

**Summary** According to Merriam-Webster's dictionary definition, a policy identifies a "course or method of action" that meets the following criteria:

1. It is "selected from among alternatives."
2. It is selected "in light of given conditions."
3. Its purpose is "to guide and determine present and future decisions."

This critique of Framingham's Housing Policy uses this basic definition as a guide in its analysis, and the policy falls short on many counts, as detailed later in this document. First, the policy fails to consider and analyze the impacts of policy alternatives. Second, it fails to provide accurate and meaningful information about the current local housing conditions. As a result, it does not provide a sound and reasonable basis for decision-making.

Here are the key issues raised in this critique:

1. Many statements are made that are broad, speculative, and/or not supported by any data;
2. Much of the data presented is not referenced to any secondary source, making independent evaluation of its credibility impossible;
3. Much of the data is presented without appropriate context, is incomplete or presented in a misleading way, which raises more questions than it answers;
4. There is a lack of analysis of policy alternatives and their impacts, including financial impacts;
5. There is no credible rationale to support the actual policy statements; and
6. There is no way to measure the success or failure of the policies due to vague wording.

Considering the very substantial shortcomings of the current policy, the FTPA, along with a broad coalition of community leaders (see [Appendix A](#)) renews the call on the Board of Selectmen, first made by the passage of a resolution at the Special Town Meeting in the fall of 2004, to rescind the existing policy and commence work on a new policy by following the process adopted by Town Meeting last fall.

**Details** The remainder of this document contains a detailed analysis of sections of the town of Framingham's Housing Policy (adopted by the Board of Selectmen March 2004). The Framingham Taxpayers Association convened an ad hoc committee of Framingham residents in December 2004 to discuss the policy and develop an initial draft of the analysis. The draft was then distributed to a broad group of community leaders for comment and/or endorsement. [Appendix A](#) lists those individuals who contributed to this document and those who endorse it. In what follows, excerpts from the town's Housing Policy are in Times Roman type and enclosed in boxes, and the ad hoc committee's observations are in Arial type.

### Town of Framingham Housing Policy

Over the past several years, the high cost and inadequacy of Framingham's housing stock, and the need

for improved housing in Framingham has been documented by extensive analysis of local and regional housing availability and need, which was facilitated by the Framingham Housing Partnership, the Framingham Planning & Economic Development Department and the Metropolitan Area Planning Council.

Housing Policy, p. 2, paragraph 1

**The broad assertion regarding the “high cost and inadequacy of Framingham’s housing stock” is not supported by specific details or references. There is no reference to specific report names, dates, sources, etc. identified in either the text or a footnote. Without such references, this conclusion lacks credibility.**

**Ad Hoc Committee**

We have found that housing is perhaps the most complex of all of the elements that comprise our Town. Housing acts as the building block of Framingham. It affects how we interact with our neighbors whether across a fence or in a lobby of a large apartment complex and influences the social networks that constitutes our community fabric. The distribution of housing is the footprint of our neighborhoods.

Housing Policy, p. 2, paragraph 2

**These sweeping generalizations, which seem to be an effort to explain the importance of, and need for, a housing policy, do not achieve their intended purpose. For example, the two statements, “Housing acts as the building block of Framingham,” and “The distribution of housing is the footprint of our neighborhoods” are too broad and abstract to be meaningful in the context of a housing policy, especially without greater elaboration. Of course, explaining the importance of a housing policy, and the kinds of beneficial effects it could have, is important and should be done thoroughly and convincingly.**

**Ad Hoc Committee**

Framingham’s population grew 3% in the 1990s, much more slowly than many of the surrounding communities did. The number of households increased by 1,000 during the 1990s, while the typical household size declined to 2.43 persons per household. Smaller household size is a reflection of several social trends – smaller families, single persons living alone, persons delaying or foregoing marriage, higher divorce rates, and the elderly living independently longer. Smaller household size has implications for the type of housing demanded now and in the future. The current "baby boomlet" is expected to increase household size somewhat; however, this increase is only expected to last for a short

period. If a significant number of homes are built for these larger families, they may become a financial burden for future small families, which could lead to dwelling conversions into multi-family houses, poor maintenance, and an increased number of accessory apartments.

Housing Policy, p. 2, paragraph 3

**This section of the housing policy raises more questions than it answers, and fails to provide meaningful information about the housing conditions in Framingham. The population data is interesting, but not very meaningful without further considering the context. For example, to what extent could Framingham's slower population growth rate be related to its much higher population density or factors other than decreased household size? Is the decline in household size consistent with national and regional trends? Are the social trends impacting household size based on national or regional data? If not, what are the unique factors leading to this in Framingham and are those factors desirable? More importantly, what kind of trends should we expect going forward?**

**In addition, portions of this section lack clear meaning without greater explanation and support from specific data and analysis. For example, it is unclear what "somewhat" really means in this sentence, "The current baby boomlet is expected to increase household size somewhat." When the policy reads, "...this increase is only expected to last for a short period," how long a time is "a short period"? And by the way, who is it that "expects" these things? And what is the basis for that expectation? In addition, the phrases "...may become a financial burden" and "could lead to dwelling conversions..." are entirely too ambiguous without further analysis and qualification. To say something "may" become a financial burden suggests that same thing "may not" become a financial burden. Likewise, simply to say something "could" happen is no more helpful than to say that something "might not" happen**

**Ad Hoc Committee**

According to the 2000 U. S. Census, 63% of Framingham's households are families and 37% are non-families. A single parent heads over 23% of the families with children, up slightly from 1990. Non-family households have increased slightly more (5%) than family households (3%) in Framingham, but not as much as in MetroWest (13%). Of non-family households in Framingham, 78% live alone, and 25% of these are age 65 or over.

Just over 50% of Framingham's housing stock is single-family residences, however, 37% of the households are non-families and 78% of the non-families are persons living alone. These statistics reflect the need to diversify our housing stock to meet the needs of our residents. We must make housing choices for our town that will accurately reflect the diversity of our population.

Housing Policy, p. 2, paragraph 4 & p. 3, paragraph 1

**The data presented in this section is presented in a confusing way and has no apparent relation to**

the two concluding statements. For example, a reasonable person could conclude that since 50 percent of the housing stock are single family residences, and 63 percent of the population are families, the town needs more single family housing. While we doubt that was the author's point, it shows how misleading data can be without sufficient analysis and elaboration. In another example, it takes significant computation to determine that only 7% of Framingham residents are age 65 or over and living alone. (The 25% (over age 65) of 78% (living alone) of 37% (non-families) = a whopping 7% over age 65 living alone). How do these statistics show a need to diversify our housing stock?

If we are to address the housing needs of a future population of Framingham, we should have reasonable projections of that population based on some authoritative analysis of future trends. What are the demographics of the people that the town is attracting, and why? Are we content to sit back and let the demographics of future residents take its own course, or do we want to try to exert some influence over this? These are all questions that need to be addressed in a serious manner in the development of a comprehensive and effective housing policy. There is no evidence in the current policy that this work has been done. This area is addressed again below.

Ad Hoc Committee

Peter Calthorpe, renowned planner and author, warned, "The old suburban dream is increasingly out of sync with today's culture. Our household makeup has changed dramatically, the work place and work force have been transformed, average family wealth is shrinking, and serious environmental concerns have surfaced. But we continue to build post World War II suburbs as if families were large and had only one breadwinner, as if the jobs were all downtown, as if land and energy were endless, and as if another lane on the freeway would end traffic congestion."

The build-out study completed by the Executive Office of Environmental Affairs and the Metropolitan Area Planning Council two years ago predicts fulfillment of Mr. Calthorpe's warning. Framingham can expect about 3,227 new housing units under existing zoning. Of those new dwelling units, 65.5% will be single family & 34.5% will be multi-family rental located in the Central Business District.

Housing Policy p. 3, paragraphs 2 & 3

The lack of impact analysis, particularly financial impact, is one of the greatest shortcomings of the current housing policy. There will most certainly be a range of impacts arising out of the build-out of new housing under existing zoning. Disturbingly, the existing policy does not seriously analyze these impacts, or directly reference any other source that does. Nor is there evidence that the various impacts have been carefully considered for a range of possible alternative zoning scenarios. Perhaps Mr. Calthorpe's warning has relevance for Framingham, but such relevance is not at all apparent in what has been presented in this section.

**Housing policy and its partner zoning by-laws can have a significant effect on the town's financial stability. Alternative zoning schemes, encouraging or discouraging various kinds of development, can lead to substantially different impacts on the town's revenues and expenses. For example, encouraging upscale, over-55 development would likely have a powerful positive impact on the town's financial picture (generating far more in property tax revenue than in incremental service costs). Yet this whole area of financial impact has been completely overlooked. Any revision to the housing policy should have a section devoted to financial impact, considering the different impacts that would come about from various alternative development schemes.**

**Ad Hoc Committee**

Sales prices, rents, and the affordability gap have grown. The low-moderate population has increased from 28% to 39% since 1990, and almost 4,000 low-income renters pay over 30% of their income for rent. Recent studies show that rental and home price increases have forced millions of households to pay more than is a generally accepted amount. Renters remain particularly vulnerable to these rapid changes in price. The chart shows the proportion of Framingham renters and homeowners that are "housing cost burdened". Specifically those paying more than 30% of their monthly income on housing cost.

Framingham incomes lost ground relative to the region in the 1990s. Median household income rose 23% to \$54,300 in 2000, slightly below Boston PMSA median of \$55,200 (+36%). Families in poverty grew by 48% to 1,000 (5,100 individuals total).

Housing Policy, p. 4, paragraphs 1 & 2.

**This section also raises more questions about housing in Framingham than it answers. Why has the low-moderate income population increased by so much (11% of the town's population), when the general population has only increased 3 percent? Are more low-income people moving into town and if so, why? These are vital questions to be answered, and yet the policy completely overlooks these questions.**

**A review of household income data shows that changes in the median household income in Framingham have not kept up with those of other communities in the region. In looking at changes in household income data for Middlesex County from 1990 to 2000, there are some startling facts that emerge. Over this period of time, the percentage increase in median household income in Framingham was lower than that of any one of the other 53 cities and towns in Middlesex County (see chart in [Appendix B](#)). Framingham's median household rank, out of 351 cities and towns in the state, dropped more than any one of the other 53 cities and towns in Middlesex County.**

**It seems that Framingham is attracting large numbers of lower income households compared to other communities similarly situated. How could this be happening if, as the current version of the policy claims, Framingham's housing is high cost and inadequate? Is this trend likely to continue,**

**and if so why? Should our policy be to provide low and moderately priced housing for everyone, whether they are currently living in our community or not? And lastly do we simply accept this trend, or do we try to exert some influence over it? These questions all need to be discussed before we can make reasonable choices about housing policy.**

**Ad Hoc Committee**

At the same time, housing tenure choice and neighborhood quality are strong determinants of the ability of households to accumulate wealth through equity in their homes. Studies show that for 67% of Americans, their home is the largest investment in their lifetime.

Housing Policy, p. 4, paragraphs 2b

**If the largest investment for most citizens is their home, then why is there no objective or statement in this policy concerning the town's responsibility to its property owners/investors? The assessed value of the residential property in town now stands at well over \$5 billion. For every percentage point change in residential property values, the net worth of homeowners in town changes by more than \$50 million. It is true that a high rate of appreciation in home prices makes it harder for people who don't own homes to buy a home. Our policy should address such issues. However, it seems logical to also include an objective to preserve and enhance the value of property in town; and there should be an assessment of how well the rate of appreciation of homes in Framingham compares to surrounding communities. We should have a comprehensive housing policy, not merely an affordable housing policy.**

**Ad Hoc Committee**

Housing rates in MetroWest and Framingham in particular, are very high. For example, the HUD Fair Market Rent (the rental rates allowed for HUD reimbursements in the Area) in Framingham for fiscal year 2001 was \$ 840 for a 1-bedroom unit, \$1051 for a two-bedroom unit, and \$1314 for a three-bedroom unit. However, the actual rents encountered in the current market, as documented by housing service providers, are up to \$200 per month higher. To make matters worse, the Framingham Vacancy Rate is the lowest in the MetroWest area: 1.7% for Apartments and 0.2% for homes. This rate is particularly distressing in light of the fact that vacancies are considered to be "tight" when they fall below 5%. Low vacancy rates coupled with high demand lead to rapidly rising housing costs.

Housing Policy p. 4, paragraph 3

**This section is flawed and misleading for a number of reasons. First, it does not even note that**

**Framingham's rents are lower than many surrounding communities. Second, it uses outdated vacancy data, and MetroWest vacancy rates are now much higher than the numbers cited in the town's policy. Third, the policy does not evaluate other factors that impact vacancy rates and market rents, including the impact of Section 8 vouchers. Fourth, the references for this information in this section are not provided. Finally, this data needs to be looked at in the context of what level of rents can be comfortably afforded by the full range of people in our region, not just those seeking HUD assistance (see next point below for more discussion on this).**

**Ad Hoc Committee**

**Framingham's single-family home sale prices rose almost 78% from 1988-2002. Of 58 new homes built in 2001, only one was assessed for less than \$200,000; 50% were over \$300,000. The average per unit construction cost for single-family dwellings in 2002 was over \$188,000. Framingham rents rose 160% from 1980-2000. The median rent in Framingham for the year 2000 was \$835, requiring an annual income of \$33,400.**

**Housing Policy p. 4, paragraph 4**

**The significance of this data is unclear without additional context or explanation, although it seems to be presented as evidence about the lack of affordability of Framingham's housing. The policy seems to be talking about new construction only. In particular, 58 new homes were built in 2001, of which half or 29 houses were over \$300K. How much over \$300k? The other 28 houses were between \$200K and \$300K and 1 was under \$200k. How do these costs compare to new construction in nearby towns for the same time period?**

**It seems more logical to use the assessed value of all homes as a measure of affordability than the value of just new housing construction. Information from the assessor's FY '03 property valuations, which was based on 2001 sale prices, shows housing distribution according to Single Family, Condo and Multi Family categories. Of the 26,734 Total Residential Units, 50% or 13,366 of the Total Housing Units are Single Family Units. Of these, 65% were valued under \$300k. 9.3% or 2,493 of the Total Housing Units are Condominiums. 99% of the Condominiums were valued under \$300k. It is curious that this housing policy is silent on the contribution of condominiums to housing affordability.**

**With respect to rental housing, it seems logical to compare median rent levels with median household income levels to provide a measure of affordability. Our analysis, which is detailed below, shows that a household with the median income can afford the median rental rate, using the standard presented in this section of \$33,400.**

**According to the year 2000 census for Framingham:**

**Median Household Income was \$54,288**

**Median Family Income was \$67,420**

**Therefore, households in Framingham earning the median household income can afford rents one and one half times greater than Framingham’s median rent. And, families in Framingham earning the median family income can afford rents two times greater than Framingham’s median rent. In other words, rental housing in Framingham seems reasonably affordable for its residents.**

**The latest census has income information from 26,147 total households in Framingham. Of these 16,618 are families with median family income of \$67,420. An estimate (using the mean to approximate the median) suggests that the median household income for the remaining 9,529 non-family households would be approximately \$31,570, and that these households would pay less than 32% of their household income for the median rent. This is only slightly over the 30% standard for affordability set by HUD, which does not suggest a large affordability gap. However, all of this really points to a more pertinent question: What is the median household income for renters alone?**

**Ad Hoc Committee**

Like it or not, as development pressure rises which it is predicted to do for the next decade, Framingham will be confronted by a steady stream of small and medium sized projects as well as the occasional “whopper”. While many residents would like to pull up the drawbridge behind them, the fundamental question is not development of housing versus no development, but rather, “How much?”, “What type?”, and “Where?”. To build a sustainable future, we must ensure that the American Dream is more accessible to our diverse population: singles, the working poor, the elderly, and the financially pressed middle class who can no longer afford the good life of the past.

Housing Policy, p. 5, paragraph 2

**The policy asks the “fundamental question” but provides no answer (other than a narrow reference to affordable units). In its current form, the policy provides us only with empty rhetoric. Instead our policy needs to carefully address what influence, if any, we want to exert over demographic trends, what alternative housing schemes might best address the future demographic profile, what impacts are likely associated with each alternative (including the likely financial impact on the town’s revenues and expenditures), and which alternative is most attractive. We need to not only ask the “fundamental question”, we also need to answer it – not just for a narrow segment of the population, but also for the town as a whole.**

**Ad Hoc Committee**

Population trends and projections show that Framingham will experience an increased population and

decreased household size. There is an imbalance between the existing housing stock and the resident's housing needs. No effort is made to ensure construction of a product that meets the needs of our townspeople. In the next decade, there will be a growing demand for more affordable housing, housing for middle-income families, and empty-nester housing to meet the needs of our aging population. In addition, there will be more pressure for family, trade-up, and early senior housing.

Housing Policy p. 5, paragraph 3

**This paragraph is largely a collection of unsubstantiated statements. Once again, reference(s) should be provided for any projections so that readers of the report can review the source(s) of such projections and be able to assess the validity and significance of any assumptions made in preparing the projections. In addition, the statement "No effort..." is simply untrue. Quality home developers assess the needs of homebuyers all the time so that they can offer products that satisfy the needs of their customers. Perhaps the authors of the policy are referring strictly to the needs of low- and moderate-income people. However, if this is true it should be explicitly stated.**

**Ad Hoc Committee**

### **Affordable Housing for All**

With the serious cutbacks we have experienced in federal and state funding for affordable housing since 1990, it is becoming increasingly difficult to maintain the current inventory of assistance, let alone expand it to address the unmet need. Funding cutbacks make it difficult to maintain existing buildings physically. In addition, some private developments are reaching the end of their use restrictions, which means that additional funding will be needed if owners are to agree to extend affordability.

Housing Policy, p. 5, paragraph 4

**What cutbacks? How much? Not just in general, but as it pertains specifically to the town. We need an analysis of those units coming off line and what they will be priced at. New 40B's (if we need any at all) should be "In Perpetuity" by policy.**

**Ad Hoc Committee**

The high cost of housing is a serious, and often intractable, social and economic problem for many residents. Framingham's middle-income households actually have more barriers to housing choice than its low-income households. Middle-income families have earnings that exceed the income limits for Chapter 40B housing, yet they could not afford to purchase a home in Framingham today and many of them cannot afford the homes they already own. With growing numbers of households in need of

housing assistance, the gap between the supply and demand for housing assistance has grown and the incidence of homelessness has risen. The current state policy of limiting housing investment primarily to short-term assistance to help the homeless will not reverse this trend.

Housing Policy, p. 6, paragraph 1

**The cost of purchasing a home should not be confused with the cost to stay in a home that has been owned for many years. If people are having difficulty staying in a home they have owned for many years it is not because property values have increased, it's because the cost of property taxes, utilities, and other such items have increased. The most significant thing that the town could do to help in this regard is to run the government as cost-effectively as possible so that increases in property taxes are kept to a minimum. Yet the current policy makes no mention of this strategy.**

Ad Hoc Committee

#### **Framingham & the Chapter 40B 10% Goal**

Framingham is fortunate to have 10.17% of its housing stock included on the Chapter 40B Inventory of Subsidized Housing as of April 2002. Many residents have expressed their frustration with Chapter 40B (G. L. c. 40B sec. 20-23), and appear willing to rest on our laurels because Framingham is one of the relatively few communities that have attained the goal: 10.17% of our total housing units are certified for inclusion of the 40B inventory of subsidized housing. However, the 10% number is arbitrary, and it is not based on our housing needs. Although Chapter 40B may have captured a commonly understood meaning of "housing need" in 1969, 10% has little relevance today. In 2003, about 35% of the Commonwealth's households are low-income or moderate-income, and 39% of Framingham's households are low-income and moderate-income. In Framingham, we need to question whether 10% is enough to meet our local needs. The data presented herein indicates that a number between 30% - 40% of the Town's housing stock should be eligible for inclusion on the Chapter 40B Inventory of Subsidized Housing to meet the needs of the residents of Framingham.

Housing Policy, p. 6, paragraph 4

**The policy numbers indicate that 39% of Framingham's population is low and moderate-income while 40B only asks for 10% affordable housing. However, Framingham is loaded with "other subsidies" that are not counted under the narrow 40B definition such as section 8 vouchers. In addition there are very likely many housing units and situations in Framingham that, although not officially counted in the Chapter 40B inventory, are nevertheless affordable to people of low or moderate income. Households with income between 62% and 80 percent of the median are considered "moderate" income households, yet can often afford market rate apartments at the median rental rate by employing various common strategies. For example, young adults frequently live together as roommates to manage the cost of housing. All of these factors should be considered**

in formulating policy, yet there is no evidence in the policy that this was done.

Ad Hoc Committee

**To this point, everything in the Housing Policy document is background, rationale and framework. We believe that we have demonstrated that the framework is significantly flawed and needs to be substantially reworked. Below are the policies contained in the document intended to guide decision-making about housing in our town.**

Ad Hoc Committee

Now therefore, to maintain and preserve Framingham as a town with a high quality of life for all its residents, the supply of housing in Framingham shall be increased and improved to address the needs of all individuals and households in accordance with the following objectives.

- The Town shall actively advocate and support the development and maintenance of a diverse housing stock throughout Framingham to ensure that quality housing is available to households and individuals at all economic and social levels.
- The town shall actively advocate and support the development of a variety of housing options for special needs populations, including homeless persons, and the elimination of barriers to such housing.
- The Town shall actively promote the elimination of substandard, overcrowded, or other undesirable living conditions.
- The Town shall actively promote and encourage creative, suitable options for the provisions of housing for elderly individuals.
- The Town shall support the preservation and improvement of existing public and privately owned affordable housing.
- The Town shall encourage the adoption of zoning, regulatory, permitting and other procedures that promote appropriate residential development.

Housing Policy

**The lack of linkage between the background/rationale and the policies themselves is striking. One would expect that the policies would follow naturally and logically from the background/rationale. However, we are hard pressed to discern any such relationship. To be sure, some of the policies have an understandable, common sense ring to them, but we are left scratching our heads trying to figure out where they came from. In the next version of the town's housing policy, each policy should have:**

- a clear linkage with the associated rationale from whence it derives;
- an analysis of the expected financial impact; and
- wording that allows success or failure to be objectively determined.

## Appendix A

### Contributors and Endorsements

The Framingham Taxpayers Association gratefully acknowledges the significant contribution to this critique made by the following individuals:

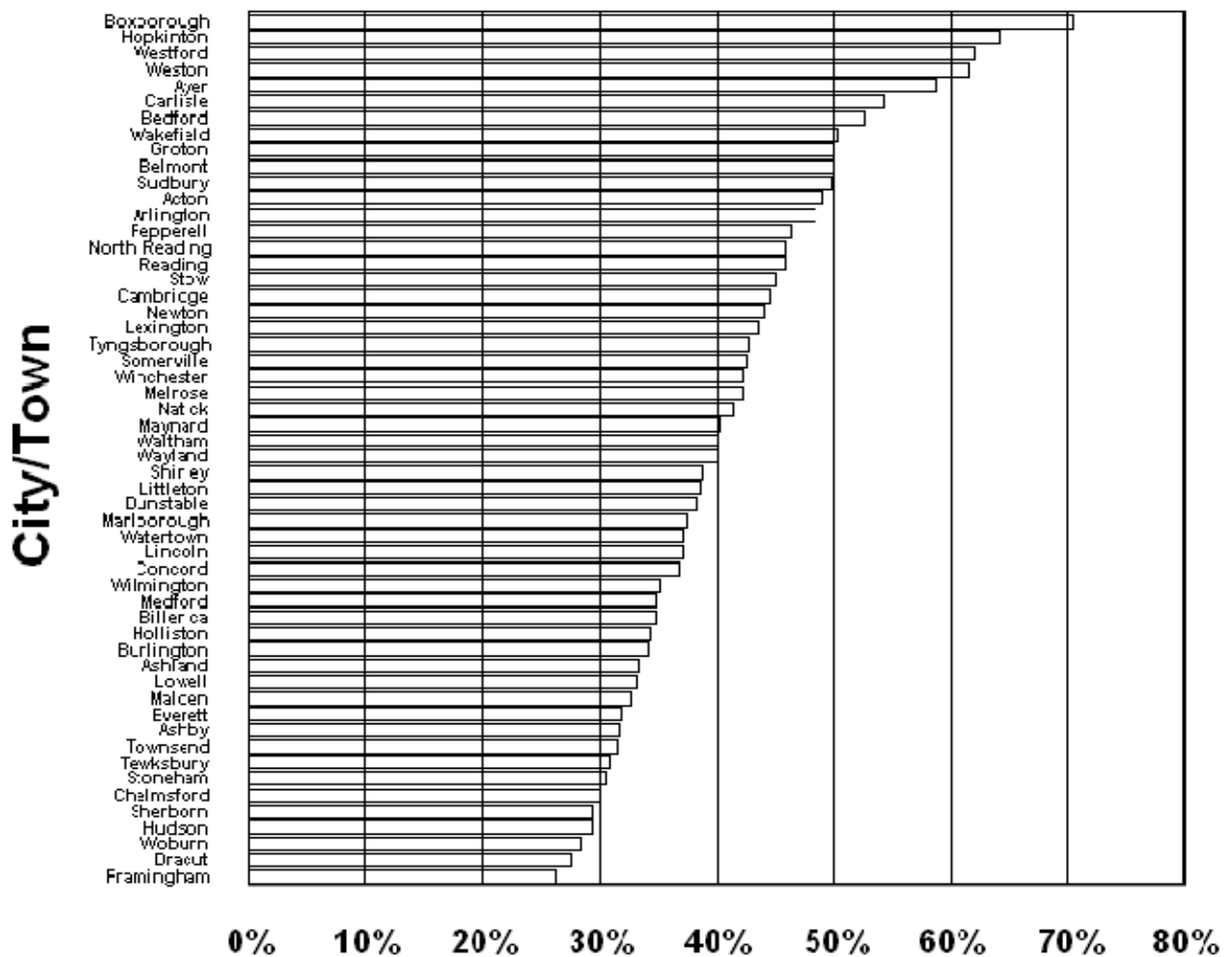
Linda Dunbrack  
Steve Kruger  
Tom LaRose  
Laurie Lee  
Steve Orr

In addition, the following individuals have reviewed this critique and wholeheartedly endorse its contents:

Marc Alpert, TMM Precinct 5	Christine Long, TMM Precinct 2
Sue Bernstein, Planning Board	Jim Madison, TMM precinct 4
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## Appendix B

### Percent Change in Median Household Income Places in Middlesex County, 1989-1999



Source: U.S. Census Bureau Database