limited English Proficiency (households)	Waltham		Consortium		Waltham % of Consortium
		% of Waltham		% of Consortium	
English only	15,351	65.0%	132,175	68.6%	11.6%
Limited English Speaking households	1,701	7.2%	10,449	5.4%	16.3%
Total households:	23,631	100.0%	192,694	100.0%	12.3%

Foreign-born Population	Waltham		Consortium		Waltham % of Consortium
		% of Waltham		% of Consortium	
Born in the US	45,104	71.6%	392,968	77.0%	11.5%
Not born in the US	17,875	28.4%	117,107	23.0%	15.3%
total:	62,979	100.0%	510,075	100.0%	12.3%



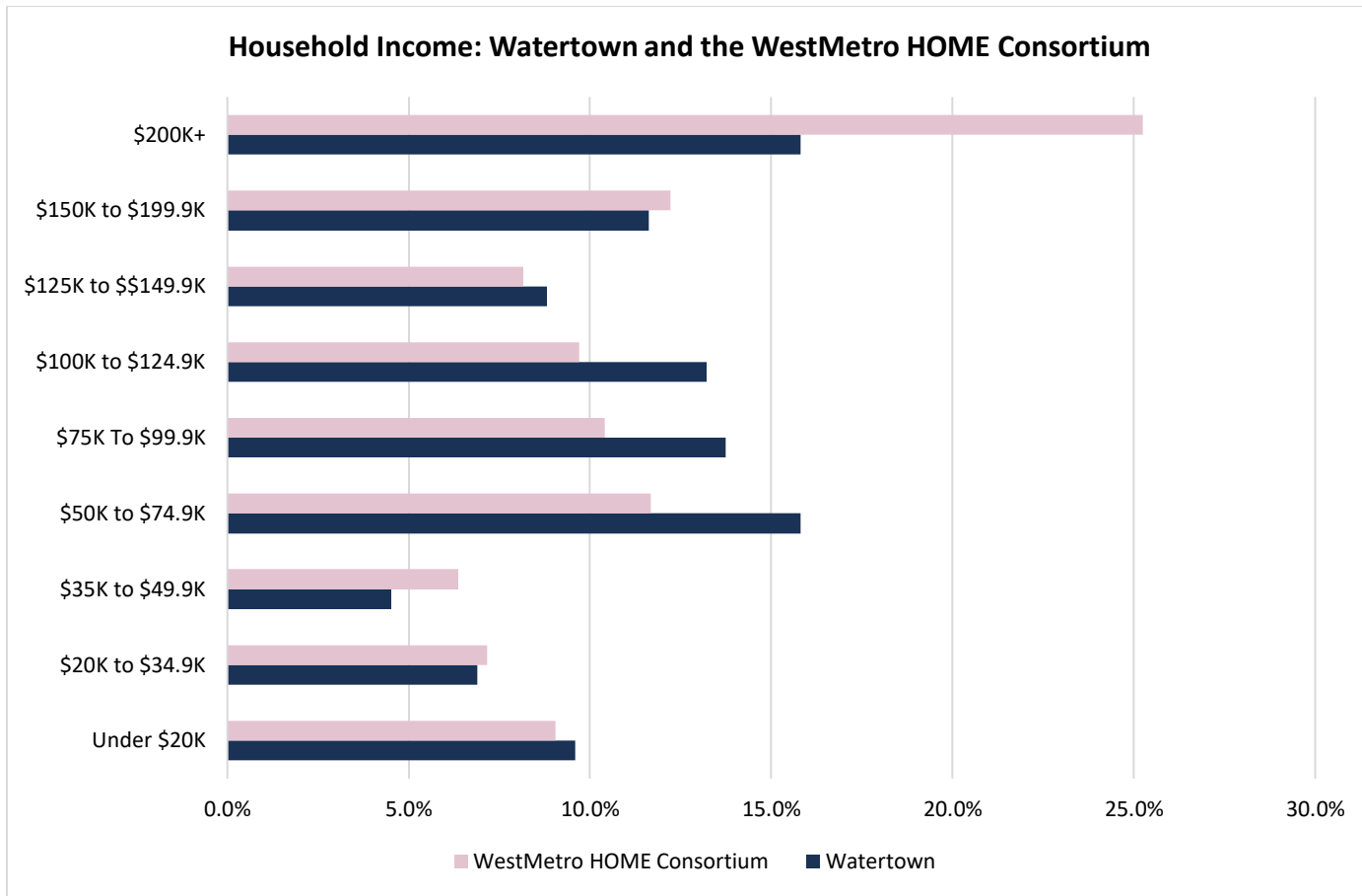
Households by Type	Waltham	% of Waltham	Consortium	% of Consortium	Waltham % of Consortium
Households	23,631	100.0%	192,694	100.0%	12.3%
Families	12,728	53.9%	126,448	65.6%	10.1%
Married Couples	9,821	41.6%	105,754	54.9%	9.3%
Single Parents	2,907	12.3%	20,694	10.7%	14.0%
Non-Family Households	10,903	46.1%	66,246	34.4%	16.5%
Single People	7,846	33.2%	51,426	26.7%	15.3%
Families by Type	Waltham	% of Waltham	Consortium	% of Consortium	Waltham % of Consortium
Families	12,728	100.0%	126,448	100.0%	10.1%
Single Parents	2,907	22.8%	20,694	16.4%	14.0%
Black	530	4.2%	2,048	1.6%	25.9%
Asian	160	1.3%	1,881	1.5%	8.5%
Latinx	691	5.4%	3,139	2.5%	22.0%
Senior Households	Waltham	% of Waltham	Consortium	% of Consortium	Waltham % of Consortium
Total Households	23,631	100.0%	192,694	100.0%	12.3%
Households with Seniors	6,174	26.1%	57,813	30.0%	10.7%
Seniors Living Alone	2,548	10.8%	22,687	11.8%	11.2%
People with Disabilities	Waltham	% of Waltham	Consortium	% of Consortium	Waltham % of Consortium
Total Population	62,765	100.0%	503,606	100.0%	12.5%
Disability Population	6,059	9.7%	43,243	8.6%	14.0%
Under 5	97	0.2%	266	0.1%	36.5%
5 To 17 Years	328	0.5%	2,879	0.6%	11.4%
18 To 34 Years	803	1.3%	5,446	1.1%	14.7%
35 To 64 Years	1,940	3.1%	12,210	2.4%	15.9%
65 To 74 Years	1,029	1.6%	6,872	1.4%	15.0%
75 Years and Over	1,862	3.0%	15,570	3.1%	12.0%

WATERTOWN



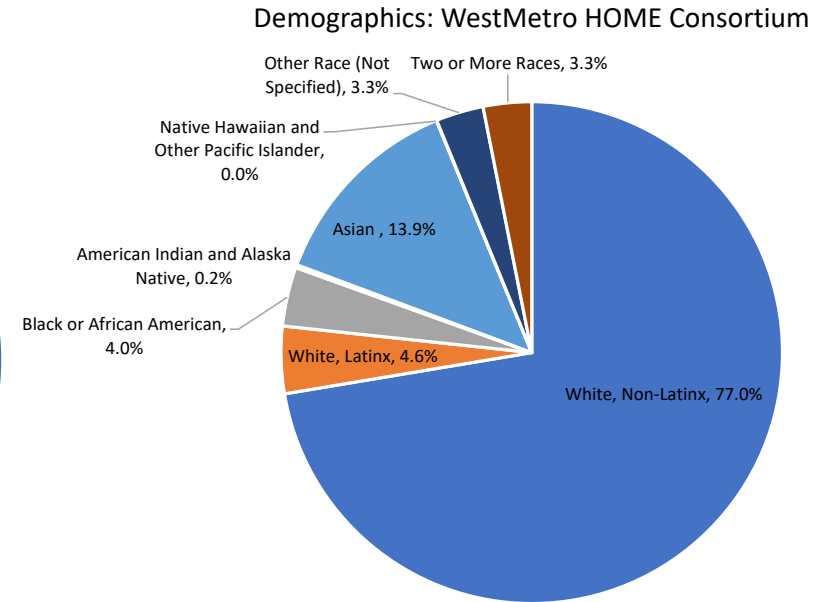
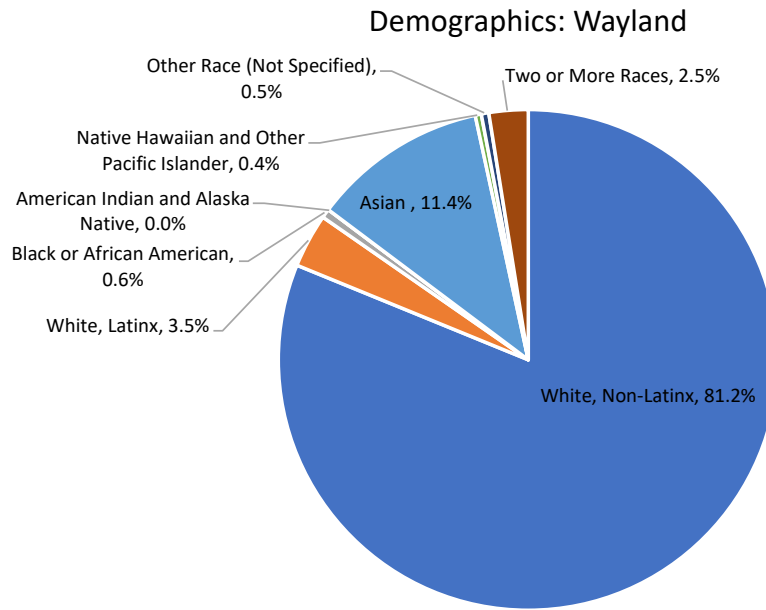
Limited English Proficiency (households)	Watertown	% of Watertown	Consortium	% of Consortium	Watertown % of Consortium
English only	10,829	69.9%	132,175	68.6%	8.2%
Limited English Speaking households	491	3.2%	10,449	5.4%	4.7%
Total households:	15,498	100.0%	192,694	100.0%	8.0%

Foreign-born Population	Watertown	% of Watertown	Consortium	% of Consortium	Watertown % of Consortium
Born in the US	27,870	79.4%	392,968	77.0%	7.1%
Not born in the US	7,233	20.6%	117,107	23.0%	6.2%
total:	35,103	100.0%	510,075	100.0%	6.9%



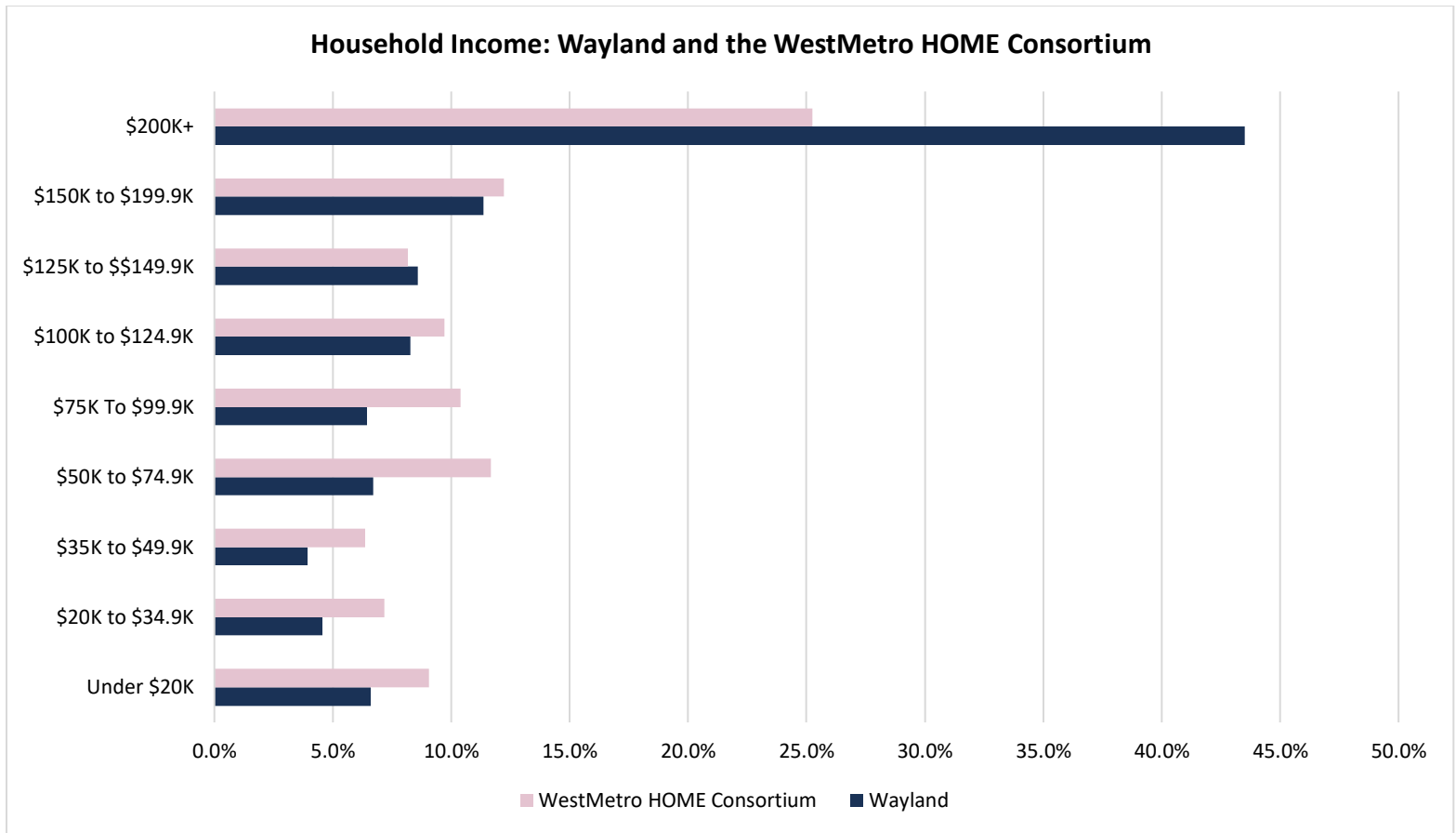
Households by Type	Watertown	% of Watertown	Consortium	% of Consortium	Watertown % of Consortium
Households	15,498	100.0%	192,694	100.0%	8.0%
Families	8,453	54.5%	126,448	65.6%	6.7%
Married Couples	6,536	42.2%	105,754	54.9%	6.2%
Single Parents	1,917	12.4%	20,694	10.7%	9.3%
Non-Family Households	7,045	45.5%	66,246	34.4%	10.6%
Single People	5,111	33.0%	51,426	26.7%	9.9%
Families by Type	Watertown	% of Watertown	Consortium	% of Consortium	Watertown % of Consortium
Families	8,453	100.0%	126,448	100.0%	6.7%
Single Parents	1,917	22.7%	20,694	16.4%	9.3%
Black	70	0.8%	2,048	1.6%	3.4%
Asian	149	1.8%	1,881	1.5%	7.9%
Latinx	305	3.6%	3,139	2.5%	9.7%
Senior Households	Watertown	% of Watertown	Consortium	% of Consortium	Watertown % of Consortium
Total Households	15,498	100.0%	192,694	100.0%	8.0%
Households with Seniors	4,290	27.7%	57,813	30.0%	7.4%
Seniors Living Alone	1,952	12.6%	22,687	11.8%	8.6%
People with Disabilities	Watertown	% of Watertown	Consortium	% of Consortium	Watertown % of Consortium
Total Population	34,955	100.0%	503,606	100.0%	6.9%
Disability Population	3,823	10.9%	43,243	8.6%	8.8%
Under 5	45	0.1%	266	0.1%	16.9%
5 To 17 Years	132	0.4%	2,879	0.6%	4.6%
18 To 34 Years	478	1.4%	5,446	1.1%	8.8%
35 To 64 Years	1,312	3.8%	12,210	2.4%	10.7%
65 To 74 Years	536	1.5%	6,872	1.4%	7.8%
75 Years and Over	1,320	3.8%	15,570	3.1%	8.5%

WAYLAND



Limited English Proficiency (households)	Wayland	% of Wayland	Consortium	% of Consortium	Wayland % of Consortium
English only	3,904	79.0%	132,175	68.6%	3.0%
Limited English Speaking households	69	1.4%	10,449	5.4%	0.7%
Total households:	4,943	100.0%	192,694	100.0%	2.6%

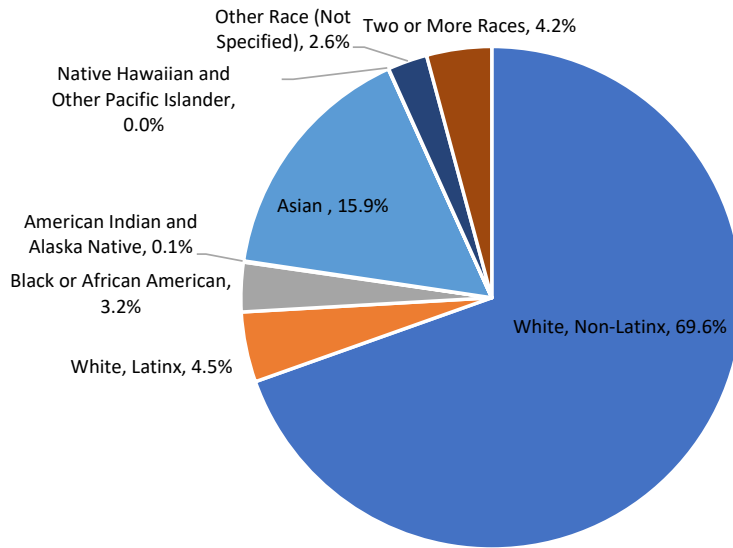
Foreign-born Population	Wayland	% of Wayland	Consortium	% of Consortium	Wayland % of Consortium
Born in the US	11,832	86.2%	392,968	77.0%	3.0%
Not born in the US	1,888	13.8%	117,107	23.0%	1.6%
total:	13,720	100.0%	510,075	100.0%	2.7%



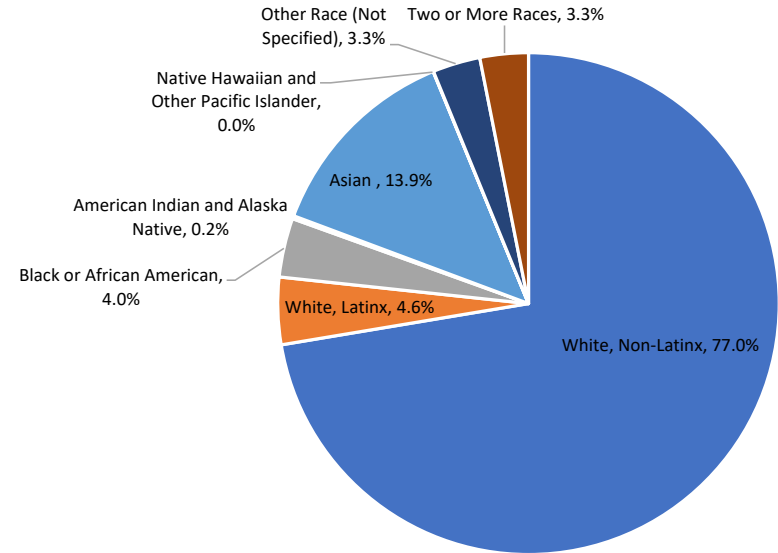
Households by Type	Wayland	% of Wayland	Consortium	% of Consortium	Wayland % of Consortium
Households	4,943	100.0%	192,694	100.0%	2.6%
Families	3,821	77.3%	126,448	65.6%	3.0%
Married Couples	3,529	71.4%	105,754	54.9%	3.3%
Single Parents	292	5.9%	20,694	10.7%	1.4%
Non-Family Households	1,122	22.7%	66,246	34.4%	1.7%
Single People	985	19.9%	51,426	26.7%	1.9%
Families by Type	Wayland	% of Wayland	Consortium	% of Consortium	Wayland % of Consortium
Families	3,821	100.0%	126,448	100.0%	3.0%
Single Parents	292	7.6%	20,694	16.4%	1.4%
Black	0	0.0%	2,048	1.6%	0.0%
Asian	13	0.3%	1,881	1.5%	0.7%
Latinx	21	0.5%	3,139	2.5%	0.7%
Senior Households	Wayland	% of Wayland	Consortium	% of Consortium	Wayland % of Consortium
Total Households	4,943	100.0%	192,694	100.0%	2.6%
Households with Seniors	1,706	34.5%	57,813	30.0%	3.0%
Seniors Living Alone	652	13.2%	22,687	11.8%	2.9%
People with Disabilities	Wayland	% of Wayland	Consortium	% of Consortium	Wayland % of Consortium
Total Population	13,682	100.0%	503,606	100.0%	2.7%
Disability Population	916	6.7%	43,243	8.6%	2.1%
Under 5	0	0.0%	266	0.1%	0.0%
5 To 17 Years	46	0.3%	2,879	0.6%	1.6%
18 To 34 Years	70	0.5%	5,446	1.1%	1.3%
35 To 64 Years	138	1.0%	12,210	2.4%	1.1%
65 To 74 Years	137	1.0%	6,872	1.4%	2.0%
75 Years and Over	525	3.8%	15,570	3.1%	3.4%

BROOKLINE

Demographics: Brookline

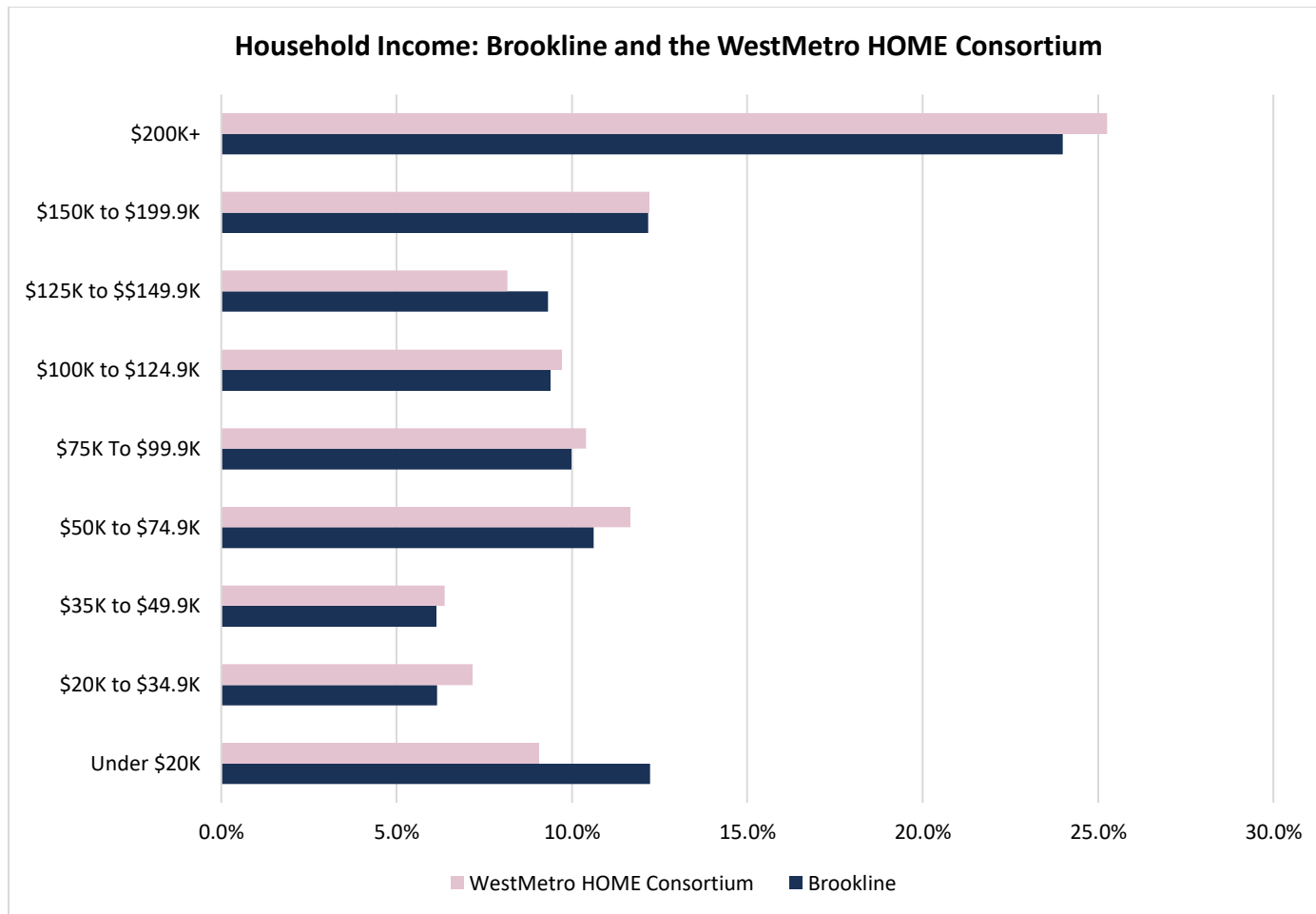


Demographics: WestMetro HOME Consortium



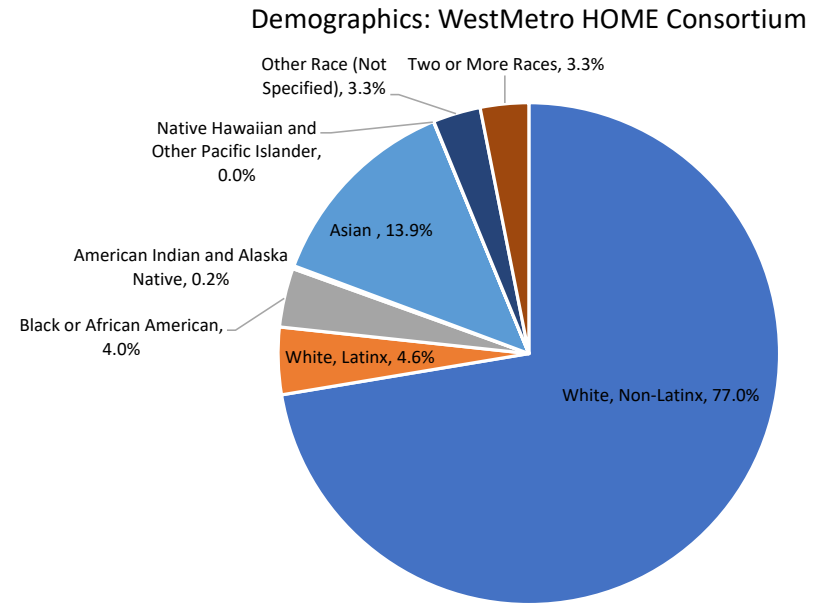
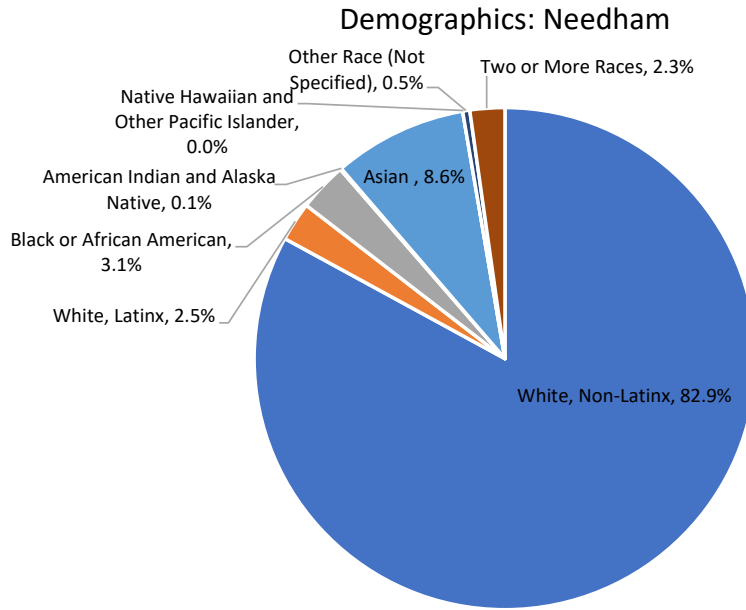
Limited English Proficiency (households)	Brookline	% of Brookline	Consortium	% of Consortium	Brookline % of Consortium
English only	15,102	61.5%	132,175	68.6%	11.4%
Limited English Speaking households	1,703	6.9%	10,449	5.4%	16.3%
Total households:	24,541	100.0%	192,694	100.0%	12.7%

Foreign-born Population	Brookline	% of Brookline	Consortium	% of Consortium	Brookline % of Consortium
Born in the US	42,400	71.6%	392,968	77.0%	10.8%
Not born in the US	16,834	28.4%	117,107	23.0%	14.4%
total:	59,234	100.0%	510,075	100.0%	11.6%



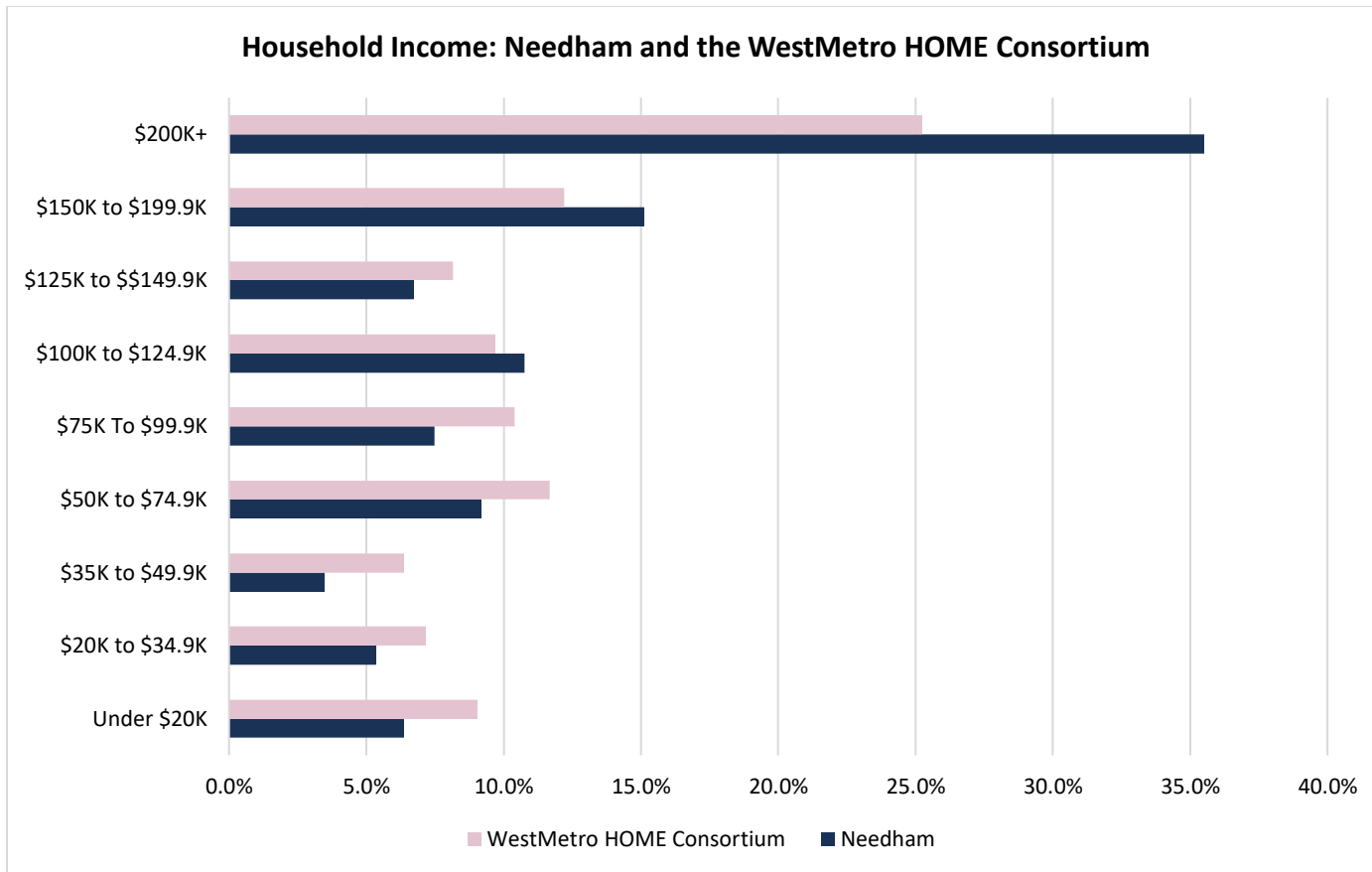
Households by Type	Brookline	% of Brookline	Consortium	% of Consortium	Brookline % of Consortium
Households	24,541	100.0%	192,694	100.0%	12.7%
Families	12,821	52.2%	126,448	65.6%	10.1%
Married Couples	10,930	44.5%	105,754	54.9%	10.3%
Single Parents	1,891	7.7%	20,694	10.7%	9.1%
Non-Family Households	11,720	47.8%	66,246	34.4%	17.7%
Single People	7,590	30.9%	51,426	26.7%	14.8%
Families by Type	Brookline	% of Brookline	Consortium	% of Consortium	Brookline % of Consortium
Families	12,821	100.0%	126,448	100.0%	10.1%
Single Parents	1,891	14.7%	20,694	16.4%	9.1%
Black	365	2.8%	2,048	1.6%	17.8%
Asian	356	2.8%	1,881	1.5%	18.9%
Latinx	267	2.1%	3,139	2.5%	8.5%
Senior Households	Brookline	% of Brookline	Consortium	% of Consortium	Brookline % of Consortium
Total Households	24,541	100.0%	192,694	100.0%	12.7%
Households with Seniors	6,552	26.7%	57,813	30.0%	11.3%
Seniors Living Alone	2,640	10.8%	22,687	11.8%	11.6%
People with Disabilities	Brookline	% of Brookline	Consortium	% of Consortium	Brookline % of Consortium
Total Population	58,739	100.0%	503,606	100.0%	11.7%
Disability Population	4,115	7.0%	43,243	8.6%	9.5%
Under 5	0	0.0%	266	0.1%	0.0%
5 To 17 Years	109	0.2%	2,879	0.6%	3.8%
18 To 34 Years	575	1.0%	5,446	1.1%	10.6%
35 To 64 Years	1,068	1.8%	12,210	2.4%	8.7%
65 To 74 Years	782	1.3%	6,872	1.4%	11.4%
75 Years and Over	1,581	2.7%	15,570	3.1%	10.2%

NEEDHAM



Limited English Proficiency (households)	Needham	Consortium		Needham % of Consortium
		% of Needham	% of Consortium	
English only	8,577	79.7%	132,175	68.6%
Limited English Speaking households	379	3.5%	10,449	5.4%
Total households:	10,765	100.0%	192,694	100.0%

Foreign-born Population	Needham	Consortium		Needham % of Consortium
		% of Needham	% of Consortium	
Born in the US	26,569	86.4%	392,968	77.0%
Not born in the US	4,166	13.6%	117,107	23.0%
total:	30,735	100.0%	510,075	100.0%

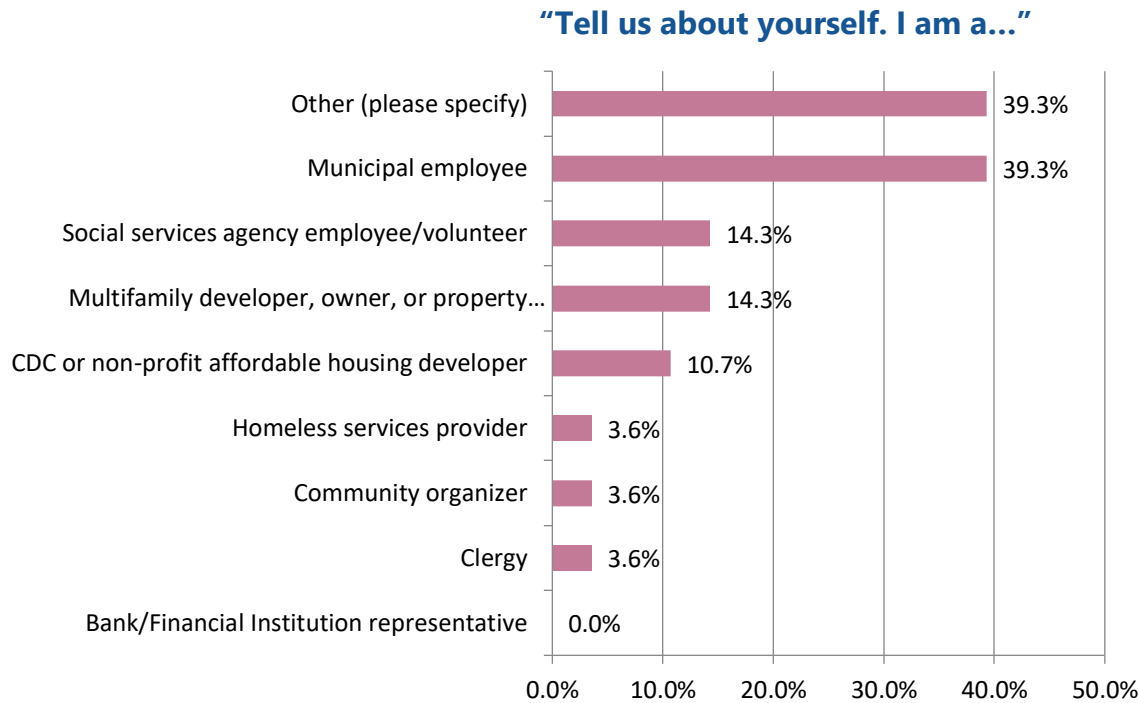


Households by Type	Needham	% of Needham	Consortium	% of Consortium	Needham % of Consortium
Households	10,765	100.0%	192,694	100.0%	5.6%
Families	8,370	77.8%	126,448	65.6%	6.6%
Married Couples	7,448	69.2%	105,754	54.9%	7.0%
Single Parents	922	8.6%	20,694	10.7%	4.5%
Non-Family Households	2,395	22.2%	66,246	34.4%	3.6%
Single People	2,217	20.6%	51,426	26.7%	4.3%
Families by Type	Needham	% of Needham	Consortium	% of Consortium	Needham % of Consortium
Families	8,370	100.0%	126,448	100.0%	6.6%
Single Parents	922	11.0%	20,694	16.4%	4.5%
Black	189	2.3%	2,048	1.6%	9.2%
Asian	67	0.8%	1,881	1.5%	3.6%
Latinx	16	0.2%	3,139	2.5%	0.5%
Senior Households	Needham	% of Needham	Consortium	% of Consortium	Needham % of Consortium
Total Households	10,765	100.0%	192,694	100.0%	5.6%
Households with Seniors	3,832	35.6%	57,813	30.0%	6.6%
Seniors Living Alone	1,527	14.2%	22,687	11.8%	6.7%
People with Disabilities	Needham	% of Needham	Consortium	% of Consortium	Needham % of Consortium
Total Population	30,250	100.0%	503,606	100.0%	6.0%
Disability Population	2,140	7.1%	43,243	8.6%	4.9%
Under 5	0	0.0%	266	0.1%	0.0%
5 To 17 Years	166	0.5%	2,879	0.6%	5.8%
18 To 34 Years	245	0.8%	5,446	1.1%	4.5%
35 To 64 Years	447	1.5%	12,210	2.4%	3.7%
65 To 74 Years	485	1.6%	6,872	1.4%	7.1%
75 Years and Over	797	2.6%	15,570	3.1%	5.1%

APPENDIX B. SUMMARY: RESPONSES TO SURVEYS

■ About the Survey Participants

Of the 28 participants, most (39 percent) identified as municipal employees or other. Of those who responded “Other,” the most common responses were various committee or board members.

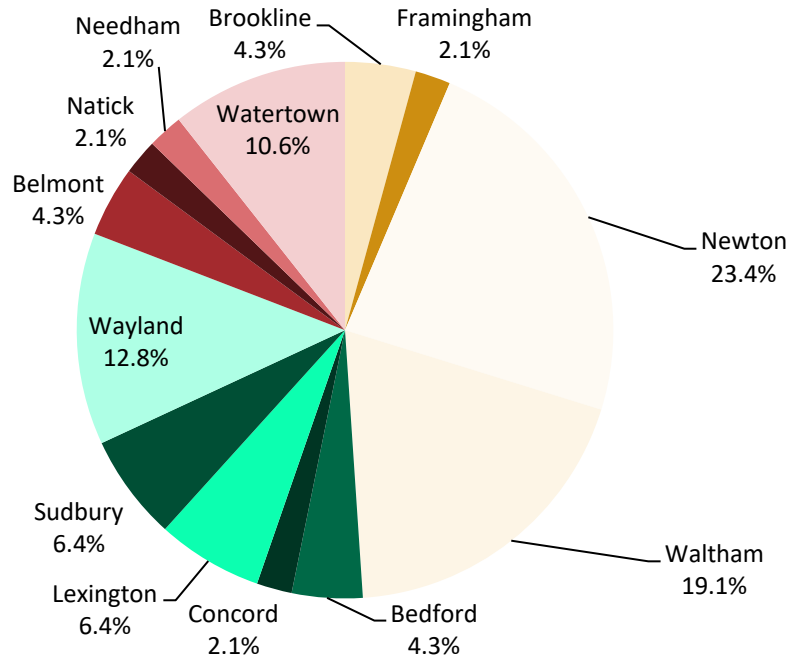


■ WestMetro communities

All 13 communities were represented in the survey responses. The survey was also distributed to regional housing partners so some participants worked with multiple communities. Newton had the most responses (11 or 23 percent) followed by Waltham (9 responses or 19 percent), Wayland (6 or almost 13 percent), and Watertown (5 responses or 10.6 percent). A third of responses

were from RHSO communities, shown in **GREEN** below, while half of responses were from Entitlement communities, shown in **YELLOW** below.

“Which WestMetro Community(ies) do you work with in an official capacity?”



Of the 10 survey participants who manage multifamily units, 9 said that they have tenants with Section 8 housing vouchers.

■ Housing need

The majority of responses (85.7 percent or 24 responses) said that there was a “Great Need” or “Extreme Need” for housing in their communities. Participants from the same community said that their community had “Average Need” and “Extreme Need.” Some participants could have responded “Average Need” recognizing that the entire MetroBoston region is in the midst of a housing crisis.



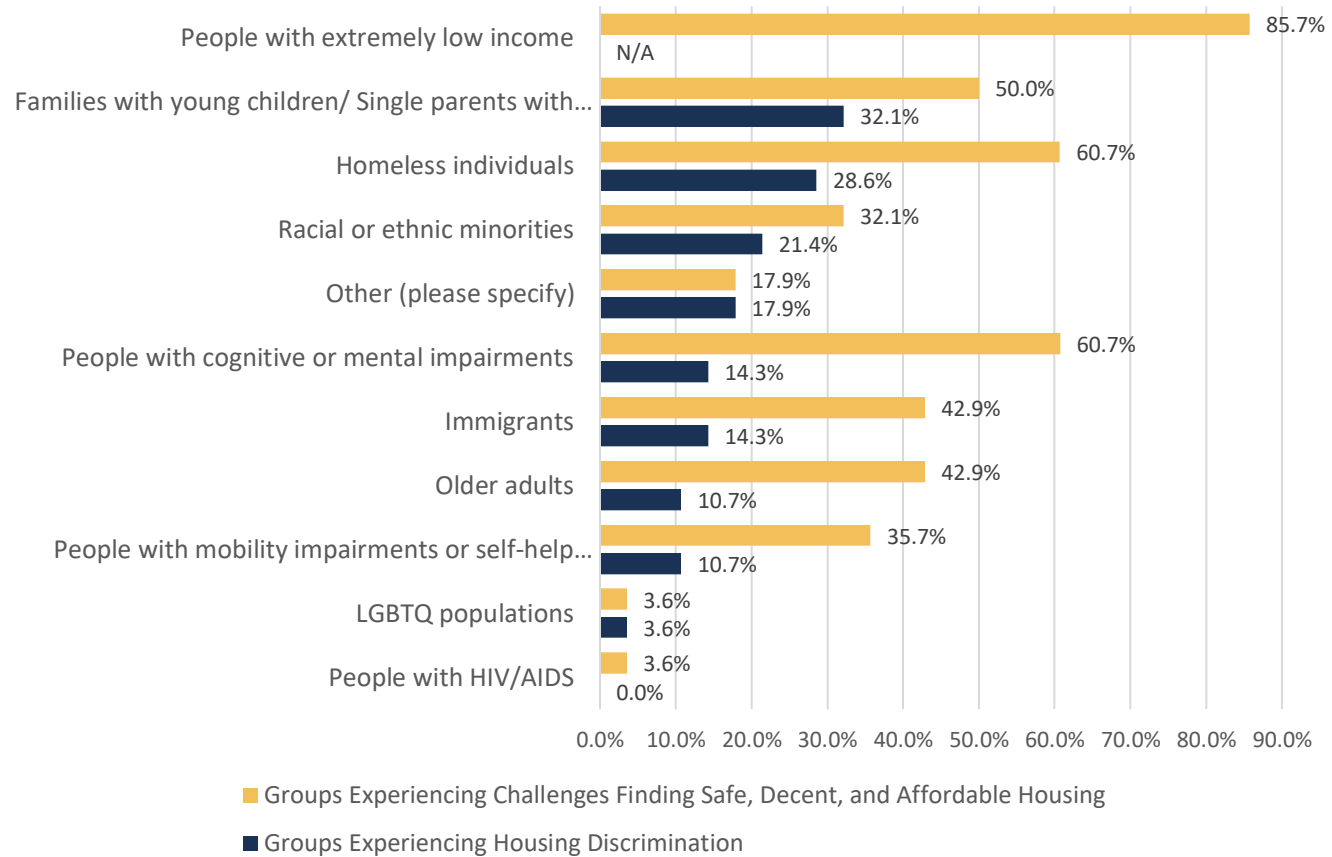
■ Groups experiencing housing discrimination and/or challenged in finding affordable housing

Participants were asked to identify which groups are challenged to find safe, decent, and affordable housing (shown in **YELLOW-ORANGE** below) and which groups are experiencing housing discrimination (shown in **BLUE** below).

People with extremely low-incomes (24 responses), people with cognitive, mental, or emotional disabilities (17 responses), and homeless individuals (17 responses) were the top three groups who have challenges finding safe, decent, and affordable housing. Of those who know groups experiencing discrimination¹², families with young children (9 responses), homeless individuals (8 responses), and racial or ethnic minorities (6 responses) were the top three groups experiencing housing discrimination. Participants noted that local preference and lack of (public) transportation in communities limits immigrants and minorities.

Other groups who are challenged finding safe, decent, and affordable housing highlighted by participants included retired municipal workers (including police, firemen, or teachers), moderate-income and a community’s workforce. Other groups experiencing housing discrimination highlighted by participants include families with Section 8 vouchers or other housing vouchers and lower-income households lacking credit.

¹² 10 responses said they do not know anyone experiencing housing discrimination.



■ Housing Challenges for Low-Income Residents

The top cited challenge (24 responses or almost 86 percent) for low-income residents in WestMetro communities was that “Affordable Housing” is not affordable to those residents who need it. Other common challenges included a long waiting list for public housing or Section 8 vouchers (16 responses or 57 percent) and limited to no access to public transportation (7 responses or 25 percent).

Housing Challenges for Low-Income Residents	Responses	
“Affordable” housing is not affordable to people who need it	85.7%	24
Waiting list for public housing or Section 8 is too long	57.1%	16
Limited/no access to public transit	25.0%	7
Not enough money for first/last/security deposit	21.4%	6
Lack of appropriate housing choices (i.e. the types of units available do not match the type of units needed)	21.4%	6
Inadequate supply of affordable housing in good repair/meets code/is free of lead paint	17.9%	5
Lack of accessible units	14.3%	4
Difficulty finding decent affordable housing in safe neighborhoods	10.7%	3
Difficulty navigating the housing search / lack of knowledge about affordable housing locations and resources	7.1%	2
Landlords refusing to accept Section 8 assistance	7.1%	2
Limited/No access to employment, goods, and services	7.1%	2
Difficulty qualifying for a mortgage	3.6%	1
Language barriers	3.6%	1

■ Fair Housing

High housing costs was a clear concern for survey participants across all questions. The majority (23 responses or 82 percent) said that the **cost of rental housing** and more than a third of responses (35 percent or 10 responses) said the **cost of for-sale housing** was the most significant fair housing concern for the community or communities that they work with. Almost two-thirds of

participants (64 percent or 18 responses) said that **availability of rental housing** was also concern. Zoning and permitting was another top fair housing concern among responses (35 percent or 10 responses).

Fair Housing Concerns	Responses	
Cost of rental housing	82.1%	23
Availability of rental housing	64.3%	18
Cost of for-sale housing	35.7%	10
Zoning and permitting	35.7%	10
Discrimination against lower-income households	17.9%	5
Neighborhood or community development policies	10.7%	3
Property assessment and tax policies	7.1%	2
Other (please specify)	7.1%	2
Occupancy standards/health and safety codes	3.6%	1
Availability of for-sale housing	0.0%	0
Housing appraisal or insurance underwriting practices		
Mortgage lending practices		

■ Regional fair housing observations

- "Closer in" towns are more desirable to low income households and are generally better served by public transit. Going "further out" can make the logistics of life just too hard.
- Framingham has many diverse neighborhoods, each with opportunities and challenges of their own. Although there is a robust public transportation system during the weekdays. Often people working in the service sector live a significant distance from their jobs.

- In Lexington, the lack of an inclusionary housing bylaw results in the lack of requiring affordable unit in their special permit residential projects.
- Holliston has established a committee to search for options for seniors who want to downsize and remain in the town but don't qualify for affordable housing. Many other communities face or will soon face similar problems.
- In communities with larger immigrant populations, there is a lot of discrimination.
- Regionally, communities seem to have very different perspectives on the creation of affordable housing and whether it should be actively encouraged. Many communities that have already met or are above the 10% SHI threshold are not very motivated to create more affordable housing.
- There is no mechanism that evaluates whether the communities are adhering to or meeting any of the goals set forth in the plan submitted to HUD.
- Waltham needs an easier path for non-profit housing development
- Wealthy towns should also have to accept some responsibility for homeless or low income housing needs not just "affordable housing." In addition to having multiple low income housing projects and dozens of group homes for varying disabilities and needs, my city also has a disproportionately high number of section 8 voucher users that is not included when speaking of housing in general. I would like to see a new metric formed where low income, affordable and Section 8 vouchers are combined compared to total housing stock. This metric would show which communities are doing less than, equal to or more than their fair share when dealing with housing.

■ Other Thoughts for the Project Team

- Affordable housing is not affordable to those who need it most, and public housing option waitlists are so long that it can take families over 5 years or more to be housed. In the meantime, families are continuing to experience extreme poverty while they wait for a stable option.
- Due to high property costs, employees of the town have to commute long distances. This situation also makes it difficult to hire. Middle income groups are also frozen out of home ownership because of this
- Families struggle to come up with first last and security- access, eligibility and ease of applications are very important.
- From the WHA perspective, cost is the major complaint and impediment to obtaining housing in Wayland, surrounding communities, and Eastern Massachusetts.
- In both my present community and my past community there is a great demand for entry level/start homes - often older units are being purchased by developers, renovated, and flipped at a much higher price than a first-time home buyer can afford or being reconstructed to a size that is much too large for a couple who have no children. Also the options for older adults to stay in their community and downsize often does not exist. Either there is limited housing stock or the

price of housing exceeds what can be afforded. There is a need for moderate housing regulations that creates moderate housing units, which supports those who work service jobs that don't qualify

- In my community and beyond, there is not enough accessible housing that is truly affordable, i.e. households with incomes at or below 50% AMI. Many people with disabilities are underemployed or unemployed and live on a SSDI or SSI and have to 'get lucky' in a lottery, and, even then, often there are not enough fully accessible rental units that are truly affordable with their low income.
- In Wayland we have the key problems of large lot zoning, no town-wide sewer, necessitating individual septic systems, no rental zoning as-of-right, and relatively little buildable land. Much of the vacant land is either unbuildable due to environmental factors or privately owned and therefore very expensive. There is currently a government-owned parcel with decent units that could be used for affordable housing, that were once military housing, but we are told they will sell the land to the highest bidder. And, recently, when a possible town-owned parcel was identified, the neighbors got very organized very quickly and were able to stop the development of affordable housing.
- Liberalize in-law unit regs
- Newton's Mayor and City Council have been working on zoning reform for almost 10 years and have made very little progress toward fair housing goals such as expanding multi-family zoning. The City Council, which is the special permit granting authority, is heavily influenced by neighborhood opposition to residential development that includes affordable housing. The membership of the Zoning Board of Appeals, which grants comprehensive permits under Chapter 40B, is more heavily weighted against residential development than in the past, which slows the approval process and increases development costs, even though Newton has not reached any of the safe harbors.
- Possibly the lack of good model bylaws. We've talked a lot about ADUs but some members are concerned about unforeseen consequences in the available model.
- Recent affordable housing gains in Newton are somewhat misleading - we are building a lot of very shallowly affordable units, and almost no deeply affordable units.
- Research extent to which policies, practices of elected officials and municipal departments promote or impede fair housing.
- Short-term rentals have taken a lot of housing off the market. They need to be limited and strongly regulated.
- Some property owners try to decline households because of their family size for the available unit. We have to constantly remind owners (and applicants) that the only rules are the state sanitary code - which allows for quite a few people per unit.
- the institutions, such as the Metropolitan State Hospital and the Middlesex County Hospital and the Fernald Institute should have stayed in business, and the state should have upgraded each facility and that would have helped some people in the populations of today

- There is a great need for mental health/ social worker support in low income housing communities. I hope you keep this in mind when dealing with housing needs.
- Very low income people, even those with Section 8 vouchers cannot pay rent, utilities, food and childcare from their limited income.
- We have begun to study the way developers (or their representatives) do the affordable lotteries. Concern has been raised about the language in their advertising which might discourage persons or families with Section 8 or other housing vouchers from applying. The permitting process in Newton poses a barrier for some developers to build affordable units.
- We need to build more Federal Housing Units.
- Zoning remains an impediment to the creation of diverse housing stock, especially for smaller units that might be more accessible income-wise for a greater diversity of population.

APPENDIX C. OFFICIALS AND ORGANIZATIONS WITH RELATIONSHIP TO FAIR HOUSING

Part 1. City/Town Officials

<i>Municipality</i>	<i>Municipal Departments and Divisions</i>	<i>Municipal Boards, Councils, Committees, Commissions, and Trusts</i>	<i>Housing Authorities</i>
<i>Bedford</i>	Town Manager Planning Department Building Department	Board of Selectmen Planning Board Zoning Board of Appeals Bedford Affordable Housing Trust Bedford Housing Partnership	Bedford Housing Authority
<i>Belmont</i>	Town Administrator Community Development - Planning Division Belmont Housing Authority Belmont Housing Trust Building Department	Board of Health Board of Selectmen Council on Aging Planning Board Zoning Board of Appeals	Belmont Housing Authority
<i>Brookline</i>	Town Administrator Housing Advisory Board Brookline Health Department Veterans Services Planning and Community Development Department Police Dept (as advocates for Domestic Violence Victims) Building Department	Board of Selectmen Planning Board Zoning By-Law Committee Commission for Diversity, Inclusion, & Community Relations Commission for the Disabled Council on Aging Age Friendly Cities Committee Commission for Women Town Meeting Housing Advisory Board	Brookline Housing Authority

<i>Municipality</i>	<i>Municipal Departments and Divisions</i>	<i>Municipal Boards, Councils, Committees, Commissions, and Trusts</i>	<i>Housing Authorities</i>
<i>Concord</i>	Town Manager Planning Division Building Department	Select Board Planning Board Zoning Board of Appeals Concord Housing Development Corporation Concord Housing Foundation Affordable Housing Trust	Concord Housing Authority
<i>Framingham</i>	Town Manager Planning Board Building Department	Board of Selectmen Planning Board Zoning Board of Appeals Economic Development and Industrial Corporation (EDIC) Framingham Downtown Renaissance (FDR) Community Development Committee Framingham Disabilities Commission Standing Committee on Planning and Zoning Conservation Commission Framingham Housing Authority	Framingham Housing Authority
<i>Lexington</i>	Town Manager Planning Department Building Department	Board of Selectmen Planning Board Zoning Board of Appeals Lexington Housing Partnership Lexington Housing Assistance Board (LexHAB) Human Services	Lexington Housing Authority

<i>Municipality</i>	<i>Municipal Departments and Divisions</i>	<i>Municipal Boards, Councils, Committees, Commissions, and Trusts</i>	<i>Housing Authorities</i>
<i>Natick</i>	Town Administrator Community Development Building Department	Board of Selectmen Planning Board Zoning Board Natick Affordable Housing Trust Board of Assessors Board of Health Commission on Disability Community Development Advisory Committee Council on Aging Economic Development Committee	Natick Housing Authority
<i>Needham</i>	Town Manager Planning Department Building Department	Board of Selectmen Human Rights Committee Planning Board Zoning Board of Appeals	Needham Housing Authority
<i>Newton</i>	Mayor’s Office Planning and Development Building Department	Board of Aldermen Planning & Development Board Zoning Board of Appeals Newton Housing Partnership Fair Housing Committee Human Services Advisory Committee Commission on Disability Human Rights Commission	Newton Housing Authority
<i>Sudbury</i>	Town Manager Planning and Community Development Building Department	Board of Selectmen Planning Board Zoning Board of Appeals Sudbury Housing Trust	Sudbury Housing Authority

<i>Municipality</i>	<i>Municipal Departments and Divisions</i>	<i>Municipal Boards, Councils, Committees, Commissions, and Trusts</i>	<i>Housing Authorities</i>
<i>Waltham</i>	Mayor's Office Planning Department Building Department Health Department	City Council Planning Board Zoning Board of Appeals Community Preservation Committee Affordable Housing Trust Fund Committee Disability Commission Waltham Housing Authority	Waltham Housing Authority
<i>Watertown</i>	Town Manager Planning and Community Development Building Department	Town Council Planning Board Zoning Board of Appeals Watertown Housing Partnership Commission on Disability	Watertown Housing Authority
<i>Wayland</i>	Town Administrator Planning Department Building Department	Board of Selectmen Planning Board Zoning Board of Appeals Wayland Housing Authority	Wayland Housing Authority

Part II. Private-Sector Partners

Name	Description	Reach
Charles River Center	The Charles River Center is a private, nonprofit human service agency headquartered in Needham, Massachusetts, providing employment and job training, residential homes, day habilitation, and recreational programs for children and adults with Down syndrome, autism, cerebral palsy and other developmental disabilities.	Regional
Citizens Housing and Planning Association	CHAPA's mission is to encourage the production and preservation of housing that is affordable to low and moderate-income families and individuals and to foster diverse and sustainable communities through planning and community development.	Statewide
Community Day Center (Waltham)	The Day Center provides day shelter and support services to those who face complex challenges including physical and emotional abuse, domestic violence, physical disabilities, mental illness, poverty, homelessness, joblessness, and the destructive coping dependencies that lead them into alcoholism, drug addiction and legal issues.	Local
Fair Housing and Equal Opportunity Office – Boston Regional Office	The Fair Housing Center and Equal Opportunity Office, like HUD, is organized in ten Regions. In each Region the office enforces fair housing laws; conducts training, outreach, and compliance monitoring; and works with state and local agencies to administer fair housing programs.	Regional
Family Promise	Family Promise's mission is to help homeless and low-income families achieve sustainable independence through a community-based response.	Statewide
Greater Waltham Arc	GWArc's mission is to serve children, adolescents and adults with intellectual and developmental disabilities and their families in the community, utilizing a person-centered planning approach. They provide quality, flexible programs, services and supports which maximize independence, foster inclusion, promote self-advocacy and build community connections.	Local
Massachusetts Commission Against Discrimination	The MCAD was established in 1946 as the state's chief civil rights agency charged with the authority to investigate, prosecute, adjudicate and resolve cases of discrimination. Led by three Commissioners, one who serves as chair, the MCAD enforces the state's anti-discrimination laws in employment, housing, credit, public accommodations and access to education, on behalf of individuals in numerous protected categories (including race, color, creed, national origin, age, disability, gender and sexual orientation).	Statewide
Metropolitan Area Planning Council	The Metropolitan Area Planning Council (MAPC) is the regional planning agency serving the people who live and work in the 101 cities and towns of Metropolitan Boston. MAPC works toward sound municipal management, sustainable land use, protection of natural resources, efficient and affordable transportation, a diverse housing stock, public safety, economic development, clean energy, healthy communities, an informed public, and equity and opportunity among people of all backgrounds.	Regional

Name	Description	Reach
Metro West Collaborative Development	Metro West Collaborative Development is a private non-profit community development corporation. The mission of Metro West CD is to organize residents, resources and good ideas to resolve community problems and improve the quality of life for all members of our Metro West neighborhoods.	Regional
Metropolitan Boston Housing Partnership	MBHP's mission is to ensure that the region's low- and moderate-income individuals and families have choice and mobility in finding and retaining decent, affordable housing. All our programs are designed to encourage housing stability, increase economic self-sufficiency, and enhance the quality of the lives of those they serve.	Regional
Middlesex Human Service Agency	The mission of Middlesex Human Service Agency, Inc. is to improve the quality of life and independent functioning of a wide variety of clients through the delivery of an extensive system of community-based substance abuse and social service programs.	Regional
Natick Service Council	Natick Service Council is an independent, non-profit organization that connects, engages and collaborates with the community to support Natick neighbors who are experiencing hardship or economic uncertainty by promoting self-sufficiency.	Local
Preservation of Affordable Housing	Preservation of Affordable Housing (POAH) is a nonprofit organization whose mission is to preserve and steward affordable rental housing to provide stability, hope and economic security to low- and moderate-income individuals and families.	Statewide
Regional Housing Services Office	The Regional Housing Services Office (RHSO) is a collaboration between the member towns of Acton, Bedford, Burlington, Concord, Lexington, Sudbury and Weston. Formed in 2011 through an Inter-Municipal Agreement with assistance from Metropolitan Area Planning Council (MAPC), the regional planning agency for Greater Boston, the RHSO serves its member towns by assisting with the municipal function of affordable housing, including proactive monitoring, program administration, project development and resident assistance.	Regional
South Middlesex Opportunity Council	SMOC's mission is to improve the quality of life of low-income and disadvantaged individuals and families by advocating for their needs and rights, to provide services, to educate the community, to build a community of support, and to participate in coalitions with other advocates and searching for new resources and partnerships.	Regional

Name	Description	Reach
WATCH CDC	WATCH seeks to connect, convene and empower a wide range of community members in order to accomplish social and economic justice goals and to create a community in which all residents, including low and middle income people, immigrants and others who are traditionally disadvantaged or removed from existing power structures, have a voice and can influence decisions, such that social decisions benefit the whole community and not just a few.	Regional
Watertown Service Provider Network	The Watertown Service Provider Network (WSPN) is an informal group of social service agencies that provide services to Watertown residents. The group meets two-three times per year to share information about programs, problems and opportunities for joint activities.	Local
Wayside Multi-Service Center (Wayside Youth and Family) (Watertown)	The Wayside Multi-Service Center is a prevention, outreach and counseling service center for the diverse population of Watertown and surrounding communities. Community and outreach activities include involvement in the Watertown Youth Coalition, community peer leadership programs, HIV/AIDS, substance abuse, violence and gang prevention in minority communities, school-based services, youth development outreach, and after-school programs.	Local

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References

- “Should Age-Restricted Communities Be Exempt from Civil Rights Laws?” HUD User, PDR Edge. Undated.
- Home Mortgage Disclosure Act (HMDA) Data, 2013-2016, Loan Applications by Race, Age, 2013-2017.
- Massachusetts Department of Housing and Community Development. *2019 Analysis of Impediments to Fair Housing Choice*. 2020 (Release Date).
- Massachusetts Department of Housing and Community Development. Subsidized Housing Inventory. April 9, 2020.
- Metropolitan Area Planning Council. *Fair Housing and Equity Assessment for Metropolitan Boston*. Undated.
- Metropolitan Area Planning Council. *Middle-Income Housing: Demand, Local Barriers to Development, & Strategies to Address Them in Select Inner Core Communities*. December 31, 2014.
- Metropolitan Area Planning Council. *WestMetro HOME Consortium Regional Fair Housing Plan, 2015-2020*.
- Newton Fair Housing Task Force. *City of Newton Fair Housing Action Plan*. 2008.
- Spicer, Yvonne, Mayor of the City of Framingham. “Veto Statement of Mayor Spicer Re: Housing Moratorium.” Undated.
- Suffolk University Law School, *Transcending Prejudice: Gender-Identity and Expression-Based Discrimination in the Metro Boston Rental Housing Market*. Legal Studies Research Paper Series, Paper 17-9. 2018.
- The Boston Foundation and Suffolk University. *Qualified Renters Need Not Apply: Race and Voucher Discrimination in the Metro Boston Rental Housing Market*. 2020.
- Town of Concord. *Analysis of Impediments to Fair Housing Choice*. 2013.
- U.S. Census Bureau, American Community Survey Five-Year Estimates, 2014-2018.
- U.S. Department of Housing and Urban Development. AFFH Rule Guidebook. December 31, 2015.
- U.S. Department of Housing and Urban Development. Affirmatively Furthering Fair Housing; Final Rule. FR Vol. 80, No. 136, 42272 .July 16, 2015.

U.S. Department of Housing and Urban Development. Affirmatively Furthering Fair Housing Data and Mapping Tool (online resource).

U.S. Department of Housing and Urban Development. Comprehensive Housing Affordability Strategy Data. 2016.

U.S. Department of Housing and Urban Development. Fair Housing Planning Guide. March 1996.

WestMetro HOME Consortium. *Five-Year Consolidated Plan*. 2020-2025.