LOWELL FORWARD

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Homes and Housing: Housing Production Plan

Final Draft for Planning Board
August 19, 2024

Acknowledgments

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Lowell Forward Homes and Housing Subcommittee

The *Lowell Forward* Steering Committee comprises individuals deeply connected to the Lowell community. Each member represents a diverse set of voices across the city. Fourteen members volunteered to be on the Homes and Housing Subcommittee. This subcommittee met regularly to provide guidance to the consultants, review draft materials, and assist with outreach strategies. This plan would not be possible without them.

Lowell Forward Homes and Housing Subcommittee

- Adam Baacke
- Joseph Boyle
- Yun-Ju Choi
- George DeLuca
- Gerard Frechette
- Olivia Herbert
- Carl Howell
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Contents

Welcome to *Lowell Forward Homes and Housing*: Lowell's Housing Production Plan

Why plan for housing?

A Housing Production Plan is an opportunity for residents, developers, housing agencies, and government officials to come together to create a proactive vision to tackle the housing challenges a community faces. Knowing housing affordability and availability is among the most critical issues Lowell is facing, City officials decided to undertake Lowell's very first Housing Production Plan alongside the *Lowell Forward* Comprehensive Plan.

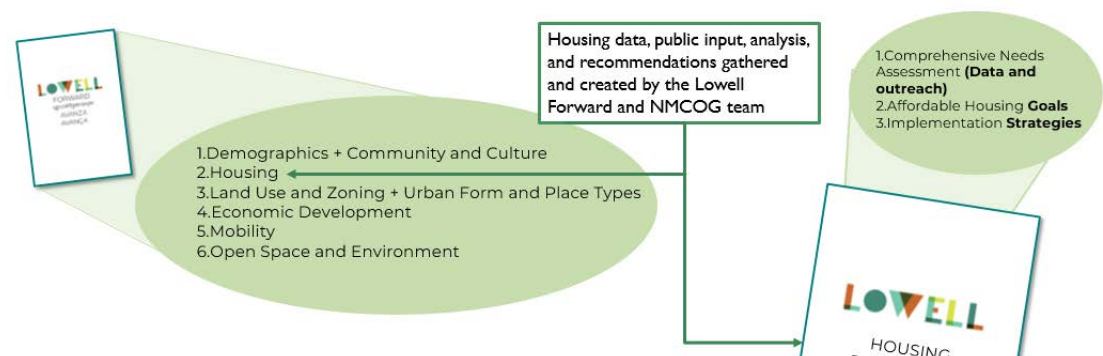
Lowell Forward Homes and Housing covers the years 2024 to 2028. It serves as a framework for considering Comprehensive Permit projects; zoning changes; Community Preservation Act (CPA) fund expenditures; housing programs funded through local, state, and federal funds; and other actions the City and its partners can undertake to meet shared housing goals. It considers both subsidized affordable housing and market-rate housing, as either strategy on its own cannot overcome Lowell's housing challenges.

This plan should be revisited and updated every five years if possible to respond to changing population projections and on-the-ground conditions.

Importantly, Housing Production Plans are rooted in the Massachusetts Regional Planning Law, *Chapter 774 of the Acts of 1969*, also known as Chapter 40B of the Massachusetts General Laws (M.G.L.). These plans provide certain regulatory benefits, including providing preferred status for certain state grant programs.

A Housing Production Plan is an opportunity for residents, developers, housing agencies, and government officials to come together to create a proactive vision to tackle the housing challenges a community faces.

Connection with Lowell Forward



This is a sister document to *Lowell Forward*, the City's comprehensive master plan covering 2024-2040. The goals in *Lowell Forward* are expanded upon in this HPP. Every five years, Lowell will undertake a process to update this HPP in accordance with *Lowell Forward*.

Lowell Homes, Housing, and Community Workshop.

The Planning Process

Community outreach and comprehensive analysis of data is foundational to *Lowell Forward Homes and Housing*. The planning process began with convening a Housing Subcommittee of the *Lowell Forward* Committee. This 14-member subcommittee represents a variety of lived experiences, connections with housing, and housing expertise. The subcommittee discussed, guided, and refined the community outreach process, data needs, and products. During this time, Northern Middlesex Council of Governments (NMCOG), working under the direction of the City of Lowell, analyzed previous plans such as *Sustainable Lowell 2025*, and summarized these in a stand-alone memorandum available on the *Lowell Forward* website.

After the first meeting of the subcommittee, NMCOG completed an analysis of data from the City of Lowell, the U.S. Census Bureau, the U.S. Department of Housing and Urban Development (HUD), and other public and proprietary sources.

Simultaneously, the *Lowell Forward* team facilitated 68 focus groups or key informant interviews that focused either on housing or the comprehensive plan more generally. Feedback was further collected in four citywide workshops, including a workshop focused specifically on housing, homes, and community with over 60 attendees. The *Lowell Forward* Team also released four surveys, with the third focused specifically on homes, housing, and community with over 800 responses. NMCOG regularly convened meetings of the subcommittee to report on progress and receive guidance. The results of this outreach are in **Chapter 2, Community Needs Assessment**.

Additional details on the Community Engagement process, including its social justice and equity lens, are explored in the "Lowell Today" report of the *Lowell Forward* planning process available on the *Lowell Forward* website.

68 Focus Groups or Key Informant Interviews

60+ Attendees at Citywide Meeting

850+ Survey Responses

2024 follow-up outreach

Definitions for important terms used in this Plan

Affordable Housing

The term “affordable housing” means many things to many people and agencies. The United States Department of Housing and Urban Development (HUD) considers housing “affordable” if housing costs do not exceed 30% of a household’s annual income.

That said, it is common to call housing “affordable” when it is rented or sold below market rate and restricted to certain income levels, often 80% of the Area Median Income (AMI). This housing can be supported by a public or private subsidy.

This plan will define affordable housing as housing restricted to and affordable by households at specific income eligibility levels. However, the plan considers the production of both affordable housing and market-rate housing as tools to overcome Lowell’s housing challenges.

Area Median Income

An important measure in affordable housing is Area Median Income (AMI). Area Median Income calculations are the most common way of prioritizing households for affordable housing opportunities.

The Department of Housing and Urban Development (HUD) has a formula for determining income thresholds based on a special measure of Area Median Income it takes called the HUD Area Median Family Income (HAMFI). HUD uses these thresholds for Section 8 and other programs, and the Executive Office of Housing and Livable Communities (EOHLC) has adopted these thresholds for many of its programs.

This plan will use the definitions provided by HUD:

- “Extremely low income” households earn 30% or less Area Median Income;
- “Very low income” households earn between 31% and 50% Area Median Income;
- “Low income” households earn between 51% and 80% Area Median Income; and
- “Moderate income” households earn between 81% and 100% Area Median Income.

M.G.L. Chapter 40B Statute (Comprehensive Permit Projects)

Chapter 40B is a state law that enables local Zoning Boards of Appeals (ZBA) to approve affordable housing developments under flexible rules if at least 20-25% of the units have long-term affordability restrictions.

Decisions by the ZBA to deny Comprehensive Permit applications can be overruled by the EOHLC's Housing Appeals Committee (HAC) unless the City has more than 10% of its year-round housing units on the state's Subsidized Housing Inventory (SHI). As of the drafting of this HPP, the City of Lowell has 5,127 out of 43,482 year-round units on the SHI, or 11.8%, exceeding this goal.

Chapter 40B also defines a Housing Production Plan. They must cover a planning period of five years and consist of a Comprehensive Housing Needs Assessment, Affordable Housing Goals, and Implementation Strategies. The HPP must have a goal of maintaining 10% of the Town's total year-round housing units on its SHI.

Fair Housing Laws

Fair housing laws address discrimination based on characteristics that are often personal and immutable. These characteristics are called "protected classes" in federal fair housing law and include the following: race; color; national origin; religion; sex; familial status; disability; age; marital status; genetic information; sexual orientation; gender identity; military service; arrest record; and public assistance.

For recipients of federal planning and community development funds from the US Department of Housing and Urban Development like the City of Lowell, program participants must adhere to the Fair Housing Act and are obligated to affirmatively further fair housing. This means that the City is required to "take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."[1]

Fair Market Rent

HUD uses Fair Market Rent (FMR) estimates primarily to determine standard payment amounts for the Housing Choice Voucher program, initial renewal rents for some expiring project-based Section 8 contracts, initial rents for housing assistance payment (HAP), contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), and to serve as a rent ceiling in the HOME rental assistance program. FMR is HUD's estimate of the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market.

Families and Households

Families and Households are defined by the U.S. Census Bureau. A household includes all the persons who occupy a housing unit as their usual place of residence. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements. (People not living in households are classified as living in group quarters.)

A family consists of a householder and one or more other people living in the same household who are related to the householder by birth, marriage, or adoption. All people in a household who are related to the householder are regarded as members of his or her family. A family household may contain people not related to the householder, but those people are not included as part of the householder's family in tabulations.

1. Affirmatively Furthering Fair Housing, 2023 HUD, https://www.hudexchange.info/programs/fair-housing-planning/
2. Source: Shufelt, Laura. Fair Housing Framework [Training Session]. Massachusetts Housing Partnership. United States. https://www.mhp.net/assets/resources/documents/Fair-Housing-for-AFHMRSP-Training.pdf

Housing Cost Burden

Housing Cost Burden is an important measure of whether a community's housing is affordable. When a household pays more than 30% of its income on housing-related costs, HUD considers it "moderately burdened" by housing; households spending 50% or more of their income on housing are considered "**severely burdened**". Housing costs for renters are defined as gross rent plus all associated utilities. Housing costs for owners include mortgage fees, property taxes, and insurance.

This is calculated by the American Community Survey (ACS) based on the income and housing costs respondents report in their survey. If a household living in an Affordable Housing unit received a survey, they would report the rent they pay to their landlords and their income. These populations would be counted as not cost burdened, because their rent should be set to 30% of their income or less.

Housing Unit

A housing unit is defined by the U.S. Census Bureau. It may be a house, an apartment, a mobile home, a group of rooms or a single room that is occupied (or, if vacant, intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building, and which have direct access from outside the building or through a common hall. For vacant units, the criteria of separateness and direct access are applied to the intended occupants whenever possible. If that information cannot be obtained, the criteria are applied to the previous occupants.

Missing Middle Housing

The phrase "Missing Middle" is often used to describe housing that includes duplexes, small multi-family buildings, and townhouses. These often match the scale and massing of existing single-family homes while offering additional housing rental and ownership options for a variety of household sizes and housing preferences. These are called "missing middle" because they are either not permitted under existing zoning rules, are difficult to build under existing zoning rules, and consequently result in a community missing affordability and choice.

Subsidized Housing Inventory

The Subsidized Housing Inventory is a list of all Affordable Housing in the state that meets its qualifications. The EOHLC lists a housing unit on the SHI if it is subsidized by local, state, or federal programs and restricted to incomes at or below 80% Area Median Income. The unit must also meet other guidelines such as asset limitations, a use restriction that runs with the land for 30 years minimum, the meeting of fair housing laws, and other requirements. A process must be followed to request the state add qualifying units to the SHI.

In a rental development, if at least 25% of units are to be occupied by Income Eligible Households earning 80% Area Median Income or less, or alternatively, if at least 20% of units are to be occupied by households earning 50% Area Median Income or less, then all of the units in the rental development are eligible for the SHI.

The state sets a goal for each municipality to have 10% of year-round units on the SHI (See the definition of M.G.L. 40B Statute on page 7).

What is a Comprehensive Needs Assessment?

The Comprehensive Needs Assessment analyzes existing and projected housing demand against existing and projected housing supply, including the resources available to the City and the constraints facing the City. This is best understood as an existing conditions report that will guide the creation of the rest of the plan. Although much more data was collected and analyzed by the *Lowell Forward* planning team, the Comprehensive Needs Assessment summarizes the findings through charts of the most relevant, surprising, and illustrative data.

The Comprehensive Needs Assessment first evaluates the existing and projected demographics of the City, then examines the homes and housing available in the city. When possible, the Comprehensive Needs Assessment compares Lowell to a selection of peer cities.

The supply and demand are analyzed together to create a gap analysis describing the amount and type of housing that would need to be built to accommodate the existing population and projected growth. Finally, the Comprehensive Needs Assessment inventories and analyzes barriers to housing production and resources available to Lowell to overcome those barriers—especially its rich mix of agencies, community based organizations, and developers.

Methodology and Data Sources

In general, this plan uses locally-sourced data such as permit data, data from local community-based organizations, or assessors' data whenever possible. However, this data is very limited. When data from local sources is not available, Decennial Census data is used. In cases in which relevant data was not included in the 2020 Decennial Census, 2017-21 five-year American Community Survey data is used instead. This data is supplemented by data from proprietary sources such as the Warren Group or real estate reports.

This plan also utilizes population and household projections prepared by the Massachusetts Department of Transportation (MassDOT), the UMass Donahue Institute, and the Metropolitan Area Planning Council (MAPC) with input from NMCOG. This team developed projections for every community in Massachusetts for 2030, 2040, and 2050. They are based upon a statewide model that uses the prior five years of data to estimate birthrates, deathrates, and migration rates for each Metropolitan Planning Organization (MPO) region to project population and household growth, including age, household type, and income categories.

Analysts then assigned that growth to census block groups through a computer model based on the block groups' attractiveness and zoning capacity. The growth would be assigned to the most attractive block group, and once the existing zoning capacity was hit, it would assign it to the next most attractive block group. This means these projections should be considered a "best guess" based on recent historical and existing conditions.

Key Figures

43,482 Year-round housing units
4,348 Subsidized Housing Unit Goal
5,127 Subsidized Housing Units

Sources: 2020 Decennial Census, EOHLC

37% Housing Cost Burdened
19% Severely Housing Cost Burdened
$445,000 Median Single Family Sales Price
$1,480 Median Annual Rental Cost

Sources: 2017-21 American Community Survey, Warren Group

Comprehensive Needs: Introduction

Lowell's Peer Cities

This plan compares Lowell to four peer cities, along with the United States and Massachusetts as a whole. These peer cities were chosen based on geographic proximity and historical similarity to Lowell. Notably, Lowell is generally in the middle of these peer cities in income, housing costs, and other factors. Lowell's proportion of Housing Cost Burdened households is actually among the lowest among its peers, although still higher than the United States and Massachusetts as a whole.

TABLE 1: DECENNIAL CENSUS INFORMATION, PEER CITIES

	Population (2020)	Households (2020)	Year-Round Units* (2020)
U.S.	331,449,281	126,817,580	140,498,736
Massachusetts	7,029,917	2,749,225	2,998,537
Worcester	206,518	79,157	84,281
Lowell	115,554	41,229	43,482
Lawrence	89,143	28,955	30,008
Haverhill	67,787	26,696	27,927
Salem	44,480	19,313	20,349

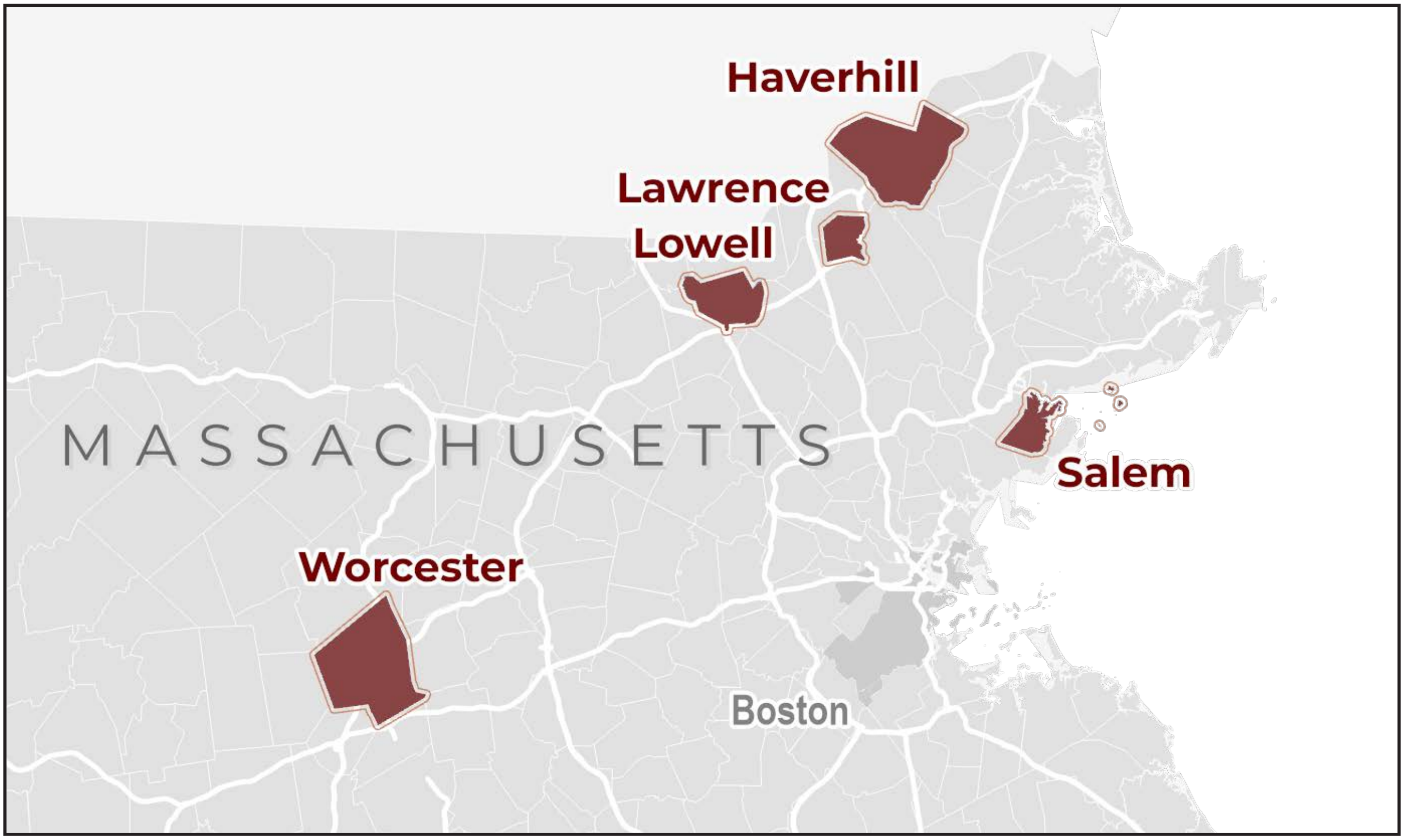
*Source: U.S. Census Bureau, 2020 Decennial Census. *Year-round units as defined by the Executive Office of Housing and Livable Communities, which include all units that are not classified by the U.S. Census "for seasonal, recreational, or occasional use" or "for migrant workers"*

TABLE 2: SELECT HOUSING AND ECONOMIC INFORMATION, PEER CITIES

	Median Income	Median Rent	1-year median rent (2021)	Median Sales Price (2022)	Percent under the Poverty Line	Percent Cost Burdened, Owners	Percent Cost Burdened, Renters	Percent of Units that are Rentals
Massachusetts	$89,026	$1,429	$1,487	$550,000	10%	26%	47%	38%
Haverhill	$75,130	$1,328	$1,426	$480,000	11%	27%	53%	42%
Salem	$72,884	$1,493	N/A	$600,000	15%	33%	51%	48%
Worcester	$56,746	$1,179	$1,253	$367,000	19%	29%	50%	58%
U.S.	$69,021	$1,163	$1,191	N/A	13%	22%	46%	35%
Lowell	$64,489	$1,311	$1,480	$445,000	18%	29%	48%	57%
Lawrence	$47,542	$1,303	$1,391	$430,000	19%	42%	56%	71%

Source: U.S. Census Bureau, 2017-2021 American Community Survey and Warren Group Annual Summaries.

MAP 1: LOWELL PEER CITIES



Source: NMCOG

Key Findings of the Comprehensive Needs Assessment

Change

Lowell's population is continuously changing, and it's anticipated to both grow and age while average household size is anticipated to decline. This suggests a continued need to have a flexible housing stock that can change along with the City's demographics.

» Lowell is projected to grow by 2,205 households (5.3%) between 2020 and 2030, which is a slower growth rate than three of four of its peer gateway cities.

» The number of households with heads of household 65 years or older has consistently grown for the last ten years, and is projected to grow from 25% to more than 30% of total households by 2030.

» Average household size increased between 2010 and 2020, defying projections and regional trends, but it is now projected to decline by 5% from 2020 to 2030 and continue shrinking, reaching an average of 2.4 people per household in 2050.

» Households that consist of a single person living alone are projected to rise from 12,000 to nearly 14,000, or roughly 17%, between 2030 and 2040.

Opportunity

People who move to Lowell tend to be younger and have smaller incomes, and data indicates that their incomes grow while in Lowell. This suggests that Lowell provides opportunities for younger households with lower incomes to get established, invest in the community, and advance economically.

» Lowell has a higher proportion of households headed by a person under 35 than all four of its peer Gateway Cities, nearly 25%, and this number is staying relatively steady in absolute terms, bucking projections and regional trends.

» People moving to Lowell are younger and have lower incomes than Lowell's median, often coming from places outside the Greater Lowell region but within Massachusetts.

» Although people moving away from Lowell tend to have higher incomes than Lowell's median income, Lowell's median income has increased in recent years, indicating that households grow their incomes while in Lowell, more than offsetting that loss.

Housing Costs

Lowell's housing prices are growing increasingly out of reach for those who call the city home, and these growing costs endanger Lowell's status as a city of opportunity. A constrained market is driving these high housing costs, which is partially an effect of Lowell's housing policies, including restrictive zoning. In addition, high construction and land costs create a gap between the cost of building a unit and the expected return, which demands consideration of new or expanded market-rate subsidy programs and the cost impacts of current policy. Finally, recent interest rate trends have drastically reduced turnover, further distorting the housing market.

» Affordability was among the greatest concerns cited in community research and was the largest barrier to those who wanted to move within or to Lowell. In addition, more than half of renters cited rent being too costly as a challenge. This is backed up by data: Between 2019 and 2022, median rent increases nearly caught up with income growth, and housing price increases surpassed it, growing by 60% (inflation-adjusted) and reaching $445,000.

» Lowell's median rent was highest among its peers until 2022 and is now second-lowest at $1,513. That said, Lowell's median income is lower than most of its peers. This means that typical gross rents are not affordable for many Lowellians, yet provides lower returns for developers than other cities. This results in a high level of housing cost burden: nearly 40% of Lowell households are at least moderately Housing Cost Burdened, and 20% are severely Housing Cost Burdened.

» High housing prices and corresponding levels of housing cost burden are likely the result of a constrained market: Lowell's vacancy rates are 0.9% for ownership units and 3.7% for rental units, below most of its peer cities, the U.S. average, and a healthy rate of 2% for ownership units and 7% to 8% for rental units.

» 16% of Lowell's land, not counting parks or protected open space, allows two-family by right and only around 10% allows multi-family by right, mainly in the city's central neighborhoods. This limits opportunities to create new small multi-family developments, accessory dwelling units, and modest single-family or duplex units.

» During focus groups, community organizations noted that this, plus other housing policies, generally benefited owners of single family detached homes, as they built equity as housing prices increased, but worked to the detriment of residents who make a lower income, young people, and newcomers from other communities and abroad.

» In focus groups, developers noted that Lowell construction costs were similar to Boston's costs, but sales prices or rental prices tend to be lower. Despite this, the cost for land or buildings requiring redevelopment is often too high to make projects "pencil out". They reported that Lowell is competitive partly because of subsidies and a friendlier development environment, but that openness to development was experienced in only certain neighborhoods of the city.

» In the last ten years, the average residential development in Lowell took 571 days from permit application to construction completion. Fewer units were permitted in the 2010s than in earlier years, with relatively low numbers in 2021 and 2022. On the positive side, the completion rate of permitted units was high, with only 2% of units expired or withdrawn, nearly 80% completed, and 18% in the pipeline.

» Notably, nationally, the cost of land, engineering, time spent permitting, or other fees can add 10-20% onto a project's overall cost, and local policy can impact these costs. In addition, permit data indicates certain types of projects cost less, with conversions being among the most cost-efficient per unit, between $50,000 and $200,000 a unit.

Affordable Housing Need

The greatest needs are among residents who make an income at the lowest end of the spectrum, and the number and quality of these units are not sufficient to meet the city's need. Affordable housing development is difficult due to lack of real estate opportunities within the city, and additional red tape related to state and federal funding sources and acquisition of city-owned properties.

» The need for affordable housing exceeds the supply. 5,127 units are listed on Lowell's Subsidized Housing inventory (SHI), but 99% of the 7,345 households in Lowell that are severely Housing Cost Burdened are low income, 80% are extremely low income, and almost all might qualify for the most typical affordable housing. In addition, waitlists are reported to be more than five years.

» Nonfamily households headed by a male householder are the most common household type experiencing poverty in Lowell, which is unusual among peer Gateway Cities.

» Evictions in Middlesex County are a few relative to other states, but they are rising as pandemic-era programs expire. A greater but unknown number of households lose housing without formally going through an eviction process because they have no lease or are otherwise housing insecure.

» Households with Section 8 vouchers are having difficulties finding housing within Lowell, according to key stakeholders. People experiencing housing insecurity are more likely to report housing that is not large enough for their household, housing that feels unsafe, and discrimination against a protected class.

» The number of sheltered families suffering from homelessness has been growing for more than a decade, and unsheltered individuals suffering from homelessness has grown considerably in recent years. As noted by some currently-homeless survey respondents and key stakeholders, many individuals became homeless due to losing their housing when single room occupancy structures (boarding houses) were closed.

» Despite a demonstrated need for affordable housing, nonprofit developers of subsidized housing report difficulties creating new affordable housing due to lack of land that is both affordable and available for multi-family units; uncertain or overly-bureaucratic systems of accessing local funding; and cumbersome requirements included in Request for Proposals (RFPs) to purchase city-owned land. They also cite barriers related to state and federal funding.

» Many developers have funding and existing services ready to wrap around units if they are built, such as case management and counseling, but cannot find land in Lowell that is appropriate, available, affordable, and would permit multi-family structures.

» Finally, nonprofit developers indicated difficulty redeveloping buildings due to historical preservation requirements. For-profit developers were more mixed, with some seeing better returns on historic properties due to tax credits and attractiveness to key markets. Among public survey respondents living in Lowell who answered the question, 44% supported providing incentives to redevelop historic structures, among the most popular policy options. Only 15% supported allowing the removal of historic structures for housing, and there were many write-in answers supportive of maintaining historic buildings.

Anti-discrimination

Lowell should be celebrated for its inclusivity and positive steps against discrimination, and it has become less geographically segregated over the last 20 years. However, housing policy may be perpetuating ongoing segregation. People of color have fewer ownership opportunities and are more often housing cost burdened, which is a critical equity issue. The Lowell community has signaled its desire and ability to continue to tackle these issues head-on, recently declaring racism a public health crisis and undertaking equity-focused comprehensive planning.

- Lowellians of color are more likely to live under the poverty line and are disproportionately housing cost burdened, especially residents identifying as Black or African American, Hispanic or Latino, or two or more races. These groups have not experienced the median income growth of other racial groups.
- Residents of color are more likely to be renters, which cuts them off from wealth-building home ownership opportunities. Hispanic or Latino households are declined for a mortgage at twice the rate of the Lowell average, and applicants of color usually receive smaller loans at higher loan to value ratios.
- This pattern reinforces segregated patterns in Lowell, as rental opportunities are scarce in neighborhoods that do not allow multi-family, such as Belvidere, parts of Pawtucketville, and parts of the Highlands. In addition, subsidized units are concentrated in Lowell's inner neighborhoods.
- Despite the appetite and possibility for dense, walkable development near many neighborhood centers and regional retail areas, developers of affordable or multi-family housing find few opportunities outside neighborhoods such as the Acre, downtown, and areas along Chelmsford Street and the Lowell Connector due to restrictive zoning.
- Lowell's declaration of racism as a public health crisis in 2022 and the adoption of the equity-oriented Lowell Forward prime it for continued work to reduce barriers to housing opportunity by race and other protected classes.

Possibility

Even though a market for higher-end units exists in Lowell, many households move away from Lowell after they are established. Affordability, safety, access to amenities, and other quality of life concerns are often cited as key features households are seeking.

- The number of households that make $150,000 or more a year has increased from 1,900 to 5,460 in the last ten years, a nearly 190% increase. Many of this higher income bracket, are renters paying much less than 30% of their income on housing, suggesting an untapped market for higher-end market rate or ownership units at that price level.
- That said, higher-income households often moved out of Lowell: individuals moving to nearby suburbs had a median individual income of roughly $36,000 (compared to Lowell's median individual income of $32,000). The median age of individuals moving from Lowell ranged between 26 and 30, notably of a life-stage that often includes starting families. Many also moved out of state to New Hampshire.
- In focus groups, key stakeholders expressed a desire to find ways to retain these households and attract similar households that work in Lowell. To these ends, the First Time Lowell Homebuyer Program, which provides down payment assistance to households that are moving to Lowell as a hiring incentivize for key employers, may be underutilized.
- More than 70% of respondents to the citywide survey who answered the question of what they were looking for in a community cited quality public schools; parks, recreational facilities, and opportunities for social gathering; and social, racial, and economic diversity. Among all groups in the survey, safety was of utmost importance. Many residents feel as if sections of several neighborhoods do not appear safe, attractive, or in good repair.

History

Much of Lowell's housing stock is historic, which makes it affordable to buy or rent but also creates maintenance, preservation, safety, and accessibility concerns. Nevertheless, renovated historic homes are often a source of pride, and historic homes have shown great flexibility to be adapted for many household types.

- 77% of Lowell's housing was built before 1960. Some of the oldest housing stock is located where communities of color reside and where some of the lowest household incomes are present.
- A small but significant number of homes—up to 958 or 2.3%—lack either kitchen or plumbing facilities. This compares unfavorably to three of four of the peer Gateway Cities. Lowell also have a higher number of occupants per room than three of four of the peer cities, indicating possible overcrowding.
- After affordability, the most common concerns of current renters participating in the survey were housing condition or issues with landlords, with both concerns cited by more than 20% of respondents to the question.
- A common concern raised during community engagement is a lack of inspectional services to ensure the quality of residential units, including sanitary standards of older units.
- Despite this, private developers and property managers noted in focus groups that one of the most in-demand types of unit are these older, "naturally affordable" multi-family units that are sized for small and midsize families.

Vision

The City strongly articulated a vision of neighborhood-centered and transit-oriented development in its last master plan and has reaffirmed it with Lowell Forward. However, there is a gap between Lowell's walkable and transit-oriented vision and the actual zoning. The new Multi-family Overlay zoning is one step toward closing this gap, but not the only step.

- Developers of both market-rate and subsidized housing noted difficulties in creating dense developments near amenities or transit due to the unpredictable nature of necessary variances or special permits.
- In some cases, existing single-family zoning does not allow the construction of new homes that are similarly sized and situated on similarly-sized lots to existing homes. These homes may be opposed by neighbors when developers seek variances.
- Both market-rate and affordable-housing developers stressed the need for permitting predictability, especially when working outside of the inner neighborhoods of Lowell, with a desire for clear guidelines in variances and special permits to make them more predictable and transparent.
- The three new Multi-Family Overlay Districts (MFODs) are a possible opportunity area for new growth near Gallagher Terminal and in the Downtown and Acre neighborhoods, but other neighborhood centers could be similarly examined for increased density and less restrictive permitting processes.
- An analysis of zoning revealed that updates may be needed to comply with fair housing laws such as the Dover Amendment, which is the common name for Massachusetts General Law (MGL) Chapter 40A, § 3. A

Partnerships

There are challenges in tracking data related to affordable housing and Lowell's unhoused population; communicating data, programs, and opportunities to the general public; and on-the-ground communication among network providers and clients. Fortunately, strong partnerships have already been built and should be leveraged for these efforts.

- Focus groups revealed a strong network of partnership between homelessness service providers, health agencies, and other human services. However, on-the-ground staff interviews revealed that coordinating with partner agencies in the moment with clients can often be difficult.
- During outreach, participants shared multiple stories of residents facing housing insecurity or in housing crisis often not knowing where to turn, and there was a strong desire for a better-advertised single point of entry that could assist in intake and connecting people with existing services. Local providers noted that intake paperwork and bureaucracy often intimidates potential clients and creates a burden on staff.
- In the public survey, respondents reported a relatively low knowledge of home ownership programs such as those provided by Merrimack Valley Housing Partnership.
- Lowell Housing Authority reports that education and advocacy are among the most needed resources, including educating low-income families about these programs and assisting them in applying for federal assistance in the form of either public housing or Section 8.
- The Hunger and Homelessness Commission is a valuable resource that connects and provides opportunities for collaboration among dozens of organizations, but there may be a need to provide education on its purpose, its meeting schedule, and its reach to the general public.
- Focus groups of agencies suggested that Land Use Boards and City Council could benefit from education on fair housing policy and law.
- Discussion with day centers suggested that they have built trust with the homeless individual population. This trust may be difficult for larger organizations to build with individuals, and it could be utilized and strengthened to assist those populations.
- It was difficult to find clearly-communicated and accurate data on number of homeless individuals, shelter beds, supportive units, and similar tracking measures. The city has begun tracking key metrics on its website, but more could be done to make this data accessible and understandable.
- Although there have been eligible units added in the last ten years, the only change to the official Subsidized Housing Inventory (SHI) has been the removal of units, suggesting a need to improve tracking of SHI units. This includes both adding qualifying units to the SHI and recording additional information about rents, accessibility, deed riders, and other tracking measures.

Communication

Continued focus on inclusive and equitable community engagement around housing policy and opportunities, including a diversity of communication channels, methods, and languages, is a priority among many of Lowell's communities. This was brought up in focus groups, public forums, and the survey as a key priority.

Lowell is projected to grow by 2,205 households between 2020-2030.

Lowell is not projected to grow as much as its peers.

According to statewide projections,[1] most eastern Massachusetts communities are projected to grow until 2040 before slowing in 2050 as birthrates decline. Compared to its peer Gateway cities, Lowell is anticipated to grow more slowly. Lowell's slow growth projection is based partially on its slow growth from 2010 and 2020—Lowell and Salem grew more slowly than Worcester, Lawrence, and Haverhill during that time, and the factors that contributed to speed of growth have been assumed to continue.

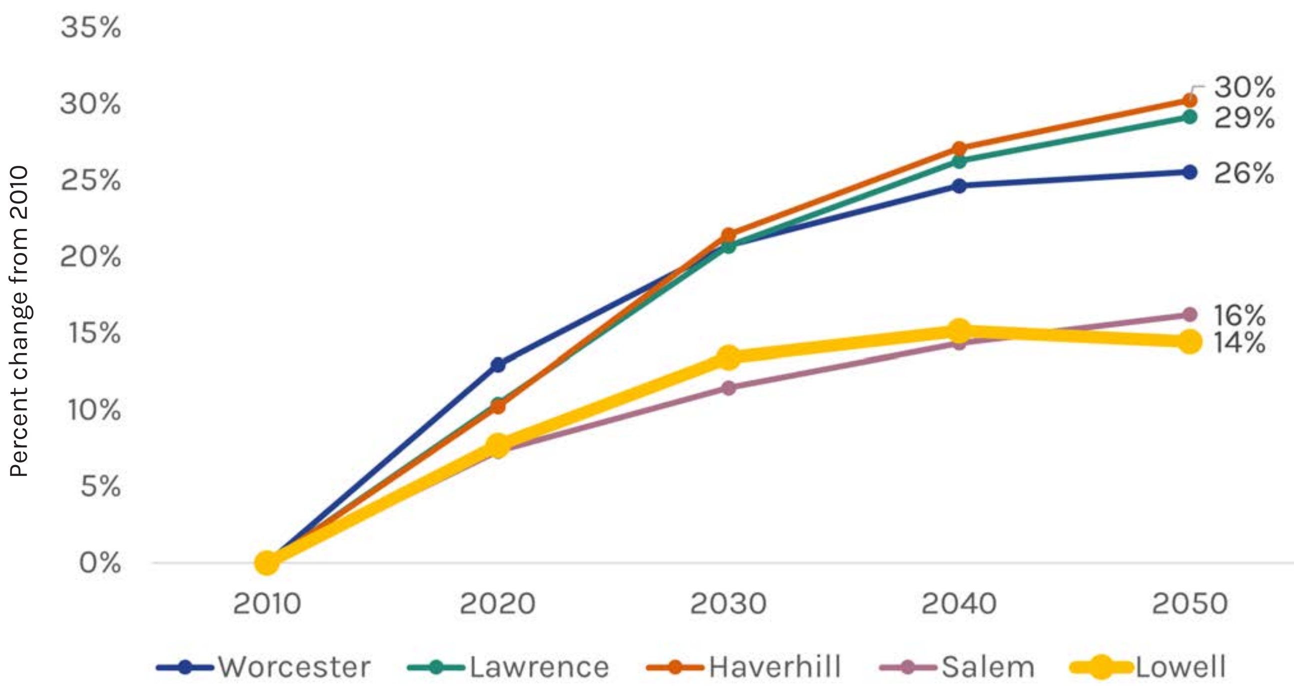
Lowell's projected growth translates to 2,358 new households from 2020-2030 and an additional 660 the following decade. One goal of this plan is to identify the best location and form for homes for these new households. In addition, it must estimate homes needed for people who are doubled up, individuals or households would live in Lowell to be closer to their job or friends and family if only they could find an affordable and appropriate home, and the region's unhoused population.

Key Figures

41,229 Households
115,554 Population
2,358 Household growth by 2030
738 Population growth by 2030

Sources: 2020 Decennial Census, MAPC

FIGURE 1: CHANGE IN NUMBER OF HOUSEHOLDS PROJECTED FROM 2010, PEER CITIES



Source: MAPC, Massachusetts Regional Household and Labor Force Projections and Subregional Allocation, 2023.

1. *See "Methodology and Data Sources" in Comprehensive Needs Assessment Introduction on page 10.*

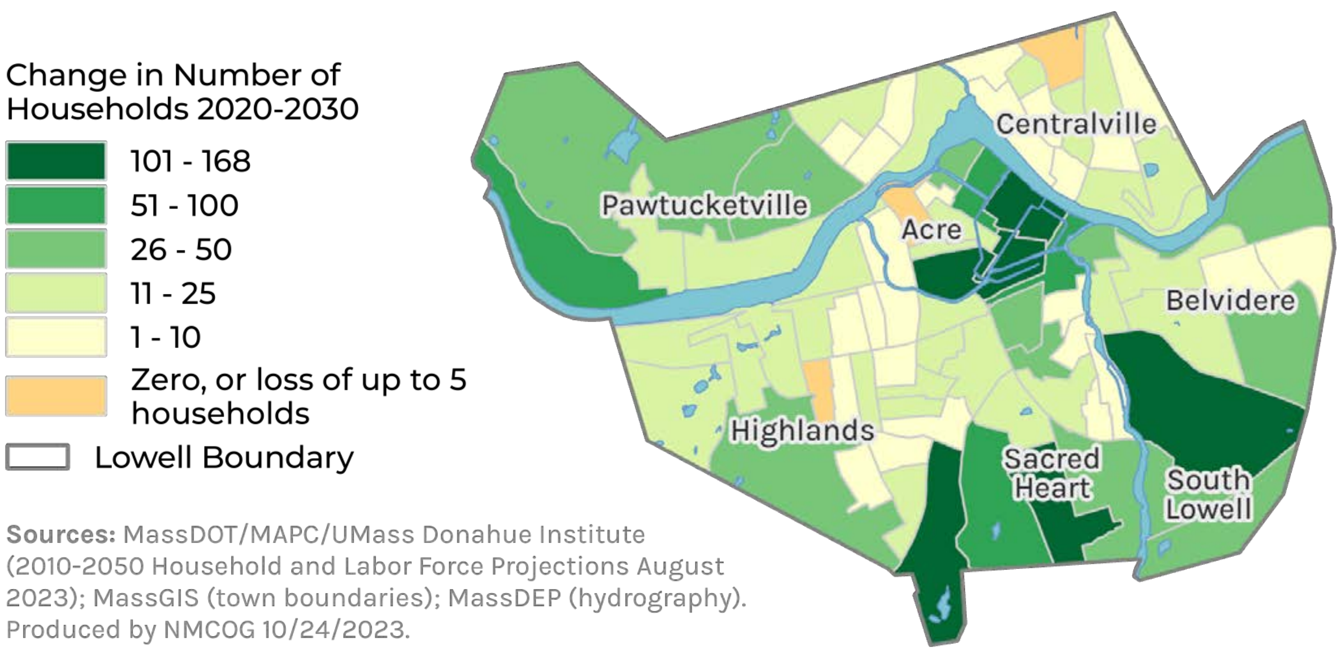
This growth is projected to occur in Downtown, the Acre, and South Lowell.

The projection model assigns growth to where current zoning allows it. For example, if a particular zone allows three units per acre, but only one unit per acre is built, the model would assign two units per acre more until all the region's projected growth was geographically assigned.

Through this methodology, Lowell's growth is projected to be concentrated in Downtown, the Acre, South Lowell, and near the I-495/US-3 interchange.

This is because these are relatively attractive areas for growth and they have additional capacity with the existing zoning. Growth may be more evenly distributed with alterations to zoning.

MAP 2: NUMBER OF NEW HOUSEHOLDS PROJECTED, 2020-2030



Source: MAPC, Massachusetts Regional Household and Labor Force Projections and Subregional Allocation, 2023.

Migration data shows Lowell is a City of Opportunity for many.

People tend to move into Lowell from other countries and places like Malden, Lawrence, and Boston. People tend to move out to adjacent communities and New Hampshire.

New households tend to come to Lowell from other communities in Massachusetts—both within and outside of Middlesex County. An outlier in 2016-20 was Bexar County (San Antonio), from which an especially large number of people moved to Lowell in 2016-20. This is near the U.S. border with Mexico and might represent international immigrants.

People leave Lowell to other Greater Lowell communities and outside the state entirely, especially New Hampshire, Virginia, and Florida. The number of people leaving Lowell for another state has increased in recent years, leading to net domestic outmigration in 2014-18 and 2015-19.

TABLE 3: TOP FIVE COUNTY/COUNTY SUBDIVISIONS FOR IN- AND OUT-MIGRATION, 2016-2020, LOWELL

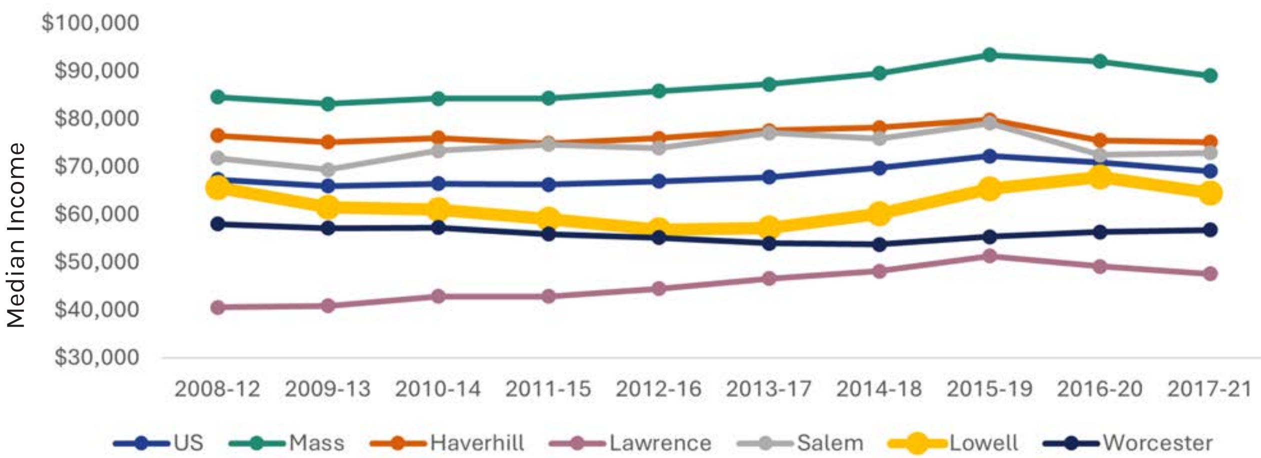
Location	People Moving to Lowell	Location	People Moving from Lowell
Tewksbury	259	Billerica	-162
Malden	256	Tyngsborough	-170
Bexar County (San Antonio)	239	Derry, NH	-183
Lawrence	232	Dracut	-222
Boston	194	Nashua, NH	-537

Source: U.S. Census Bureau, County-to-County Migration Flows, 2016-2020

Lowell's median income is in-line with the US and has been rising until recently, but it is still in the middle of its peers.

Lowell's median household income in 2021 dollars shrank from 2008-12 to 2012-16 before rebounding to a high of nearly $67,831 in 2020. The latest American Community Survey measured a median of $64,489, lower than two of the peer cities.

FIGURE 2: MEDIAN INCOME IN 2021 DOLLARS, 2008-2021, PEER CITIES



Source: U.S. Census Bureau, ACS Five-year data 2008-12 – 2017-21, Table B19013

This pattern might be due to Lowell being a City of Opportunity: People who move out have higher incomes than those who move in.

Table 4 and 5 summarize people moving to and from Lowell by population. Focusing on people moving from abroad or from a different county in Massachusetts to Lowell because these are the most common movers, Table 4 indicates people in those categories over age 15 tend to have a lower income than those in categories that tend to move away from Lowell. Despite these ongoing patterns of immigration, Lowell's inflation-adjusted median income rose from 2013-17 to 2016-2020.

Table 5 shows that the median age of those who move to Lowell is lower than those who move from Lowell, but both figures are lower than the overall median age of Lowell. Even among the younger, more mobile categories of households, the youngest households are the ones who come from another county in Massachusetts.

This data together shows a pattern: households move from other Massachusetts towns and cities or from abroad, grow their incomes in Lowell, then move to suburbs or other states. This may mean Lowell is a City of Opportunity for younger individuals or households just getting established: they move to Lowell when they are younger and make a lower income, and after building a career in Lowell, they leave to nearby communities or to New Hampshire for lower-density housing or ownership opportunities. While in Lowell, their incomes grow quickly enough to raise Lowell's median income.

TABLE 4: MEDIAN INDIVIDUAL INCOME OF MOVERS, 2017-2021, LOWELL

Median Income, Lowell	$32,012	
Same house 1 year ago	$32,864	
	Moved to Lowell	**Moved from Lowell**
Moved within Middlesex County	$32,583	$35,938
Moved from/to different county within Massachusetts	$17,348	$28,616
Moved from/to different state	$20,022	$30,885
Moved from/to abroad	$11,796	Not available

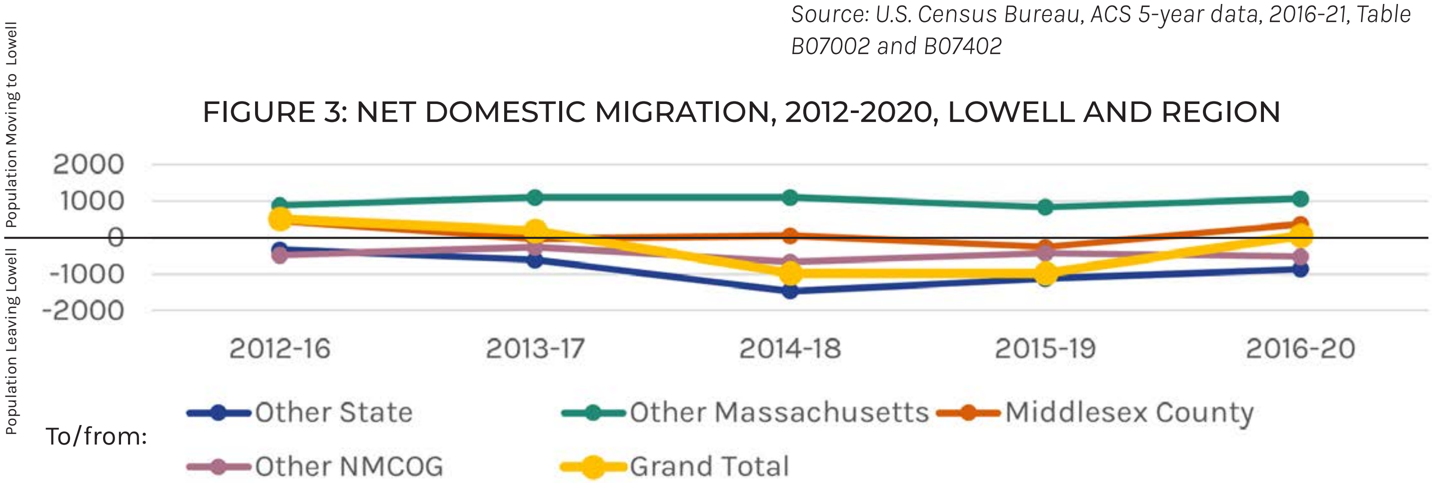
Source: U.S. Census Bureau, ACS 5-year data, 2016-21, Table B07411 and B070015

TABLE 5: MEDIAN AGE OF MOVERS, 2017-2021, LOWELL

Median Age, Lowell	34.9	
Same house 1 year ago	36.7	
	Moved to Lowell	**Moved from Lowell**
Moved within Middlesex County	29.5	30.1
Moved from/to different county within Massachusetts	23.4	25.9
Moved to/from different state	23.6	28.5
Moved from abroad	24.1	Not available

Source: U.S. Census Bureau, ACS 5-year data, 2016-21, Table B07002 and B07402

FIGURE 3: NET DOMESTIC MIGRATION, 2012-2020, LOWELL AND REGION



Source: U.S. Census Bureau, County-to-County Migration Flows

Although Lowell's median income has risen, it is not distributed evenly.

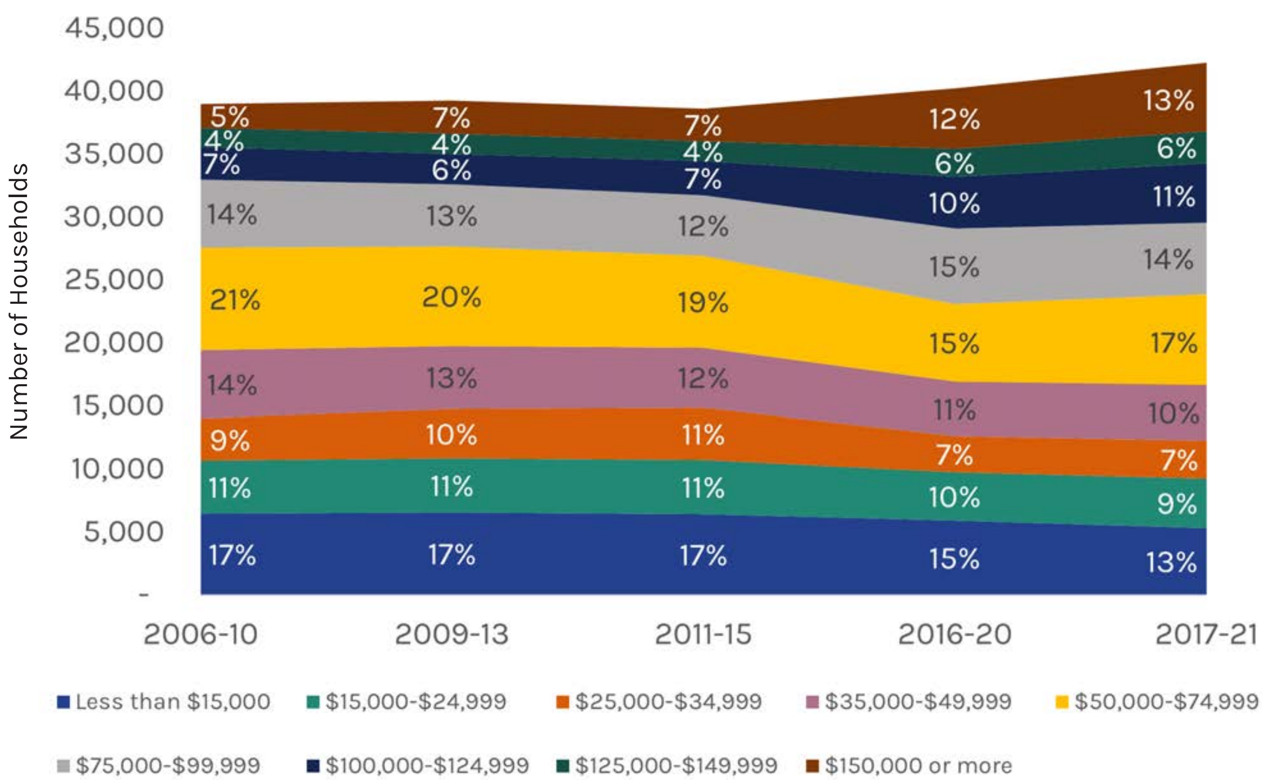
The number of households at the highest income distribution is growing, but the number of households at the lowest end is holding relatively steady despite median income growth.

Although income distribution cannot be as easily adjusted for inflation as median income, it is notable that the number of households earning less than $15,000 annually has stayed relatively steady between 6,496 and 5,343 in the last ten years, while the number earning $150,000 or more has increased from 1,900 to 5,460.

This change in the upper income category could represent individual households increasing their income or it could represent an in-migration of higher-income people. That said, migration patterns show that higher-income people tend to migrate out of Lowell.

Regardless, a large number of households remain in low income brackets even as the buying power of a dollar decreases. If the number of homes does not increase as quickly as the number of households living in Lowell, those households will be the first that are forced into housing-insecure situations, including potentially unhoused situations.

FIGURE 4: HOUSEHOLD INCOME DISTRIBUTION, 2006-2021, LOWELL



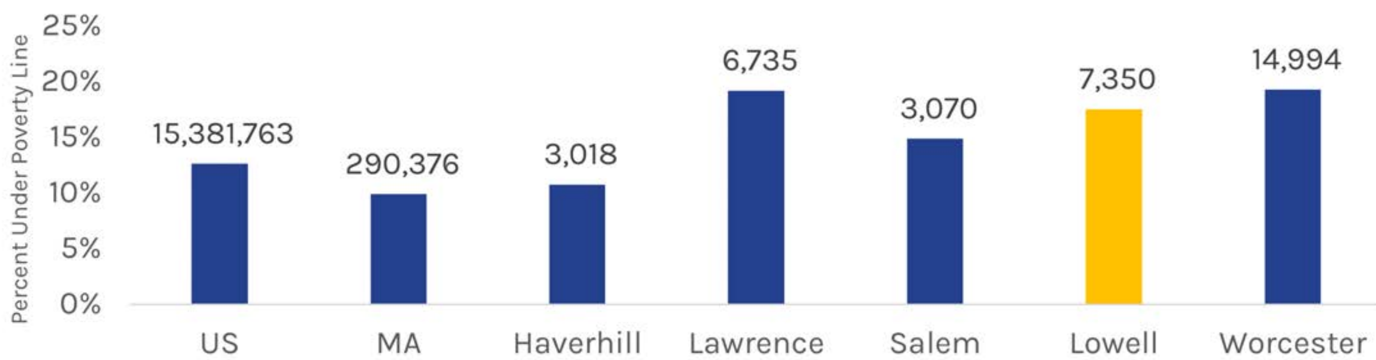
Source: U.S. Census Bureau, ACS 5-year data, 2006-21, Table B19001

Lowell has 7,350 households under the poverty line, concentrated among working-age households, especially nonfamily households headed by a man.

Lowell has 7,350 households under the poverty level, which is 17% of all Lowell households, very similar to the 18% recorded in the 2007-11 American Community Survey. Of Lowell's peer cities, only Worcester and Lawrence have a greater proportion under the poverty line.

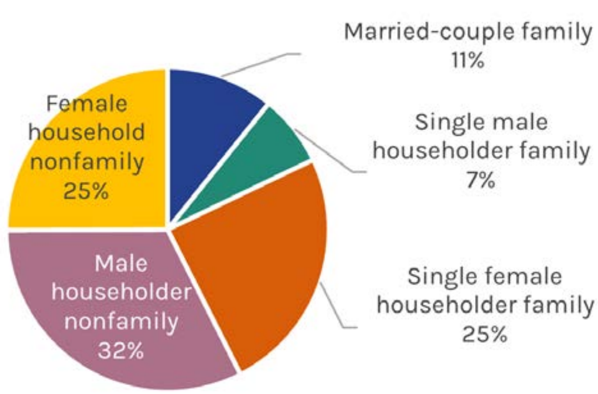
The composition of Lowell's households living under the poverty level is unique in many ways. Unlike Salem and Lawrence, households headed by an elder over 65 years had a similar poverty rate to the general Lowell population—17%. Because Lowell has an overall younger population than its peers, this means a smaller proportion of households in poverty are headed by elders. Also unlike its peers, in Lowell nonfamily households headed by a male householder are more commonly under the poverty level than those headed by female householders. In fact, nonfamily households headed by a male householder are the most common household type living under the poverty line in Lowell. Men in general have a similar poverty rate to women, unlike peer cities or the U.S. as a whole.

FIGURE 5: PERCENT & NUMBER OF HOUSEHOLDS UNDER THE POVERTY LINE, 2017-21, PEER CITIES



Source: U.S. Census Bureau, ACS Five-year data 2017-21, Table B17017

FIGURE 6: HOUSEHOLDS UNDER THE POVERTY LINE, 2017-21, LOWELL



Source: U.S. Census Bureau, ACS 5-year data, 2017-21, Table B17019

Key Figures

$64,489 Lowell Median Household Income (2017-2021)
$77,946 Lowell Median Family Income (2017-2021)
$112,900 Area Median Family Income (2021)
17.4% Lowell Households under the poverty line (2017-2021)

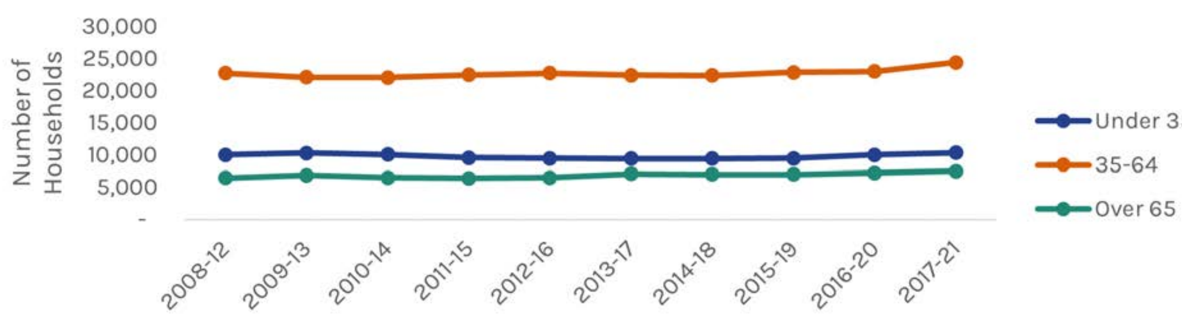
Sources: ACS, HUD

Lowell is uniquely home to many young people and also includes a growing number of households headed by a 65+ year old.

The number of households with heads 65+ years old has consistently grown for the last ten years, but more recently the number of young households has grown.

Although the total number of households has grown steadily from 2008-2012, that growth has been concentrated in households older than 35. The number of households with a householder under 35 has not changed by much, shrinking between 2008-12 and 2013-17, then rising again to meet the 2008-12 level as of 2017-21.

FIGURE 7: NUMBER OF HOUSEHOLDS BY AGE OF HOUSEHOLDER, 2008-2021, LOWELL

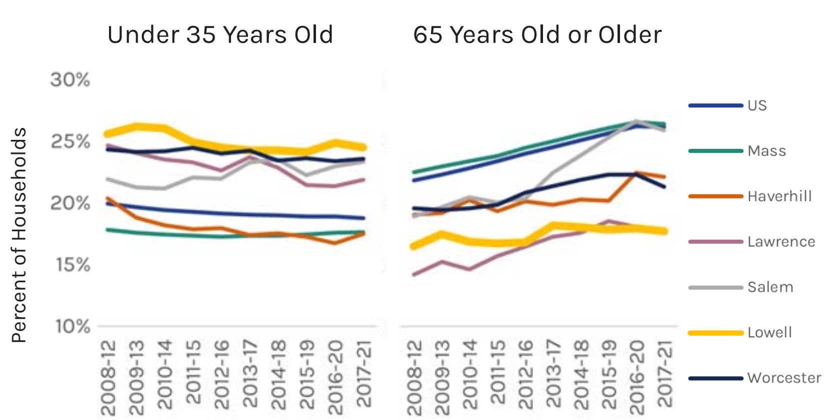


Source: U.S. Census Bureau, ACS Five-year data 2008-12 - 2017-21, Table B25007

Lowell has a higher percentage of young households and lower percentage of older households compared to peer Gateway Cities, with both proportions holding close to steady.

Because the overall number of households has been growing, the proportion of young households has been shrinking even as its absolute number holds steady. Nevertheless, Lowell still has a higher proportion of young households than its peers.

FIGURE 8: PERCENT OF HOUSEHOLDS HEADED BY UNDER 35 AND 65+, 2008-2021, PEER CITIES



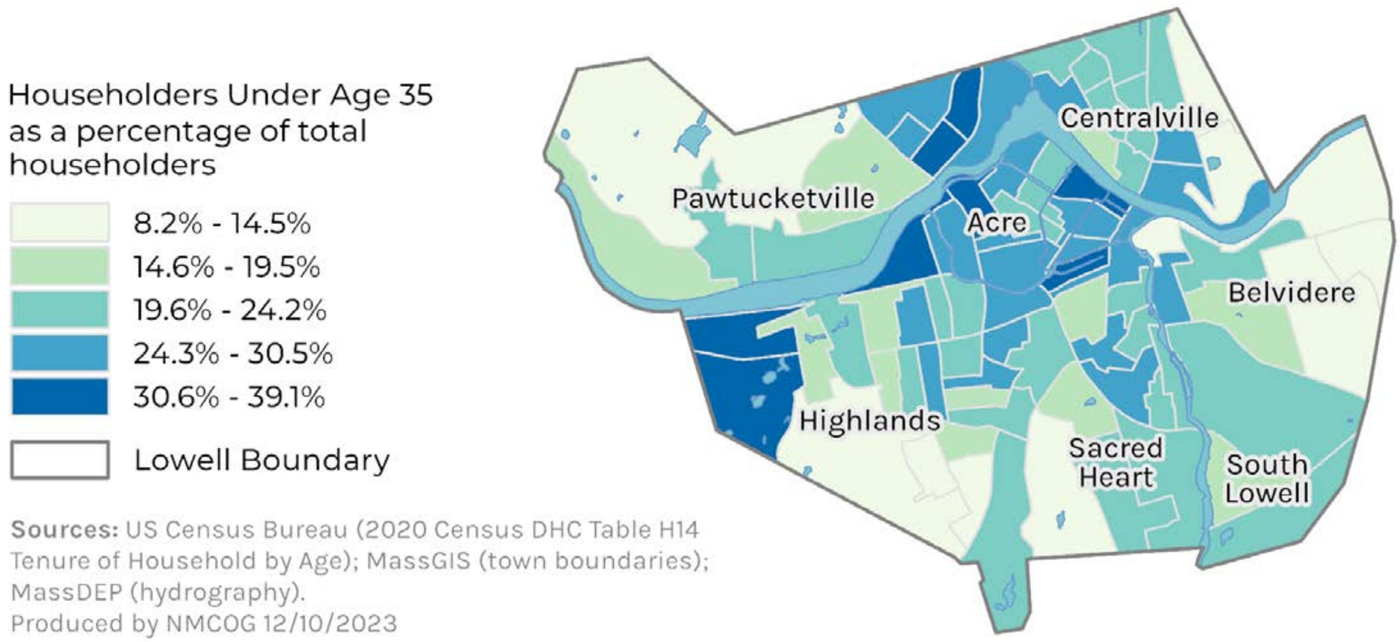
Source: U.S. Census Bureau, ACS Five-year data 2008-12 - 2017-21, Table B25007

Lowell's under 35 households are concentrated in the inner neighborhoods of Lowell, near the campuses, and in the Middlesex Village area.

Households aren't distributed evenly, and younger households are concentrated in areas with multi-family housing, including downtown, the Acre, the Middlesex Village area of the Highlands Neighborhood, and near the UMass Lowell campuses.

Households over 64 are concentrated in the outer edges of Belvidere, Pawtucketville, and the Highlands. Despite this, because of Lowell's inner-neighborhood density, older households as well as young have a higher per-acre density there.

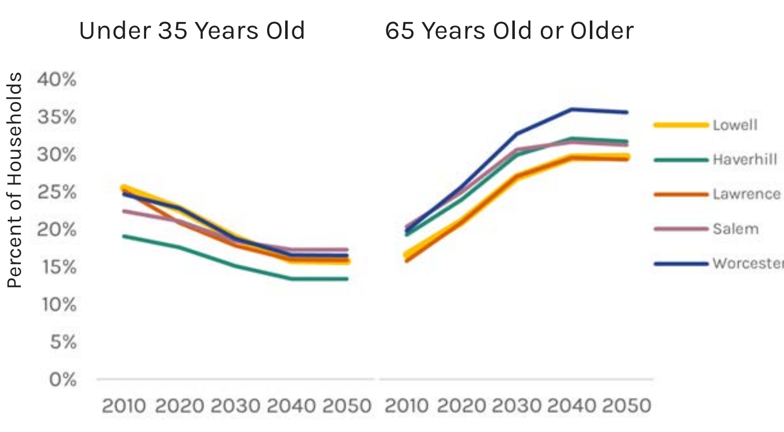
MAP 3: PERCENTAGE OF HOUSEHOLDS UNDER 35 YEARS BY CENSUS TRACT



Source: U.S. Decennial Census, 2020, Table H14.

Lowell is projected to shrink in number of households headed by people under 35 years of age and grow in households headed by those over 65 years of age, following state trends.

FIGURE 9: PROJECTED PERCENT OF HOUSEHOLDS HEADED BY UNDER 35 AND 65+, PEER CITIES



Source: MAPC, Massachusetts Regional Household and Labor Force Projections and Subregional Allocation, 2023.

Projections[1] indicate that the proportion of Lowell's young households will shrink until levelling off at 2040—for both Lowell and its peer cities. Although the 2017-21 American Community Survey estimated that Lowell's proportion of young households did not shrink from the 2016-20 period, it is unclear if that means the trend is reversing or if it will revert to the long-term shrinking trend.

Meanwhile, the number of households 65 and older is projected to grow until it overtakes the Under 35 category. This implies that homes need to be flexible to serve families as they age.

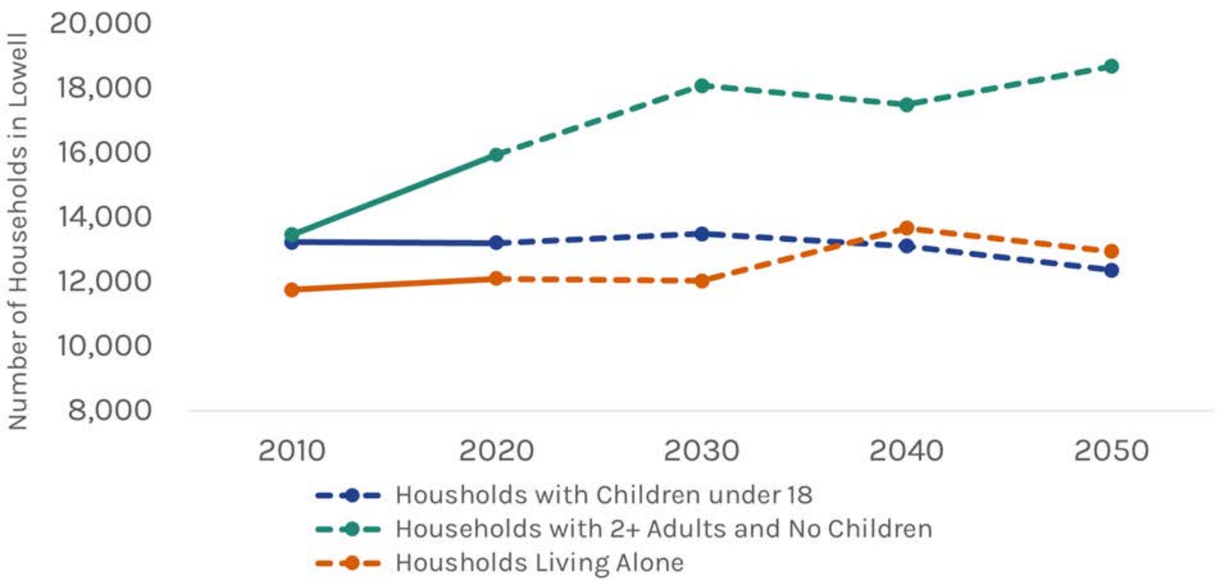
1. See "Methodology and Data Sources" section in Introduction

Lowell's households are projected to shrink.

The number of households with 2 or more adults and no children rose by nearly 3,000 from 2010-2020 and is projected to grow.

Between 2010 and 2020, nearly all growth of number of households in Lowell was in households with 2 or more adults but no children. That is projected to continue to 2030. However, further in the future, single households are anticipated to grow as households with children are anticipated to decline. This pattern is already being seen in Lowell's suburbs.

FIGURE 10: PROJECTED HOUSEHOLDS BY TYPE, LOWELL, 2010-2050



Source: U.S. Decennial Census, 2010-2020, Table P19 and P21 for years 2010 and 2020, and MAPC, Massachusetts Regional Household and Labor Force Projections and Subregional Allocation, 2023 for years 2030-2050.

201 Canal Apartments. Source: NMCOG

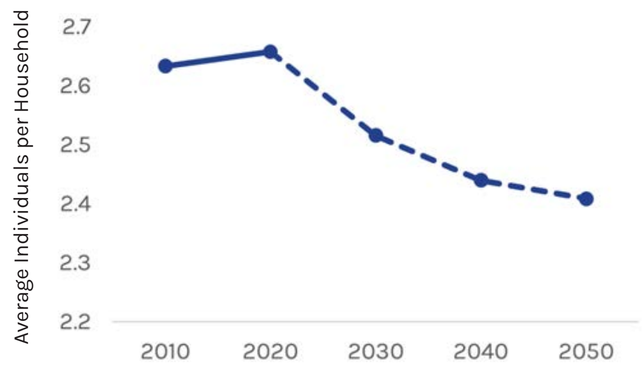
Boott Mills. Source: NMCOG

Average household size is projected to shrink by 5% from 2020 to 2030, and continue shrinking through 2050, reaching an average of 2.4 people per household.

Bucking regional and state trends, the average household size grew in Lowell between 2010 and 2020. Given that most growth during that time was households with only adults (see Figure 10 on opposite page), this may reflect trends such as families doubling up or adult children staying with parents because of housing cost concerns.

Regardless, projected household size is anticipated to drop by 5% to around 2.5 people per household in 2030, and continue to drop through 2050.

FIGURE 11: PROJECTED AVERAGE HOUSEHOLD SIZE, LOWELL, 2010-2050

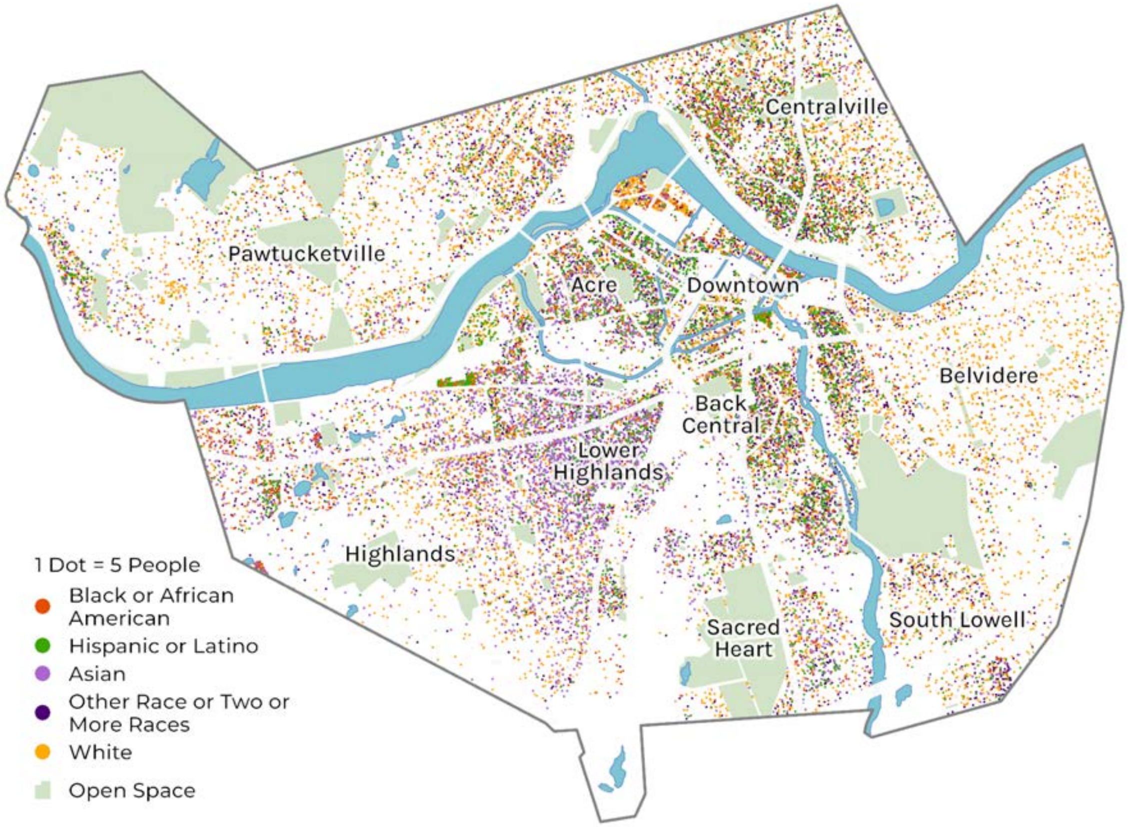


Source: U.S. Decennial Census, 2010-2020, Table P15 for years 2010 and 2020, and MAPC, Massachusetts Regional Household and Labor Force Projections and Subregional Allocation, 2023 for years 2030-2050.

Lowell is very diverse, but inequities create fair housing concerns.

Lowell is segregated by race, and areas with lack of multi-family or affordable housing may perpetuate this segregation.

MAP 4: LOWELL BY RACE AND ETHNICITY



Source: ESRI Living Atlas (US Census Bureau 2020 PL 94-171 Blocks, Tables P1 and P2); MassGIS; MassDEP. Produced by NMCOG 1/2/2024.

A 2006 study[1] found Lowell to have the most segregated white population of the 313 Metropolitan Statistical Areas in America. This study measured the likelihood of any census block to be adjacent to other census blocks that contained a majority of the same race. The larger the group of census blocks that contained mostly the same race, the more segregated that population would be considered.

Although the study would be difficult to replicate with current data, it is notable that racial diversity has increased within many of Lowell's census blocks. Although the Asian population is concentrated in the Lower Highlands, this group is represented throughout Lowell's inner neighborhoods. Upper Belvedere, portions of the Highlands, portions of Christian Hill, and portions of Pawtucketville, on the other hand, have a larger proportion of people identifying as White, non-Hispanic or Latino than other areas in Lowell.

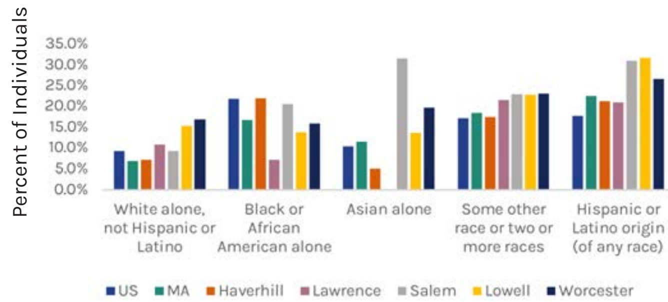
These racial demographics correlate with housing typologies: areas with fewer multi-family and rental opportunities have a higher proportion of White, non-Hispanic or Latino households. Historically, income disparities have blocked people of color from ownership opportunities and have reinforced segregated patterns, as will be discussed later.

1. *A Measure of Segregation Based on Social Interactions, Echeinque and Fryer, 2006*

People identifying as Black or African American, Asian, some other race or two or more races, and those identifying as hispanic or Latino are more likely to be under the poverty line than those identifying as White, not hispanic or Latino.

When comparing Lowell's population living under the poverty level to the United States in general, it is unique in many ways. The poverty rates of people identifying as White alone (13%), Black alone (15%), and Asian alone (15%) are all under Lowell's average poverty rate (17%). Those with poverty rates above the overall poverty rate are hispanic or Latino (33%) and some other race or two or more races (24%). This is different than national trends, in which people identifying as Black or African American alone often have the highest poverty rates, although similar in that people of color in general have higher poverty rates.

FIGURE 12: PERCENT UNDER THE POVERTY LINE BY RACE, SELECTED GEOGRAPHIES, 2017-2021

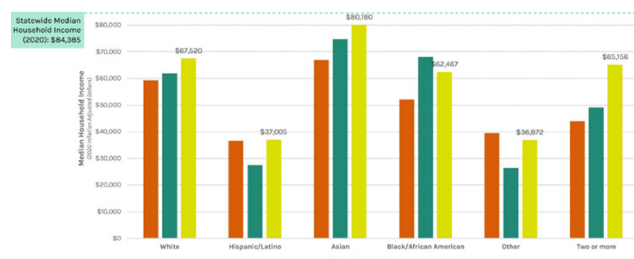


Source: U.S. Census Bureau, ACS Five-year data 2008-12 – 2017-21, Table B19013

Income growth has not been equitably experienced by all racial and ethnic groups, and the gap has grown between households with a White head of household and those with Hispanic and Latino, Black, and other heads

The financial disparities suffered by people of color are echoed in median household income. Median household income has been increasing since 2000 for households with a householder identifying as White, Asian, or Two or More Races. However, income has fluctuated without a clear growth pattern for households of other races or Hispanic or Latino. These racial groups started had the lowest median incomes in 2000, and the gap between them and the overall median income has only grown wider since.

FIGURE 13: MEDIAN HOUSEHOLD INCOME BY RACE, LOWELL, 2000-2020

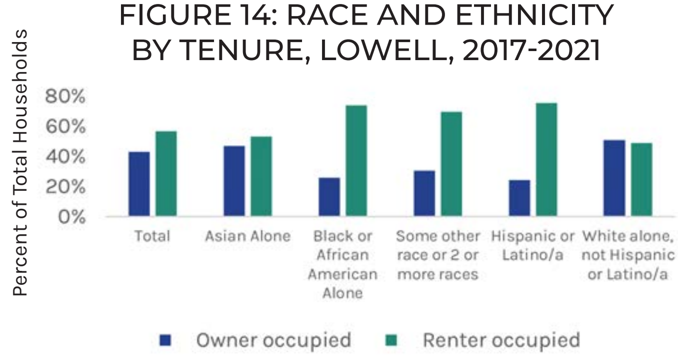


Source: U.S. Census Bureau, 2020 Decennial Census, ACS 5-year Data, 2006-2010 & 2016-2020

Lack of access to ownership opportunities may prevent one method of wealth-building.

The connection between income, race, and housing opportunity is shown through comparing tenure by race. Households with a householder identifying as White alone is the only category in which a majority are owner-occupied. In contrast, households with a householder identifying as Black, Hispanic or Latino, and Some other race or two or more races each are 30% or less owner-occupied.

FIGURE 14: RACE AND ETHNICITY BY TENURE, LOWELL, 2017-2021



Source: U.S. Census Bureau, ACS Five-year data 2008-12 – 2017-21, Table B19013

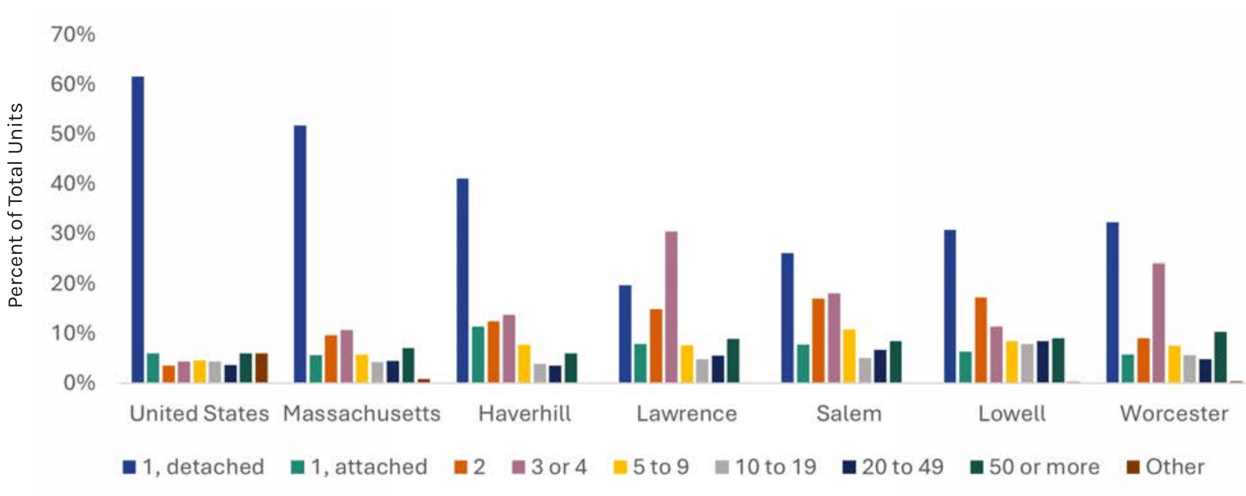
Lowell's residential permitting activity is down from the mid-2000s and is now largely for multi-family units.

As of the 2020 Census, Lowell had 43,482 units of housing, with 43,370 considered year-round housing units.

Although the Decennial Census gives a count of overall units, the five-year American Community Survey estimate must be used for housing type. This breakdown is shown in Figure 15.[1]

Lowell has a similar proportion of single family homes to Worcester and Salem, more than Lawrence, and fewer than Haverhill. However, Lowell's proportion of duplexes is much higher than Worcester's, and its remaining structure sizes are more evenly distributed than its peers, which tend to have a high proportion of units in buildings of 50 or more units. 45% of Lowell's units overall are multi-family (3 or more), slightly lower than Worcester's 52% and Salem's 49%, and much lower than Lawrence's 57%.

FIGURE 15: DWELLING UNITS BY TYPE, PEER CITIES, 2017-21



Source: U.S. Census Bureau, ACS Five-year data, 2017-2021, Table B25024

Similar to Salem and Worcester, 90% of Lowell's new permits were multi-family, most of which were in 5+ unit structures.

Figure 18 shows that Lowell, Salem, and Worcester have similar proportions of building types permitted in the last five years. Most new structures in those cities have been multi-family with 5+ units. Unlike them, Lawrence had a balance of single-family and two-family construction with very few units permitted in three or more unit structures, and the majority of housing permitted in Haverhill was single-family units.

Key Figures

43,370 Year-round units
45% are Multi-family
211 Homes completed in 2022
165 Annual Average 2018-2022

Sources: Census, Lowell Permit Data

1. The number of units was higher than the 2020 Decennial Census count, so this should be treated as an overestimate that is useful for analysis, including comparison with peer cities.

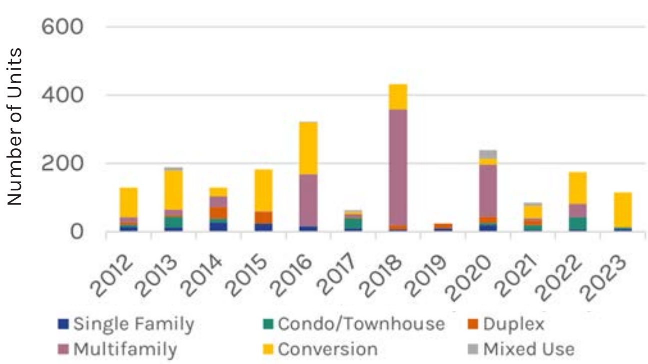
Once issued, most permits are completed: As of July 2023, out of an estimated 2,135 units applied for since 2012, 80% were built, 18% were in the pipeline, and 2% were expired or withdrawn. Permits took 571 days on average to complete.

Two key figures in housing production are housing units permitted by year and number of housing units completed. A low permit number may indicate a cool market or restrictive zoning, whereas a low number of completions may indicate volatile market conditions or other difficulties for developers to finance their projects.

After the Great Recession, permitting activity had resumed by 2012. There were short downturns in 2017, 2019, and 2021, but otherwise permit activity has remained between 125 and 425 units per year. The majority of new units were in new multi-family buildings (three or more units) and conversions of commercial structures (with a majority being larger downtown buildings and mills). Lowell's ten-year average was 571 days from application to completion. For reference, the national average construction time in 2022 for 2+ unit buildings was 510 days, but because start dates were not recorded, it is unknown how many of the 571 day average was permitting vs. construction.[2]

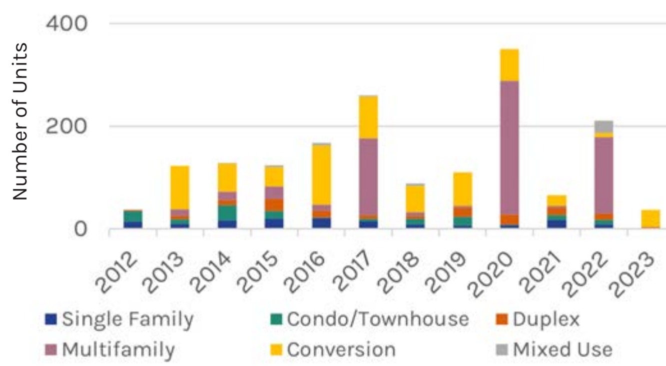
Permitting of single family housing and new condominiums and townhouses has stayed relatively steady, but at much smaller volumes. Since 2012, single family permits have ranged between 4 and 26 annually, townhouses between 0 and 36 annually, and duplexes between 0 and 34 annually.

FIGURE 16: UNITS PERMITTED BY TYPE OF DEVELOPMENT, LOWELL, 2012-2023



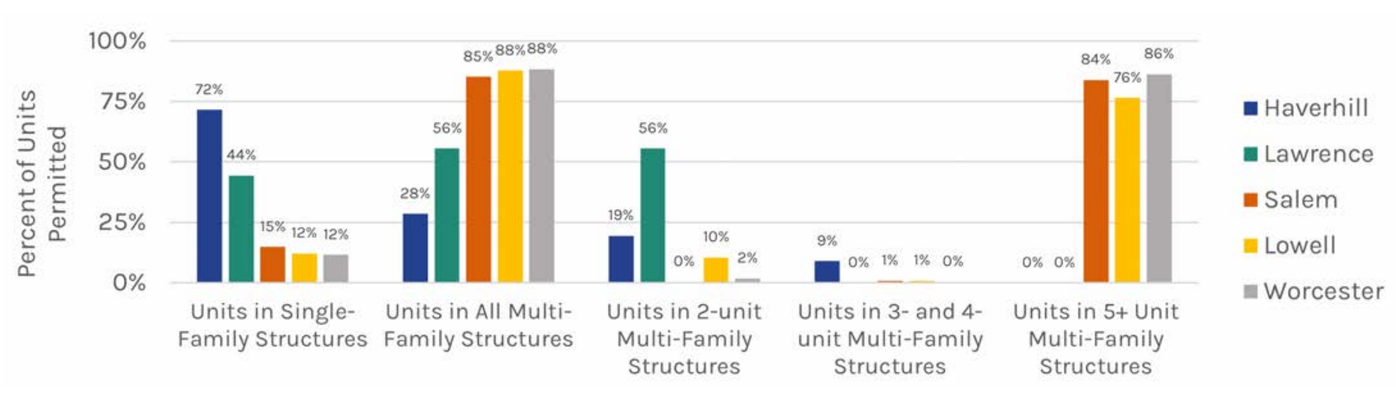
Source: City of Lowell Department of Planning and Development

FIGURE 17: UNITS COMPLETED BY TYPE OF DEVELOPMENT, LOWELL, 2012-2023



Source: City of Lowell Department of Planning and Development

FIGURE 18: PROPORTION OF UNITS PERMITTED, PEER CITIES, 2018-2022



Source: U.S. Census Bureau

2. *Statista.com. https://www.statista.com/statistics/909951/us-construction-of-residential-buildings-average-time/*

Lowell's development is not evenly distributed geographically.

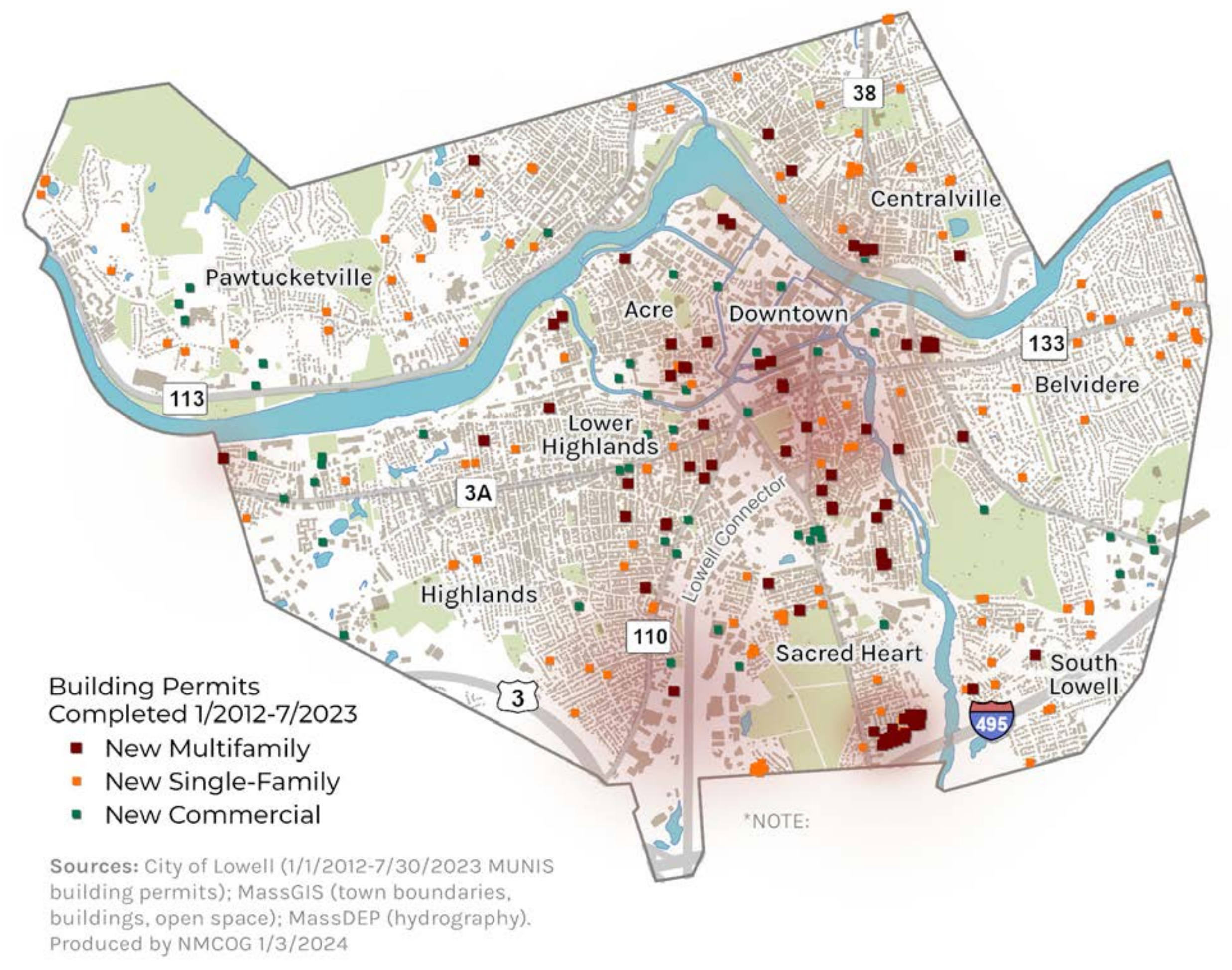
New homes are mostly being permitted in Lowell's core and along the Lowell Connector/Chelmsford Street corridor.

Broadly speaking, builders have concentrated recent housing development in central and south-central sections of Lowell and constructed relatively few developments in the western and eastern sections. Notably, most new development has occurred in the corridor along the Lowell Connector and Chelmsford Street, which are major thoroughfares from interstates to Lowell's core.

Lowell's predominantly single-family neighborhoods have seen little development. There has also been a lack of concentrated development in regional retail areas outside the corridor such as near Chelmsford, Drum Hill, and Stadium Plaza.

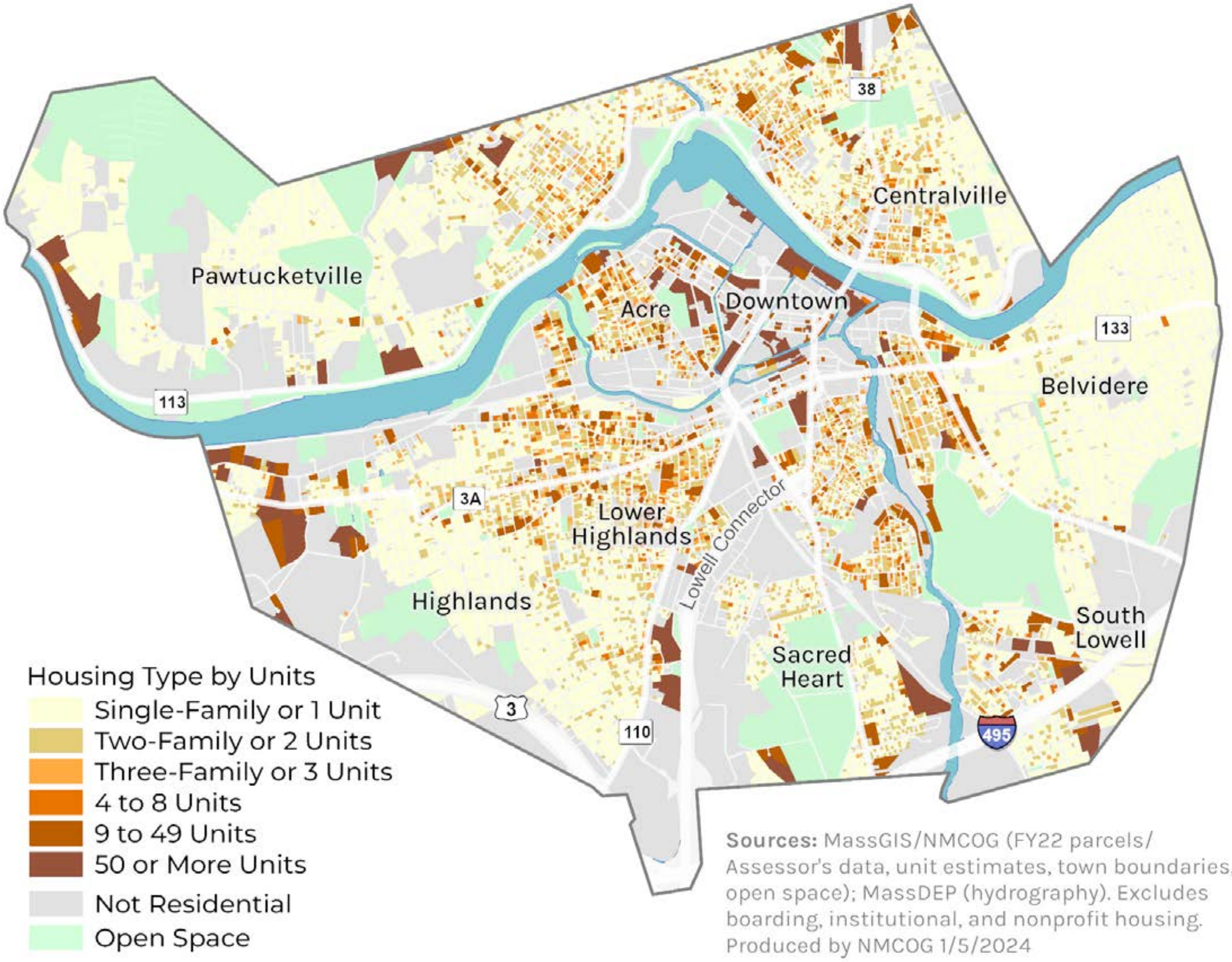
Two largest reasons for distribution are zoning and desirability of location, which includes access to transit or highways.

MAP 5: NEW RESIDENTIAL AND COMMERCIAL DEVELOPMENT LOCATIONS, 2010-2022



Source: City of Lowell, 2023.

MAP 6: HOUSING BY BUILDING TYPE



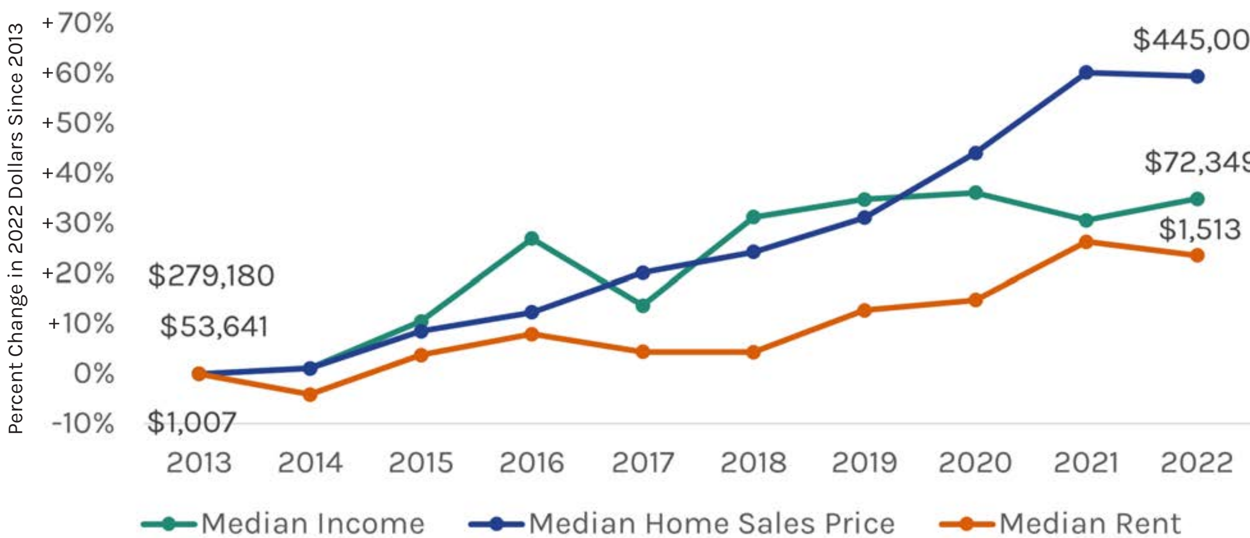
Source: MassGIS/NMCOG Assessor's data.

Existing multi-family housing is not just concentrated in inner neighborhoods, but also along Lowell's northern and western borders and in South Lowell

A majority of Lowell's residential land--67%--contains single-family housing, mainly in the city's outer neighborhoods. Housing density is highest in Lowell's downtown and inner neighborhoods, with lower densities in predominantly single-family neighborhoods such as Pawtucketville and Belvidere. However, a number of larger-scale multi-family housing developments exist on larger parcels along the Merrimack River and at the edges of the city, creating pockets of density around certain nodes such as Middlesex Village.

The average home price has grown 60% adjusted for inflation in the last ten years to a median of $445,000.

FIGURE 19: MEDIAN HOME SALES PRICE, RENT, AND INCOME, LOWELL, 2013-2022



*Source: Warren Group and U.S. Census Bureau One-Year American Community Survey Tables B25064 and B19013 *One year data not available for 2020, 2018-2022 Five-Year data used instead.*

Inflation-adjusted income increased by 35% between 2013-2020, but rent increases have caught up and sales price has surpassed it, rising by 60%.

Figure 19 uses one-year American Community Survey to make direct comparisons to median housing sales prices. For the last ten years, single family and condo housing sales prices have been rising against inflation at an increasing rate. Median household income, after shrinking when adjusted for inflation until 2014, increased greatly between 2014 and 2016 and has been trending upward since then, increasing by 35%.

However, median rent has kept up with the median income increase and median sales price has surpassed it, rising by 60%. The median condo sales price increase is nearly identical to the single-family home sales price increase.

Key Figures

$445,000 Median Single Family Sales Price, 2022
$287,500 Median Condo Sales Price, 2022
$1,513 Median Rent, 2022

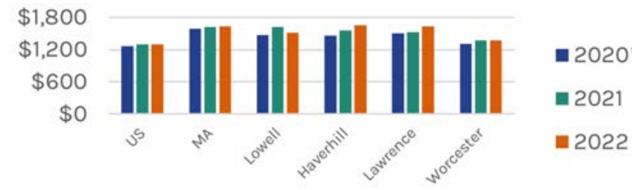
Sources: Warren Group, ACS One-Year Data

Lowell's median rent was highest among its peers until 2022, but has been receding since a 2020 high during the height of the COVID-19 pandemic. Its median single family home sales price is lower than its peers.

One-year ACS data reveals that although Lowell had the highest median rent of peer cities[1] in 2021, when adjusted for inflation, that median was estimated to have receded in 2022 and is now lower than all peers but Worcester. That said, Lowell's median increased by $33 when not adjusting for inflation.

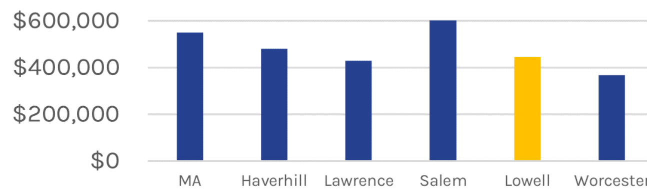
Despite the substantial increase of Lowell's median single family home sales price, it is still below Haverhill and Salem, which are $480,000 and $600,000 respectively. Lowell home prices are comparable to Lawrence, despite Lawrence's lower median income and higher vacancy rates.

FIGURE 20: MEDIAN RENT, PEER CITIES, 2020 - 2022



Source: U.S. Census Bureau, ACS One-year data, 2021, Table
**2018-2022 Five-Year data used for 2020.*

FIGURE 21: MEDIAN SALES PRICE, SINGLE FAMILY DETACHED, PEER CITIES, 2022



Source: Warren Group

There are more homes valued at less than $150,000 than those valued at $750,000 or more in Lowell. There is a similar pattern for rentals over $2,500 and less than $300.

The American Community Survey asks homeowner (single family and condo) residents the following question: "About how much do you think this house and lot, apartment, or mobile home[...] would sell for if it were for sale?" This gives an estimate of the value of every home, not just those that were recently sold. More than a quarter of homes were valued between $300,000 to $399,999, and more than three-quarters fell between $200,000 and $499,999.

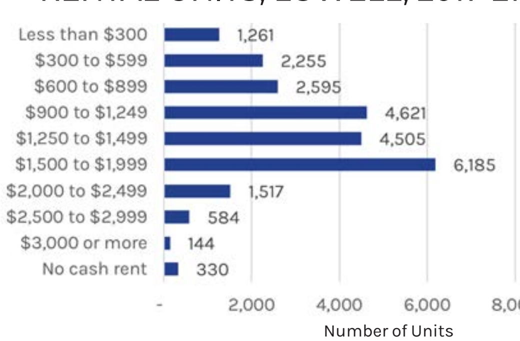
FIGURE 22: HOME VALUE DISTRIBUTION, OWNERSHIP UNITS, LOWELL, 2017-21

Source: U.S. Census Bureau, ACS 2017-2021, Table B25075

That said, an estimated 1,330 owners thought their homes would sell for less than $150,000, which could reflect small condos, dilapidated units, and/or underestimates by owners.

The ACS includes self-reported rent and utility costs when creating its gross rent estimates. An estimated 75% of units have a gross rent between $600 and $1,999, with a quarter between $1,500 and $1,999. 330 have no cash rent and 1,261 have less than $300 monthly rent.

FIGURE 23: GROSS RENT DISTRIBUTION, RENTAL UNITS, LOWELL, 2017-21



Source: U.S. Census Bureau, ACS 2017-2021, Table B25063

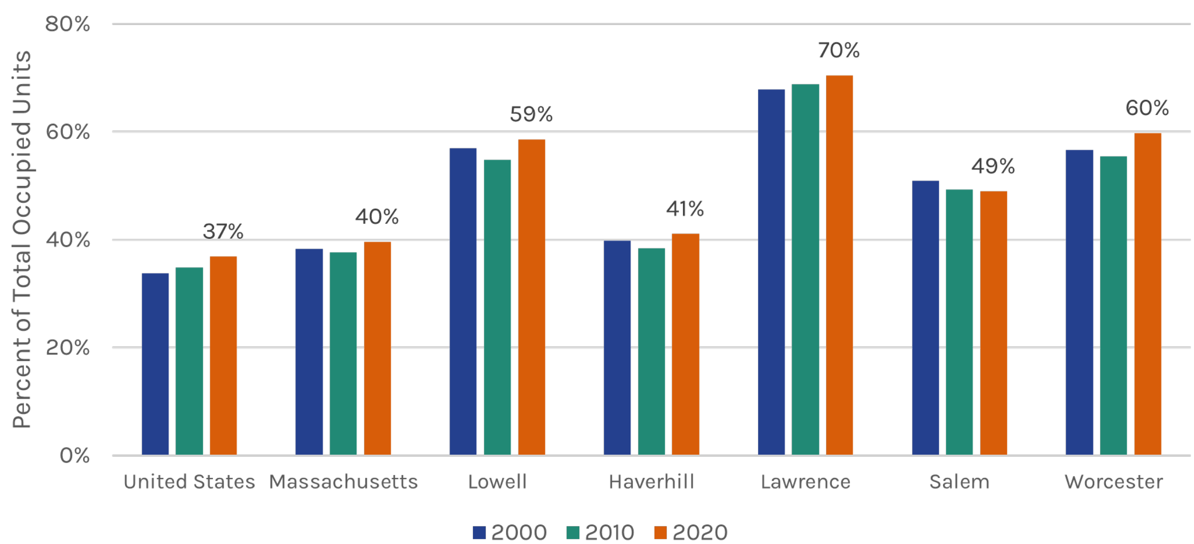
1. *The American Community Survey does not report one-year data for Salem due to small sample size.*

The proportion of renter-occupied units in Lowell was increasing, then plateaued. It may now be decreasing.

The proportion of units that are rentals increased from 55% to nearly 60% between 2010 and 2020, although most growth was in the first half of the decade with a slight decrease as of 2017-21.

Lowell's proportion of total units that are rental dropped from 57% to 55% between 2000 and 2010, but had rose to nearly 60% by 2020. This represents an increase from 21,085 to 24,165 rental units, and increase of 3,080 units. At the same time, the number of occupied dwelling units rose by 2,759 to 41,229 total occupied units. This means at least 321 units were converted from ownership to rental or otherwise lost. That said, the American Community Survey shows the proportion had stopped growing as of 2011-15 and even had declined from its peak as of 2017-21.

FIGURE 24: PROPORTION OF RENTAL UNITS, PEER CITIES, 2000-2020



Source: U.S. Census Bureau, 2000, 2010, 2020 Decennial Census, Table H4

59% of Lowellian households rent, which is similar to Worcester, less than Lawrence, and more than other peer cities

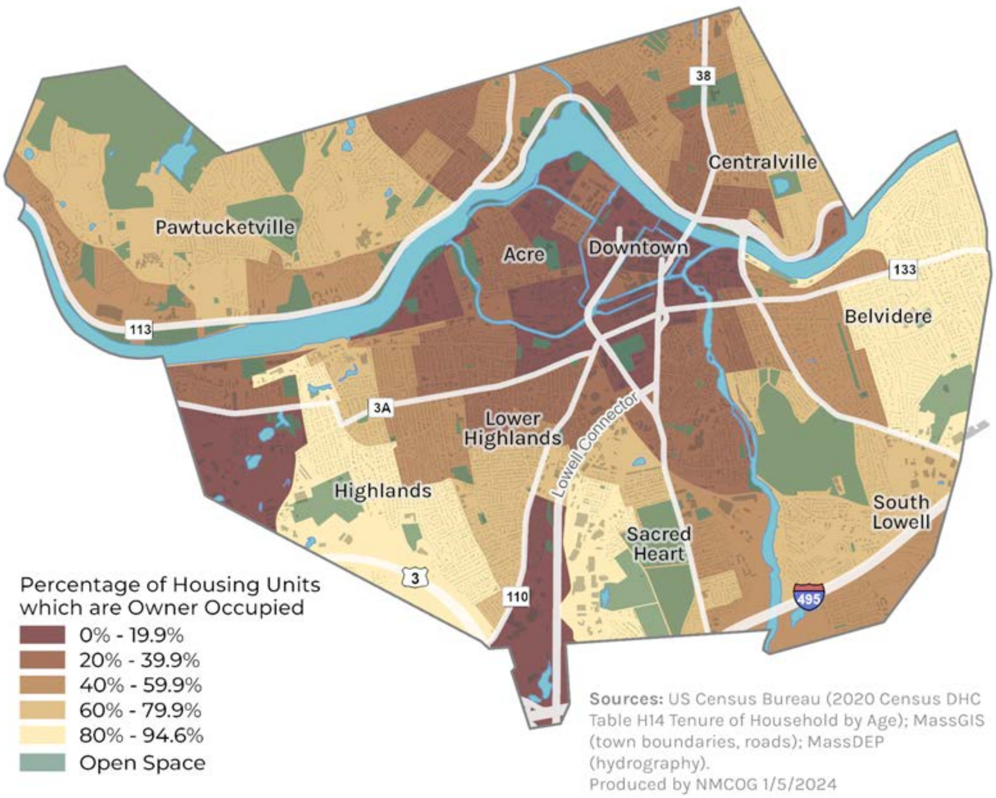
As of 2020, Lowell's renter/owner mix was broadly similar with its peer cities, with an almost identical mix to Worcester. Haverhill and Salem are closer to the Massachusetts average with more owner occupied units than rental units. However, Lawrence has a much larger proportion of rental units.

Lowell's rental units are concentrated in Lowell's inner neighborhoods and in the Middlesex Village area of the Highlands.

Lowell's rental units are not distributed throughout the City. Renters have less access to the southeastern and northwestern areas of Lowell, including Belvidere, South Lowell, Sacred Heart, and western Pawtucketville. Rental housing is most concentrated in Downtown, Back Central, and the Acre. There is a concentration of rental units in Lowell's inner neighborhoods, but a sizable proportion in and around Middlesex Village are also multi-family rental units.

Providing a distribution of tenure opportunities throughout a community is important. Rentals provide access to neighborhoods to lower-income households, while ownership units provide wealth-building opportunities and stability. Apartments, townhomes, or single family can all include ownership and rental opportunities.

MAP 7: TENURE BY BLOCK GROUP, 2020



Source: United States Census Bureau, 2020 Decennial Census, Table H14.

More data is needed to explore owner-occupied multi-family homes

Of special interest are small multi-family homes occupied by the owner. These are advantageous as wealth-building opportunities for investors and multigenerational housing opportunities. They also offer a natural way to mix both rental and ownership units in the same area, leading to the advantages discussed above.

Key Figures

57% of units are renter-occupied, 2020
83% of units in the Acre are renter-occupied, 2020 (highest percentage neighborhood outside downtown)
28% of units in Belvidere are renter-occupied, 2020 (lowest percentage neighborhood)

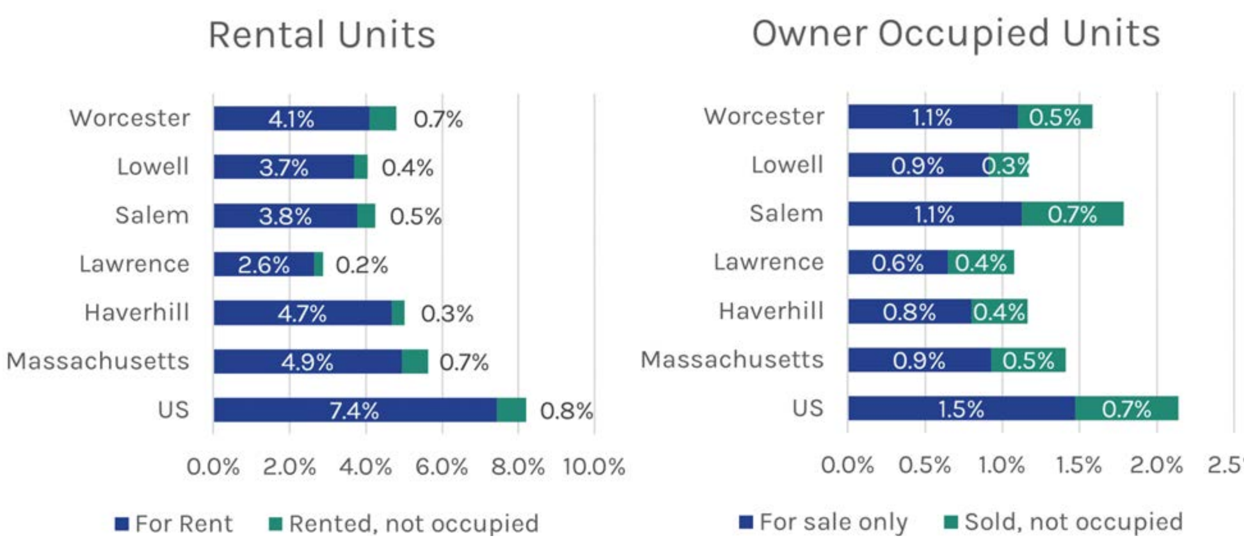
Sources: 2020 Census (Acre census tracts counted 3107, 3111, and 3883. Belvidere counted 3125.01 and 3125.02)

Lowell has a tight renter and owner market, driving up prices.

Lowell has half the vacancy rates that is recommended for a healthy market for both ownership and rental units.

When evaluating vacancy rates, a healthy market for ownership units might be considered a 2% vacancy rate, which provides buyers with a good selection of homes. A vacancy rate of 7% to 8% is often considered a healthy rental market.[1] Lowell had a 0.9% vacancy rate for ownership units in 2020, on par with its peer cities and echoing the tight US market. Lowell had a 3.7% rental vacancy rate, also similar to its peers but well below the US average. In other words, Lowell was not immune to the very tight housing market in Massachusetts.

FIGURE 25: VACANCY RATES, PEER CITIES, 2020



Source: U.S. Census Bureau, ACS Five-year data 2017-2021, Tables B25004 (for number of vacancies by type) and B25032 (for number of occupied units by tenure)

Lowell's home sales volumes are as low as that seen in the mid-1990s, despite now having a higher number of total units.

Lowell had a peak of nearly 800 total home sales in 2004-2005. Condo sales, possibly driven by mill conversions, surpassed sales of single family detached homes during that period. However, even before the 2011 recession, that number had dropped to volumes seen in the mid-1990s. Sales partially recovered, but then returned to a low of 494 single family sales and 374 condo sales from 2019 until 2022, the most recent data available.

The post-2021 sales slowdown corresponds with high interest rates and a 2022 increase in median days on the market (See Figure 28). The timing of these trends may indicate a connection to the COVID-19 pandemic or the rise of interest rates. However, the consistently low number of sales before 2016 and in 2019 indicates that sales may be constrained in Lowell for other more systemic or long-lasting reasons.

1. *Alan Mallach, The Empty House Next Door, 2018. For the purposes of this analysis, only units that are "for rent" or "for sale" are considered vacant. Other types of vacancy are not counted in this figure.*

Key Figures

Sources: 2020 Census, Warren Group

1.1% of owner units are vacant, for sale
3.2% of rental units are vacant, for rent

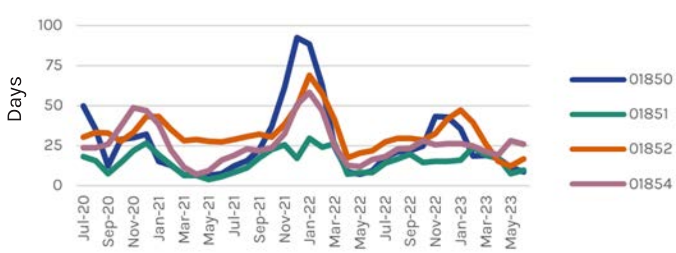
494 single family units sold in 2022
374 condo units sold in 2022

Lowell's median number of days on the market for sales units (single family and condo combined) is at a 3-year low and lower than the Boston region as a whole.

The length a home stays on the market is another way to evaluate a community's housing supply and demand. As shown in Figure 35 and Figure 36, Realtor.com measures this by zip code. Lowell had a slowdown in winter of 2022, but otherwise no zip code has surpassed a three-month average median of 50 days on the market in the winter and 30 days in the summer. Zip code 01851, which encompasses the entirety of the Lower Highlands and Upper Highlands, never surpassed 30 days on the market and for many months out of the study period had a median of just 5 days on the market.

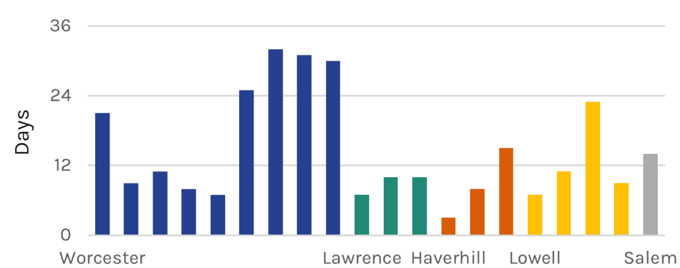
In July 2023, the median number of days a home was on the market of each of the four zip codes in Lowell was between 7 and 23 days, with all zip codes but 01852 (downtown and Belvidere) equivalent or lower than peer cities, indicating a tighter market. For reference, during the same period, homes in the Boston-Cambridge-Newton area had a median 36 days on the market, San Francisco had a median of 34, and the US as a whole had a median of 45.

FIGURE 26: MEDIAN DAYS ON MARKET 3-MONTH ROLLING AVERAGE, LOWELL ZIP CODES, JULY 2020-MAY 2023



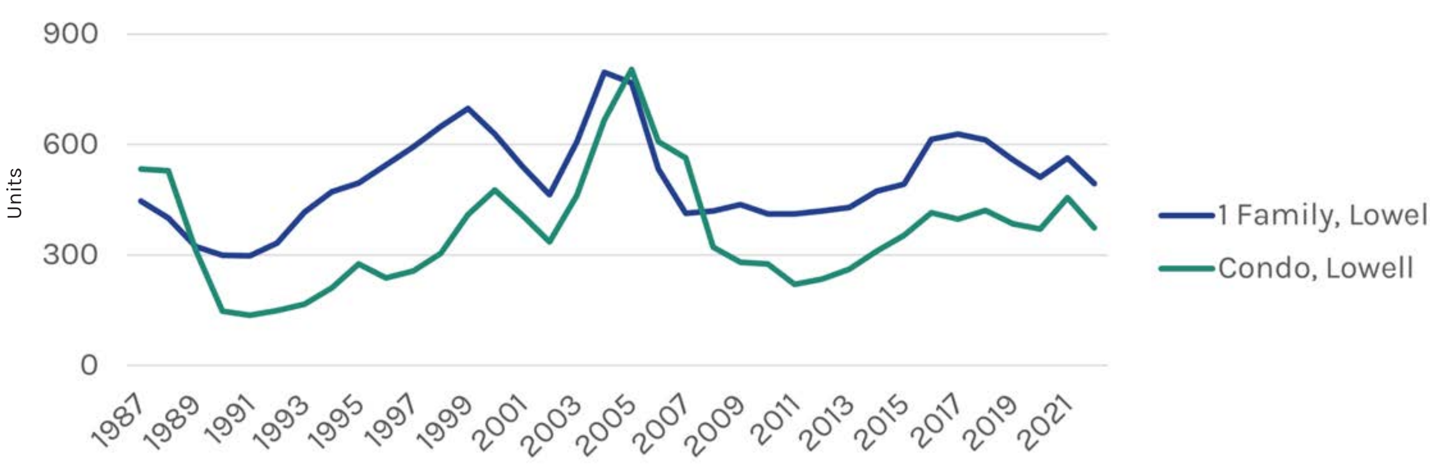
Source: Realtor.com® Economic Research, Monthly Inventory.

FIGURE 27: MEDIAN DAYS ON MARKET, JUNE 2023, PEER CITY ZIP CODES



Source: Realtor.com® Economic Research, Monthly Inventory.

FIGURE 28: HOME SALES, LOWELL, 1987-2021



Source: Warren Group

Lowell has 1,580 units (3.7%) that are considered overcrowded; 958 units (2.3%) lack complete kitchen or plumbing; and almost a third were built before 1900.

The proportion of homes lacking kitchen or plumbing facilities are small, but compare unfavorably to peer cities.

According to the U.S. Census Bureau, complete plumbing requires hot and cold water and a bathtub or a shower, and a complete kitchen requires a sink with a faucet, a stove, and a refrigerator. 279 homes were estimated to lack plumbing and 679 to lack a kitchen. Although this is roughly 0.7% and 1.6% of Lowell's total occupied dwelling units respectively, this proportion was higher than all peer cities except Lawrence (1.9% and 1.8% respectively).

TABLE 6: TOP FIVE COUNTY/COUNTY SUBSDIVISIONS FOR IN- AND OUT-MIGRATION, 2016-2020, LOWELL

Condition	Number	Percent
Lacking Plumbing Facilities	279	0.7%
Lacking Kitchen Facilities	679	1.6%

Source: : U.S. Census Bureau, ACS Five-year data 2017-2021, Tables B25053 and B25049

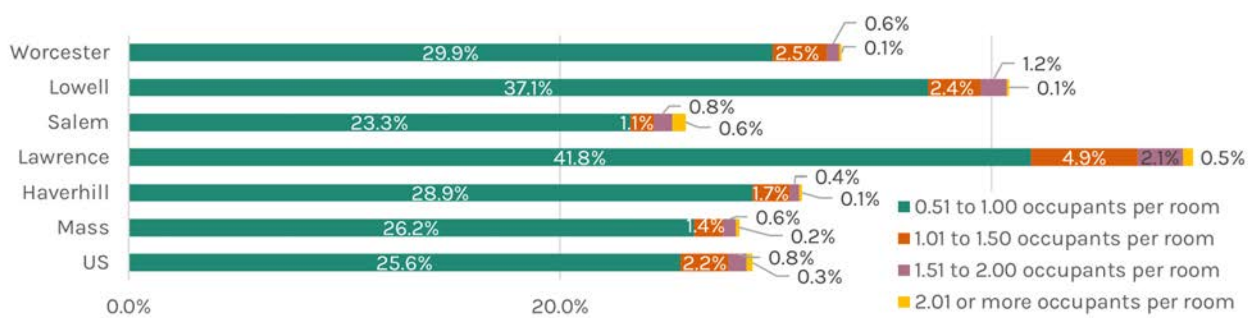
Lowell has a higher-than-average number of occupants per room, surpassed only by Lawrence among its peers.

Overcrowding is sometimes measured through persons per room, with more than one person per room are considered crowded.[1] Lowell has 1,580 units (3.7% of occupied units) with more than 1.0 person per room. This is slightly higher than the U.S. average of 3.3% and may indicate a need to evaluate overcrowding.

Lowell has more units on the threshold of overcrowding: 17,254 units (41% of occupied units) have 0.5 or more persons per room. This is higher than the U.S. average of 29% and all peers except for Lawrence.

Notably, the proportion of overcrowded rental units in Lowell is slightly less than its peer cities, and the proportion of overcrowded ownership units is slightly greater.

FIGURE 29: NUMBER OF OCCUPANTS PER ROOM, PEER CITIES, 2017-21



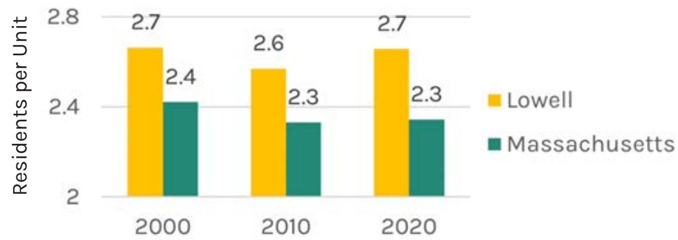
Source: U.S. Census Bureau, ACS Five-year data 2017-2021, Table B25014

1. U.S. Census Bureau, Historical Census of Housing Tables: Crowding. https://www.census.gov/data/tables/time-series/dec/coh-crowding.html

Population per housing unit indicates possible overcrowding and suggests that creation of housing units has not kept pace with population growth.

Another simple way to evaluate whether the number of housing units is keeping up with population growth is to compare the number of Lowell's residents to the total number of Lowell's housing units. Despite family sizes trending smaller, the number of residents per housing unit grew back to its 2000 level between 2010 and 2020. In Massachusetts as a whole, the number of residents per unit stayed relatively steady between 2010 and 2020.

FIGURE 30: RESIDENTS PER UNIT, LOWELL, 2010-2030



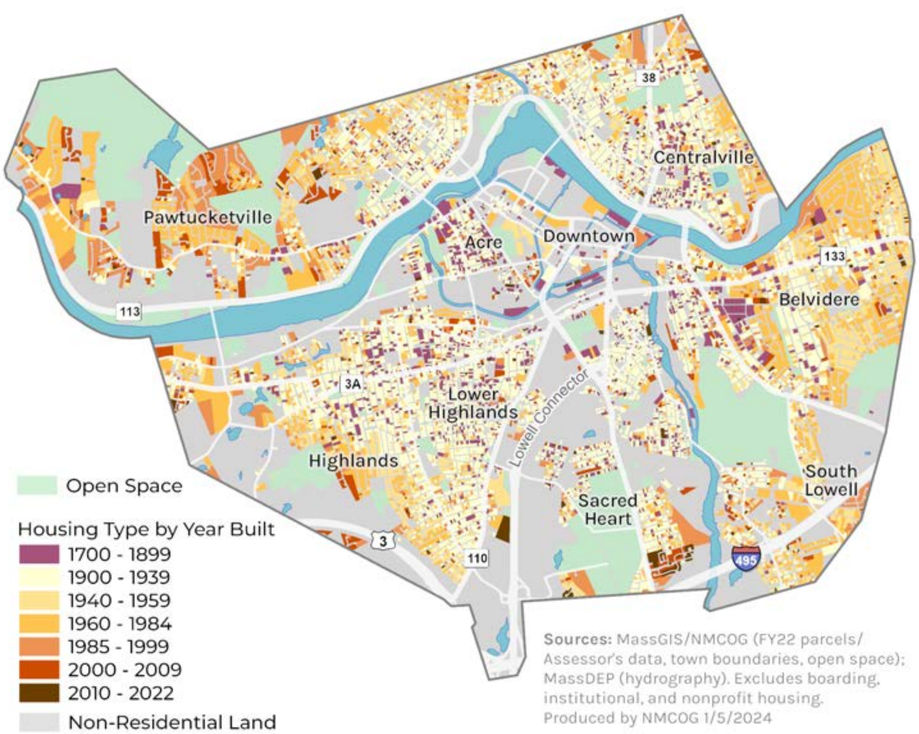
Source: U.S. Census Bureau, 2000-2020 Decennial Census

Nearly a third of Lowell's homes were built before 1900, and another third were built 1900-1940, with only 4% built after 2000.

More than three quarters (77%) of Lowell's housing was built before 1960. The city's oldest housing is concentrated in Lowell's core and Centerville, although there are historic homes scattered throughout Lowell. Pawtucketville has the greatest share of newer housing among Lowell neighborhoods, with newer housing generally built in higher-income areas.

Although many units built before 1900, such as those located in Lowell's redeveloped mill buildings, have undergone recent renovations, older homes have higher maintenance costs and are generally in poorer condition than newer homes. Given that the majority of Lowell's housing stock was constructed before 1960, housing quality is a concern.

MAP 8: LOWELL HOUSING BY YEAR BUILT, 2022



Source: MassGIS/NMCOG 2022 Assessor's Data. Some properties may be categorized by last major renovation, others by original structure. Some properties built before 1900 are categorized at 1900.

Lowell needs deeply subsidized units to meet the needs of its population.

A typical affordable unit is eligible to a 3-person household making $85,200, which is around the salary of many public servants. $2,130 a month is considered affordable for that income level.

HUD calculates a special area median income each year called HUD Area Median Family Income, or HAMFI, and bases housing eligibility on percentages of this number adjusted for the number of people in a household. Local and state programs often also use this eligibility threshold for their programs, with a common threshold being 80%, highlighted in pink in Table 7.

In 2023, the HAMFI in Greater Lowell was $132,400. This means a household of three making $85,200 and meeting other conditions would qualify for affordable housing at an 80% threshold.

In 2022, the approximate average salary for Lowell employees ranged from $78,200 for a public school teacher, $70,135 for a Fire Fighter II, and $67,894 for a Lowell Police Department patrol officer.

TABLE 7: INCOME ELIGIBILITY LIMITS

Income Eligibility	Single Person	Two People in Household	Three People in Household
Low Income (80%)	$66,300	$75,750	$85,200
Very Low Income (50%)	$46,350	$53,000	$59,600
Extremely Low Income (30%*)	$27,800	$31,800	$35,750

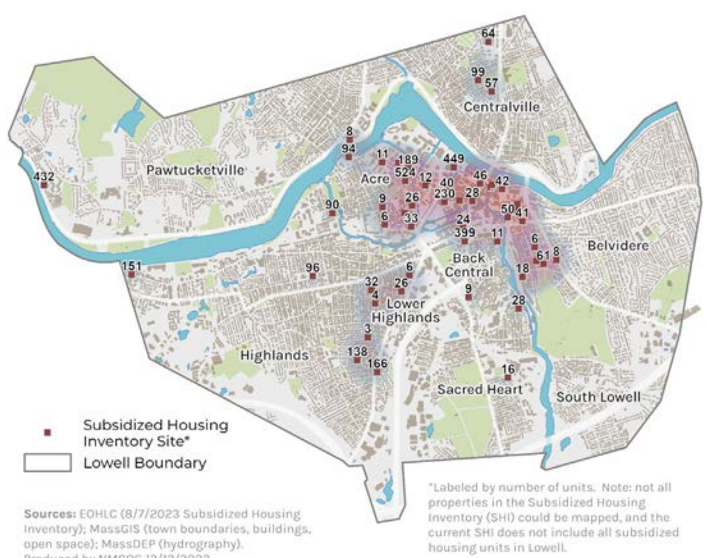
Source: U.S. Department of Housing and Urban Development, Lowell Area HUD Area Median Family (HAMFI) Income

The SHI

The Subsidized Housing Inventory (SHI) is a list of income-restricted units affordable to 80% AMI or less kept by the state. SHI units must meet other requirements as well. The state has set a goal of each municipality reaching 10% of its total, year-round units on the SHI. More information is on page 8.

Lowell's SHI units are concentrated in the Acre, Downtown, Lower Belvidere, and the Lower Highlands.

MAP 9: SHI LOCATIONS, LOWELL



All neighborhoods have at least one development on the SHI, but SHI units are concentrated in Lowell's inner neighborhoods. One job of this HPP is to evaluate whether SHI units should be clustered near services or spread evenly throughout the City, as this is an important fair housing consideration and each approach brings benefits and costs.

Source: Executive Office of Housing and Livable Communities

Lowell lost 84 units from the Subsidized Housing Inventory (SHI) from 2012 to 2022 and now has 5,127 Units on the SHI.

Development	Number Lost	Year
CBA Ownership Revitalization project on Fletcher Street	8	2017
First Lowell Rehab on 1010 Central Street	38	2017
Residents First Dev Corp on various streets	8	2017
Cabot Street 104-120	30	2020

In the last five years, Lowell lost 84 SHI units per the table above. Other changes are due to fluctuations in the number of Department of Developmental Services and Department of Mental Health group beds. Despite losing these units, newly constructed income-restricted units have also been added to Lowell's housing stock. However, these units had not been added to the SHI as of the drafting of this plan. In addition, there may be other affordable units that don't meet the requirements of the SHI, but still have income restrictions and are rented below market rate, such as housing restricted to households at 100% or 120% AMI.

Regardless, Lowell has the largest number and second-highest proportion of SHI units of the region's municipalities. The 2020 census counted 43,370 year-round units. The number of units on the SHI (5,127) in Lowell is 11.8% of this total, exceeding the goal of 10%.[1]

FIGURE 31: NUMBER AND PROPORTION OF SHI UNITS, NMCOG COMMUNITIES, 2022

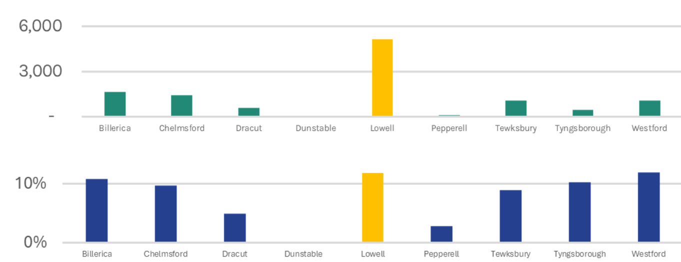
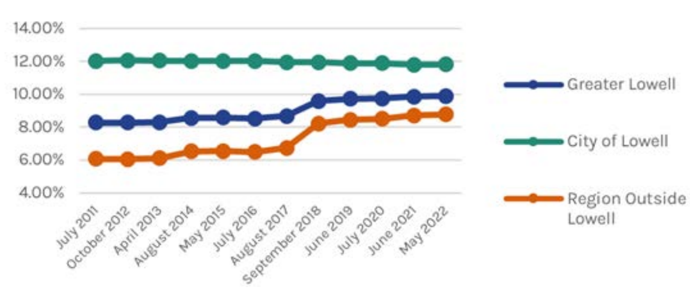


FIGURE 32: SHI COUNTS, LOWELL AND REGION, 2011-2022



Source: Executive Office of Housing and Livable Communities

1. See sidebar on opposite page.

How is an affordable unit priced and funded?

Although different state and federal programs work differently, most state and local affordable housing has a cost cap of 30% of the threshold level. For example, a home suitable for a three-person household would have a maximum rent of $2,130. This is a simplification for illustrative purposes.

Many times, this capped level is less than the cost of constructing and maintaining a unit. This is why local, state, or federal agencies often provide a subsidy to a for-profit or nonprofit developer to offset the cost of constructing affordable units. In return, the developer must restrict a number of units as affordable for a certain period of time or in perpetuity. In mixed-income properties, depending on the market-rate rent, the revenue from market-rate units can offset the cost of the affordable units.

There are other, less common, ways of financing affordable units as well. In addition, Lowell Housing Authority manages public housing units, which operate differently from units constructed by for-profit or nonprofit entities. Lowell Housing Authority will be explored later in the plan.

For full details, consult the DHCD (now EOLHC) Guidelines for MGL 40B Comprehensive Permit Projects, Subsidized Housing Inventory, DHCD (now EOLHC), updated December 2014, and based upon Regulatory Authority 760 CMR 56.00 or the guidelines to the state or federal program of interest.

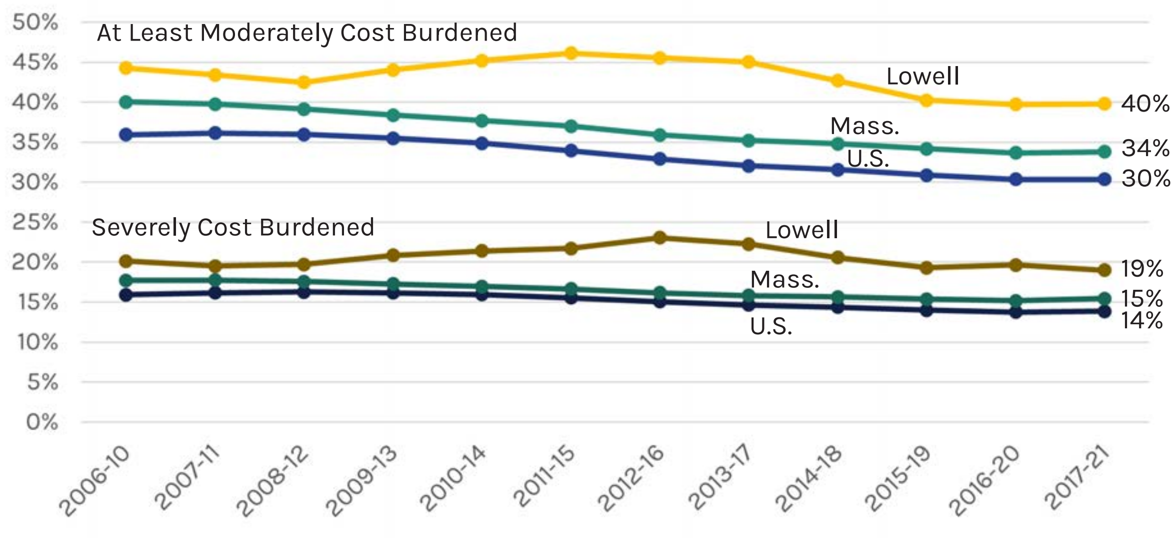
20% of Lowell's households pay more than half of their income on housing, and 40% are considered Housing Cost Burdened.

16,825 households are cost-burdened, with 8,023 of those paying more than half of their income on housing.

When considering both the increasing demand for housing and the constrained supply, housing costs are increasing faster than inflation. However, because incomes have been rising in Lowell from the middle of the decade until recently, the proportion of households that are moderately or severely housing cost burdened has had a generally downward slope. There was an exception in the middle of the 2010s, reaching highs of 46% cost burdened and 23% severely cost burdened.

That said, that progress against housing cost burden has halted in recent years. The proportion of both moderately- and severely-housing cost burdened households has generally held steady at 40% and 20% respectively since 2015-19. In fact, because the number of households in Lowell has been growing, the absolute number of households in both categories is therefore growing, reaching 16,825 and 8,025 respectively by 2017-21.

FIGURE 33: HOUSING COST BURDEN, SELECTED GEOGRAPHIES, 2006-10 – 2017-21

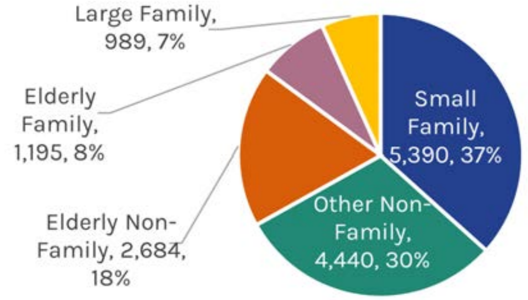


Source: U.S. Census Bureau, ACS Five-year data 2006-2021, Tables B25091 and B25070

37% of cost-burdened households are small families (4 people or less) and 30% are non-elder non-family households. Other types make up a smaller proportion of burdened households.

The largest category that are at least Moderately Cost Burdened are small families: more than 5,000 small families, or 37% of all cost burdened households. Non-elder, non-families, which care unrelated individuals living together or living alone under age 62, is also a very large category at nearly 4,500 households or 30% of all cost-burdened households. There are fewer elderly families and elderly non-families (often elders living alone) who are cost-burdened that non-elders, but still a large number: nearly 4,000 households for both elder categories combined.

FIGURE 34: COST-BURDENED HOUSEHOLDS BY TYPE, LOWELL, 2015-2019



Source: U.S. Department of Housing and Urban Development, CHAS Data, 2014-19, Table 1

What is Housing Cost Burden?

Housing cost burden is a common measure of whether a community has enough affordability. The United States Department of Housing and Urban Development (HUD) considers housing "affordable" if housing costs do not exceed 30% of a household's gross annual income. When a household pays between 30% and 50% of its income on housing-related costs, HUD considers it "moderately housing cost burdened" by housing; households spending 50% or more of their income on housing are considered "severely housing cost burdened".[1]

1. When calculating housing cost burden for the Comprehensive Housing Affordability Strategy (CHAS) dataset, HUD includes gross rent plus associated utilities for renter-occupied housing. HUD includes cost of mortgage, property taxes, and insurance for owner-occupied housing. Gross income includes income received on a regular basis such as wages or Social Security before any payroll deductions for taxes and does not include noncash benefits. Source: US Department of Housing and Urban Development.

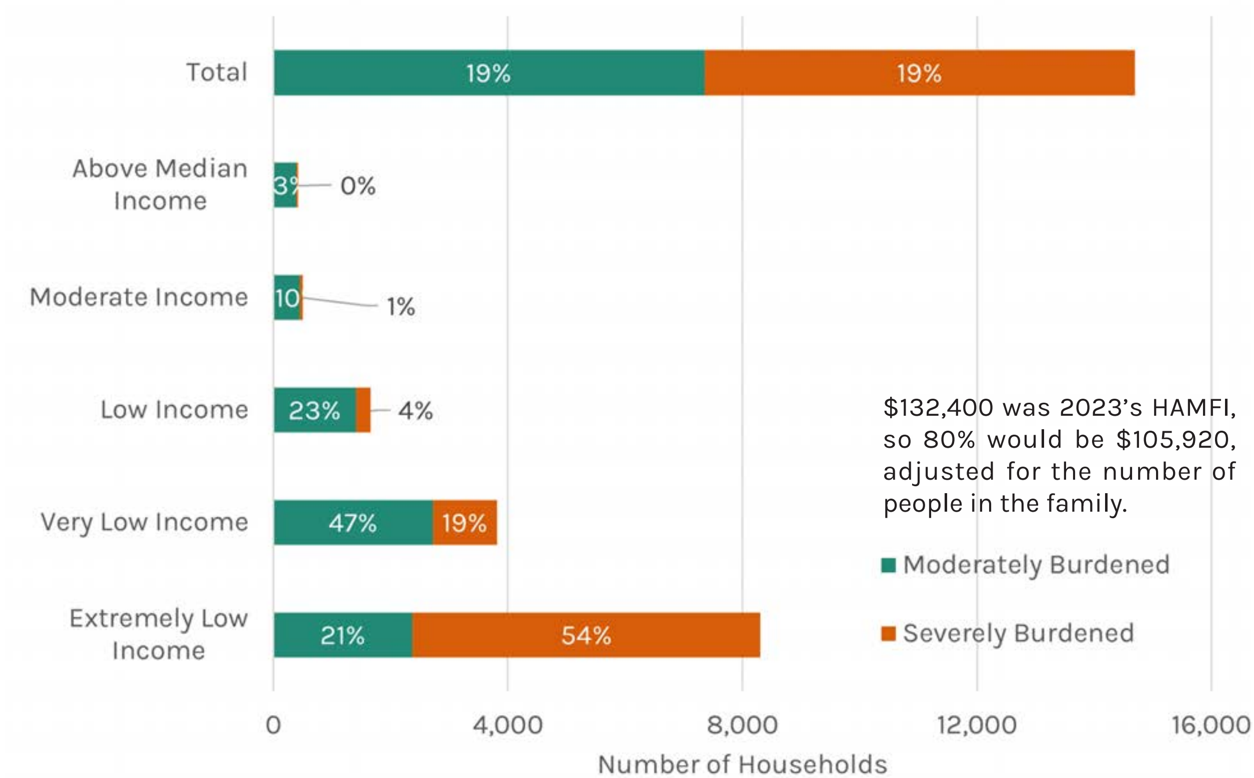
The majority of housing cost-burdened households are low-income, but their demographics otherwise greatly vary.

Most *Severely* Housing Cost Burdened households are extremely low income, but Housing Cost Burdened households exist across all income groups.

Using the most recent estimates available (2015-19) for Housing Cost Burden by income level, the majority of severely Housing Cost Burdened households (roughly 80% of severely burdened households) were in the Extremely Low-Income category, making less than 30% AMI. Moderately Housing Cost Burdened households were more evenly spread among income categories below 80% AMI which qualify as at least "Low Income."

Meanwhile, 89% of those who made between 80% AMI and 100% AMI and 97% of those that made more than AMI were not Housing Cost Burdened. Most of Lowell's neighboring communities have a larger proportion of moderate and above-median income households that are Housing Cost Burdened.

FIGURE 35: COST BURDENED HOUSEHOLDS BY INCOME, LOWELL, 2015-2019



Source: U.S. Department of Housing and Urban Development, CHAS Data, 2014-19, Table 1

Key Figures

37% or 14,695 households are at least Moderately Housing Cost Burdened, 2017-21
19% or 7,345 households are Severely Housing Cost Burdened, 2017-21

13,775 households making less than 80% AMI are Housing Cost Burdened, 2016-20
7,275 of those are Severely Housing Cost Burdened, 2016-20
12,115 households making less than 50% AMI are Housing Cost Burdened, 2016-20
7,025 of those are Severely Housing Cost Burdened, 2016-20

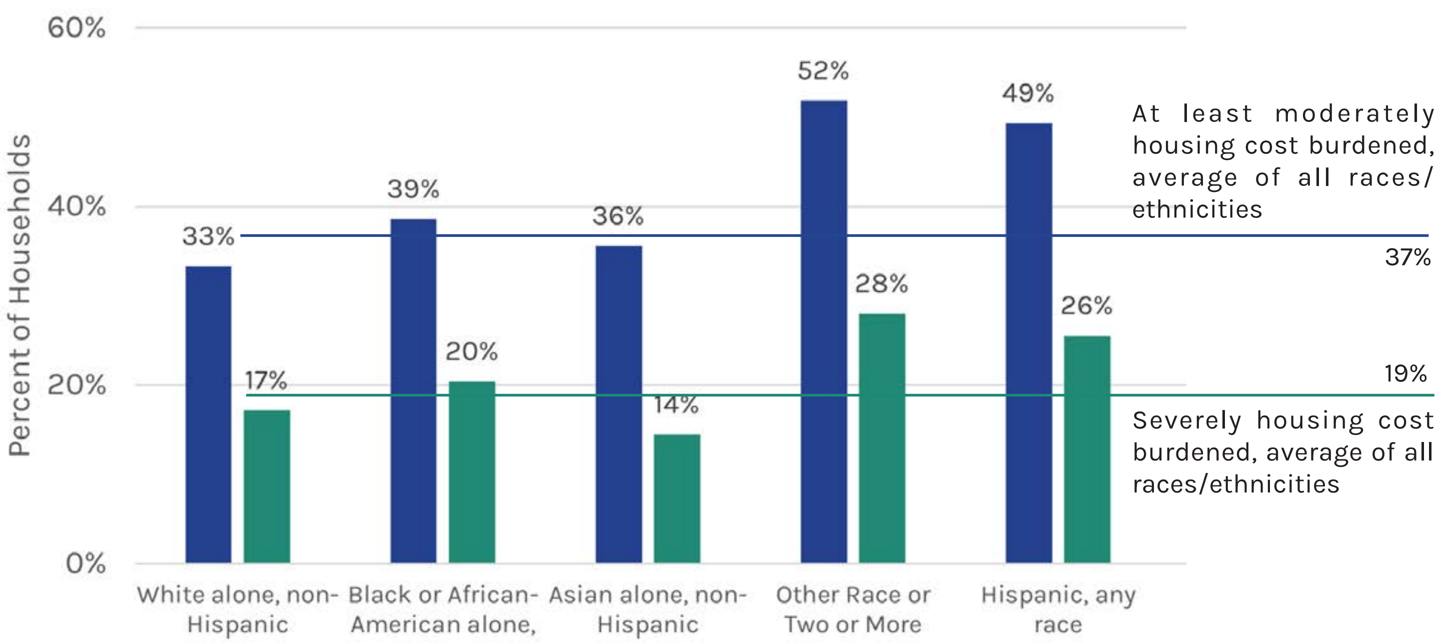
33% of households with a White householder are Housing Cost Burdened, 2017-21
39% of households with a Black householder are Housing Cost Burdened, 2017-21
35% of households with an Asian householder are Housing Cost Burdened, 2017-21
49% of households with a Hispanic or Latino householder are Housing Cost Burdened, 2017-21

Sources: 2017-2021 ACS, 2016-2020 CHAS

Housing Cost Burden and other housing issues disproportionately impacts households headed by people identifying as Black or African American, as a race other than White or Asian, and as Hispanic or Latino

Echoing income by race and ethnicity, households headed by individuals who identify as a race other than White or Asian, are disproportionately Housing Cost Burdened—both moderately and at the higher "severely" level. Hispanic or Latino households of any race have significantly higher Housing Cost Burden levels than the average across Lowell as well.

FIGURE 36: HOUSING COST BURDEN BY RACE AND ETHNICITY, LOWELL, 2015-2019



Source: U.S. Department of Housing and Urban Development, CHAS Data, 2014-19, Table 9

At least 2,502 units are needed based on growth projections, particularly units affordable to lower incomes or filling an untapped mid-income market.

Lowell is projected to require 2,502 new units by 2030 to create a healthy vacancy level and keep up with anticipated growth.

There are currently 43,482 housing units in Lowell according to the 2020 census, plus a possible 314 more constructed between 2020 and 2023 based on City of Lowell's Division of Development Services permit data. Therefore, this Plan assumes the current count is 43,795.

A simple calculation was used to determine a "healthy" market number for the number of households projected to be in Lowell in 2030, 2040, and 2050. This number is based on having a 7% rental vacancy, a 2% sales vacancy, and 1% "other vacant," and also assuming the mix of rentals to ownership units stays at 57% vs 43%. Obviously, there are many assumptions going into this calculation, but it should give an order of magnitude for the housing production that may be targeted by this Plan.

Notably, if projections hold, Lowell's proportional size compared to the region will decline even as it adds households. If Lowell were to maintain its proportion of households in the region, the number of total units required would be greater: 47,580 by 2030 and 48,876 by 2040. These figures are available in Table 8.

TABLE 8: PROJECTED HOUSEHOLDS AND UNITS, LOWELL, 2030-2050

Projected Year	2030	2040	2050
Number of households projected, proportional size decreases	43,587	44,247	43,980
Number of target units, proportional size in region decreases	46,298	46,999	46,715
New units required, proportional size in region decreases	2,502	701	-284
Number of households projected, maintain proportional size	44,794	46,013	45,729
Number of target units, maintain proportional size in region	47,580	48,876	48,573
New units required, maintain proportional size in region	3,784	1,296	-302

Source: MAPC, Massachusetts Regional Household and Labor Force Projections and Subregional Allocation, 2023 and NMCOG analysis.

13,775 Cost Burdened Households (34% of total households) could qualify for affordable housing

A simple way to consider housing mismatch is to estimate the number of cost burdened households in Lowell that have an income of less than 80% AMI and would therefore qualify for most affordable housing.

The estimated number of households earning 80% AMI or less and paying 30% or more of their income on housing costs is 13,775 households. The number of households earning 80% AMI or less and paying 50% or more of their income on housing costs is 7,275 households (18% of total households, see key figures on page 49).

Key Figures

2,502 additional units by 2030 to keep up with demand and a desirable vacancy rate

3,203 additional units by 2040 to keep up with demand and a desirable vacancy rate

Undersupply of 4,189 sales units valued at $200,000 or lower

Undersupply of 3,633 rental units rented at $600/month or lower

Sources: NMCOG Analysis

There is a mismatch of prices and incomes in Lowell.

Another way to identify recommended housing production figures is to evaluate the gap between the number of homes that are affordable to various income thresholds and the number of households at those thresholds. This will estimate a number of homes at each level of affordability needed for current residents based on American Community Survey data, although it will not consider potential growth.

There is an undersupply of units costing under $200,000 for sale.

TABLE 9: COST MISMATCH FOR OWNERSHIP UNITS, 2017-21

Home Value	Estimated Demand	Estimated Supply	Mismatch
Less than $150,000	4,126	1,330	-2,796
$150,000 to $199,999	2,975	1,582	-1,393
$200,000 to $299,999	2,706	5,585	2,879
$300,000 to $399,999	4,202	5,148	946
More than $400,000	4,279	4,643	364
Total	18,288	18,288	0

Source: NMCOG Analysis (See sidebar.) For full value distribution, refer to page 37.

NMCOG compared the income data explored on page 24 with the housing value data explored on page 37. The housing values were categorized by an estimated monthly mortgage cost for each, and matched to income categories that could afford that mortgage, using 30% of income as an affordability threshold.

The analysis indicates there is a large undersupply of owner units that could be sold at $200,000 or less. Most units in Lowell are valued at $200,000 and above and would probably sell for more than that amount.

For many households that currently own, a mortgage for a home priced at $200,000 or more would cost more than 30% of their income. These households may have purchased their house when it was less expensive, locking in a low mortgage. It is also possible that they acquired their house at less than its market value through family or purchased their house when their income was higher, for example, before they retired. If those households wish to relocate now, there may be no options that are as affordable to them as the house they already own.

There is an undersupply of rental units under $600 a month gross rent, but also a possible undersupply of rental units over $2,000 a month.

A similar analysis of rental units indicates that there are not only an undersupply of the most affordable units—$600 a month and below—but also there is an undersupply at the highest cost ranges, $2,000 and up. This suggests that there could be an untapped market for higher-end market rate rental units or for ownership units at that price level. If available, some of those who could afford these newer units might relocate, which would free up more naturally affordable units for lower incomes.

Importantly, this might not actually play out in practice for every higher-income renter—some may choose a more modest rental home even if they could afford more for many reasons. A thorough market study would be appropriate to determine how many upper-end rental or starter ownership units Lowell could absorb and if this would have an effect of freeing up more affordable units.

Regardless, Lowell's largest housing need is at the most affordable level, with a nearly 3,000 unit mismatch between those who can afford $300 monthly or less and units available at that level. Units at this rent would need to be deeply subsidized and likely income-restricted.

TABLE 10: COST MISMATCH FOR RENTAL UNITS, 2017-21

Monthly Rent	Estimated Demand	Estimated Supply	Mismatch
Less than $300 or no cash rent	4,558	1,591	-2,967
$300 to $599	2,921	2,255	-666
$600 to $899	2,126	2,595	469
$900 to $1,249	2,953	4,621	1,668
$1,250 to $1,499	4,194	4,505	311
$1,500 to $1,999	3,004	6,185	3,181
$2,000 to $2,999	3,060	2,101	-959
$3,000 or more	1,181	144	-1,037
Total	23,997	23,997	3,164

Source: NMCOG Analysis (see sidebar). For full rent distribution, refer to page 37.

Are there really homes for sale under $150,000 and for rent under $600?

The American Community Survey asks homeowner (single family and condo) residents the following question: "About how much do you think this house and lot, apartment, or mobile home[...] would sell for if it were for sale?" This gives an estimate of the value of every home, not just those that were recently sold.

Homes that were valued at small amounts could reflect small condos, dilapidated units, and/or underestimates by owners. Median single family home sales price ($445,000) gives a more accurate snapshot of the costs a typical household would face buying a new home, but does not show a distribution. Taking these two data sets together can give a fuller picture of the housing situation.

Similarly, the American Community Survey asks respondents the costs of their rent and utilities and combines these into a "gross rent" number. Households that report very low rents may live in subsidized housing, they may pay below-market rents to friends or family, or they may live in other unique situations that result in rents below the market rate. The estimate of median rent (roughly $1,500) is a more accurate snapshot of the costs of a typical renter household, but like the median home sales price, it does not show a distribution.

NMCOG grouped units into cost categories and matched these cost categories to income groups which could afford them using an affordability threshold of 30% of income. The number of households in each income category was subtracted from the number of units affordable to them to result in the numbers in the tables in this section.

Lowell has a growing population priced out of the market entirely.

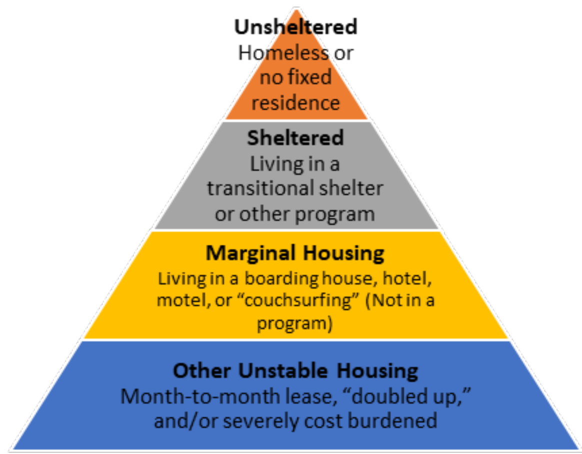
The housing insecure population includes more than unsheltered, unhoused people.

Many people who are housing insecure or homeless are not counted in cost burden or other household-based figures. This is because they are not living in households—they are instead living in group housing like a boarding house, hotel, or shelter, or for a relatively small number, they may be living in cars or outdoors.

"Housing insecurity" is an umbrella term that encompasses many housing problems people may experience such as affordability, safety, quality, insecurity, and loss of housing. It is a continuum, and it is hard to get an exact count of any of the levels.

People in insecure housing situations are a diverse group, including families and individuals; men and women of all ages, races, and ethnicities; people with disabilities or chronic health conditions; people with substance abuse concerns; people with mental health conditions; and people with no diagnosis beyond being priced out of the housing market.

FIGURE 37: HOUSING INSECURITY CONTINUUM



Lowell Forward Homes and Housing summarizes top-line numbers, but the team also undertook research and interviews to better understand the housing-insecure and homeless populations and the challenges they face. Additional information is provided in sections detailing providers that directly work with these populations.

Eviction Diversion Figures

The Executive Office of Housing and Livable Communities provided an Eviction Diversion Initiative dashboard through April 2023. It included four programs that provided direct cash assistance to families who were in danger of losing housing (see glossary for definitions). All below figures are number of Lowell households.

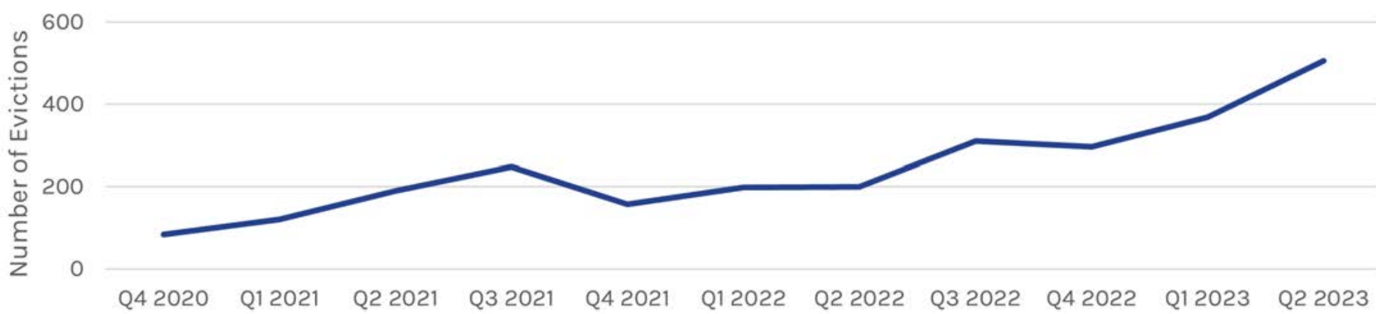
1,248 were served by ERMA
371 were served by RAFT in 2023

2,360 were served by ERAP
5 were served by HomeBase in 2023

One measure of housing insecurity is the number of evictions and foreclosures. The number of evictions is small but growing, while foreclosures remain relatively small.

The number of evictions is only tracked at the county level, and the number for Middlesex County has been growing steadily since eviction diversion programs such as RAFT have ended. In Q4 of 2020, 84 tenants were court-ordered evicted in Middlesex County. The most recent full quarter of data, Q2 of 2023, 506 tenants were evicted. This number is relatively small compared to many other states due to Massachusetts' strong tenant protection, but it is notable that the number has increased by 400% since Q4 of 2020. This does not capture tenants who were no longer able to live in their rental units due to cost or other concerns but were not currently in a lease or not formally evicted through a court.

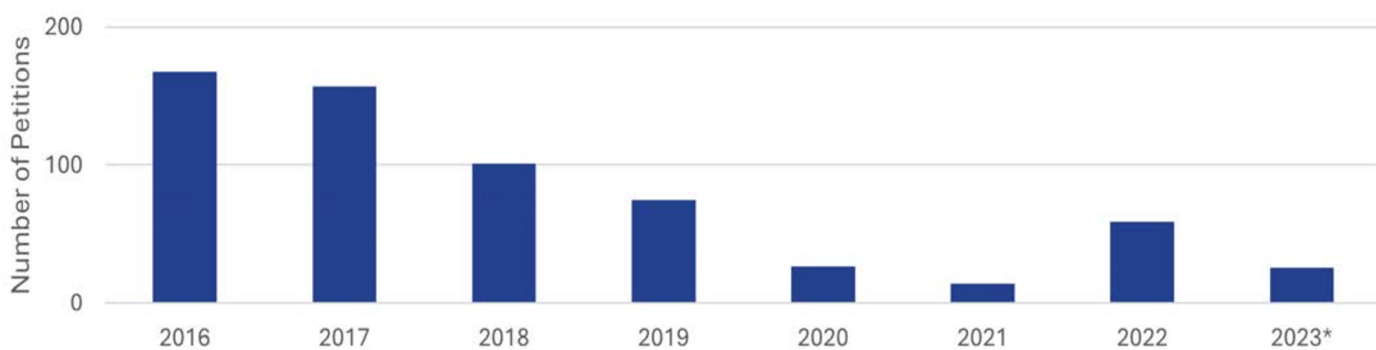
FIGURE 38: NUMBER OF EVICTIONS, MIDDLESEX COUNTY, 2020-2023



Source: Trial court dashboard by Residential Eviction Cases, Executions Issued - https://www.mass.gov/info-details/civil-court-reports-and-dashboards#interactive-dashboards-

The data source for foreclosures is specific to Lowell and extends further back. With this viewpoint, it is clear that foreclosures were on a downward trend before the pandemic, when they ebbed to a low of 14 petitions to foreclosure in 2021. This may be due to several pandemic-era foreclosure protections continuing through 2021. 2022 had more foreclosures (59) than the pandemic years but still not as many as 2019 (75). Although 2023 is not complete, it is on track to have a lower number than 2022.

FIGURE 39: PETITIONS TO FORECLOSURE, LOWELL, 2016- 2020-2023



Source: https://www.mass.gov/info-details/foreclosure-trends-reports 2016-2021, Warren Group 2022-23

Since 2019, the count of unsheltered individuals has grown from 26 to 114, and sheltered family numbers have been growing for years.

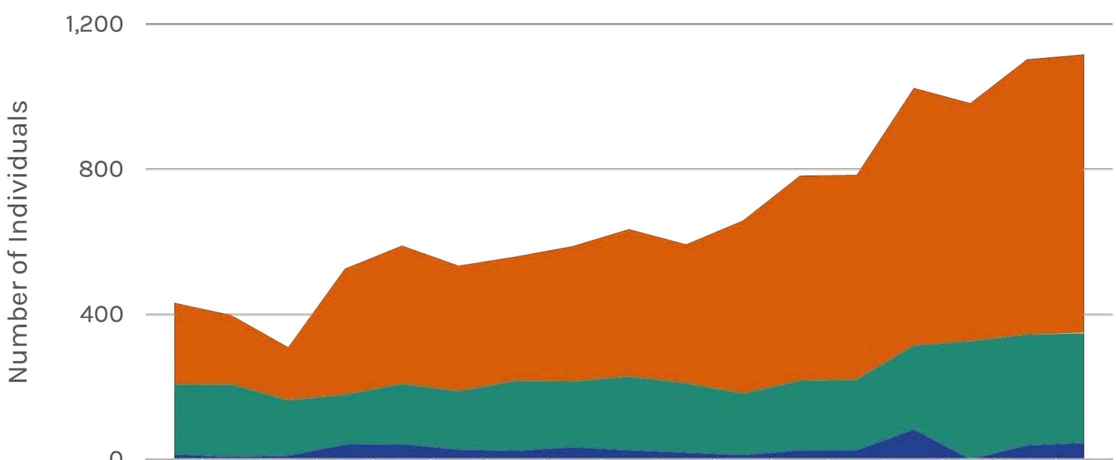
Until 2019, the number of unsheltered and sheltered individuals stayed relatively steady as the number of families living in emergency shelter more than doubled. Sheltered individuals rose during the pandemic.

From 2007-2019, the number of unsheltered individuals fluctuated between 10 and 40 with only one exception. This may be an undercount due to the difficulties of counting unsheltered individuals, and the count increased when the City changed its methodology in 2020. The number of sheltered individuals generally stayed between 150 and 200.

There was a clear trend of increasing numbers of families being counted as homeless and receiving shelter, from 224 in 207 to 563 in 2019. Beginning in 2020, there was a large increase in sheltered families and individuals.

2023's point in time count was 768 sheltered people in families, 303 sheltered individuals, and 46 unsheltered.

FIGURE 40: POINT IN TIME COUNTS, LOWELL CONTINUUM OF CARE, 2007-2019



	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Sheltered People in families	224	190	146	347	380	345	341	372	406	384	476	565	563	710	657	760	768
Sheltered Indviduals	194	200	152	138	166	161	193	181	203	191	170	192	195	232	326	305	303
Unsheltered Individuals	14	8	11	41	43	28	25	35	26	19	12	26	26	83		39	46

■ Unsheltered Individuals ■ Sheltered Indviduals ■ Sheltered People in families

Source: HUD User 2007-2019 Point in time Estimates by CoC, Excel Spreadsheet https://www.huduser.gov/portal/sites/default/files/xls/2007-2019-Point-in-Time-Estimates-by-CoC.xlsx.

Due to consolidation with "Balance of State" Continuum of Care in 2019, 2020-2023 sheltered counts are estimated based on the reported counts of all known sites in Lowell. These are estimates, as some emergency shelters within Lowell may have not been included and some shelters outside of Lowell may have been included. Due to the COVID-19 Pandemic, at the direction of HUD, there was no unsheltered count in 2021.

Since the pandemic, the number of unsheltered people has increased dramatically, while the number of families in emergency shelter has continued growing.

The 2024 Point in Time Count was recently finished when this plan was drafted. That count was 97 unsheltered individuals, a dramatic increase from the count of 26 prior to the pandemic. The count was 189 sheltered individuals, slightly down from pre-pandemic of 195 and also down from the 200+ that were sheltered during the pandemic.

The 286 unhoused individuals during that count compares to an estimated 237 transitional, emergency shelter, or rapid rehousing beds. However, many of these beds are for special populations such as youth, HIV survivors, or domestic violence survivors. In short, there were more unhoused individuals in Lowell than the number of emergency beds in Lowell, and many of the shelter options would be unsuitable for some of those unsheltered individuals.

Because pandemic-era counts are estimates (see footnote opposite page) and family counts were not available during the plan, it is hard to make apples-to-apples comparisons.

What is a Point-in-Time Count?

A Point-in-Time Count is required every year by the U.S. Department of Housing and Urban Development. This is a count taken on a single night in winter, and includes both unsheltered and sheltered people. It is a snapshot of homelessness in our community, but is likely an undercount because it only includes people volunteers could find and count in a single night.

Key Figures

238 unsheltered individuals (summer 2023)
112 sheltered individuals (winter 2023)
560 sheltered families (2019)
237 transitional, emergency, or rapid rehousing beds
71 supportive units

TABLE 11: POINT IN TIME COUNTS, 2019 AND 2023

Category	2019	2024
Unsheltered People, Individuals	26	97
Sheltered People, Individuals	195	189
Sheltered People, Families	563	Unknown
Total Unsheltered	26	97
Total Sheltered	1135	Unknown
Sheltered People, Children	353	Unknown

Source: 2019: HUD, 2024: City of Lowell

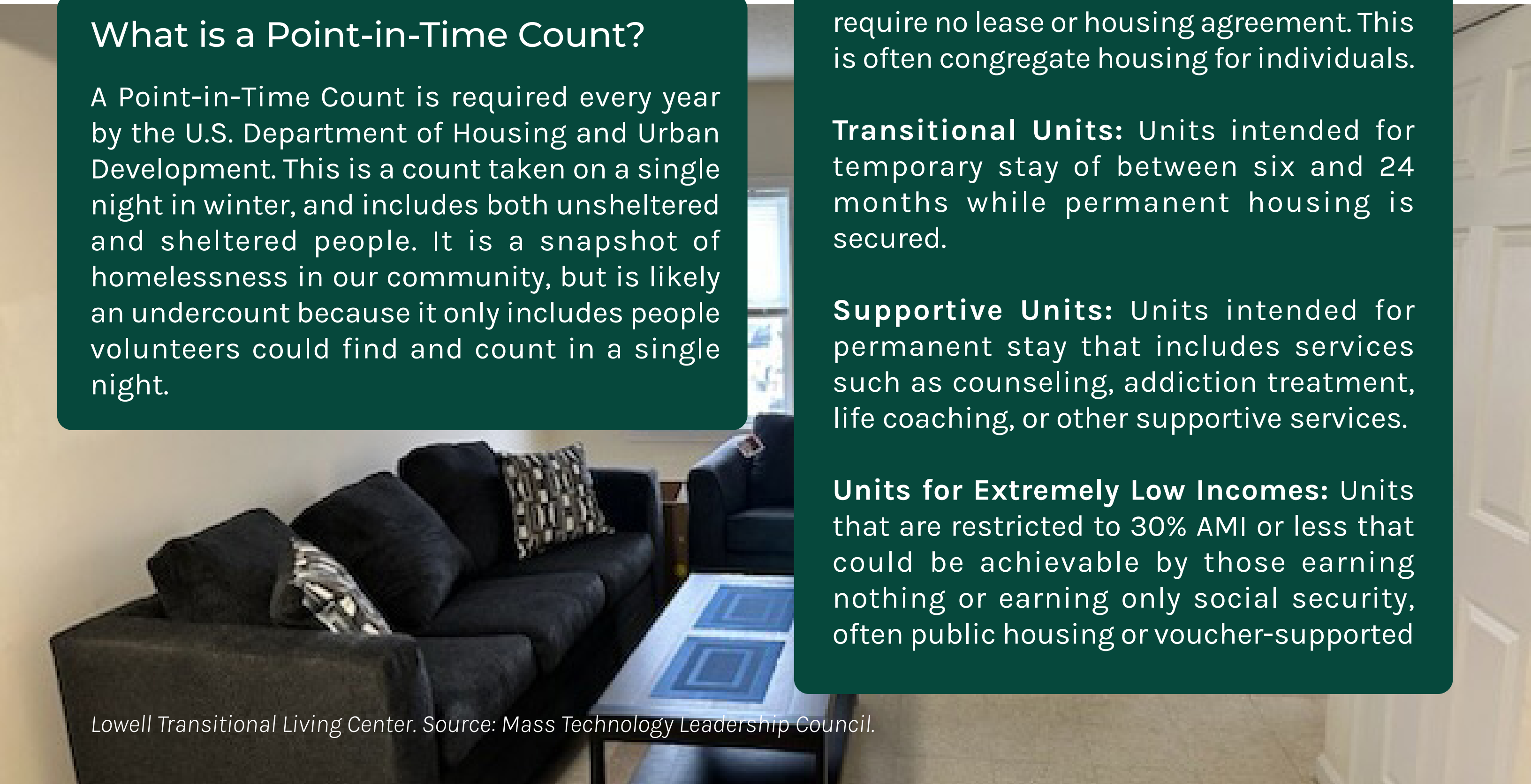
Types of Housing Support for People Suffering from Homelessness

Emergency Shelter: Facilities that provide short-term stabilization and shelter that require no lease or housing agreement. This is often congregate housing for individuals.

Transitional Units: Units intended for temporary stay of between six and 24 months while permanent housing is secured.

Supportive Units: Units intended for permanent stay that includes services such as counseling, addiction treatment, life coaching, or other supportive services.

Units for Extremely Low Incomes: Units that are restricted to 30% AMI or less that could be achievable by those earning nothing or earning only social security, often public housing or voucher-supported



Lowell Transitional Living Center. Source: Mass Technology Leadership Council.

Lowell must consider the fair housing impacts on all its decisions.

Complying with fair housing law means more than avoiding intentional discrimination, such as determining whether zoning creates unintentional disparate impacts.

According to HUD, "the obligation to affirmatively further fair housing requires [taking] meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."[1]

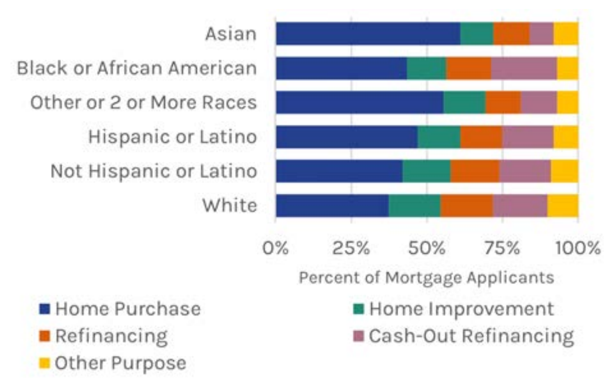
The biggest challenge of fair housing policy is disparate impact, when a policy or practice can have an unintentional discriminatory effect. Historically, many zoning policies have been found to cause disparate impact, such as policies that only allow single-family houses and require large lot sizes, and zoning laws that prioritize single bedroom units or townhouses. These policies make the process of housing development extremely inflexible, and assume a one size fits all approach to addressing housing needs. These policies have helped both increase the cost of purchasing and renting housing and made it harder to increase housing supply, which disproportionately impact several protected classes. Increasing the flexibility of local residential zoning is a first step to reducing disparate impact of housing policy.[2]

One lens this plan considers is through Home Mortgage Disclosure Act (HMDA) data. Mortgage providers are required to disclose local mortgage data in order to show any discrepancies in housing finance, which is a key barrier to fair housing goals.

In 2021, most mortgages were for refinancing, and in 2022, most mortgages were for new home purchases.

In 2021, more loans were taken out for refinancing than for home purchases. However, most 2022 loans were obtained for a home purchase. Notably, in 2022, American Indian or Alaska Native and Black or African American households were most likely to obtain a loan for cash-out refinancing.

FIGURE 41: PURPOSE OF MORTGAGE BY RACE AND ETHNICITY, LOWELL, 2023



Source: Home Mortgage Disclosure Act Data Tables

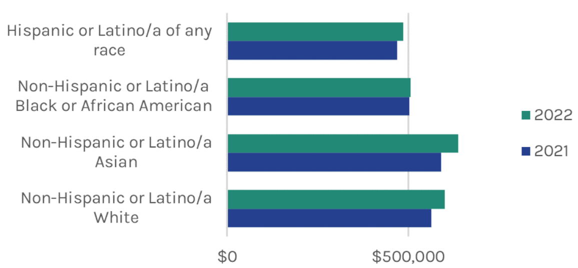
1. Affirmatively Furthering Fair Housing, 2023 HUD, https://www.hudexchange.info/programs/fair-housing-planning/
2. Source: Shufelt, Laura. Fair Housing Framework [Training Session]. Massachusetts Housing Partnership. United States. https://www.mhp.net/assets/resources/documents/Fair-Housing-for-AFHMRSP-Training.pdf

In both 2021 and 2022, Lowell experienced racial discrepancies related to loan amounts and loan to value ratios.

Critical numbers to be considered when evaluating mortgage data include the amount of the loan and the loan to value ratio, which is ratio of the loan against the overall value of the house. Non Hispanic or Latino White households and Asian households tend to have higher loan values--in 2022, both had an average loan amount more than $100,000 of Black or African American or Hispanic than Latino households.

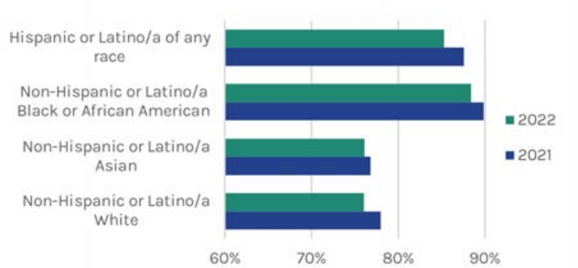
These groups also had lower loan-to-value ratios, meaning they were able to provide a larger down payment. The average for both groups was roughly 75-77% compared to 85%-90% for Black or African American or Hispanic or Latino households.

FIGURE 42: AVERAGE LOAN AMOUNT BY RACE AND ETHNICITY, LOWELL, 2021 AND 2022



Source: Housing Mortgage Disclosure Act Data Tables

FIGURE 43: AVERAGE LOAN TO VALUE RATIO BY RACE AND ETHNICITY, LOWELL, 2021 AND 2022



Source: Housing Mortgage Disclosure Act Data Tables

What is Fair Housing?

State and federal law prohibit discrimination in the sale and rental of housing, The Federal Department of Housing and Urban Development (HUD) provides a framework of these laws which together promote fair policies and practices and minimize disparate impact. Massachusetts has also passed additional laws to further this mission.

Fair Housing Act of 1968: This law prohibits the discrimination related to the sale, rental, and financing of housing based on race, religion, national origin, sex, handicap, and family status. This law is Title VIII of the Civil Rights Act.

Title VI of the Civil Rights Act of 1964: “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Section 504 of the Rehabilitation Act of 1973: This law prohibits organizations and employers from denying individuals living with disabilities an equal opportunity to receive program benefits and services.

Americans with Disabilities Act of 1990: This law prohibits discrimination against people living with disabilities in areas such as employment, transportation, public accommodations, communications, and access to state and local government programs and services.

Massachusetts Anti-Discrimination Law: This law prohibits unlawful discrimination on the basis of race, color, religious creed, national origin, ancestry, or sex.

Massachusetts Public Accommodation Law: This law prohibits any individual from aiding or inciting another individual in discriminating against someone from a place of public accommodation on the basis of gender identity.

Massachusetts Lead Paint Law: This law prohibits unlawful practices in selling, renting, or leasing premises containing lead in paint, plaster, or materials.

People of color more often had mortgages denied or closed than people identifying as White, not Hispanic or Latino.

Hispanic or Latino applicants are almost twice as likely to be denied a loan than non-Hispanic or Latino applicants, and other groups also face disproportionate levels of loan denials.

In 2021, individuals identifying as White, Asian, and Two or more races were most likely to have a loan originated. Individuals identifying as Native Hawaiian or Pacific Islander were the least likely to have a loan originated, which means that they received the loan. They were also the most likely to have an application denied. They along with those identifying as American Indian or Alaska Native were most likely to withdraw their application. This group, along with Black and African American individuals, was also the most likely to see their file closed for incompleteness. Hispanic or Latino individuals were twice as likely to see their applications denied and were therefore less likely to have loans originated.

In 2022, 5% of all mortgages for a home purchase are denied, but that number is 9% for Asian, non-Hispanic; 10% for Black, non-Hispanic; and 15% for Hispanic or Latino of any race.

Diving deeper into those numbers, individuals identifying as another race or two or more races were most likely to have a loan originated. Individuals identifying as Black or African American. American Indian or Alaska Native, or Native Hawaiian or Other Pacific Islander were least likely to have a loan originated and most likely to have an application denied. Those identifying as either Hispanic or Latino were less likely to have a loan originated than those who did not identify as Hispanic or Latino. They were also more likely to have their application denied. Individuals identifying as Native Hawaiian or Other Pacific Islander were most likely to have a file closed for incompleteness.

Aerial image of Lowell. Source: Bing Maps.

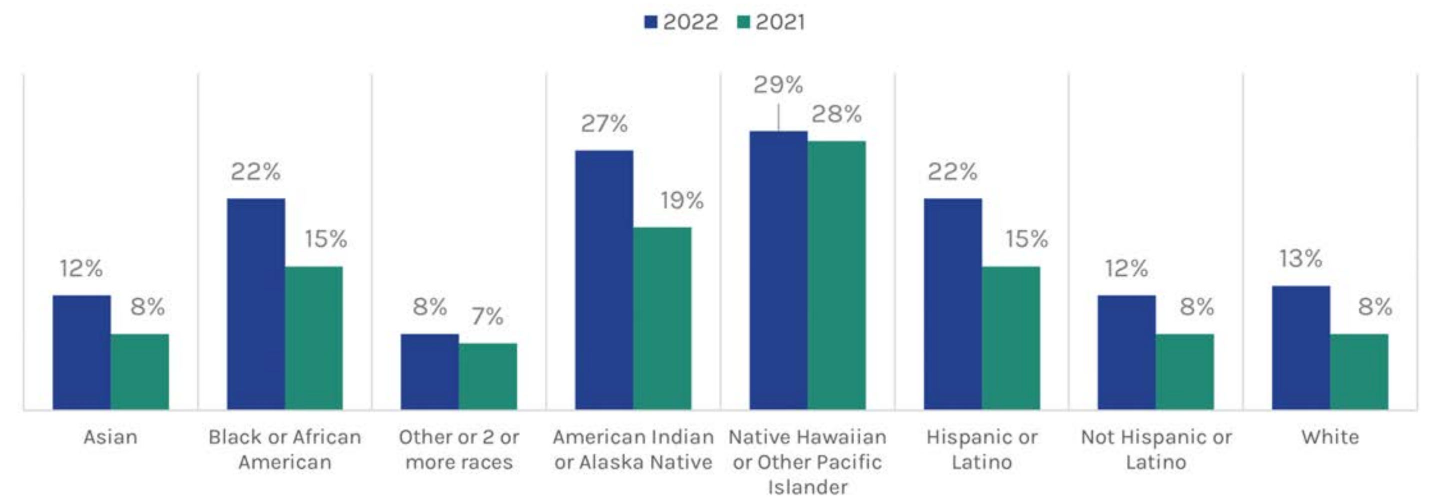
Photo Nesmith Street. Source: Google Maps.

Who is covered by Fair Housing laws?

The following classes of persons are considered protected classes in the Commonwealth of Massachusetts:

- **Race**
- **Color**
- **National Origin**
- **Religion**
- **Sex**
- **Disability/Handicap**
- **Familial Status/Children**
- **Marital Status**
- **Age**
- **Sexual Orientation**
- **Gender Identity**
- **Military Status**
- **Public Assistance/Housing Subsidy**
- **Genetic Information**
- **Ancestry**

FIGURE 44: PERCENT APPLICANTS DENIED BY RACE, LOWELL, 2022 AND 2023



Source: Housing Mortgage Disclosure Act Data Tables

Public Engagement: Overview

Community outreach is foundational to the HPP. The planning process began with convening a Housing Subcommittee of the *Lowell Forward* Committee. This 14-member subcommittee represents a variety of lived experiences, connections with housing, and housing expertise. The subcommittee discussed, guided, and refined the community outreach process, data needs, and products.

After the first meeting of the subcommittee, the planning team completed the analysis of data that is featured throughout this plan. Simultaneously, the *Lowell Forward* team facilitated 68 focus groups or key informant interviews that focused either on housing or the *Lowell Forward* plan more generally. Feedback was further collected in four citywide workshops, including a workshop focused specifically on housing with over 60 attendees. The *Lowell Forward* Team also released four surveys, with the third focused specifically on homes, housing, and community with 867 responses. NMCOG regularly convened meetings of the Housing Subcommittee to report on progress and receive guidance. Additional details on the Community Engagement process, including its social justice and equity lens, are explored in the "Lowell Today" report of the *Lowell Forward* plan.

This section summarizes the results of the community engagement. The overall message received was that increasing the affordability of housing in Lowell is a priority for participants, and that there's a wide range of interventions they might support to achieve that goal. That said, there was a diversity of opinions on which interventions should be undertaken. Increasing the amount of income-restricted, subsidized housing both for people suffering from homelessness and low-income families was the strongest priority.

Lowell Forward's initial visioning revealed a focus on housing.

In the initial visioning phase of Lowell Forward, the Lowell Forward team undertook a workshop with over 100 attendees, a visioning survey with over 700 responses, undertook 21 one on one free-form conversations, and accepted 40 comment cards. When combining these responses, "Affordable and diverse housing options" was the #2 theme with 135 responses after "Transportation efficiency and safety" with 170 responses.

In the visioning survey in particular, a major theme in the Acre was "Affordable Housing," in Back Central was "Homeless", and in downtown was "Housing." Other neighborhoods had transportation (sidewalks, traffic) or general neighborhood issues as the largest themes based on word clouds of responses.

In the first public workshop, affordable housing was the most common theme, with many comments related to renovation of vacant buildings into affordable housing.

Lowell City-wide Public Workshop 1. Photo: Utile

68 Focus Groups or Key Informant Interviews were undertaken.

The *Lowell Forward* team facilitated 24 focus groups or key informant interviews that focused either on housing or Lowell Forward more generally. A broad number of groups and agencies were directly invited to focus groups, although some declined.

In addition, the team shared an open call to participate in key informant interviews that were advertised via the Lowell Forward Housing Subcommittee and at Lowell Forward Citywide Workshops.

In addition to standard questions, participants were asked specific questions about the constituents they serve, their relationship with City government, and their role in Lowell's homes and housing. Their responses were recorded and inform several sections in the plan.

Lowell City-wide Homes and Housing Workshop

TABLE 12: HOUSING-FOCUSED FOCUS GROUPS OR KEY INFORMANT INTERVIEWS

Category	Participants
Economic Development Organizations	Community Teamwork, Inc., E for All, Greater Lowell Chamber of Commerce, Lowell Plan, MassDevelopment (Transformative Development Initiative Fellow), MassHire Greater Lowell Workforce Board
Community Development Corporations and Housing-focused Nonprofits	Coalition for a Better Acre, Community Teamwork, Inc., Habitat for Humanity of Greater Lowell, House of Hope, Merrimack Valley Housing Partnership
Cultural Organizations	African Community Center of Lowell
Higher Education	Middlesex Community College, University of Massachusetts Lowell
Homelessness/ Unhoused Services	City of Lowell Health and Human Services, Elliot Church, House of Hope, Life Connections Center
Charities/ Foundations	Greater Lowell Community Foundation
Public Housing Organizations	Lowell Housing Authority
Health Organizations	City of Lowell Health and Human Services, Greater Lowell Community Health Center, Lowell General Hospital
Other	City of Lowell Police Department, Lowell Association for the Blind, Mill City Grows
Environmental, Open Space Organizations	350 MA of Greater Lowell, Lowell Parks & Conservation Trust, Massachusetts Department of Conservation and Recreation
Neighborhood Groups	Two neighborhood groups
Private Banks	Three private banks
For-profit housing and commercial developers	Eleven private for-profit developers

The Homes and Housing Survey

The Homes, Housing, and Community Survey was open from the Citywide Public Workshop #3 on June 21, 2023 to September 8, 2023. The survey was distributed both online via the Qualtrics program and via paper surveys. In addition to being shared at the workshop, the survey was advertised via NMCOG, City of Lowell, and *Lowell Forward* social media channels, through direct mailing lists, at neighborhood meetings, at festivals and events, and at a Lowell City Council meeting on August 22, 2023. Khmer, Spanish, and Portuguese versions of the survey were released in August. Paper copies were also distributed to the Lowell Senior Center and Cambodian Mutual Assistance Association. Finally, the survey was distributed to incoming University of Massachusetts Lowell faculty, staff, and students in September.

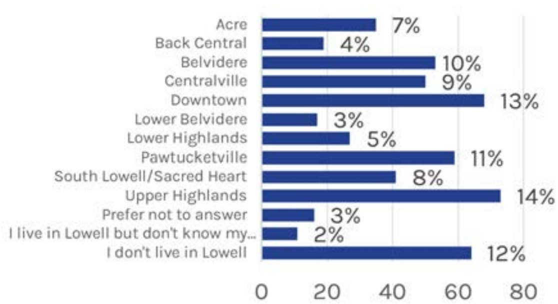
The NMCOG team received 867 surveys including five in Khmer, four in Portuguese, and 15 in Spanish.

Of Lowell residents who took the survey, there was broad representation of neighborhoods, income, and age.

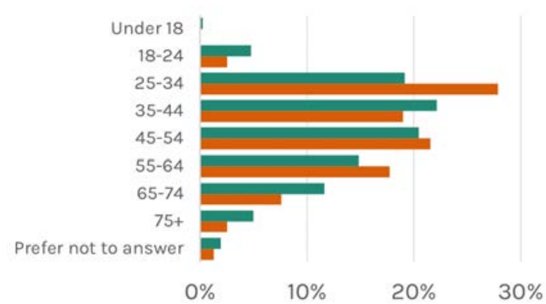
There was also a diversity in number of people in household. However, the survey did not reach a representative sample of those under 24 years of age or those identifying as a race and ethnicity other than White, non-Hispanic or Latino.

The team did additional outreach to agencies working with these groups, including Lowell Public Schools, Latinx Community Center for Empowerment, and Cambodian Mutual Assistance Association.

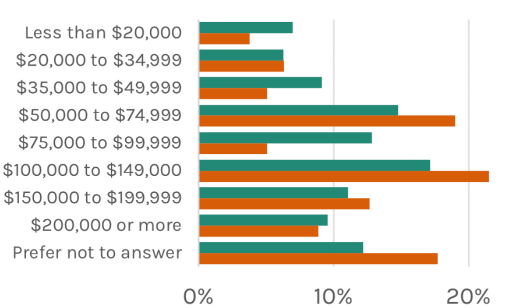
NEIGHBORHOOD OF RESPONDENTS



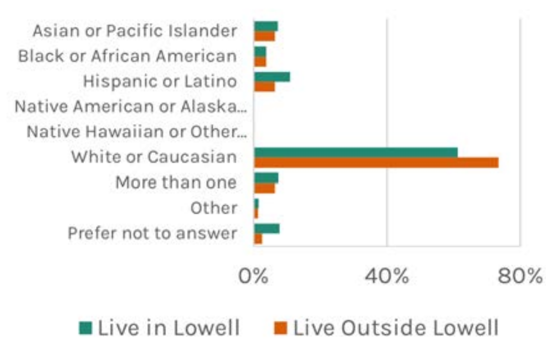
AGE OF RESPONDENTS



2022 ANNUAL HOUSEHOLD INCOME



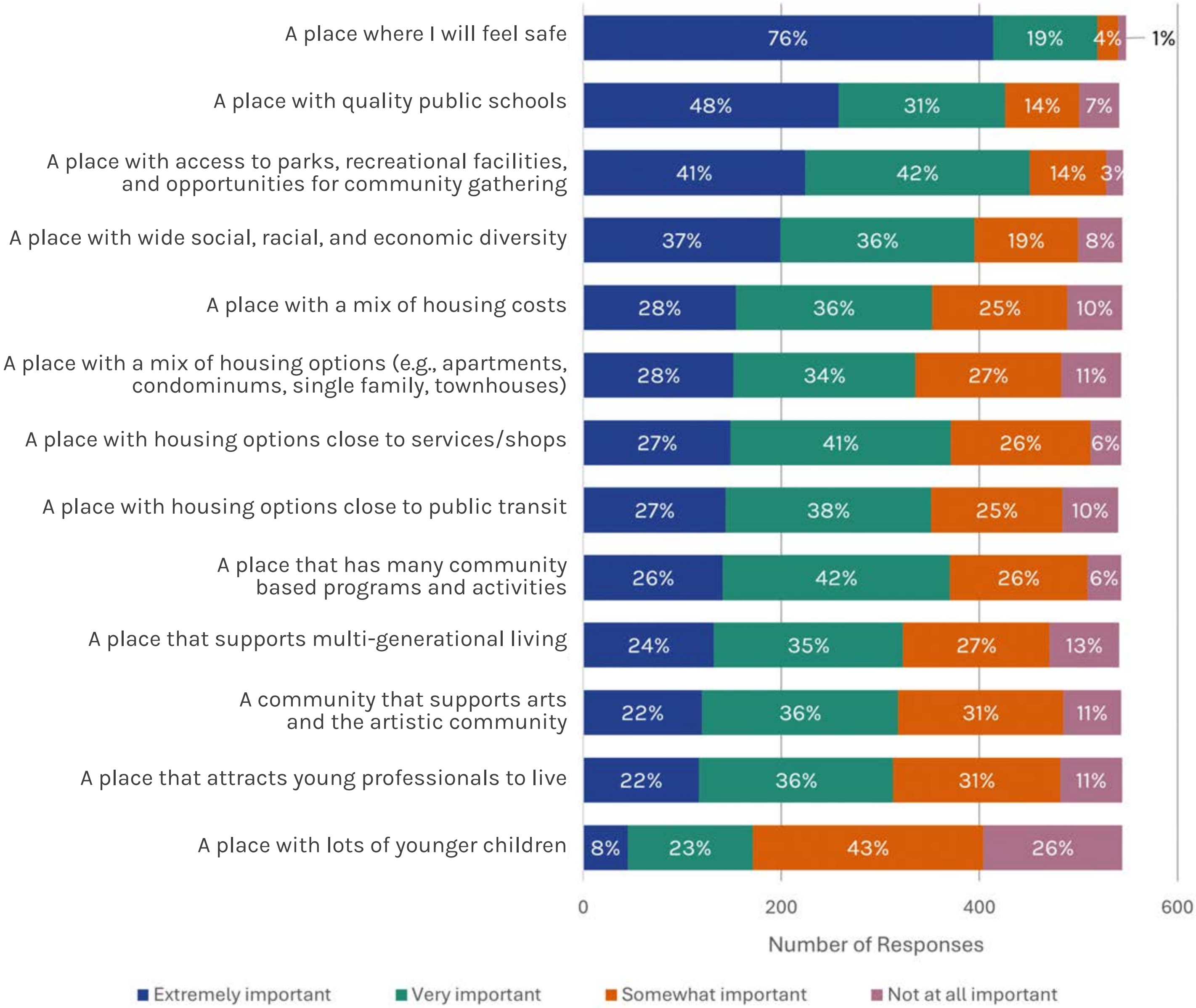
RACE AND ETHNICITY



Source: Lowell Forward Homes and Housing Survey

Safety, schools, and parks were the most desired amenities in a community.

FIGURE 46: CHARACTERISTICS OF AN IDEAL COMMUNITY



Source: Lowell Homes, Housing, and Community Survey

Figure 45 represents feedback received from people currently living both within and outside Lowell. Survey respondents were also prompted to write-in attributes of an ideal community, and safety was by far most cited, with 75% rating it as extremely important, compared to the second highest ranked feature, quality public schools, and 48% extremely important. Quality public schools; parks, recreational facilities, and opportunities for social gathering; and wide social, racial, and economic diversity were also ranked as "extremely important" or "very important" by more than 70% of people who answered the question. More than 50 wrote in attributes. These were coded by topic, with housing development the most important write-in attribute at 14 responses.

> Recently I have seen too much emphasis on new "luxury" housing developments that are impractical for people who actually work here.
>
> -Survey Respondent

Housing challenges very widely depending on living situation.

The rest of the survey analysis focuses only on current residents of Lowell. When asked about current challenges, those who owned, rented, or had other living situations gave very divergent answers. The only challenge listed by more than 20% of owners was taxes or utilities too costly, although snow removal and maintenance were also somewhat popular answers. A far greater percentage of renters named challenges, with rent too costly in over 50% of responses. Taxes/utilities, lack of room, and condition-related challenges were also somewhat popular responses. Those in situations such as being unsheltered or sheltered or living in hotels or transitional living spaces cited challenges about space to be with or grow family at roughly 25% of responses. This group also commonly cited challenges about quality of their living quarters and was most likely to cite discrimination by race, ethnicity, gender, or age.

Survey respondents support many policies, but support for income-restricted, affordable units was highest.

Figures on page 68 show responses from respondents ranking production and program goals. The most important production goal was income-restricted affordable rental homes. However, an interesting finding is that the goal that was both second-most often cited as most important and most often cited as least important was “Encourage or enable flexibility in housing types in single-family neighborhoods,” making this a topic that appears to have passionate feelings on both sides by significant numbers of respondents.

The program goal most-often cited as most important was to increase the quality of housing stock. Increasing amount of direct housing support such as rental assistance was the second-most cited.

Respondents were prompted to select up to three actions Lowell should prioritize to achieve its goals. Out of 447 who answered the question, nearly 40% chose providing more options for households that make a low or moderate income. Others with more than 100 responses included:

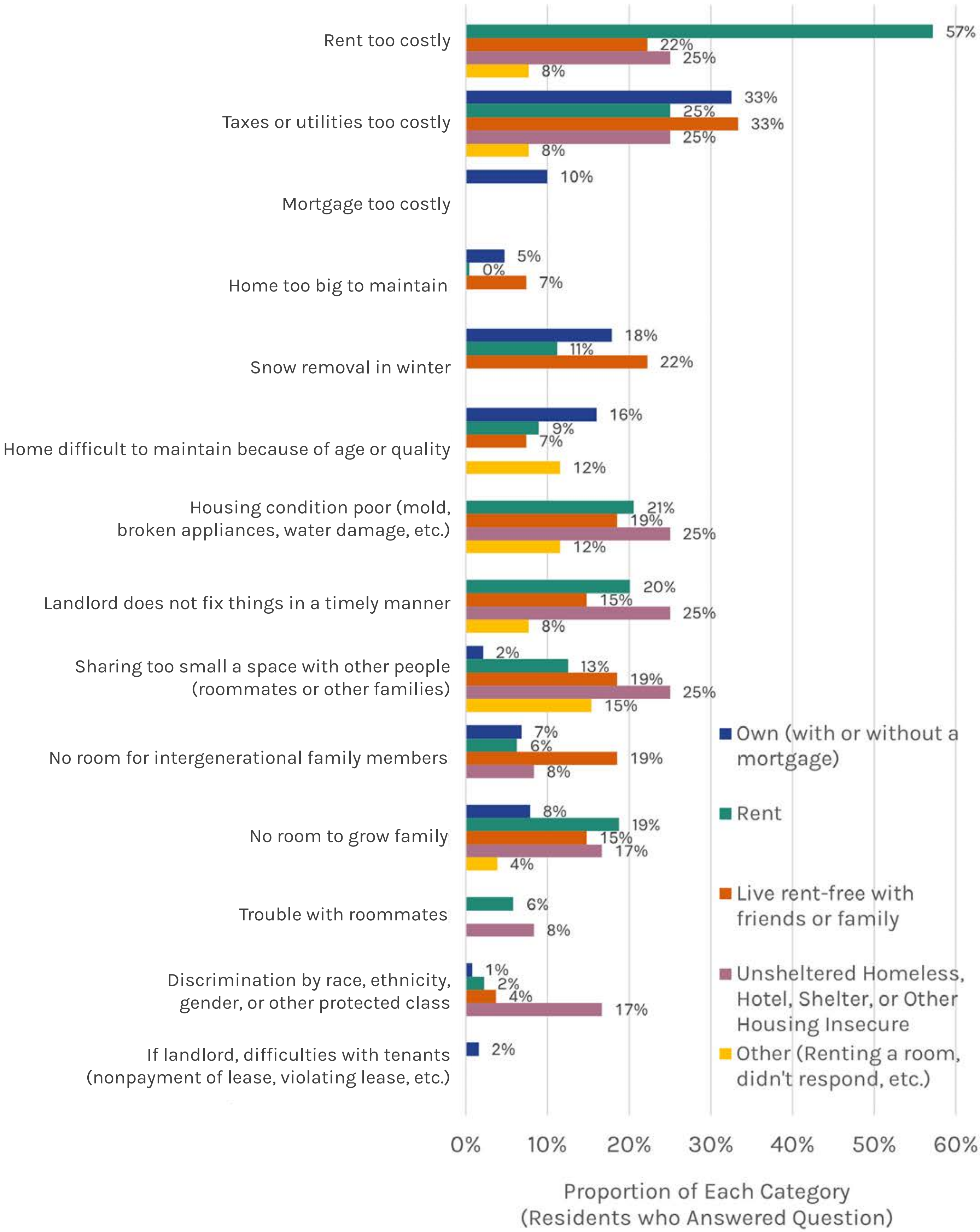
- Encourage Creation of Housing for Unhoused Individuals or Families
- Encourage Creation of More Housing Options/Choices
- Encourage Creation of Homes with a Mix of Prices

When asked which policies they would support, more than half that responded to the question stated they would support the following policies:

- Allowing Housing in Commercial Areas Such as Near Crosspoint Towers, Drum Hill, or Near Stadium Plaza
- Allow 2-Family Developments in Some Areas Where Only Single-Family is Allowed
- Providing Financial Support to Renovate Historic Structures into Denser Housing

> Denser development should mean smaller or more condensed housing to avoid eliminating sidewalks, trees, etc. I don’t think changing historic buildings is a good idea when so much of Lowell is about history.
>
> -Survey Respondent

FIGURE 46: DO YOU FACE ANY CHALLENGES IN YOUR CURRENT SITUATION?



Source: Lowell Homes, Housing, and Community Survey, responses from those currently living in Lowell.

FIGURE 47: GOALS RANKED BY IMPORTANCE

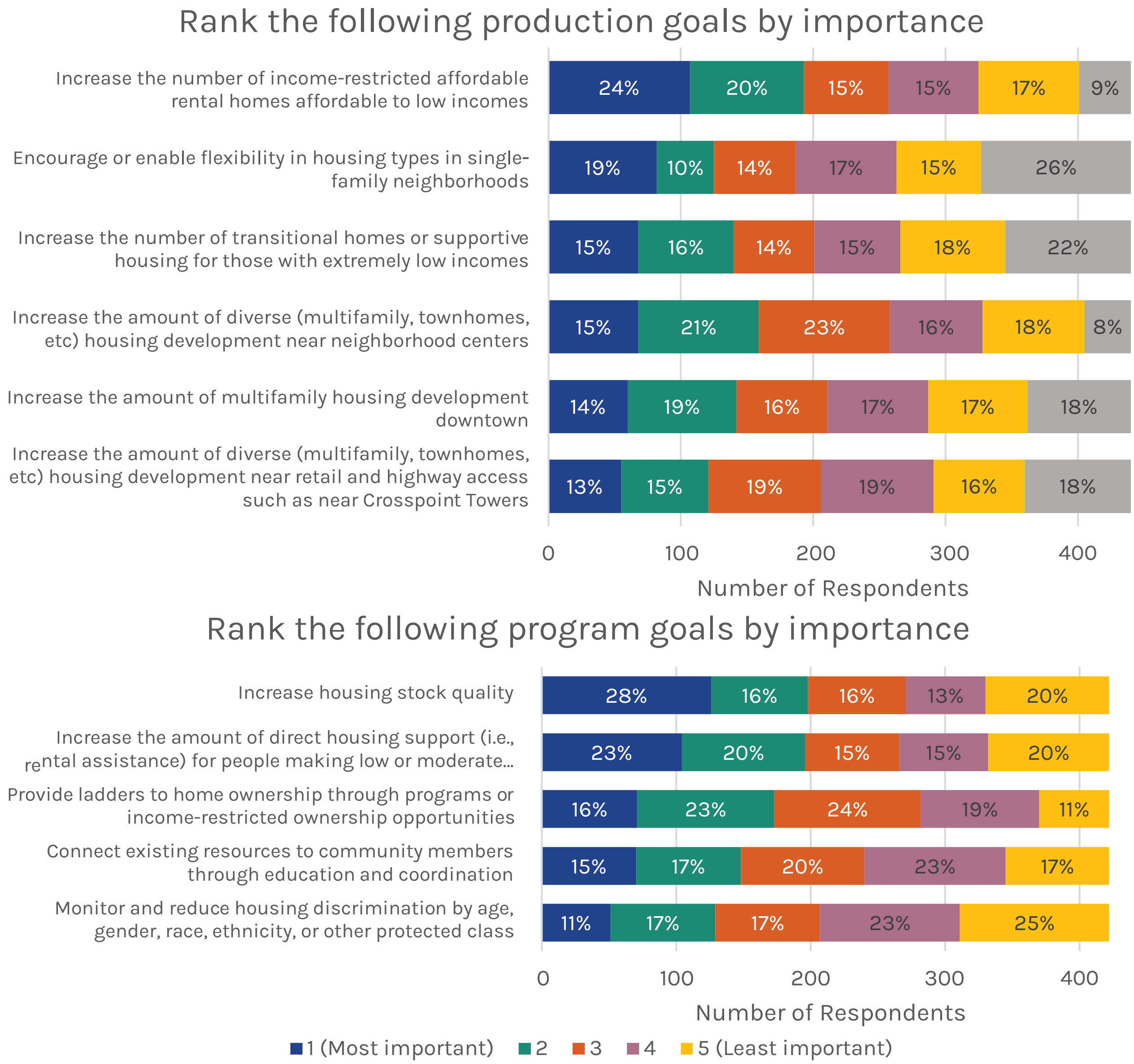


TABLE 12: WHAT ACTIONS SHOULD LOWELL PRIORITIZE? (TOP SEVEN)

Action	Count
Provide More Options for Households that Make a Low/Moderate Income	175
Encourage Creation of Housing for Unhoused Individuals or Families	124
Encourage Creation of More Housing Options/Choices	109
Encourage Creation of Homes w/ a Mix of Prices	102
Encourage Preservation of Existing Homes	89
Encourage Creation of Homes Within a Convenient Walking Distance from Businesses/Services	87
Help People Stay in Their Homes As They Age	78

Source: Lowell Homes, Housing, and Community Survey, responses from those currently living in Lowell.

> You are forgetting about taxes - you don't keep taxes reasonable then those who pay them will move.
>
> -Survey Respondent

Conclusions and the public comment period

Affordability is a common concern, but some groups have special challenges.

Respondents who rent their home generally express concern about affordability of rent, and those who own their home are concerned about the cost of taxes and utilities. Across groups, there is strong support for income-restricted, subsidized units. There is also support for other production strategies, such as allowing housing in new areas including commercial areas such as near Crosspoint Towers and 2-family developments in select areas.

Certain subgroups expressed different special needs. Seniors, people living with disabilities, immigrant communities, and those in need of transitional housing would like to be able to more easily connect with relevant human service agencies. Those who don't speak English as a first language were more likely to report language or cultural barriers to City Hall or other groups. Those who are unsheltered, live in shelter or transitional housing, or are otherwise housing insecure were more likely to report discrimination and housing quality concerns.

The survey also reached those who don't live in Lowell. Of special note are questions related to barriers to moving to Lowell and reasons people might not want to move to Lowell. 69% of people who wished they could move to Lowell cited housing or living costs as a barrier to moving to Lowell. The next most cited barrier, school choice, was at 17%. No other barrier was cited by more than 15% of out-of-town respondents.

This is a summary of public engagement, and the full results are presented in companion memorandums to this document.

21 diverse comments were recorded during the public comment period.

A draft version of this plan and a feedback form were released to the public on July 10, 2024. It was advertised through the City mailing list and special outreach to neighborhood groups and community-based organizations. Comments were accepted through July 26, 2024, and 21 responses were recorded.

Comments related to the clarity of the document included formatting concerns, length of executive summary (too detailed or not detailed enough), a more definitive statement on whether market-rate housing is included in the analysis, and a desire for more information about community process. All comments were addressed except for length of executive summary, which will be addressed through communication channels outside the document.

Comments related to vision, goals, and strategies included concern about retaining households with higher incomes, concern about housing production impacts to schools and infrastructure, desired priority for veterans' housing, desired focus on expanding public housing, a note that the plan's housing goals are necessary but ambitious, disagreement about Accessory Dwelling Units as a possible strategy, traffic and parking concerns, a suggestion to eliminate parking minimums in more zoning districts, the specifics of population projections, desire to retain use of special permits instead of "by-right" development, importance of building subsidized units in higher-income neighborhoods, a suggestion to provide guidelines for special types of development such as Single Room Occupancy, importance of Universal Design, the need for public education on housing, and other specific suggestions and recommended edits.

Comments were addressed when possible while balancing data analysis and input received during the drafting of the plan. The City also recorded comments not related to housing as general feedback.

> College educated but low paying field. Single without any family. Grew up in a house. All hope of owning is lost. Now only hope would be Section 8 and an apartment with a private bath.
>
> -Survey Respondent

Private and Public Partners

The previous pages included housing challenges and opportunities Lowell will encounter in the short- and long-term. The following pages detail the partners and resources Lowell can call upon to tackle these challenges and to capitalize on the opportunities. Possible partners include public agencies, nonprofit organizations, and private businesses such as banks and developers.

Of course, the most important partners are the community members who live and work in Lowell. This plan strives to capture their voice and vision in public outreach, goals, and objectives sections.

Each organization includes:

- A brief description
- Feedback from that organization
- One or more model projects or programs that should be replicated or expanded
- Possible pipeline projects

Information on organizations was obtained through public sources and through detailed interviews with organization staff.

This section also includes information on funding sources.

City of Lowell

A list of resources should start with the City's well-staffed departments that must work in unison to address housing challenges. City Departments should understand their roles and the ways they should communicate to one another and to outside partners.

Lowell City Hall. Image Source: City of Lowell

Department of Planning and Development

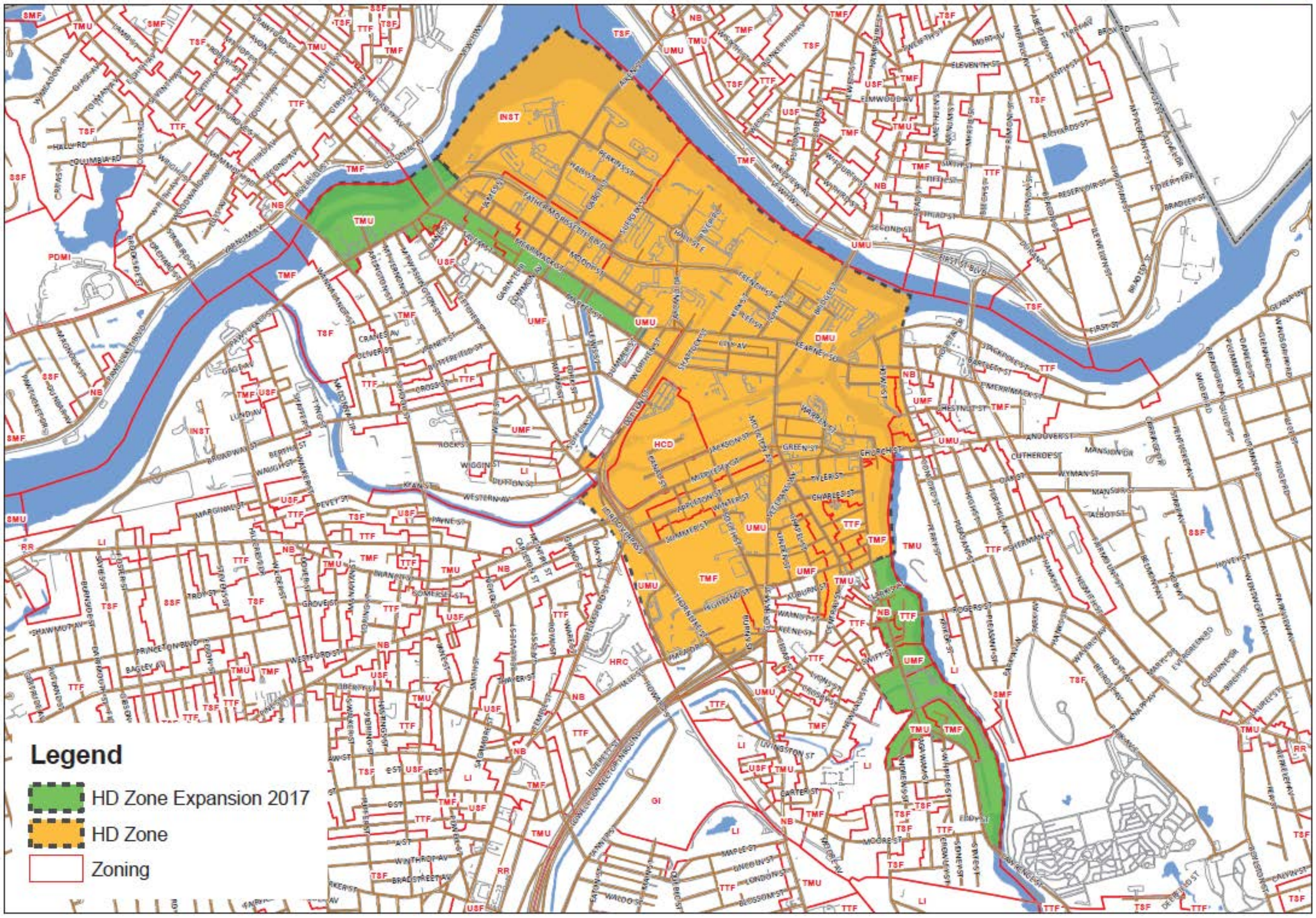
The Department of Planning and Development oversees and evaluates land development and land use projects to ensure that they comply with the City of Lowell's Master Plan and Zoning Code. The department also oversees the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) Program funds.

It implements several housing programs eligible to households with incomes of 80% AMI or lower, including:

- **First Time Home-Buyers Program** offering a $10,000 deferred loan to eligible buyers
- **Owner-Occupied Housing Rehabilitation Program** offering deferred, no-interest loans to correct substandard conditions or provide accessibility improvements
- **Lead Abatement Program** offering loans to delead units that will give preference to eligible tenants

DPD also administers two state tax incentive programs: The Housing Development Incentive Program (HDIP) and the Urban-Center Housing Tax Increment Financing (UCH-TIF), which provides tax incentives to Developers of housing projects. See Map 10 on the next page for the HDIP boundary.

MAP 10: HDIP BOUNDARY



Source: City of Lowell

Department of Health and Human Services

The City of Lowell Department of Health and Human Services provides a wide range of programs. It includes the Office of Homelessness Initiatives, which foster partnerships to prevent and reduce homelessness.

Hunger and Homeless Commission

The Hunger and Homeless Commission is a six-member commission that advises the City Manager on issues related to homelessness and hunger in the City of Lowell. It generally meets monthly, although minutes are not available on the City of Lowell website.

Historic Board and Tax Credits

DPD administers the historic review process and both federal and state historic tax credits.

Planning Board

The Lowell Planning Board reviews, approves, and implements the City of Lowell's Master Plan. It also administers and enforces the provisions and requirements of the Subdivision Control Law, and provides site plan review and Special Permit review to projects for which it is the Special Permit Granting Authority. The Board also provides recommendations to the City Council regarding proposed zoning text and map amendments.

Zoning Board of Appeals

The Zoning Board of Appeals (ZBA) hears applications for variances from the Lowell Zoning Code. It also is the Special Permit Granting Authority for some types of projects.

Coalition for a Better Acre

> We value open communication.
> -Yun-Ju Choi, Executive Director

Coalition for a Better Acre (CBA) is a membership-based Community Development Corporation (CDC) that has operated since 1982. It has built and renovated more than 556 residential units, and currently owns 486 affordable rental units in Lowell. It also has built 50 affordable homeownership units in Lowell and a number of units in other municipalities. One of CBA's major goals is to assist families with economic self-sufficiency, and an element of this is maintaining housing affordability. CBA has other priorities in health, civic engagement, and economic development.

Public communication, dependability in funding, & transit are critical needs.

Open communication is critical for real estate development, and CBA reports that they have good communication with City government and that permitting and zoning is streamlined. Language access for residents is critical, including communicating through non-digital methods, diverse meeting times, and other ways to meet with a population that is diverse in language, background, and age.

Dependable funding is also a critical element for large real estate projects, such as state or federal funding. Creative solutions to challenges such as parking and transportation access are also critical considerations. This includes enhancing transit services between affordable housing locations and employment and services.

555 Merrimack Street rendering. Source: CBA.

A model for targeted, project-based subsidy

555 Merrimack is under development with:

- 7 studios with project-based subsidy capped at 30% of householder's income
- 11 one-bedrooms rent from $1,027-$1,244
- 9 two-bedrooms with rent $1,492

All units have heat, electric, and hot water included in the rent and a preference for households with income at or below 60% AMI that also qualify for voluntary services, including supportive services focused on recovery from substance use disorder. In partnership with Lowell House, supportive programs will be located on the ground floor, along with office, community space, and a laundry facility with direct access to the exterior. It is also Lowell's first affordable housing development to earn a Passive House green certification.

Existing & Pipeline Projects

Other recent CBA model projects in Lowell:

- 305 Gorham Street, 24 apartments and townhouses, 2015
- Unity Place, 482 Moody Street, 23 apartments, 2011

More recently, CBA completed 9 veterans' apartments in Dracut in 2022 and 44 in Haverhill in 2021. CBA is considering a possible opportunity for affordable homeownership housing at 437-463 Market Street and is preparing to renovate and retrofit their North Canal Apartments, 267 units across 27 buildings, to meet Enterprise Green Communities standards.

Community Teamwork and Common Ground

> An Affordable Housing Trust Fund can... reduce red tape.
>
> -Carl Howell, Chief Program Officer

Community Teamwork, Inc (CTI), a non-profit community action agency, a regional non-profit housing agency, and a community development corporation, was established in 1965. As the Community Action Agency for the Greater Lowell Area, its strategic plan focuses on housing, community education, workforce development, and any other support needed to become economically established in the region. CTI now serves over 50,000 people and partners with many organizations such as immigrant and refugee communities. CTI also oversees 108 households staying at the Methuen Hotel and owns 7 transitional units at 767 Merrimack Street.

Common Ground, CTI's development subsidiary, partners with municipalities to create affordable housing, having now created 129 units. Its projects in Lowell include:

- Four affordable duplex units on two vacant lots acquired from the City
- 205 Worthen Street, 3 rental units
- 420-430 Broadway Street, 29 units, many of which for formerly-homeless tenants

Tavenier Place in Acton, Source; Housing Navigator

Tavenier Place: A Deeply-Subsidized Partnership in Acton

Common Ground's most recently-completed project was 31 one-bedroom affordable rentals for seniors ages 62 and up and individuals with disabilities, located at 446 Massachusetts Avenue in Acton. Eight units are restricted for households earning 30% or less of AMI, and 23 units for households earning 60% or less of the AMI. Funding sources for the project include Massachusetts Housing Partnership, the Executive Office of Housing and Livable Communities (EOHLC), Community Economic Development Assistance Corporation (CEDAC), Eastern Bank, MassHousing, RBC Capital Markets, and Acton Community Housing Corporation.

Pipeline Projects

Common Ground is evaluating the feasibility of new affordable housing at a site in the Acre. Community Teamwork is also seeking funding and sites for 60 shelter beds and a fifteen-bed youth shelter. They hope to acquire and renovate additional buildings to convert into single-room occupancy units.

Partnerships Fuel Initiatives to Reduce Homelessness

CTI reports its partnerships with homelessness initiatives have been successful so far due to a shared vision that has opened further communication on housing issues. However, there are challenges regarding funding alignment. These include documentation of spending, communication about how funds are accessed, and identifying sources of red tape. An Affordable Housing Trust Fund is one strategy that can help streamline the process of getting housing for those in need while also reducing red tape.

More flexibility in local zoning will help Community Teamwork and Common Ground develop more affordable, multi-family housing options that suit a larger variety of housing needs.

In addition, more outreach is needed towards vulnerable populations, including low-income, migrant, BIPOC, youth, and senior residents. Renters and small business owners are also underrepresented.

Day Centers: Eliot Church, Life Connection Center, and Living Waters

Eliot Church runs a Day Center weekdays in mornings and early afternoons, providing safe day space to anyone who is unhoused. This center provides breakfast, a restroom, wi-fi, charging stations, coffee, refreshments, clothing, and personal hygiene items. The director of social services provides case management for housing readiness. A chaplain is available for prayer and counseling. Through partnerships with other agencies, a case worker is available three days per week and a nurse and harm reduction specialist are on site one day per week. The Day Center serves a diverse population.

Life Connection Center offers numerous services, such as harm reduction services with the Lowell Community Health Center, providing on-site HIV and HEP C testing, complementary condoms, recovery support, referrals to detox, harm reduction supplies, and access to Narcan, Monday through Friday until 2 pm. They operate visit additional locations with a mobile outreach van. They also offer hot lunches on certain days. It has operated a twenty bed congregate shelter and a short-term emergency hotel project. Faith-based support and homeless outreach are also available. It was noted that with improvements to meet building code, LCC could provide additional shelter beds.

Living Waters Center of Hope operates a downtown day center serving 850 members of the Lowell community that includes a three-step program that starts with basic needs, develops relationships through workshops and training, and

Life Connection Center (LCC). Source: LCC.

inviting guests to volunteer time and talent.

Perhaps the most critical challenge that day centers report is uncertainty of funding. This includes the need for more dependable year-to-year funding streams and speed of receiving funding after awards even as attendance rises (Eliot's Day Center grew from 60 daily clients in 2020 to over 120 at the end of 2023.)

That said, these centers see themselves as a first step and a home base, but they believe that ultimately, Lowell needs more permanent supportive housing, which is the best solution to addressing the homelessness problem.

In addition, a general call center for those facing homelessness would help people navigate the many resource options available throughout Lowell to help coordination on not just the executive level, but at an on-the-ground level. A general call center would also help with increase awareness of the range of resources available to those facing homelessness, which is another critical challenge.

> This is a first step, but more housing is needed.
>
> -Heather Prince Doss, Pastor

Day services are a trusted link to people suffering from homelessness.

Day programs have built a level of trust with their guests. These may be a potentially strong avenue to connecting with people who might be distrustful of larger organizations or who have had bad experienced in the shelter system such as bedbugs, safety, or expulsion from a shelter.

Greater Lowell Community Foundation, Lowell Plan, and LDFC

Three local agencies that aren't directly related to housing have nevertheless been working together to partners in supportive proactive solutions to housing challenges.

The Greater Lowell Community Foundation is the leading charitable organization in the Greater Lowell/Merrimack Valley area, and makes grants to nonprofit organizations, high school scholarships, and special funding initiatives, works in partnership with donors on philanthropic initiatives, and operates as a center of information in terms of resources and shared goals for nonprofits throughout the area.

The Lowell Plan, Inc. is a private non-profit economic development organization that seeks to ensure that the City of Lowell is a successful, thriving community. It has sustained a dialogue among local leaders in community development, government, business, and education. The Lowell Development and Financial Corporation (LDFC), a sister organization to the Lowell Plan, provides subordinate financing in support of economic development, including housing projects.

Political will and policy coordination is necessary for housing investment.

Both organizations reported that more coordination among stakeholders is necessary to overcome housing challenges. In addition, zoning policies are too restrictive, so an update is needed to enable necessary flexibility.

With that said, the Greater Lowell Community Foundation has explored partnering with LDFC and leveraging project-based vouchers for a low-interest loan program targeted toward smaller developer's startup funding for affordable housing creation.

Staff of Lowell Plan, Greater Lowell Chamber of Commerce, and Greater Lowell Community Foundation discuss housing issues. Source: Lowell Sun.

> Diverse housing options not only enhance the quality of life for residents but also contribute significantly to the city's vitality, attracting diverse talent and fostering a robust, resilient community.
>
> -Allison Lamey, Executive Director

A model public-private partnership: Housing Incentive Program

Both organizations have played an important role in bringing together organizations and funding, including providing flexible funding sources that can support more innovative programs. The LDFC created and conducts two programs in collaboration with the Merrimack Valley Housing Partnership:

First Time Homebuyer Program provides downpayment assistance to households purchasing a home for the first time.

First Time Lowell Homebuyer Program provides downpayment assistance to households that are moving to Lowell. This program is used as a hiring incentive for some of the city's largest employers, including Lowell General Hospital, UMass Lowell, and others.

House of Hope

House of Hope consists of two distinct non profit organizations: House of Hope Shelter and House of Hope Housing. House of Hope Shelter provides emergency shelters for 58 families in Lowell. House of Hope Housing develops, owns and manages deeply affordable permanent housing and support services to formerly homeless families. It owns four multi-family buildings containing 37 units with up to four bedrooms.

The shelter has also developed the Learn2Work Program which provides resident interns with employment training and job placement support. This includes culinary skills training where residents learn the basics of institutional kitchen work and food preparation, becoming certified in both ServSafe and Food Allergen Training. The other component is experience working in retail sales by operating the Hope Chest, a nonprofit children's retail store.

Zoning has created barriers to expansion within neighborhoods and funding remains a critical issue.

House of Hope Housing hopes to expand permanent housing at sites that currently operate emergency shelters. This hybrid model will provide services and programming to both sheltered and formally homeless families, which will prove to sheltered families that housing stability is possible. House of Hope Housing reports that obtaining this minimal level of density is critical for funding affordability. Additionally, they report that integrating properties seamlessly into neighborhoods is critical for client success.

New Hope 3 Apartments. Source: House of Hope

House of Hope Housing: Integrating Services and Subsidized Housing and Services in Neighborhoods

House of Hope integrates homes accessible to those with very low incomes into mixed-income neighborhoods such that the shelter housing is indistinguishable from other homes in the neighborhood. The goal is to allow clients to be part of a vibrant neighborhood without shame or stigma. These multi-family properties provide stability for children and pathways to greater independence for parents.

In addition, House of Hope Shelter has a Learn2Work program that connects homeless parents living in shelters with soft skills training and job placement. Sheltered families also receive Case Management and Housing Search and Stabilization.

Another nonprofit agency, Dwelling House of Hope, is unrelated, but works with similar groups such as immigrants and lower-income families in the Merrimack Valley.

Lowell Transitional Living Center

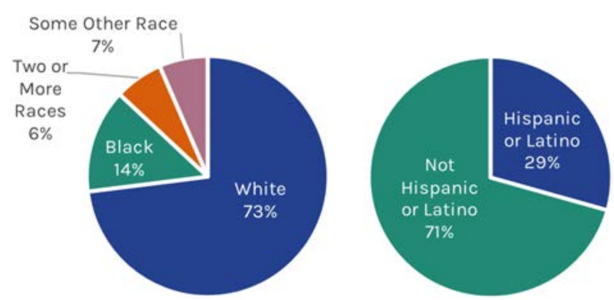
The Lowell Transitional Living Center is an emergency shelter for homeless adults. This agency provides housing solutions, meals, and connections to community-based resources and support. Case Managers specialize in financial assistance, health and wellness, and housing. It utilizes a Housing First model to get homeless individuals the resources they need as quickly as possible. The agency currently operates 90 emergency shelter beds that are expanded to 120 during winter protocol, 60 units at their main site on 201-205 Middlesex Street, which includes both single-room and apartments, and an additional 35 units in other sites in Lowell. These units are all affordable to extremely low or no incomes and intended for chronically homeless households. LTLC is an affiliate of South Middlesex Opportunity Council (SMOC), and the statistics here include all SMOC-operated programs in Lowell.

LTLC provides a variety of programs.

The Engagement Bed Program (EBP) targets homeless people who are HIV positive or at a high risk of infection. LTLC teaches clients about risk reduction and connects them to regular testing and counseling. It also provides case management services.

The Winter Emergency Bed Program (WEBP) provides extra cots and includes access to showers, laundry, meals, outreach, and engagement services to the homeless population from November to March.

FIGURE 48: LOWELL TRANSITIONAL LIVING CENTER CLIENTS BY RACE AND ETHNICITY, 2023



Source: SMOC

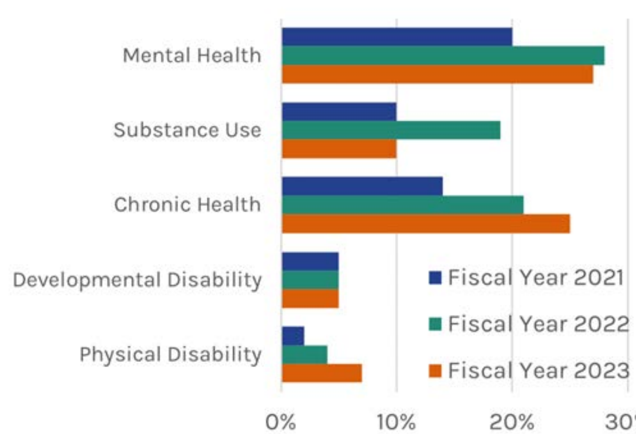
Lowell Transitional Living Center. Source: LTLC

Clients are very diverse in terms of disabilities and ages, but tend to be White, Black, or of Mixed Race.

In fiscal years 2022 and 2023, Lowell Transitional Living Center served more than 400 individuals annually. Generally, fewer than 30% of clients have mental health concerns. With the exception of a spike in 2022, 10% had identified substance use. However, a growing number have chronic health conditions (now 25%) and a small but growing number have a physical disability (now 12%).

Notably, LTLC clients do not reflect Greater Lowell's race and ethnicity. LTLC serves fewer individuals identifying as Asian and more individuals identifying as Black proportionately to the City and the region.

FIGURE 49: CHARACTERISTICS OF LOWELL TRANSITIONAL LIVING CENTER CLIENTS, 2021-2023



Source: SMOC, Fiscal Year begins July 1

Lowell Housing Authority

The Lowell Housing Authority (LHA), funded in 1937, is the first public housing authority in Massachusetts, and one of the largest in the state. The LHA's primary mission is to provide safe, decent, and sanitary housing for low to moderate income residents in the City of Lowell. It strives to be a full-service social agency managing public housing developments and implementing affordable housing programs to help its residents become self-sufficient.

The LHA portfolio consists of 3,405 units comprised of 1,802 units of federally funded housing contained within four housing developments and an additional 1,603 units of leased housing utilizing HUD Section 8 vouchers and MRVP vouchers funded by the Commonwealth of Massachusetts.

In addition to partnering with local agencies, the LHA manages a Family Self-Sufficiency Program offering mentoring services to help families achieve career, financial and educational goals.

River's Edge on the Concord rendering. Source: Lowell Housing Authority.

North Common Village. Source: Lowell Housing Authority.

A collaboration between LHA and the City is needed.

LHA reports that a collaboration between the LHA and the City of Lowell is vital for success. The stronger this relationship becomes, the greater the prospect for funding and providing affordable housing opportunities. The LHA believes additional affordable housing opportunities are very much needed in Lowell.

The LHA has two projects in the pipeline that could create 150 new units.

RIVERS EDGE ON THE CONCORD: The final phase of this project, which began in 2002, will construct 32 new affordable home ownership opportunities to be sold to families with an income of 80% to 100% of AMI.

MERRIMACK STREET CORRIDOR: This project proposes 118 one/two-bedroom units of affordable rental housing, of which 75% will assist individuals and families with incomes below 50% AMI. The project includes 20 units of veterans' housing.

Jobs Plus could serve as a model to combat the "cliff effect".

LHA partners with HUD and MassHire for Jobs Plus program, which combines employment, training, and job placement services with a rent incentive. It includes education about the Earned Income Disallowance, which prevents rent increase as a result of income increase. This mitigates what is known as the "cliff effect," in which subsidizing housing tenants may no longer qualify for the housing they live in without an affordable alternative, disincentivizing employment.

LHA has a significant impact on housing in Lowell.

LHA's 3,405 units make up nearly 7.5% of Lowell's housing stock, representing a majority of the subsidized housing on the Subsidized Housing Inventory (SHI) in Lowell. This illustrates the substantial impact the LHA has on all housing in Lowell.

The Affirmatively Furthering Fair Housing Data Tool combines data from the 2010 Decennial Census, the 2011-15 American Community Survey, and other data sources to measure equity in housing. It reports that 81% of LHA units are in Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), which are census tracts that are less than 50% non-Hispanic or Latino White. It uses a formula to determine whether the poverty rate is substantially higher than the rest of the metropolitan area. These tracts are in the Acre and in Back Central neighborhoods. Conversely, only 13% of Project-based voucher units are in R/ECAPs.

TABLE 13: PUBLIC HOUSING BY RACE/ ETHNICITY, 2020

	White	Black	Hispanic or Latino/a	Asian or Pacific Islander
Public Housing	39%	6%	38%	16%
Project-Based Section 8	47%	2%	47%	4%
HCV Program	36%	6%	51%	7%
Total Public	**38%**	**5%**	**45%**	**9%**
Total Lowell 0-30% AMI	50%	6%	30%	12%
Total Lowell 0-50% AMI	52%	6%	26%	14%

Source: AFFHT, HUD, 2020. LIHTC data not presented due to incompleteness.

The nonwhite population disproportionately lives in public or voucher-based housing.

Although 50% of households that have incomes of 30% or less AMI are White, only 38% of households living in public housing or utilizing Section 8 vouchers are White. Households identifying as Black, Asian or Pacific Islander make up a smaller proportion of total households in public or voucher-based housing than their proportion of under 30% AMI households.

Hispanic or Latino households make up a larger share of public or voucher-based households than their share of under 30% AMI households. Further research is necessary to better understand this disparity.

Merrimack Valley Housing Partnership

The Merrimack Valley Housing Partnership is a 501(c)3 that started in 1986 as a developer of housing for low and moderate income earners. In 1991, it shifted its focus to homeownership education through a series of homebuyer training seminars. They now also offer financial and credit counseling, monthly landlord training seminars, and technical and administrative support for down payment assistance programs for first-time home buyers.

MVHP provides a variety of programs, but home ownership is becoming more difficult due to lack of options.

MVHP offers multiple programs that assist first time home buyers and low-income households purchase or maintain ownership units. These include the following:

- Home Buyer Training Classes
- Landlord Training Classes
- Lead Paint Abatement Loans
- Housing Rehabilitation Loans

MVHP expressed that the City of Lowell is very supportive of increasing affordable home ownership and supports the use of HOME funds to encourage affordable home ownership. These funds however have federal restrictions that make it difficult to use them.

That said, MVHP believes the City needs to update zoning policy to reflect the need for more housing to be developed. Further collaboration with stakeholders can help the City better understand housing needs. Better understanding of funding sources and processes for obtaining funding will help streamline the process of developing new properties.

Acre Crossing Residences flyer. Source: MVHP.

Acre Crossing Residences brought new options to a disproportionately renter-occupied neighborhood.

Merrimack Valley Housing Partnership is the lottery agent for the new development, Acre Crossing Residences. Acre Crossing Residences is a new development located at 650 Merrimack Street in Lowell. This project consists of 32 new condominium homes of twenty-four two-bedroom units and eight three-bedroom units, which will be available for sale to first-time home buyers earning at or below 100% Area Median Income (AMI). Construction is scheduled to be completed in mid-2024. MVHP plans to organize information sessions that will cover the application process for obtaining one of these units.

For-profit Developers

Private, for-profit developers offer skills, expertise, and funds to develop new housing projects as well as non-profit housing developers. NMCOG has met with developers representing firms such as Farley White, D2 Development, Heritage Properties, and TMI Rentals. Some of these developers have experience building workforce housing and 40B, as well as commercial development.

The Carter Apartments. Source: Nine Zero Two Development.

Developers report that the fastest-renting market-rate units are relatively inexpensive; new micro-units, appropriate for younger professionals or empty nesters; or older units sized for families.

Developers pay close attention to the market and have first-hand experience of what types of housing people moving within or to Lowell look for. They noted that the market for high-end units is softer, but older, less expensive units large enough for households of up to six people are very desired.

An exception to this is micro-units with one bedroom and many modern amenities. These type of units can be rented for more per square foot while remaining affordable to singles or couples due to their small size.

There was general agreement that an upscale market exists and that private developers are poised to take advantage of this, but they need to include shared and community amenities in safe, walkable, and attractive neighborhoods.

The types of people developers report move to Lowell tend to be UMass Lowell grads, people born in Lowell and returning, and new people looking for an affordable urban home. Generally speaking, affordability is the largest barrier rather than the wrong option at the right price.

Developers feel that zoning does not reflect the previous Master Plan or city goals such as transit-oriented development.

Many developers believe that the regulations for housing development are too strict. When it comes to zoning, the regulations should align with the Master Plan and reduce required Board approvals for projects that align with the Master Plan.

An example was that zoning for a specific site less than a quarter mile from Gallagher Terminal required too many parking spaces for a proposed transit-oriented micro-unit project. Zoning should reflect the City's goals whenever possible, including walkability and transit use.

There is a gap between sales prices or rents in Lowell and those in Boston, yet construction costs are similar, creating a need for subsidy and realistic land prices.

Private for-profit and non-profit developers face similar construction and borrowing costs. Developers report these costs are similar in Lowell and Boston, yet rents and sales prices are not as high as in Boston and its suburbs. In order to continue to attract high-quality development, Lowell must make up the gap with tax credits, HDIP, or other ways to bridge this gap.

Lowell does compare favorably to Boston in terms of its permitting and should continue in this direction. Developers report that quality mid-size developers are being forced out of the Boston area due to onerous requirements that only larger developers can handle, creating a new market for developers outside Boston.

They also noted that this means property owners need to price land accordingly. A major barrier to housing construction is not zoning, but rather a mismatch between land costs and the rents or sales prices that Lowell's market can support, and the City should evaluate its policies around vacant or dilapidated structures that might have a high sales price preventing their redevelopment.

Predictability is the most important consideration for developers in Lowell, with a desire for transparency in decision criteria and priority sites.

Developers are discouraged when a project that appears to align with the City's master plan requires a special permit or variance, and a small group of people speaking at a hearing would change the decision-making board's decision.

Developers in Lowell would prefer that clear criteria are defined that would indicate whether a project is appropriate for a particular neighborhood. This might include by-right multi-family near walkable areas or near transit, with clear criteria for site plan review.

The Residences at Crosspoint. Source: Residences at Crosspoint.

Funding Opportunities

Low Income Housing Tax Credits (LIHTC)

The Low Income Housing Tax Credit (LIHTC) Program gives state local LIHTC-allocating agencies about $9 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, and new construction of rental housing for low-income households.

Federal Funding Programs (CDBG, HOME, HOME-ARP, and ESG)

The Community Development Block Grant (CDBG) Program provides annual grant money to municipalities to develop urban communities by providing decent housing and by expanding economic opportunities for low and moderate-income households.

The HOME Investment Partnerships Program provides formula grants to communities to fund various housing-related activities, including buying, rehabilitating, and constructing affordable housing for rent or homeownership or providing direct rental assistance to low-income households.

The HOME American Rescue Plan (HOME-ARP) Grant Program provides funding to qualified jurisdictions to assist individuals or families who are either homeless, at-risk of homelessness, fleeing domestic violence or human trafficking, are in a situation where providing supportive services or assistance under Section 212(a) of the Act would prevent their homelessness, or veterans and families that include a veteran family member that meet one of the other criteria. Four activities are eligible for funding: supportive services, production or preservation of affordable housing, the purchase and development of non-congregate shelter, and tenant-based rental assistance (TBRA).

The Emergency Solutions Grants (ESG) Program provides funding for various activities to address homelessness as authorized under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009.

OneStop for Housing

One Stop for Growth is a single application portal and collaborative review process that allows an application to be considered by multiple grant programs simultaneously. Applicants can receive feedback on their applications directly and receive referrals to additional programs they may otherwise be unaware of.

Community Preservation Act

The Community Preservation Act (CPA) is a tool that helps communities preserve historic sites and open space, develop outdoor recreation facilities, and create affordable housing. It also helps strengthen local economies by expanding housing opportunities and construction jobs.

MassDevelopment

The Massachusetts Development Finance Agency (MassDevelopment) was created by the state in 1998. MassDevelopment offers many programs that can assist in multi-family housing development or the development of necessary infrastructure for housing. This includes predevelopment site readiness support, tax-exempt bonds, loans, and consulting.[1]

MassDevelopment PACE Program

The Property Assessment Clean Energy (PACE)Program provides financing for energy improvements through a betterment assessment and lien on properties. The annual savings of energy improvements and tax credits can be used to repay the financing.[2]

Property & Casualty Initiative

The Property & Casuality Initiative (PCI) is "committed to assisting developers, property managers, and nonprofit organizations in their efforts to create, renovate, and preserve affordable housing across the Commonwealth of Massachusetts."[3]

They provide loan capital for affordable housing predevelopment, acquisition, and construction, along with other economic development loans.

1. Providing financing for multifamily housing projects. MassDevelopment. https://www.massdevelopment.com/products-and-services/services-by-industry/housing/

2. PACE Massachusetts MassDevelopment. https://www.massdevelopment.com/products-and-services/financing/green-finance/pace/

3. The Property & Casualty Initiative. Property & Casuality Initiative. https://www.pcifund.com/

What is Lowell's Current Zoning?

Background

Lowell's zoning code regulates what can be built in the City and where. It includes use regulations that determine where different types of uses can occur, such as multi-family residential or drive-through restaurants. It also regulates how large those uses can be, how much parking they require, who needs to approve the project, and many other aspects of land use. Buildings that were constructed before the zoning code was enacted may not conform to the zoning code. They may also be granted variances by the Zoning Board of Appeals.

This analysis provides context into what types of housing can currently be produced in the City of Lowell under current zoning conditions. As Lowell is designated as an MBTA community, this analysis will focus primarily on housing development allowed by-right and how the transit-oriented development (TOD) overlay districts adopted by the City Council on October 24, 2023, expand the flexibility of development in the middle of the city. In addition to residential districts, commercial and mixed-use districts will also be included in this analysis.

Lowell's Zoning Code: An Overview

Lowell's zoning is "transect based." This means that zones near the center of the City tend to allow more compact development than those near the edges. The "transects" can be considered:

- Downtown
- Urban Neighborhood
- Traditional Neighborhood
- Suburban Neighborhood

Each of these "transects" are divided into zones that define allowed uses. Zones based on residential use include:

- Mixed-Use
- Multi-family
- Two Family
- Single Family

Zoning districts can be defined as a combination of a transect and a zone, for example, Urban Neighborhood Multi-family or Traditional Neighborhood Two Family. Not every transect has every zone.

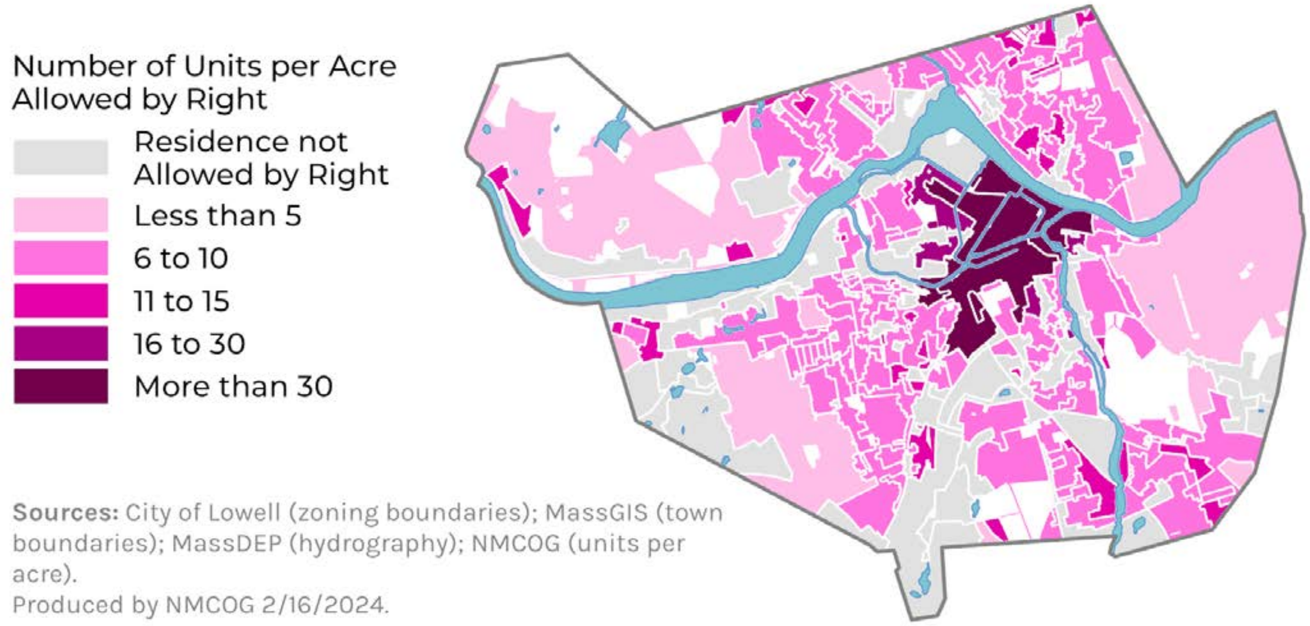
Additionally, there are zoning districts for commercial, industrial, and intuitional uses. These tend to follow the densest-in-the-center rule as well. These zones are:

- High-rise commercial
- Neighborhood business
- Regional retail
- Institutional mixed-use
- Office/Research park
- General industry
- Light industry

Finally, there are a few "special" zoning districts that are overlays or have special rules:

- Hamilton Canal District
- Planned Development Medical/ Institutional
- Multi-family Overlay District

MAP 11: NUMBER OF UNITS PER ACRE ALLOWED BY RIGHT



Source: City of Lowell.

General Housing Density Allowed By-right and By Special Permit

Lowell has many zoning districts, but for this analysis, the map has been simplified based on how many housing units per acre each zone allows by-right and by special permit, taking the new Multi-Family Overlay Districts into account.

"By-right" means that a property owner may build any project that meets the requirements laid out in the zoning code, so long as that owner goes through the proper steps. "By Special Permit" means that a board or committee has discretionary power to approve or deny a project based on their judgement, even if it otherwise meets the zoning requirements.

The table summarizes how much land is in each dwelling unit per acre category and the map above shows this visually. Note that the table shows the densest use. I.e., the 2,069 acres that allow multi-family by special permit includes all districts that allow multi-family by-right. Those districts may allow two-family by right or by special permit. The total of all districts analyzed include 7,610 land acres that were not protected open space (parks).

TABLE 14: ZONING ACRES BY HIGHEST ALLOWED UNITS PER ACRE AND DENSEST HOUSING TYPE

Category	By-right	By Special Permit
No residential units allowed	1,842	979
1 - 5 Units per Acre	2,342	2,342
5.1 - 10 Units per Acre	2,565	2,731
10.1 - 15 Units per Acre	347	347
15.1 - 30 Units per Acre	102	314
30.1 or more Units per Acre	412	898
Single Family Detached	4,563	4,563
Two Family	423	0
Multi-family	782	2,069
Total Acres*	**7,610**	**7,610**

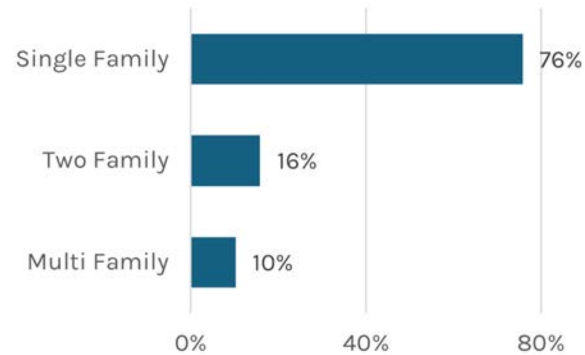
*Source: NMCOG Analysis. Density was determined by dividing minimum lot size by numbers per unit per lot; by multiplying Floor Area Ratio (FAR) by 43,560 to get square feet of allowed floor space per acre and dividing that number by 1,000 to approximate the number of units that could fit into that floor space; then taking the smaller of the two numbers. *Zoning acres does not include open water or protected open space, but does include other undevelopable space such as right of way and other wetlands.*

What does the zoning allow?

Allowed Uses, By-right and By Special Permit

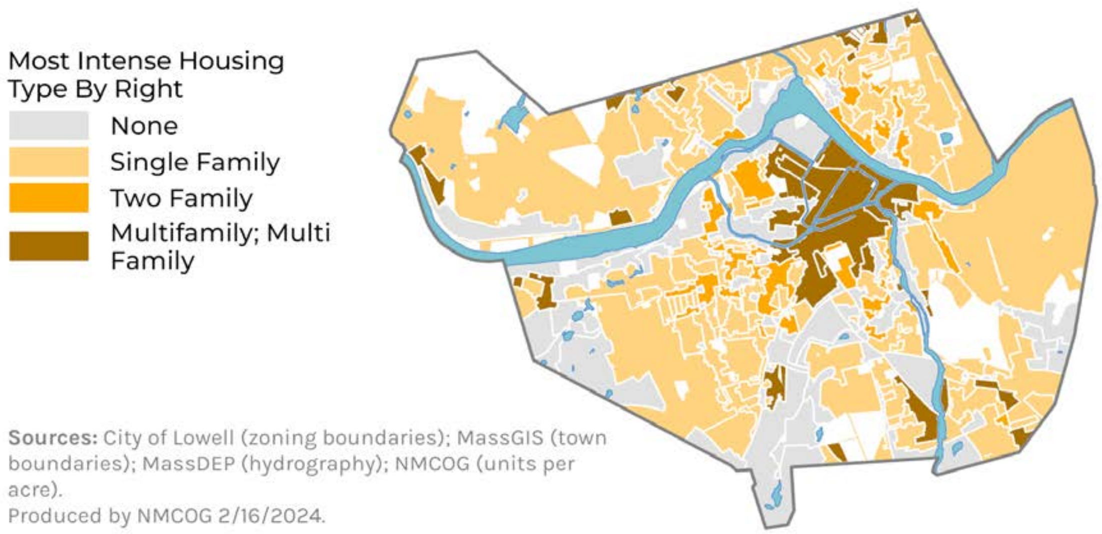
In addition to dwelling units per acre, NMCOG analyzed zoning districts by the most intense use by-right and by special permit, not counting open water, parks, or protected open space. Roughly 10% of land area allows construction of multi-family buildings as of right, and 16% allows duplexes. 24% of land doesn't allow any housing at all by-right and 13% does not allow it even by special permit. 60% of land allows single family, but no other residential uses by right or special permit.

FIGURE 50: TOTAL LAND AREA ALLOWING CERTAIN TYPES BY-RIGHT



Source: City of Lowell, NMCOG Analysis

MAP 12: MOST INTENSE HOUSING TYPE ALLOWED BY RIGHT



Parking requirements are a limiting factor in Lowell's inner neighborhoods, even as many parking spaces are empty.

The City of Lowell's recent parking study, completed in June 2021, determined that future growth in Downtown Lowell can be easily accommodated by the existing parking supply. Downtown contains six parking garages and over 10,000 total spaces. Therefore, new parking policies should focus on improved management of the existing parking supply, rather than expanding upon it. The report also finds that 4,200 parking spaces that are usually empty in downtown could accommodate either nearly 7,000 additional housing units or 1.2 million square feet of new commercial development and still maintain a 10% buffer in parking supply. Parking requirements in the DMU and the new MFOH, MFOM, and MFON districts have been eliminated.

Transit-Oriented Development Overlay Districts

The goal of the Transit-Oriented Development (TOD) Overlay Districts is to encourage higher-density, mixed-use development near public transportation. Lowell's City Council adopted three overlay districts toward these ends on October 24, 2023: Multi-Family High Rise (MFOH), Multi-Family Mid-Rise (MFOM), and Multi-Family Neighborhood (MFON).

Accessory Dwelling Units (ADUs)

Accessory Dwelling Units are only able to be added onto single-family homes in the Urban Neighborhood Single-Family District by special permit.[1]

Smart Growth Overlay District

The Downtown Lowell Smart Growth Overlay District was developed as a 40R-compliant smart growth district that allowed for denser development of key parcels in return for a minimum of 20% of total units to be affordable for at least 30 years. The districts were drawn around specific development sites, and the districts provide no additional capacity at this time. Unless Lowell chooses to expand this district or create additional 40R-compliant districts, it has a limited impact on future housing development.

Neighborhood Character Special Permit

In the TTF, TMF, TMU, UMF, or UMU districts, if a building on the site has or had one or more housing units, a special permit is required to add units, even if that building has been demolished. As most sites in Lowell have at least one housing unit, this means that almost all two family or multi-family construction in those districts requires a special permit regardless of the use table.

1. The City should review how the ADU provision of the Affordable Homes Act impacts this section of the ordinance. The act was signed into law by Governor Healey on August 6, 2024 as Chapter 150 of the Acts of 2024. The ADU provision will become effective 180 days from the governor's signature.

Dover Amendment (Massachusetts General Law Chapter 40A, § 3)

Among other stipulations, Massachusetts General Law Chapter 40A, § 3 states, "*Notwithstanding any general or special law to the contrary, local land use and health and safety laws, regulations, practices, ordinances, by-laws and decisions of a city or town shall not discriminate against a disabled person. Imposition of health and safety laws or land-use requirements on congregate living arrangements among non-related persons with disabilities that are not imposed on families and groups of similar size or other unrelated persons shall constitute discrimination.*"

It is possible Lowell's zoning code does not comply with this provision, as the zoning code defines a family as an unlimited number of related individuals but not more than three non-related individuals. In certain zoning districts, only a single family may occupy a residential unit. This creates a requirement imposed on unrelated persons that is not imposed on families of a similar size. This and other requirements in the zoning code should be examined to ensure they are compliant with state and federal laws.

43D Priority Development

Chapter 43D Expedited Local Permitting Program allows communities to zone certain sites as priority development sites. These sites must have guarantee that they will make permitting decisions 180 days or less after application, along with other policies that streamline permitting. In return, the state provides priority consideration for certain grants and markets the sites online.

Lowell adopted the provisions on several sites when it was only available for commercial, industrial, and mixed-use projects. Afterward, the state expanded the program to include residential projects. The City may consider adding residential sites to its map of Priority Development sites to indicate and market to developers that it will expedite permitting of key residential sites.

Is zoning a barrier to affordable housing development?

Zoning concentrates development, locking people out of certain neighborhoods.

Though implementation of zoning overlay districts has increased the allowable density of housing development, much of the higher density development is restricted to downtown and Lowell's inner neighborhoods. Current zoning is partial to single-family housing development, as a third of the city is zoned Suburban Neighborhood Single-Family, which only allows that type of development, and just over two thirds of land area allows single-family homes by-right. Not even a third of the City's land area allows small-scale mixed-use development (one to two units with a ground floor non-residential use) by-right.

There are not many options for alternatives to single family housing near neighborhood centers

Zoning should be more flexible to allow for multi-unit developments. Allowing duplexes, triplexes, quadplexes, and other types of Missing Middle housing development, particularly in suburban and traditional neighborhood districts will add much to the local supply of housing. As part of this, the Zoning Ordinance should be amended in accordance with M.G.L. c. 40A, § 1A and 3 to allow for Accessory Dwelling Units (ADUs), which will expand flexibility in housing development.[1]

Based on our analysis of residential zoning, the easiest type of residential development to build by far is the single-family house. Over 70% of land in Lowell allows for single-family housing by-right. Unfortunately, this flexible allowance for single-family housing does not extend to other development types, as only one fifth of the city's land allows two-unit developments by-right. Larger developments with three or more units are allowed by-right in less than 10% of the city, and mixed-use development with a residential component is allowed by-right on 30% of Lowell's land. Though other development types are permitted in several districts, special permit approval from either the Planning Board or Zoning Board of Appeals is required, which typically increases the time and cost of producing new housing.

While the Transit-Oriented Development Overlay Districts increased flexibility of allowable residential development, these increases are minimal as the district overlay include Lowell's downtown and adjacent mixed-use corridors, where higher density residential and mixed-use developments are already allowed. Zoning changes or overlay districts implemented outside of Downtown Lowell where multi-family uses are not current allowed would have a larger impact on the expansion of flexibility in residential development, as well as an increase in overall housing stock.

1. The Affordable Homes Act was signed into law by Governor Healey on August 6, 2024 as Chapter 150 of the Acts of 2024. This act amended M.G.L. c. 40A, § 1A and 3 with a provision related to ADUs that will become effective 180 days from the governor's signature.

Affordable housing is totally optional, even in areas where the market might support mixed-income housing.

Affordable housing development is only required in the Smart Growth Overlay District in Downtown Lowell, taking up only 5.2 acres of land. The units developed in this district must only be affordable for 30 years, further limiting the amount of available affordable housing stock. Expiring affordability requirements may also be a reason for Lowell's steady loss of units on its SHI in recent years.

Existing housing is often non-conforming under today's zoning but represents desirable historic neighborhood patterns.

In addition to legalizing more housing types in more places, other zoning strategies to consider are expanding the Downtown Mixed-Use (DMU) Zone, revising dimensional requirements to reflect existing or desired residential development patterns, and increasing maximum floor area ratios (FARs). A revision of the dimensional requirements in higher density residential zones will allow people to add more homes to their properties incrementally, as many homes in these districts are now considered pre-existing nonconformities under today's zoning. Increasing FARs would accomplish a similar effect, as many older homes also exceed maximum FARs under current zoning.

How does this plan measure density?

To estimate allowable densities by zoning district, NMCOG used a modified version of the compliance model used by the Executive Office of Housing and Livable Communities for evaluating compliance with the MBTA Communities Act. This model determines the element of zoning that is a limiting factor on density and uses that to determine the maximum number of units per lot.

Unlike the model, NMCOG assumed lots could be reconfigured to an ideal layout to achieve the maximum density. However, actual allowed density over the entire district would be lower because not every lot is the ideal size. This also does not take into account residential uses with additional requirements such as senior congregate housing such as assisted living or requiring a ground-floor commercial use.

Is transportation a barrier to affordable housing development?

Lowell's transit system has additional capacity but is currently underutilized.

Lowell is a dense, walkable city. Although the driving mode share is relatively high as compared to peer cities, if new units are designed with active transportation in mind, the number of Vehicle Miles Travelled should be lower than the average of other communities as people can substitute other modes for vehicle trips.

The City of Lowell is serviced by the Lowell Regional Transit Authority (LRTA). The LRTA oversees 11 city bus and shuttle routes, and nine suburban routes connecting riders to Dracut, Tyngsborough, Tewksbury, Billerica, Burlington, and Chelmsford. Average daily ridership between December 2022 to November 2023 was 2,177 per day.[1] This is down from a pre-pandemic (December 2018 to November 2019) average of 3,637 per day, suggesting the system has capacity for additional residents. The city fixed-route fare is $1.25 and the suburban fixed-route is $1.85.

The Lowell Line to Boston provides critical connection to employment centers from transit-oriented housing opportunities.

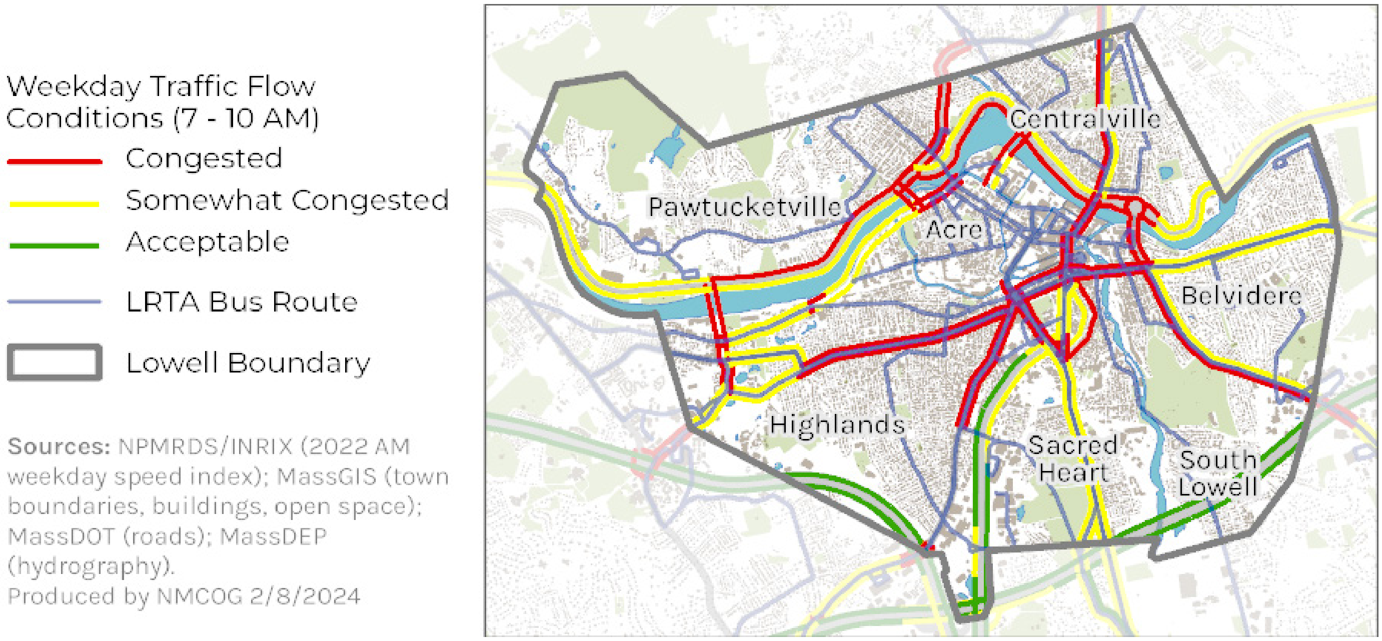
The City of Lowell is designated as a Massachusetts Bay Transportation Authority (MBTA) Community has a commuter rail line that connects to North Station in Boston. A one-way ticket for the Commuter Rail can cost between $2.40 and $13.25. The Lowell Line is the MBTA's fifth busiest commuter rail line, running parallel to both Interstate 93 and Route 3. Average weekday ridership in 2023 was 6,627, with weekend ridership being 2,177. This is down from 10,625 and 5,938 respectively, suggesting the rail has plenty of capacity for additional riders.[2] The commute from Lowell to North Station is about 46 minutes, with most users riding the line end-to-end.

The Lowell Station is not located close to the center of town, but has good bus connections provided by the LRTA and the Merrimack Valley Regional Transportation Authority (MEVA). However, these connections can be improved with a more frequent bus schedule coordinated with the trains. Bike and pedestrian access could also be improved. New construction and development of both the Lord Overpass and the Hamilton Canal Innovation District (HCID) present opportunities for improved access to the station. The Lord Overpass seeks to improve both car and bike access, while the HCID will include 125 new housing units within walking distance to the station.

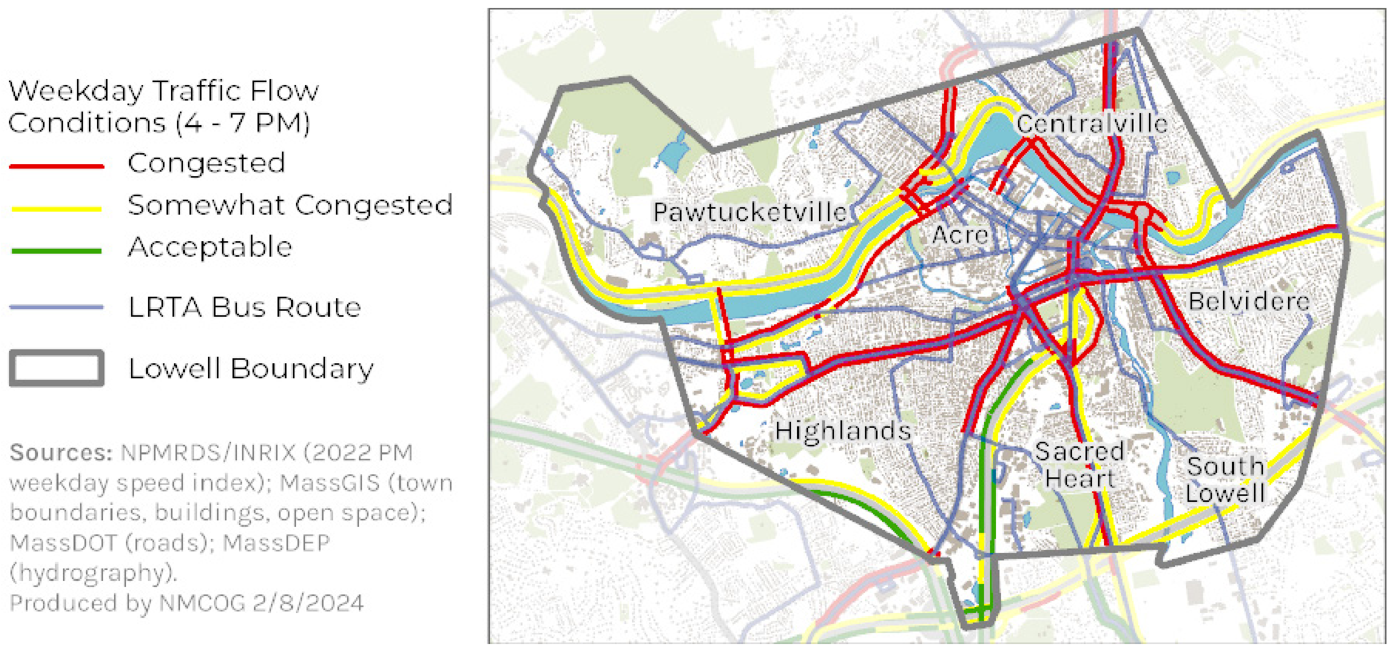
Two major changes that could improve rail line service are increasing rail service to every half an hour daily, and electrifying the rail lines. The first offers much-needed schedule flexibility for users, while the other results not only in faster service, but also reduces fuel emissions.

1. Federal Transit Administration, National Transit Database. https://www.transit.dot.gov/ntd/data-product/monthly-module-adjusted-data-release
2. Massachusetts Bay Transportation Authority, MBTA Commuter Rail Ridership by Service Date and Line. https://mbta-massdot.opendata.arcgis.com/datasets/e2635c945f5b47a7923e0ee441b040c8_0/explore

MAP 13: A.M. TRAFFIC FLOW CONDITIONS



MAP 14: P.M. TRAFFIC FLOW CONDITIONS



Source: NMCOG, Envision 2050.

Although key arterials such as the Westford/Middlesex/Andover Streets corridor are considered congested and have limited capacity, those areas are served by transit and other roadways near divided highways are not congested.

Generally speaking, the road networks are considered "congested" along most of the arterial ways except for the Lowell Connector, MA-110 east to Lawrence, and Gorham Street in the A.M. and portions of Pawtucket Boulevard in the P.M. This underscores the importance of dense development in key areas that can be well-served by transit or walkable, but also indicates that certain areas near the edges of town have access to highways that currently have additional capacity.

Is the cost of construction a barrier to affordable development?

Construction costs are notably higher in Massachusetts compared to other states in the US, which presents a significant barrier to housing production. Although the ultimate price of housing to be sold is generally set by supply and demand, housing construction costs are fixed. This creates a "floor" below which housing won't be built without subsidy, even if there is demand, because the owner or contractor will not make the required amount to offset the opportunity cost and risk. In these cases, the higher the cost per unit, the more subsidy per unit is required.

Qualitative research indicates Lowell is near this threshold, meaning that developers often require some type of subsidy (such as historic tax credits or Low Income Housing Tax Credits) or innovative ways to reduce per-unit cost (such as reduced cost for land acquisition or micro-units).

The average cost per unit in Lowell was calculated using permit data provided by the City of Lowell's Division of Development Services. The numbers were inflated to 2023 dollars for easy comparison. Generally speaking, single-family and townhouse construction costs have been trending upward and are the most expensive housing types to build (. From 2009 to 2011, single-family and townhouse construction costs were under $150,000 per unit. Although these costs fluctuate year-to-year, in general, new single-family and townhouse units currently exceed $350,000 per unit.

There is a less clear trend related to the inflation-adjusted construction cost per unit increase in duplexes, multi-family (3+ unit) developments, and conversions of existing structures. Although construction costs for these housing types also fluctuate, they all tend to be less expensive on a per unit basis compared to single-families and townhouses.

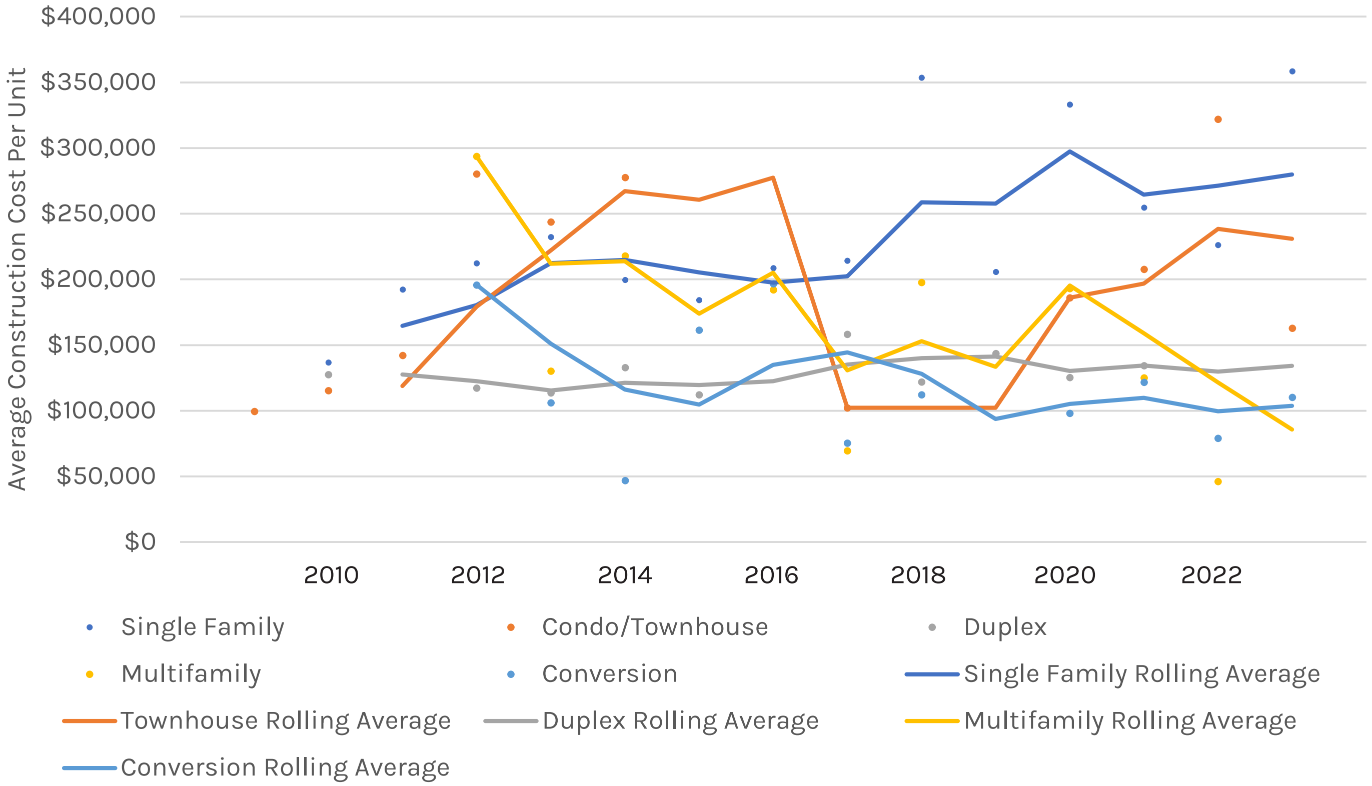
Conversions of existing buildings are almost always the least expensive type in a given year, fluctuating between a low of $50,000 per unit and a high of $200,000 per unit. Construction costs for mixed-use developments were not included in this analysis due to the difficulty in separating the cost of a mixed-use development's housing component from the cost of its non-housing uses.

Please note that these costs only include the cost of construction. They do not include the cost of land, engineering, or other fees, which can add 10 to 20% onto a project's overall cost. Some of those "extra" costs—especially permitting costs—can be influenced to some extent by a jurisdiction's local land use policies.

1. No townhouse or condo units were built in the years 2015, 2016, 2018, and 2019, which makes drawing conclusions from data between 2015 and 2019 difficult. The years of 2009-2014 and 2020-2021 however showed trends of increasing inflation-adjusted construction costs.

555 Merrimack under construction. Source: Coalition for a Better Acre.

FIGURE 51: AVERAGE ESTIMATED COST BY UNIT TYPE IN 2023 DOLLARS, LOWELL, 2009-2023



Source: City of Lowell Department of Planning and Development, Permit Data 2009-2023,, NMCOG Analysis

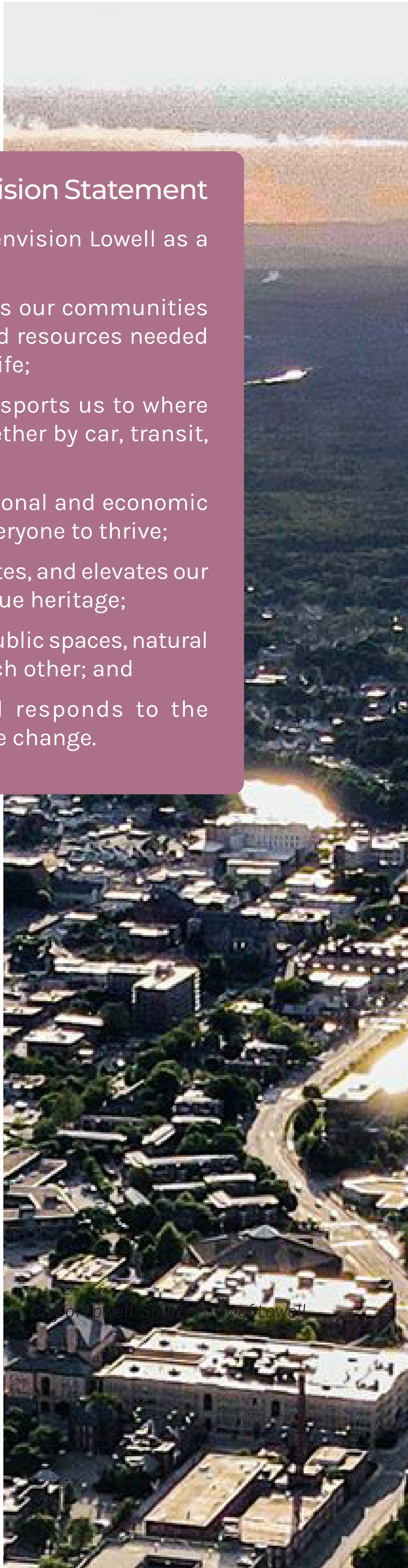
The *Lowell Forward* Vision

The *Lowell Forward* planning process developed a vision statement through inclusive dialogue with the community that was summarized in Section 2 of this plan. That vision statement guides the goals and actions in *Lowell Forward*. It reflects the collective aspirations of our communities in Lowell, featuring six elements each tied to a set of broader, long-term goals. The *Lowell Forward Homes and Housing Plan* follows and builds upon this vision.

Lowell Forward Vision Statement

Looking forward, we envision Lowell as a city that:

- Equitably connects our communities to the housing and resources needed to live a fulfilling life;
- Conveniently transports us to where we need to go whether by car, transit, walking or biking;
- Cultivates educational and economic opportunity for everyone to thrive;
- Embraces, celebrates, and elevates our diversity and unique heritage;
- Takes care of our public spaces, natural resources, and each other; and
- Prepares for and responds to the impacts of climate change.



Lowell Forward Values

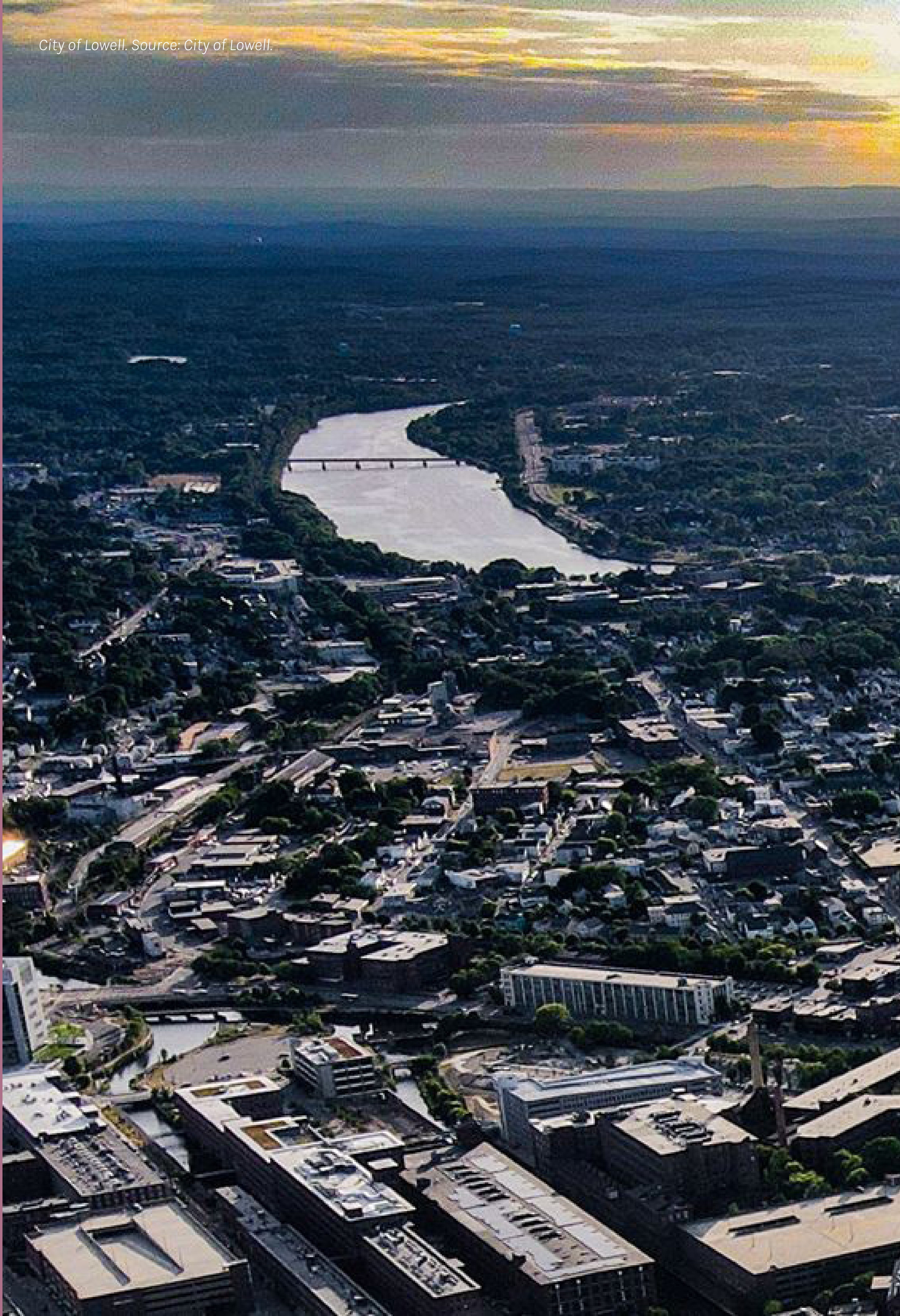
In addition to this shared vision, clear shared values arose to guide and reinforce the Lowell Forward and Lowell Homes and Housing Plan's community-centered process and implementation:

- Sustainability and Resilience
- Proactive Maintenance
- Accountable Governance and Community Stewardship
- Innovation and Creativity

For the full description of these values, please consult *Lowell Forward*.

City of Lowell. Source: City of Lowell.

Housing Goals: The Housing Vision



City of Lowell. Source: City of Lowell.

Lowell Homes and Housing Vision

Based on the *Lowell Forward* vision and values, along with the community input received during the planning process, the *Lowell Forward* team created a vision statement for homes and housing in particular. This statement, written below, expands upon the general vision to help guide housing-related goals and strategies. The goals in this chapter will address the challenges identified in the Comprehensive Needs Assessment while working toward this vision.

We envision a city with homes that support people's needs, goals, and dreams. These homes will be safe, healthy, well-maintained, and connected to multiple forms of transportation. Their impacts to water quality, air quality, climate, and other natural systems will be minimized, and they will be resilient to changes in climate.

We envision a city of continuing opportunity for households of all types, with a choice of homes that are affordable to those who call Lowell home, regardless of their stage of life or economic situation. These homes will be connected to economic, open space, and cultural opportunities.

We envision a city that retains households as they grow and build lives in Lowell, with equitable and walkable access to opportunities and amenities sought by modern households. Historic and new homes alike will pair with attractive centers in all neighborhoods as the centerpiece of a thriving community economy and a model for other gateway cities.

Finally, we envision a city that proactively and affirmatively promotes fair housing, fights discrimination, and eliminates segregation.

Housing Indicators of Progress (Housing Production Goals)

The State's Housing Production Plan guidelines require inclusion of an annual, numerical goal for affordable housing production. This numerical goal is based on the City's total year-round number of housing units: the City should produce a number equal to at least 0.5% or 1.0% of its total year-round units during every calendar year included in the Plan. The 0.5% goal is 217 annually based on the 2020 count of 43,482 units. The 1.0% goal is 434 units.[1]

There should be a direct link between the setting of these goals and the results of the needs assessment. Because the City has surpassed the state goal of 10% of total year-round units being listed on the SHI, yet is still facing the deep housing challenges described in the Comprehensive Needs Assessment, it has developed a set of five numerical goals that surpass maintaining its existing proportion of subsidized housing and instead proactively expand its market-rate and subsidized stock. *Lowell Forward* calls these targets **Indicators of Progress**.

Indicators of Progress Summary

By 2030, Lowell will have...

1. **3,150** or more new year-round housing units
2. **800** or more net new SHI units
3. **599** or fewer number of units lacking complete plumbing facilities plus number of units lacking complete kitchen facilities
4. **36.6%** or smaller proportion of households that are housing cost burdened
5. **18.0%** or smaller proportion of households that are severely housing cost burdened
6. **6%** vacancy rate

1. *EOHLC, Revised HPP Production Goals: https://www.mass.gov/doc/hpp-production-goals-2020-census/download*

Indicator 1

Increase the total number of year-round housing units to 46,950 in 2030 and 47,950 in 2040.

As estimated on page 48 in the Comprehensive Needs Assessment, Lowell is projected to grow to 43,587 households by 2030, and if it maintains its current proportion of households in the region, it would grow to 44,794 households. As both scenarios are plausible, the *Lowell Forward Homes and Housing Plan* assumes Lowell will grow to an average of these projections: 44,191 households by 2030 and 45,130 by 2040.

Lowell requires roughly 46,950 units by 2030 to absorb that projected growth and maintain a vacancy rate of 7% rental vacancy, a 2% sales vacancy, and 1% "other vacant" units. It requires roughly 47,950 units by 2040. There were an estimated, approximate 43,800 housing units in Lowell at the end of 2023 based on the 2020 census count and permit data from 2021-2023. Table 16 starts at this number and provides annual goals to meet the 46,950 unit goal by 2040 in the first three columns. 450 new year-round housing units are required per year to meet the goal.

This results in 3,150 new units over seven years. *Lowell Forward* also sets Indicators of Progress for number of units in certain locations for the purposes of downtown revitalization. The 3,150 units can be divided based on these goals into three categories as detailed in Table 15.

TABLE 15: 2030 YEAR-ROUND HOUSING UNIT GOALS BY LOCATION

Location of New Units	2030 Goal
New units with the MFOD	1,898
New units within upper stories of downtown buildings	607
New units outside of the MFOD	649
Total Year-Round Units, City-Wide	**3,154**

TABLE 16: YEAR-ROUND HOUSING UNIT AND SHI ANNUAL GOALS

Year	End of Year Total Year-Round Units	Net new Year-Round units	End of Year SHI Units	Net new SHI units	Percent of Total Units on SHI	Percent of 2020 Census Count Total Units on SHI
2023	43,800	N/A	5,127	N/A	11.7%	11.8%
2024	44,250	450	5,240	115	11.8%	12.1%
2025	44,700	450	5,352	115	12.0%	12.3%
2026	45,150	450	5,465	114	12.1%	12.6%
2027	45,600	450	5,577	114	12.2%	12.9%
2028	46,050	450	5,690	114	12.4%	13.1%
2029	46,500	450	5,803	114	12.5%	13.4%
2030	46,950	450	5,915	114	12.6%	13.6%
Total	**46,950**	**3,150**	**5,915**	**800**	**12.6%**	**13.6%**

Sources: 2020 Decennial Census, EOHLC

Indicator 2

Produce 800 new affordable housing units by 2030 and an additional 250 by 2040

This plan sets a goal of 25% of annual units created to be affordable at 80% AMI or below and ideally affordable to households with very low (31-50% AMI) or extremely low (0-30% AMI) incomes. Rounded up, this results in 800 new units by 2030. This is represented in Table 16 on the previous page.

Indicator 3

Reduce total number of households lacking kitchens and lacking plumbing to 599 by 2030 near zero by 2040

According to U.S. Census American Community Survey estimates, there are currently an estimated 279 units lacking complete plumbing facilities and 679 lacking complete kitchen facilities. Units lacking complete plumbing facilities are without hot and cold running water and/or a shower or a tub, and units lacking complete kitchen facilities don't have a sink, a stove, and/or a refrigerator.

Although the number lacking complete facilities is small, these basic amenities are essential for quality of life. This indicator represents steady progress toward near zero units without complete plumbing facilities or kitchen facilities by 2040, and the plan includes strategies to help upgrade any units that are missing these facilities to make that progress.

Indicator 4

Reduce percentage of cost-burdened households to 37% by 2030 and 32% by 2040

39.8% of households, or 16,825 households, pay more than 30% of their income on housing costs in Lowell according to estimates from the 2017-2021 American Community Survey. This plan sets of a goal of reducing this number to 36.6% by 2030 and 32% by 2040. The 32% target was chosen because it is the Housing Cost Burden level of one of the most affordable cities on the east coast, Providence, Rhode Island.

These numbers have been trending downward by roughly 0.25 percentage points each year between the 2008-2012 American Community Survey and the 2017-2021 American Community Survey, showing the city made progress reducing housing cost burden. However, this target would represent a doubling of that rate of reduction, roughly 0.5 percentage points annually.

Importantly, 36.6% was chosen not because it is an ideal number, but because it is potentially achievable by 2030. Lowell's ambition is to surpass this target and set a more aggressive goal for its next five-year housing plan.

Indicator 5

Reduce percentage of severely cost-burdened households to 18% by 2030 and 16% by 2040

The 2017-2021 American Community Survey estimate of the proportion of households that pay more than half of their income on housing costs in Lowell was 19%. Similar to Indicator 4, this plan sets a goal to mirror one of the most affordable cities on the east coast, Providence, by reducing the number reported by the latest American Community Survey to 16% by 2040.

Similar to Indicator 4, Lowell has been making progress between the 2008-2012 American Community Survey and the 2017-2021 American Community Survey at a rate of reduction of roughly 0.1 percentage point annually. The goal would nearly double Lowell's rate of reduction to approximately 0.2 percentage points annually.

Just as in Indicator 4, 18% was chosen based on its achievability, and Lowell's ambition is to surpass this target and set a more aggressive goal for its next five-year housing plan while ensuring the reduction in housing cost burden isn't reflecting displacement.

Indicator 6

Achieve a healthy housing unit vacancy rate of 6% by 2030 and maintain through 2040.

The vacancy rate of 6% is a blend of 7% for rental units and 2% for sales units at the current tenure mix of Lowell. This represents approximately 2,820 homes for sale or rent in Lowell on any given day in 2030 and 2,860 in 2040. As described on page 38, these are considered relatively healthy vacancy rates that provide buyers and renters with a good selection of homes while maintaining a good rate of return for owners or developers. If Lowell meets the production goals of Indicator 1 while growing to its target number of households, this vacancy rate will be achieved.

Summer Street Bedroom. Source: CTI.

Lowell's Qualitative Housing Goals

Seven qualitative, or non-numerical, goals were developed based on the Housing Vision articulated on page 95. These goals are meant to address the ten Comprehensive Needs Assessment findings listed on page 12.

These goals are in no particular order. Notably, goals are the "what" of what Lowell wants to achieve. The specific ways "how" the community can achieve the goals is in the next chapter, Implementation Strategies.

Goal 1

Plan for equitable and accessible growth

This goal acknowledges Lowell is projected to grow and that well-managed and strategic growth can positively impact the City's fiscal sustainability. Acknowledging and addressing this is critical to provide homes for households of all types, regardless of their stage of life and economic situation. Another facet of this goal is to make sure that the benefits of the growth are distributed equitably and targeted toward ways that maximize benefits for the community, such as balancing growth in all neighborhoods and targeting areas that can be well-served by alternative transportation. An important element of this goal is doing all of the above while maintaining and enhancing all the great things residents currently love about each of their neighborhoods.

Goal 2

Develop homes for all types of households and individuals

The plan must not only consider where homes are built, but also allow and encourage a wide variety of homes to meet the needs of a very diverse population. This includes making sure a variety of housing typologies are allowed, that units are accessible, and that units are appropriate for differing needs.

Qualitative Goal Summary

1. Plan for equitable and accessible growth
2. Develop homes for all types of households and individuals
3. Improve housing quality
4. Eliminate homelessness and reduce housing insecurity
5. Provide housing options for households that make low- and very low- incomes
6. Expand and create new opportunities for affordable homeownership
7. Ensure fair housing policies and practices

Goal 3

Improve housing quality

Recognizing that more than three-quarters of Lowell's homes were built before 1960, improving the quality of Lowell's existing housing stock is a critical goal. It is necessary to achieve the vision of safe, ecologically sustainable, and well-maintained homes that retain households as they grow and provide a good quality of life regardless of income. This includes a careful balance of enforcement, incentives, and improvements to public areas.

Goal 4

Eliminate homelessness and reduce housing insecurity

It will be impossible to achieve the vision of equity in Lowell without eliminating homelessness. As of the drafting of this plan, the numbers of sheltered families and unsheltered individuals were increasing. Addressing this crisis requires a three-prong solution: identifying housing-insecure people and strengthening systems to prevent them from becoming unhoused in the short-term; providing more efficient systems and shelter in the medium-term; and building more housing of all types in the long-term.

Goal 5

Provide housing options for households that make low- and very low- incomes

This goal recognizes that in order to provide housing for all types of people, production of affordable housing must be increased in step with market-rate housing. There are many barriers to developing affordable housing that must be addressed to achieve the vision, including those related to funding, zoning, and monitoring.

Goal 6

Expand and create new opportunities for affordable homeownership

To achieve the vision of Lowell being a city for all types of households to pursue their dreams and grow, Lowell must develop pathways to homeownership for households of many types. This includes developing innovative new programs to support home buyers and ensuring that a mix of rental and ownership units are in every neighborhood. This also includes preserving smaller, naturally affordable sales units such as condos, townhomes, and small single-family detached homes whenever possible.

Goal 7

Ensure fair housing policies and practices

A vital element of the housing vision is that Lowell will proactively and affirmatively promote fair housing and fight discrimination and segregation. This requires a holistic examination for systemic racism, and it requires addressing barriers to all types of people, including people of color, elders, families with children, people of all gender expressions and orientations, people with disabilities, people with limited English proficiency, people with limited literacy, immigrants, and others who may find unfair barriers to neighborhoods or housing developments. The result of progress on this goal will be more access to each of Lowell's unique neighborhoods through additional rental opportunities, ownership programs, or other methods.

What are Implementation Strategies?

The DHCD [now EOHLC] Housing Production Plan Guidelines state that Housing Production Plans should have an "explanation of the specific strategies will achieve its housing production goals as well as a time frame/schedule for achieving the housing goals identified." The strategies in the Lowell Homes and Housing Plan are divided into five sections:

1. **Implementation Strategies**, which are specific actions the City or other agencies will undertake to meet the goals articulated in the previous Section;
2. **Attributes of Proposed Residential or Mixed-Use Developments**, which is a list of attributes such as performance standards and location to guide siting and features of housing development;
3. **Proposed Modifications to Zoning Districts**, which is a list of Implementation Strategies that modify zoning;
4. **Land with Potential for Affordable Housing**, which are lists of specific parcels chosen based on the attributes described in Subsection B that the City will encourage Comprehensive Permit (40B) developments or will pursue issuing Requests for Proposals (RFPs); and
5. **Regional Collaborations**, which is a list of Implementation Strategies that will require or would benefit from regional collaborations.

Implementation strategies, also known as "action items," are grouped by the goals they address in priority order. However, goals have no priority order: each goal is equally important.

Summer Street Ribbon Cutting. Source: Community Teamwork

Goal 1:

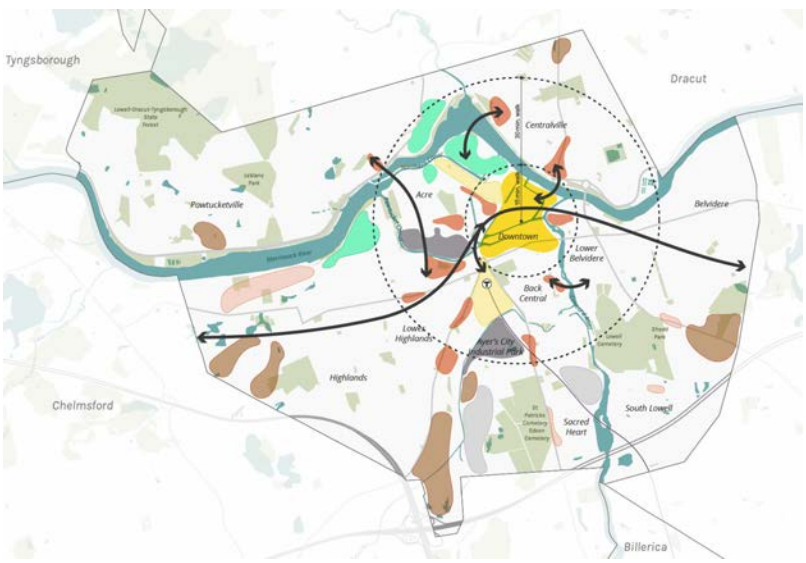
Plan for equitable and accessible growth

1.1. Engage communities to identify priority development sites for multifamily housing

Develop neighborhood-level plans through community engagement with the goal of increasing density in key growth areas that can be well-served with alternative transportation options, especially within and near neighborhood centers. This could include the identification of nodes near neighborhood centers or corridors extending along major streets that have or could contain the necessary infrastructure.

Addresses: Change, Housing Costs, Anti-Discrimination, Vision

MAP 15: GROWTH STRATEGIES MAP



Sources: Lowell Forward, Page 63

1.2. Develop a funding pipeline to acquire, finance, and develop sites with a high capacity for multifamily

Identify sites, both as part of the *Lowell Forward Homes and Housing Plan* and after its adoption, that are ideal for multifamily housing, from parking lots to opportunities for adaptive reuse. A funding pipeline should be developed to create housing on these properties and leveraged by city funds. This could be facilitated by a public-private partnership with nonprofit or for-profit developers.

***Addresses:** Change, Housing Costs, Anti-Discrimination, Vision*

1.3. Allow housing or mixed use projects in the Regional Retail and High Rise Commercial districts

Update the Regional Retail and High Rise Commercial districts to allow multi-family or mixed use development including multi-family by-right. Commercial uses should be incorporated when possible to sustain economic development opportunities. In fact, multi-family developments may bring customers and vitality to these districts. With this in mind, updated zoning should allow multifamily development while also allowing and encouraging mixed-use as to not negatively impact key commercial districts. This will increase housing near jobs while retaining the economic strength of these districts. Housing or mixed use should be allowed by right in either the entire district or selected areas within the districts.

***Addresses:** Change, Housing Costs*

1.4. Document projected and actual infrastructure impacts for major developments

Deepen an understanding of the potential impacts of development on existing water, sewer, energy, and transportation infrastructure. Lowell should seek state and federal grants to improve infrastructure including water, sewer, and transportation to ensure it can meet its housing goals. However, at times the projected impact of developments is overestimated. Lowell should develop strategies to measure actual impact of residential developments whenever possible to better estimate needed improvements to create capital plans, to strengthen grant applications, and to correct misinformation when appropriate.

***Addresses**: Housing Costs*

1.5. Prioritize the sale of city properties to support the creation of housing at all income levels

Strengthen the dispossession process of City-owned properties for housing. During focus group discussions, the development community expressed that additional costs required and other barriers in Requests for Proposals (RFPs) hindered redevelopment of key city-owned properties for affordable housing. The city should create a model RFP collaborating with the development community and/or state technical assistance providers that eliminates any barriers that don't provide a strong community benefit and that incentivizes deeply-subsidized affordable housing redevelopment in appropriate areas.

***Addresses**: Change, Affordable Housing Need, Partnerships, Vision*

1.6. Participate in regional initiatives such as *At Home in Greater Lowell* that include plan development, implementation, and community engagement activities and education

Participate in *At Home in Greater Lowell*, which is a planning process being undertaken in 2024 to create a regional housing strategy. *At Home in Greater Lowell* will not only include measurable, achievable benchmarks and strategies based on data analysis and community input, but will also go beyond this by documenting the first-hand experiences of people living in diverse housing situations in their own words. Furthermore, the plan's strategies and recommendations will include a toolkit of implementation and public education materials so our communities can take action. These three components come together to balance data with narrative–putting faces and stories behind the facts—and provide educational tools that communities can use to talk about housing policy and zoning.

***Addresses**: Change, Housing Costs, Affordable Housing Need*

1.7. Living in Lowell Campaign and Neighborhood Hubs

Address the common concern of stakeholders that households move out of Lowell as they grow. This concern is reflected in out-migration data. School choice, safety, and other quality of life concerns were cited in the Homes and Housing survey among those who might otherwise stay in or move to Lowell. To address this, the City should encourage the development of neighborhood hubs to increase community connection and grow a sense of safety. These hubs would integrate and strengthen existing neighborhood groups, supporting authentic nodes of connection among residents. This could include a messaging campaign within or outside of Lowell about Lowell's excellent and unique neighborhoods and school options. They could be a springboard for community-led placemaking described in **Strategy 3.4**.

***Addresses**: Opportunity, Possibility*

1.8. Evaluate citywide zoning, including a study of nonconforming structures to restore by-right dimensional standards in blocks where many nonconforming structures exist

Utilize GIS analysis to evaluate where significant numbers of homes are nonconforming due to lot size, setbacks, or other dimensional requirements; adjust zoning to bring these homes into conformity and allow similar homes to be built on vacant lots in the block; and consider adding a context-derived setback section to the zoning ordinance that would allow homes to be built at similar dimensions to their neighbors.

This strategy may also involve adjusting the **Section** 9.4 Neighborhood Character Special Permit. This section requires a special permit whenever any project within certain zoning districts creates two or more units. It could be adjusted to require by-right site plan review. This strategy may also include evaluating the Artist Overlay District (AOD)'s interaction with the Multi-Family Overlay District (MFOD) to determine if the MFOD provides a greater density or other relief that makes the AOD obsolete in certain areas.

***Addresses**: Change, Housing Costs, Vision*

1.9. Study use of HDIP program against peers and make best practice adjustments if necessary

Study the use of Lowell's Housing Development Incentive Program (HDIP). HDIP is a valuable tool to work toward the goal of upper-story revitalization and to address developer concerns about the gap between Lowell's market rate and development costs. However, it is unknown whether its utilization in Lowell is similar to that of peer cities and how Lowell could strengthen the program. To review and revise HDIP, the City should study its use in peer cities and evaluate whether Lowell's policy is similar to that of those that have experienced the most success. Improvements could include additional marketing, adjusting boundaries, expedited application processing, adjusted typical increment amounts, or the provision of assistance through the application process for smaller developers without experience in HDIP.

***Addresses**: Change, Housing Costs, Opportunity*

About Rent Control and Rent Stabilization Policies

Rent control and rent stabilization are often used interchangeably but are separate policies. Rent control is stricter, generally targets older or existing buildings, and generally sets a cap on rent prices and limit increases. Maine, Maryland, Minnesota, New Jersey, and New York have rent control policies in place at the local level and California and Oregon have rental control policies at the state level. Rent stabilization is similar to rent control but applies to a broader range of housing but provides more flexibility for rent increases based on a number of factors including the rate of inflation, vacancy of a unit, and whether a unit is upgraded. It is now the more common of rent policies.

The impacts of rent control and rent stabilization have been mixed. In some cases, the buildings without rent control became more expensive than the buildings that were controlled, resulting in the policy possibly increasing the citywide average rent even as it slowed rent growth in select buildings. In another, fewer buildings were built due to developers' reduced expected rate of return, restricting supply. However, the policy seemed to have a positive effect on median rent in a third case.

Overall, a complex interaction between market conditions and the way the policy is designed may influence whether these rent policies have the intended effect, and more national research is needed to better understand the interplay between market and policies.

Regardless, these type of rent policies were banned in Massachusetts in 1994 by a ballot question. There are higher-priority steps that are considered best practices due to their efficacy that don't have the same state legislative roadblocks as rent control. Therefore, this plan recommends prioritizing those other actions, while monitoring for additional studies that can better define the types of rent control that meet the goals articulated in this plan and for changes in the legislative landscape that might make it easier to implement those policies.

For more information, reference "What Does the Research Tell Us about the Effectiveness of Local Action?" by Prasanna Rajasekaran, Mark Treskon, and Solomon Greene, January 2019.

New Construction along Suffolk Street. Source: City of Lowell.

Goal 2:

Develop homes for all types of households and individuals

2.1. Adjust key zoning regulations to reduce barriers to special housing typologies

Identify zoning barriers to typologies that provide new housing options and adjust as needed, including but not limited to Single Room Occupancy and micro-units. Several studies have already identified gaps in Lowell's zoning such as the *2021 Zoning for More Housing* report prepared by the Department of Planning and Development. The next step is to identify specific barriers and language changes needed to allow these critical typologies in appropriate areas of Lowell.

For example, boarding houses are allowed by special permit in Suburban Mixed Use, Traditional Mixed Use, Neighborhood Business, Institutional, and all Urban districts except Urban Single Family. They require one parking space per 2 beds outside the Downtown Mixed Use zone, despite residents of boarding houses often not owning private vehicles. This could be adjusted to as-of-right and/or reducing the number of parking spaces required. This work could also include investigating standardized guidelines for these special types of housing.

In addition, the city should eliminate any barriers to and create incentives for accessible units. Finally, the City should consider bonus density or other incentives for missing "starter home" unit types such as townhomes in appropriate areas of all neighborhoods.

***Addresses**: Change, Housing Costs, Affordable Housing Need*

2.2. Expand housing choice in all residential areas by an Accessory Dwelling Unit (ADU) ordinance and mixed-use nodes

Amend the zoning ordinance in accordance with M.G.L. c. 40A, § 1A and 3 to allow for Accessory Dwelling Units (ADUs) in single-family residential zoning (SSF, TSF, and USF).[1] In addition, build consensus around zoning amendments to create and expand mixed-use nodes. Consider a more expansive ADU ordinance allowing ADUs in these districts.

ADUs are a small but critical piece of the housing puzzle for several reasons. They increase the number of units without substantially changing the built environment, they allow homeowners to adjust their units to account for changing household sizes, they make home ownership more achievable because they provide a form of income through rent to help offset mortgage costs, and they provide very small, affordable units in neighborhoods that may lack rental opportunities. The City might review the ADU proposal from 2023 and then develop and seek agreement around an amended proposal. Education related to misconceptions may also be considered on ADUs and where they will be allowed.

Furthermore, the city should consider creating or expanding mixed-use nodes as part of **Action 1.1**.

***Addresses**: Change, Housing Costs,*

1. The Affordable Homes Act was signed into law by Governor Healey on August 6, 2024 as Chapter 150 of the Acts of 2024. This provision will become effective 180 days from the governor's signature.

Opportunity, Possibility

2.3. Encourage housing typologies that include universal design to support all ages and abilities

Working with partners such as the Council on Aging and the Disability Commission, examine any barriers and incentives to include universal design whenever possible as part of new developments and major renovations of existing buildings, especially in walkable and transit-served locations. The City should develop policies that specifically support senior populations such as growing programs that would make existing and new housing fully ADA accessible and adaptable to allow for all ages and abilities.

Addresses*: Change, History*

2.4. Continue to work with developers of all types of low-income housing with an emphasis on missing age groups and AMI ranges

Develop new informal and formal ways to talk about opportunities and challenges such as regular meetings, e-mail lists, office hours, surveys, or other methods with local and regional developers of low-income housing to continuously identify housing development opportunities of both private and public parcels, the barriers to development of those parcels, and possible policies or actions the City can take to eliminate those barriers.

Addresses*: Housing Costs, Affordable Housing Need, Anti-Discrimination*

2.5. Identify opportunities for infill development on historic properties within historic districts and eliminate barriers to those opportunities through policy change

Study and adjust regulations as needed to unlock development while protecting historic resources. Key properties within historic districts may be prime for housing, but also may contain buildings worth restoring and preserving to support sustainability, community pride, and economic development. However, those properties may have opportunity to expand through building additions, outbuildings, or other methods that enable developers to receive tax credits without negatively impacting the historic landscape. The City should identify these opportunities and, critically, determine whether zoning or other local regulations serve as barriers to realizing these opportunities.

Addresses*: Change, Housing Costs, History*

Goal 3:
Improve housing quality

3.1. Create a well-funded program that could provide no-interest home improvement loans

Create a new initiative targeted toward improving quality of homes occupied by low-income tenants while preserving the affordability of those rentals. This would include the identification of key neighborhoods that are in danger of decline. This could utilize Community Development Block Grant (CDBG) sources or other sources to free HOME funding sources for development of new affordable units.

***Addresses**: History, Possibility*

3.2. Identify additional resources to enforce city codes for residential property (inspectional services).

Enforce and enhance minimum housing requirements and building codes, including HOME-funded low income housing and other types of housing.

***Addresses**: History, Possibility*

3.3. Work with partners to understand how many units and of what tenure could benefit from retrofits, and develop a program to target the gap

Expand energy retrofits to more homes. MassSave, National Grid, and other utility providers offer many energy saving initiatives that support upgrades to equipment, energy efficiency upgrades to windows or insulation, and other retrofits and upgrades through low- to zero-interest loans, rebates, or similar programs. However, a gap was identified for rental homes in which tenants pay for energy. In these homes, tenants do not have an incentive to make improvements to a property they do not own, and landlords do not have an incentive to make improvements that would not result in a savings to them. Work to identify the size, scope, and location of this gap and work with partners to create programs to address the gap.

***Addresses**: History*

3.4. Stabilize neighborhoods through reconstruction and improvement of streetscapes

Support community-based initiatives in each neighborhood that will contribute to and improve the quality of life such as the inclusion of key amenities, public art, and traffic calming. This could include grants or other ways to empower residents to direct the beautification efforts and utilize the neighborhood hubs described in **Action 1.7**.

***Addresses**: Possibility*

Goal 4:

Eliminate homelessness and reduce housing insecurity

4.1. Study and develop a Housing First incentive zone located near transit and well-connected areas or service providers

Develop an incentive zone or zones with dedicated funding and bonuses available to developers who build permanent supportive housing units or housing units that are dedicated to people experiencing chronic homelessness that are co-located near supportive services, transit, and jobs. The objective of this strategy is to fill the need for homes that are affordable and accessible to individuals and families experiencing chronic homelessness.

Addresses*: Housing Costs, Affordable Housing Need, Partnerships*

4.2. Increase funding and expedited permitting for qualified providers

Identify target sites that are ideal for multifamily housing and reduce hurdles by expediting permitting and increasing city funding for qualified providers of housing. Dedicate funding commitments to these sites, with a focus on leveraging HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) funding, if awarded, and identifying additional funding sources such as Affordable Housing Trust Funds described in **Action 5.1**.

Addresses*: Housing Costs, Affordable Housing Need, Partnerships*

4.3. Implement recommendations within *City Manager's Task Force on Homelessness and Sustainable Housing Action Plan and Final Recommendations*

Develop a prioritized and funded implementation plan to complete all recommendations within the *City Manager's Task Force on Homelessness and Sustainable Housing Action Plan and Final Recommendations.*

Addresses*: Housing Costs, Affordable Housing* Need, Partnerships

4.4. Create a new staff position dedicated to housing stability to enhance program coordination among local, regional, and state providers

Create a new position dedicated to housing stability. This position could be modeled after similar positions within Offices of Housing Stability based in the cities of Boston, Somerville, Malden, and Revere. A housing stability officer's roles are to help prevent the displacement of any resident at risk of losing their housing, to help rehouse people without stable housing or who otherwise need assistance with relocation, and to educate people about their legal rights. This staff person could also work closely with the Director of Homelessness Initiatives to enhance coordination among providers and streamline processes in order to help people access services and housing. In addition, the staff person would build connections with those in unstable housing, such as those who don't have leases, and would gain an understanding of the scope and scale of this population for further recommendations to create policies or practices to reduce housing instability and displacement.

Addresses*: Affordable Housing Need, Partnerships*

4.5. Initiate or participate in a Housing Needs Awareness Campaign to inform and educate about the affordable housing shortage

Initial critical education and open discussions to address homelessness. A public education campaign such as the "We Need to Talk about Housing" campaign sponsored by Community Teamwork, the Lowell Plan, the Greater Lowell Community Foundation, and the Greater Lowell Chamber of Commerce would align well with the regional *At Home in Greater Lowell* plan and its regional campaign. Through this campaign, the City and partners can share programs and policies to support housing production and discuss perceptions around homelessness in Lowell and the region. This campaign could be expanded to include other types of housing, barriers to building those types of housing, and needs and opportunities those types would address.

***Addresses**: Affordable Housing Need, Partnerships, Anti-discrimination, Communication*

4.6. Develop and strengthen a single point of intake in coordination with the Hunger and Homelessness Commission

In coordination with nonprofit partners, and potentially as a role of a Housing Stability staff person as described in **Action 4.4**, develop a single point of intake and clearinghouse to help people at risk of losing their housing or experiencing housing instability move quickly through application processes. This point of contact can provide referrals for appropriate services. This may also simplify marketing and increase awareness of these services. The objective of this strategy is to continue and enhance the existing coordination of nonprofits, support their on-the-ground staff, and simplify application processes for people experiencing housing insecurity.

***Addresses**: Affordable Housing Need, Partnerships*

4.7. Work with federal partners to reduce administrative burdens that may hinder intake and supports to people experiencing homelessness

Work with federal partners, including HUD administration officials, the National Community Development Association, and the congressional delegation, to develop and advocate for changes that would streamline local processes and bolster efforts to support people experiencing homelessness. More broadly, the city should evaluate ways to modernize and improve service efficiency.

***Addresses**: Affordable Housing Need, Partnerships*

4.8. Create an online data dashboard with clear tracking measures and explanations of city boards and commissions

Make data more easily accessible, such as official and unofficial Point in Time counts, number of units of different types including voucher-based or extremely low income units, units intended for individuals or families suffering from chronic homeless, permanent supportive units, transitional units, emergency shelter beds, and other data. Currently, it is difficult for the public and stakeholders to find or understand this data. This vacuum creates misconceptions and makes it more difficult to create policies related to unhoused individuals and families. This lack of data also makes it difficult to track the efficacy of certain policies.

The City should create a single, easy-to-understand data dashboard that integrates anonymous data as reported to HUD and the Executive Office of Housing and Livable Communities, including historic data to track progress on key metrics. This one-stop website could also contain clear descriptions of the roles and responsibilities of staff, boards, and committees, such as the Hunger and Homelessness Commission and nonprofit partners.

Addresses*: Affordable Housing Need,* Partnerships, *Communication*

4.9. Utilize the Hunger and Homelessness Commission and the City Manager's Task Force on Homelessness

Develop specific implementation roles for two critical committees.

The first, the Hunger and Homelessness Commission, routinely attracts dozens of housing professionals and unhoused support service professionals to discuss critical issues every month. Their charge is to advise the City Manager on issues pertaining to Homelessness and Hunger in the City of Lowell. The second, the City Manager's Task Force, is a group of experts that meets regularly to discuss homelessness issues.

The expertise of both of these groups should be utilized to advance the Actions in the *Lowell Forward Homes and Housing Plan*. The City should define the roles of both committees in implementation of this plan. Their work could be advisory or could directly implement strategies depending on the topic and as directed by the City administration.

Addresses*: Partnerships*

Goal 5:

Provide housing options for households that make low- and very low- incomes

5.1. Develop an Affordable Housing Trust Fund (AHTF) to help streamline the process of getting housing for those in need

Establish and fund an Affordable Housing Trust Fund (AHTF). An AHTF is a critical "one stop" tool that combines several funding sources into a single application process. It provides a streamlined process for developers and nonprofits to solicit funding and reduces red tape. Lowell's AHTF should be led by independent trustees approved by the City Council rather than directly through an existing body such as the City Council to increase expertise and reduce political decision-making. The City should also create a five-year Strategic Plan to guide the Trustees' decision-making. The AHTF could be funded through a number of methods including Community Preservation Act (CPA), Inclusionary Zoning fees, donations, and other funding sources.

Addresses: *Affordable Housing Need*

5.2. Conduct an in-depth inventory of deed-restricted affordable housing units

Inventory deed-restricted affordable housing units, collecting critical information on the affordable housing stock. Lowell has not added affordable units to the state's Subsidized Housing Inventory (SHI) since at least 2011, despite building units with subsidies and likely meeting the requirements for listing units on the inventory. Additional information can be added to a local or regional database, such as the number of income-restricted units in a mixed-income rental development.

Beyond the regulatory benefits, a higher level of monitoring allows the City to track progress toward goals, strengthens the ability for the City to plan ahead for expiring units, confirms all affordable units are meeting requirements, and identifies gaps in affordable housing typology and affordability level. All deed-restricted affordable housing should be tracked, including homes not eligible for the SHI, such as housing affordable to 120% AMI.

Effectively monitoring the SHI requires time and resources. NMCOG is currently facilitating a Regional Housing Workgroup consisting of representatives from its nine member communities, seven housing authorities, and several affordable housing committees to explore the development of a regional partnership to ensure that communities across the region can achieve and maintain affordable housing goals, including maintaining existing subsidized housing inventories. City staff should continue participating in the Regional Housing Workgroup to determine the feasibility of participating in a shared-service model or other model to achieve these goals. At a minimum, the city should study its current subsidized housing stock including type, price point, affirmative fair housing marketing plans and requirements, and SHI status.

Addresses: *Housing Costs, Affordable Housing Need, Partnerships, Communication*

5.3. Develop a strategy and a fund that can preserve affordability of expiring deed-restricted units

Take a proactive stance to maintain affordable units. Eighty-four units were dropped from the Subsidized Housing Inventory (SHI) due to expiring deed-restricted properties from 2012 to 2022. Hundreds are set to expire during the period of performance of this plan from 2025 through 2029, and hundreds more are set to expire in the 2030s. Although many of these may have their affordability extended by the owners through Low-Income Housing Tax Credit program or other methods during refinancing, the City should take proactive steps to ensure affordability continues.

Through the proposed Affordable Housing Trust Fund or another vehicle, the City should develop and formalize a strategy that can preserve affordability of expiring deed-restricted units, including continued use of the Housing Rehabilitation program. It can create additional affordability with the First-Time Home-Buyers Program. The strategy should include monitoring of SHI units and providing funding when necessary to extend affordable housing regulatory agreements that would otherwise expire.

Addresses*: Affordable Housing Need, Partnerships*

5.4. Conduct an Inclusionary Zoning (IZ) market study and develop an appropriate IZ ordinance

Undertake a market study to understand how much subsidy a market-rate development at current construction costs and rates could bear. This study would assist the City in developing an Inclusionary Zoning section in the zoning ordinance. Inclusionary Zoning requires a certain percentage of units developed in a district or citywide to be set aside as affordable. In some cases, an Inclusionary Zoning section can allow developers to provide land or funding in lieu of the units. This type of study can be undertaken by a consultant and should be conducted every five years to evaluate the efficacy of Inclusionary Zoning because it must be fine-tuned as to provide the maximum number of affordable units without making development economically infeasible. This might vary by building type or neighborhood. After the market study is complete, the City should follow its recommendations in crafting an Inclusionary Zoning section in the Zoning Ordinance.

This market study may include another important component: a study of local construction and permitting costs. This can be used not only to fine-tune Inclusionary Zoning but also to better understand efficiencies that can be created in Lowell's permitting process. Lowell may consider adjusting building requirements that increase costs without providing community benefit. Lowell's efficiency could also be evaluated through the utilization of records of permits to track the number of days between permit applications and permit awards and compare to state and national benchmarks. Any requirements that exceed state requirements could be evaluated, and the cost of compliance could be compared to Lowell's peers outside of Massachusetts.

Addresses*: Housing Costs, Affordable Housing Need*

Implementation Strategies

5.5. Use CDBG for home improvements and match HOME with more developments

Prioritize HOME funding for the creation of new units, potentially used as leverage for Low Income Housing Tax Credits and One Stop funding. The City has found consistent success in utilizing HOME funding for development, and this source should be prioritized to the creation of deeply-subsidized, affordable units that the market cannot provide on its own. Community Development Block Grant (CDBG) funding and other sources can be targeted toward improving housing quality.

Addresses*: Affordable Housing Need, Partnerships*

5.6. Incentivize the creation of subsidized housing outside of Lowell's core

Incentivize the creation of more affordable housing beyond the core by adopting a policy preference for City funds, including AHTF and HOME, to support housing that is distributed throughout Lowell's neighborhoods. This action's objective is to deconcentrate subsidized housing, which is currently concentrated in Lowell's inner neighborhoods for several possible reasons: historically less expensive land, political resistance to subsidized housing, and zoning regulations.

Addresses*: Affordable Housing Need, Anti-discrimination*

5.7. Study, expand, and promote Jobs Plus

Study the results of Jobs Plus at the Lowell Housing Authority and determine what lessons can be learned and whether it can be expanded. This program is offered by the United States Department of Housing and Urban Development (HUD), and the Lowell Housing Authority participates. It provides employment-related services, community support for work, and a 100% income disregard for up to 48 months for their rent, allowing residents to increase their salary and build their wealth without suffering a corresponding increase in rent. Normally, an increase in rent would disincentivize increasing a salary because it makes it difficult to save additional money from additional income.

Addresses*: Opportunity, Affordable Housing Need, Partnerships*

5.8. Study options to mix voucher-based housing with median-income and market-rate housing

Study and implement the several innovative models that involve renovating public housing into mixed-income housing without displacing residents. This includes examples in Chelsea and Somerville. This creates a continuum of housing so that residents can continue living in the same development even as their income grows. The City should explore and document which opportunities for this type of conversion are in Lowell while carefully evaluating any proposed project to ensure displacement does not occur as part of the project and that a high level of maintenance and affordability will be maintained.

Addresses*: Opportunity, Affordable* Housing *Need, Partnerships*

5.9. Educate developers on programs and funding options to ease conversion of historic properties into housing, building capacity of non-profit and for-profit developers

Put a focus on education related to historic and commercial conversion. During focus group discussions, the development community was mixed on the viability of conversions of historic properties into housing. Some developers felt that the state Historic Rehabilitation Tax Credit and the federal Historic Tax Credit program—combined with the desirability of living in historic buildings—made those buildings easier to redevelop and market than ground-up construction. Other developers experienced historic regulations as cumbersome, hindering redevelopment. Furthermore, conversions were routinely the lowest-cost construction method noted in the permit data. However, some developers noted they struggle with making conversions cost-effective in focus groups. This disparity in success rates suggests a need for education about how to best redevelop and take advantage of historic properties for housing, especially in the city's historic districts.

The City should share educational tools or provide direct assistance to developers, especially developers of homes affordable to people who make lower incomes, to facilitate the conversion of properties to housing. It could connect nonprofit developers with for-profit partners to provide networking and learning opportunities. This may include promotion of networking events, such as Middlesex 3 events. In addition to education, these opportunities may facilitate partnerships between local for-profit and nonprofit developers to create mixed-income developments.

The City should further seek technical assistance providers to assist smaller developers with historical properties or conversions. The City may distribute any cost-saving information it learns through the Inclusionary Zoning study recommended as **Action 5.3** and coordinated this strategy with **Action 2.5**.

Addresses*: Affordable Housing Need, History, Vision*

5.10. Partner with LHA to evaluate possibilities through Project-Based Section 8 Housing Vouchers

Discuss expanding the use of project-based vouchers with Lowell Housing Authority (LHA) and other regional housing providers to meet LHA and town goals for deeply subsidized developments and/or encouraging ladders to home ownership. Section 8 Housing Vouchers are flexible, including the possibility to allocate a certain number as project-based vouchers, which may facilitate funding of new affordable housing. They may also be used to help renters become homeowners by providing subsidies toward mortgages. ***Addresses****: Affordable Housing Need, Partnerships*

5.11. Work with community organizations to explore the role and benefits of a Community Land Trust

Explore benefits of community Land Trusts (CLTs), which are legal entities that hold land in trust for current and future residents of affordable housing. A CLT acquires property, and in one popular model, buys homes on the private market or builds homes on vacant or underutilized land it purchases. It then sells units on that property while keeping ownership of the land. This allows the CLT to obtain revenue through the increased value of the land to further its mission while requiring the units on that land to remain affordable. Owners of homes in CLTs must sell to a qualified buyer for an affordable price. However, they can collect a portion of the increased equity of that home, providing a wealth-building opportunity for that owner. A CLT can also acquire and "bank" property until it can create affordable homes on it. CLTs exist in Roxbury, Lawrence, Amherst, and Andover among other communities inside and outside Massachusetts. The City should identify interested community organizations and assist them in learning from existing CLTs and determining whether a CLT would be appropriate in Lowell.

Addresses*: Affordable Housing Need, Partnerships*

Goal 6:

Expand and create new opportunities for affordable homeownership

6.1. Leverage federal entitlement funds and expand the city's first-time homebuyer program

Evaluate, expand, and market the City first-time homebuyer program to assist first-time home buyers to encourage young adults and families to remain or move to Lowell, and expand it to first generation buyers. This program is strong, but City staff report that it appears to be underutilized post-pandemic. Higher interest rates combined with high costs may create barriers that down payment assistance cannot overcome. The city should work with banks and agencies such as MassHousing and the Merrimack Valley Housing Partnership to develop low- to no-interest products to better serve and expand upon opportunities for first-time homebuyers, including people who make lower incomes and are first generation homebuyers. These programs can be utilized for both subsidized and market-rate attached and detached single family homes.

Addresses: *Opportunity, Possibility*

6.2. Conduct additional study into barriers for first-time homebuyers

Develop a better understanding of barriers that first-time homebuyers or households looking to upsize or downsize their house are facing on a neighborhood-by-neighborhood level. This could include evaluating which areas might have higher than average numbers of larger institutions or companies outbidding first-time homebuyers and whether this out-competition is based on purchase price, down payment, or some other factor. First-time homebuyer programs can be adjusted to close those barriers based on this data. This study should be undertaken with a fair housing lens, noting whether particular races, ethnicities, or other identities face steeper barriers into entering the homeowner market.

Addresses: *Opportunity, Possibility, Anti-Discrimination*

6.3. Conduct an educational campaign for housing options

Partner with nonprofits to market housing options. Survey respondents indicated a low level of knowledge of first-time homebuyer programs such as Merrimack Valley Housing Partnership and the City's first-time homebuyer program. The city should partner with nonprofits to amplify these options to the general public, potentially in combination with other educational campaigns discussed in other goals.

Addresses: *Opportunity, Possibility, Communication*

6.4. Study owner-occupied housing and develop owner-occupied incentive program

Evaluate options to expand opportunities for owner-occupied multifamily buildings. Duplexes and small multifamily developments are options for prospective owners to house multiple generations of their family or build equity in an attached investment unit. However, key informant interviews reveal these types of buildings can be challenging for individual households to purchase. Investors out bid individual households for properties in key neighborhoods due to their potential for rental income. The City should study this pattern and design an incentive program, possibly a no-interest or low-interest revolving loan program, to reduce barriers to the creation of and opportunities for small, owner-occupied multifamily properties. This type of incentive program should not compete with other programs such as those described in **Actions 1.2, 3.1, 4.1, 4.2, 5.3, and 6.1.** It should be developed with other funding or after those programs are fully funded.

Addresses*: Opportunity, Possibility*

Goal 7:

Ensure fair housing policies and practices

7.1. Develop a Fair Housing Action Plan

Develop a Fair Housing Action Plan, which would analyze and make recommendations to improve city programs, policies, and practices. This action's objective is to ensure that the City is affirmatively furthering fair housing. As a recipient of federal community development and planning funds through HUD, the City must work to eliminate disparities in access to opportunity in accordance with fair housing laws.

Fair housing laws (*Fair Housing Act (Title VIII of the 1968 Civil Rights Act) and M.G.L. Chapter 151B*) address discrimination based on characteristics that are called "protected classes" in fair housing law, and include the following: race; color; national origin; religion; sex; sexual orientation; gender identity; familial status (presence of children); disability; marital status; age (40 and older); genetic information; military service; source of income (housing vouchers); and arrest record. The City should develop a plan, which would include but is not limited to researching data sources and documenting protected classes' ability to access opportunity, disparities in access, structural barriers to fair housing, and education and enforcement of fair housing laws.

The plan would recommend any amendments to the Zoning Bylaw to ensure compliance with fair housing laws. This may include modifications to ensure that the City allows the protected uses referenced in M.G.L. Ch 40A Sec. 3, commonly known as the Dover Amendment; properly handles requests for reasonable accommodations; and uses non-discriminatory definitions and other language. This may include evaluation of the definition of "family" in the zoning code . The plan would also research where rental vouchers including Section 8 are utilized to ensure broad access and ensure that they are fairly accepted and geographically distributed.

Addresses*: Anti-Discrimination, Communication*

7.2. Ensure all notices are translated into all languages spoken broadly by the Lowell community

Develop targeted marketing campaigns for specific groups, recognizing cultural, language, and media consumption differences. This should be undertaken for a broad array of communication, including communication about new programs, opportunities for public input, and public education. Public input indicated a need to redouble efforts to communicate to stakeholders, ensuring that notices are in multiple languages and accessible to those without access to technology and those with disabilities.

Addresses*: Anti-Discrimination, Communication*

7.3. Require land use board, Council, and staff receive training on fair housing laws

Develop a policy requiring members of land use boards (Planning Board and Zoning Board of Appeals), City Council, and their staff to receive trainings on fair housing laws and affirmatively furthering fair housing.

Addresses*: Anti-Discrimination, Communication*

7.4. Expand City efforts to ensure diverse representation on City permit-granting boards, committees, and advisory committees, including targeted outreach and recruitment

A key value of *Lowell Forward* is to advance "Accountable Governance and Community Stewardship: We believe in accountable governance and community stewardship, fostering an environment where empowerment and connectivity between residents and the local government are central to decision-making processes." This value should extend to a diversity of skills, ages, lived experiences including both renters and owners, and identities on permit-granting boards such as the Planning Board, the Zoning Board of Appeals, the Conservation Commission, and the Historic Board. The City should ensure that there is a diverse pool of applicants ready to serve on local permit-granting boards, committees, and advisory committees. To promote diversity and inclusion, the City should partner with established and emerging organizations to help engage people from diverse racial and cultural backgrounds.

Addresses*: Anti-Discrimination*

The Implementation Action Plan

The following pages use the *Lowell Forward* implementation framework, which identifies timeframes for goals and actions to aid action takers—like city departments, local organizations, anchor institutions, and the community—in the prioritization of tasks and next steps.

This creates an action plan for the next ten years.

Although each action item can work on its own, action items build on one another and will be stronger together.

Goal 1:
Plan for equitable and accessible growth

Order of Priority	Actions	Action Type/ Mechanisms	Status	Timeframe	City Steward and Partners
1.1	Engage communities to identify priority development sites for multifamily housing	New Study and Plan	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, Planning Board; NMCOG
1.2	Develop a funding pipeline to acquire, finance, and develop sites with a high capacity for multifamily	New Study and Plan	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—DPD; Local Property Owners/Developers
1.3	Allow housing or mixed use projects in the Regional Retail and High Rise Commercial districts	Zoning Change	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board
1.4	Document projected and actual infrastructure impacts for major developments	City programs and operations	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, DPW
1.5	Prioritize the sale of city properties to support the creation of housing at all income levels	City programs and Operations	Ongoing	Near Term (0 - 5 yrs)	City of Lowell-DPD, Law Department
1.6	Participate in regional initiatives such as *At Home in Greater Lowell* that include plan development, implementation, and community engagement activities and education	Regional Partnership	Ongoing	Near Term (0 - 5 yrs)	City of Lowell-DPD; NMCOG
1.7	Living in Lowell Campaign and Neighborhood Hubs	City Program	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell-DPD; NMCOG; Regional Community Based Organizations
1.8	Evaluate citywide zoning, including a study of nonconforming structures to restore by-right dimensional standards in blocks where many nonconforming structures exist	Zoning Change	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board
1.9	Study use of HDIP program against peers and make best practice adjustments if necessary	City programs and operations	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD

Goal 2:

Develop homes for all types of households and individuals

Order of Priority	Actions	Action Type/ Mechanisms	Status	Timeframe	City Steward and Partners
2.1	Adjust key zoning regulations to reduce barriers to special housing typologies	Zoning Change	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board; NMCOG
2.2	Expand housing choice in all residential areas by an Accessory Dwelling Unit (ADU) ordinance and mixed-use nodes	Zoning Change	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board; NMCOG
2.3	Encourage housing typologies that include universal design to support all ages and abilities	Local Partnership	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, Disability Commission
2.4	Continue to work with developers of all types of low-income housing with an emphasis on missing age groups and AMI ranges	Other Regulatory/ Policy	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—DPD
2.5	Identify opportunities for infill development on historic properties within historic districts and eliminate barriers to those opportunities through policy change	New Study and Plan	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, Historic Board

Goal 3:

Improve housing quality

Order of Priority	Actions	Action Type/ Mechanisms	Status	Timeframe	City Steward and Partners
3.1	Create a well-funded program that could provide no-interest home improvement loans	City Program	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD; Local Community Based Organizations (Community Teamwork, etc.)
3.2	Identify additional resources to enforce city codes for residential property (inspectional services).	City Program	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—DPD
3.3	Work with partners to understand how many units and of what tenure could benefit from retrofits, and develop a program to target the gap	Other Regulatory/ Policy	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, DPW (Sustainability); Local Community Based Organizations (Community Teamwork, etc.); State Programs and Utilities
3.4	Stabilize neighborhoods through reconstruction and improvement of streetscapes	Local Partnership	Ongoing	Medium Term (5 – 10 yrs)	City of Lowell—DPD, DPW; Local Partnerships (CBA, Neighborhood Groups)

Goal 4:

Eliminate homelessness and reduce housing insecurity

Order of Priority	Actions	Action Type/ Mechanisms	Status	Timeframe	City Steward and Partners
4.1	Study and develop a Housing First incentive zone located near transit and well-connected areas or service providers	Zoning Change	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, Planning Board
4.2	Increase funding and expedited permitting for qualified providers	Capital Investment	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD
4.3	Implement recommendations within *City Manager's Task Force on Homelessness and Sustainable Housing Action Plan and Final Recommendations.*	Regional Partnership	Ongoing	Near Term (0 - 5 yrs)	City of Lowell— City Manager's Office, DPD, Local Partnerships (Community Teamwork, House of Hope, LTLC, Salvation Army, etc.)
4.4	Create a new staff position dedicated to housing stability to enhance program coordination among local, regional, and state providers.	City Program	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—City Manager's Office, DPD
4.5	Initiate or participate in a Housing Needs Awareness Campaign to inform and educate about the affordable housing shortage	City Program	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office, DPD; Local Partnership (Community Teamwork, House of Hope, LTLC, Salvation Army, etc.)
4.6	Develop and strengthen a single point of intake through the Hunger and Homelessness Commission	City Program	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office, Hunger and Homelessness Commission; Local Community Based Organizations (Community Teamwork, House of Hope, LTLC, Salvation Army, etc.); State Agencies
4.7	Work with federal partners to reduce administrative burdens that may hinder intake and supports to people experiencing homelessness	Regional Partnership	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office; State Agencies; Community Based Organizations (Community Teamwork, House of Hope, LTLC, Salvation Army, etc.)
4.8	Create an online data dashboard with clear tracking measures and explanations of city boards and commissions	City Program	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, City Manager's Office; NMCOG
4.9	Utilize the Hunger and Homelessness Commission and the City Manager's Task Force on Homelessness	Local Partnership	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office, Hunger and Homelessness Commission

Goal 5:

Provide housing options for households that make low- and very low- incomes

Order of Priority	Actions	Action Type/ Mechanisms	Status	Timeframe	City Steward and Partners
5.1	Develop an Affordable Housing Trust Fund (AHTF) to help streamline the process of getting housing for those in need	City programs and operations	Ongoing	Medium Term (5 - 10 yrs)	City of Lowell—City Manager's Office, DPD
5.2	Conduct an in-depth inventory of deed-restricted affordable housing units	Other Regulatory/ Policy	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—DPD; NMCOG
5.3	Develop a strategy and a fund that can preserve affordability of expiring deed-restricted units	City Program	New Initiative	Medium Term (5 - 10 yrs)	City of Lowell-DPD
5.4	Conduct an Inclusionary Zoning (IZ) market study and develop an appropriate IZ ordinance	Zoning Change	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board
5.5	Use CDBG for home improvements and match HOME with more developments	City programs and operations	New Initiative	Medium Term (5 - 10 yrs)	City of Lowell—DPD
5.6	Incentivize subsidized housing outside of Lowell's core	City programs and operations	New Initiative	Medium Term (5 - 10 yrs)	City of Lowell—DPD, Manager's Office
5.7	Study, expand, and promote Jobs Plus	New Study and Plan	New Initiative	Medium Term (5 - 10 yrs)	City of Lowell—DPD
5.8	Study options to mix voucher-based housing with median-income and market-rate housing.	Local Partnership	New Initiative	Medium Term (5 - 10 yrs)	City of Lowell—DPD
5.9	Educate developers on programs and funding options to ease conversion of historic properties into housing, building capacity of non-profit and for-profit developers	Other Regulatory/ Policy	New Initiative	Medium Term (5 - 10 yrs)	City of Lowell—DPD, Historic Board; Regional Partnership
5.10	Partner with LHA to evaluate possibilities through Project-Based Section 8 Housing Vouchers	Local Partnership	New Initiative	Medium Term (5 - 10 yrs)	City of Lowell—DPD; Lowell Housing Authority
5.11	Work with community organizations to explore the role and benefits of a Community Land Trust	Local Partnership	New Initiative	Medium Term (5 - 10 yrs)	City of Lowell—DPD; Regional Community Based Organizations

Goal 6:

Expand and create new opportunities for affordable homeownership

Order of Priority	Actions	Action Type/ Mechanisms	Status	Timeframe	City Steward and Partners
6.1	Leverage federal entitlement funds and expand the city's first-time homebuyer program	City Program	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD
6.2	Conduct additional study into barriers for first-time homebuyers	New Study and Plan	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD
6.3	Conduct an educational campaign for housing options	City Program	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD
6.4	Study owner-occupied housing units and develop owner-occupied incentive programs	Local Partnership	New Initiative	Long-Term (10+ yrs)	City of Lowell—DPD; Local Community Based Organizations

Goal 7:

Ensure fair housing policies and practices

Order of Priority	Actions	Action Type/ Mechanisms	Status	Timeframe	City Steward and Partners
7.1	Develop a Fair Housing Plan	New Study and Plan	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—DPD
7.2	Ensure all notices are translated into all languages spoken broadly by the Lowell community	City programs and operations	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office, DPD
7.3.	Require land use board, Council, and staff receive training on fair housing laws	City programs and operations	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—DPD, Land Use Boards and Committees
7.4	Expand City efforts to ensure diverse representation on City permit-granting boards, committees, and advisory committees, including targeted outreach and recruitment	City programs and operations	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office, DPD

Preferred Attributes of Proposed Residential or Mixed-Use Developments

The Executive Office of Housing and Livable Communities (EOHLC) Guidelines state that strategies should include "Characteristics of proposed residential or mixed-use developments that would be preferred by the municipality for example, infill development, cluster developments, adaptive re-use, transit-oriented housing, mixed-use development, and/or Inclusionary Zoning. Preferred characteristics should take into account the surrounding context of the built and natural environment. Characteristics placing special restrictions on the development of affordable housing, such as limiting size of affordable units, limiting diversity in types of housing, or applying other zoning constraints, will not be approved. In addition, affordable housing plans must comply with all state and federal fair housing laws" (c.3).

These attributes provide guidance and criteria for identification of specific sites for which the municipality will encourage the filing of Comprehensive Permit applications and specific publicly owned sites to consider for requests for proposals (RFP) to develop SHI Eligible Housing. These attributes also explain the expectations the City of Lowell has for affordable housing developments and provide guidance for the Zoning Board of Appeals (ZBA) when considering Comprehensive Permit applications. However, it should be noted that not all attributes can be met in all circumstances due to funding restrictions, site constraints, or other issues.

Location

In general, affordable housing within walking distance (½ mile) to certain amenities is preferred. Affordable housing within ¼ mile is highly preferred. These amenities include:

- Existing transit lines
- Major job centers, such as Crosspoint Towers or Lowell General Hospital
- Major shopping areas, such as Drum Hill or Stadium Plaza, especially if pedestrian improvements were made in those areas
- Neighborhood business districts
- Parks or open space

A location within ½ mile of Gallagher terminal is especially preferred, as this provides ideal transit access to points both within and outside of Lowell.

Parcels with redevelopment opportunities are preferred. In other words, reusing space that is already occupied by impervious surfaces is preferred, which might include adaptive reuse, redeveloping existing residential buildings into denser structures, redeveloping vacant structures, or developing areas currently occupied by parking lots.

Density, Scale, and Typology

The typology of housing should reflect the context of its site:

Neighborhood Centers and Downtown Lowell

In neighborhood centers and downtown Lowell, the preferred development type is mixed-use, with a retail or other active use on ground floor and apartments on upper stories.

Adjacent to Neighborhood Centers

Adjacent to neighborhood centers, the preferred development type is multifamily and townhomes. Larger-scale multifamily with 20 or more units is ideal for major corridors, larger parcels, and closer to neighborhood centers.

In or near Regional Retail Centers

Regional retail centers may afford excellent opportunities for very large-scale mixed-income multifamily. Ideally, this is co-located with retail in mixed use clusters with walkable connections to shopping and employment opportunities within the centers. The goal of any affordable housing within regional retail centers should be to complement, not replace, existing and potential commercial opportunities.

Within Single Family Neighborhoods

On certain key parcels, affordable housing organized into small-scale multifamily with 6 or fewer units or duplexes may be appropriate within single family neighborhoods.

Tenure

The City encourages both affordable rental and ownership opportunities. Affordable rental units are especially encouraged in neighborhoods in which there are few current rental opportunities (block groups below 40%) and affordable ownership units are especially encouraged in neighborhoods in which there are few current ownership opportunities (block groups below 40%).

Multigenerational Opportunities

Affordable ownership units that allow for multigenerational opportunities, with complete units that are connected within a structure to allow for related families to live adjacent to one another, is encouraged.

Affordability Performance Standards

The City prefers a mix of levels of affordability whenever possible. This includes 30% AMI, 50% AMI, 60%, and 80% AMI levels. The City highly prefers units that are affordable to extremely low incomes, such as units restricted to 50% AMI or less and voucher-supported units.

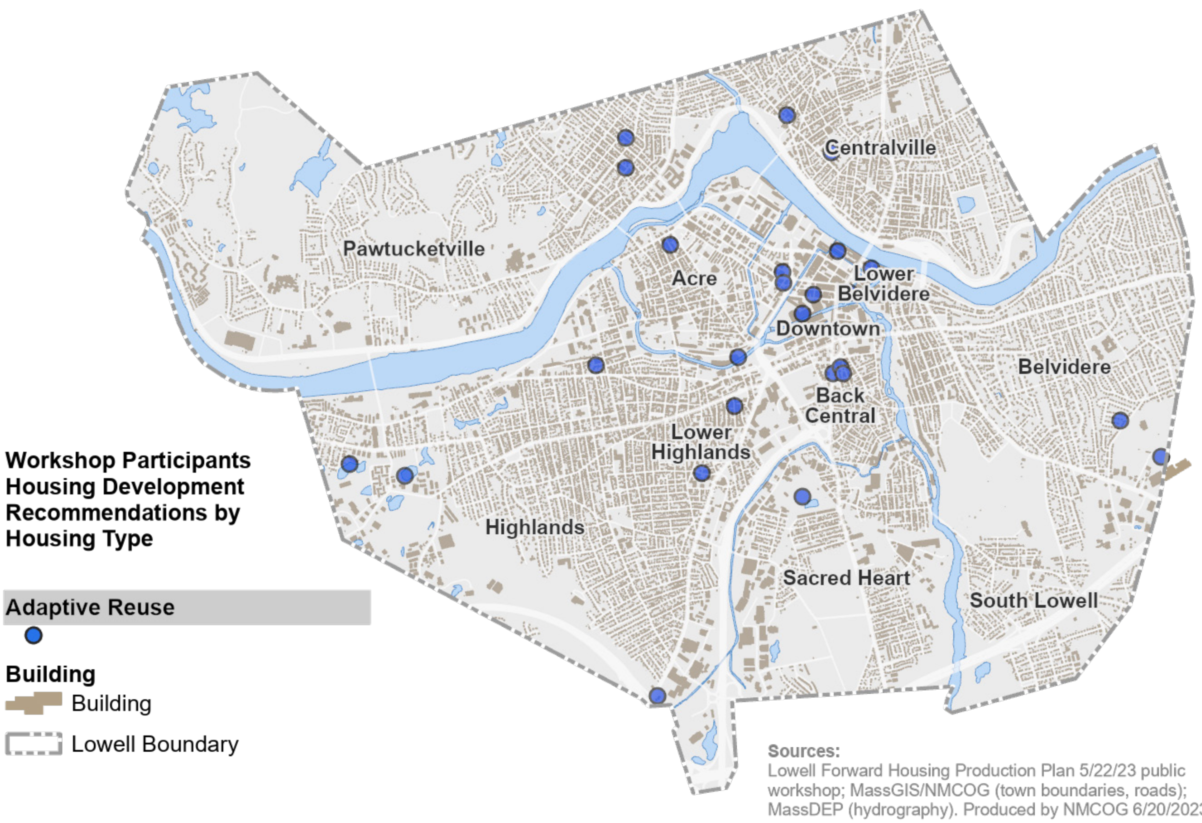
The City also prefers permanent supportive housing for chronically homeless individuals and families and other special-needs populations, especially when integrated into neighborhoods.

Adaptive Reuse Opportunities

At the May 31 citywide workshop, participants were asked to mark specific locations of adaptive reuse opportunities on a map or describe them to the facilitator. The areas participants marked are mapped below.

In addition to the locations that were marked, participants stated an interest in adaptive reusing remaining mill buildings, churches, and other older buildings. Specific buildings mentioned were the St. Louis School, the Superior Courthouse, and the remaining undeveloped mill of Massachusetts Mills.

MAP 16: WORKSHOP PARTICIPANTS ADAPTIVE REUSE RECOMMENDATIONS



Design

Developments that have larger numbers than required of fully accessible units are preferred, especially those that are integrated with the rest of the development.

All affordable units constructed or rehabilitated should be situated within the development so as not to be in less desirable locations than market-rate units in the development and shall, on average, be no less accessible to public amenities, such as open space, as the market-rate units. Affordable units within market-rate developments shall be integrated with the rest of the development and shall be compatible in design, appearance, construction, and quality of materials with other units. Interior features of affordable units shall comply in all respects with the minimum design and construction standards of the Executive Office of Housing and Livable Communities (EOHLC) for the Local Initiative Program or other applicable subsidy.

Features that encourage active transportation are highly encouraged. This includes indoor bicycle storage, safe pedestrian connections, and clear drop-off/pick-up zones whenever possible. This also includes electric vehicle (EV) charging stations as appropriate.

Other sustainability features that are preferred include:

Energy

Features that go beyond minimum codes, especially when those features can reduce long-term maintenance costs or costs to tenants, such as tight weatherization and heat recovery ventilation; high-efficiency heating system, controls, lighting, and appliances; and integration of solar or other alternative energy technologies.

Storm water

Appropriate best management practices (BMPs) for storm water management, including green infrastructure, rain barrels, or other storm water management strategies.

Open space

Ecologically-beneficial open space such as habitat, pollinator gardens, space suitable for food production, green walls or roofs, or other open space creation that may be affordably integrated into site design.

Light pollution

Appropriate and adjustable brightness for outdoor lights, elimination of light trespass, and promotion of “dark sky” measures.

Water efficiency

Minimization of vegetation requiring permanent irrigation, water-efficient fixtures such as toilets, faucets, washers, and other water-consuming appliances.

Indoor air quality

Moisture control plans, create handling plans for Volatile Organic Compound (VOC) emission, and ventilation.

Construction

Best practices during construction to mitigate or minimize run-off, solid waste, disturbance to habitat, and other temporary and permanent construction impacts.

Land with Potential for Affordable Housing

Executive Office of Housing and Livable Communities Guidelines state that strategies should include "The identification of specific sites for which the municipality will encourage the filing of Comprehensive Permit applications. Identification of specific sites should be consistent, to the greatest extent possible, with Sustainable Development Principles. Strategies should include any proposed zoning changes, advantages to construction on the site, an acknowledgement of site constraints, and the costs to overcome such constraints" (c.2).

This list exemplifies one or more of the preferred location attributes on the previous pages. It can be used to advertise to land owners and developers which sites the City would be most interested in seeing proposals for development or redevelopment into mixed-use or multifamily homes that include subsidized, income-restricted units.

This list does not change the legal or regulatory status of any of the identified sites. It also isn't exhaustive, as the City would be interested in seeing proposals for any sites that align with the preferred location attributes.

TABLE 17: PRIVATELY-OWNED LAND WITH POTENTIAL FOR AFFORDABLE HOUSING

Site Name	Address	Acres	Current Use	Zoning District	Potential for Housing	Characteristics and Barriers
Cross River Center	1001 Pawtucket Boulevard	42.62	Industrial	SMU	Develop parking lot or undeveloped area into multi-family	Require evaluating compatibility of uses
Spartan's Pizza	863 Varnum Avenue	1.47	Retail/ Restaurant	NB	Redevelop into mixed use	
Lowell General Hospital	275 Varnum Avenue	65.19	Hospital	PDMI	Develop undeveloped area into housing	
St. Rita's Parish	158 Mammoth Rd; 49 Wright St; 39 Wright St; 3 W Fifth Ave	3.48	Church	TSF	Develop parking lot or undeveloped area adjacent to church	
Social Club of Pawtucketville	123 University Ave	0.12	Retail/ Restaurant	TMU	Redevelopment of existing building	
Davidson Street Parking Lot	105 Davidson St; 30 Howe St; 65 Davidson St; 45 Davidson St	3.40	Parking, Office, Vacant	DMU	Redevelopment of Parking Lots and Office into mixed use	May require master planning and public-private parntership due to mix of publicly- and privately-owned land
Near St. Louis Park	700 Aiken St; 716 Aiken St; 740 Aiken St; 754.1 Aiken St; 10 Island Street	1.32	Retail/ Restaurant	UMU	Redevelop into mixed use	

How was this list chosen?

NMCOG staff and City staff finalized preferred location attributes and analyzed sites for alignment with those attributes. Sites were also chosen based on their existence in other City plans, their vacancy status, and the potential for redevelopment of single-use into mixed use.

TABLE 17: PRIVATELY-OWNED LAND WITH POTENTIAL FOR AFFORDABLE HOUSING, CONTINUED

Site Name	Address	Acres	Current Use	Zoning District	Potential for Housing	Characteristics and Barriers
Federal Carpet	1 Ennell St Ext; 640 Lakeview Ave	1.27	Retail/ Restaurant	UMU	Redevelop into mixed use	
PCEA NEEMA Church	201 Coburn St	2.11	Church	TSF	Development of parking lot into housing	
Sunrise Shopping Center Area	1148, 1190, 1141, 1201, 1140, 1230, 1170, 1235, 1200, 1150, 1180 Bridge St; 11 Emerson Ave; 92 Willard St	15.55	Retail/ Restaurant	RR, SMF	Redevelopment of one or more parcels into mixed use	
302 and 308 Nesmith St	302, 308 Nesmith St	0.46	Vacant	TMF	Develop into multi-family	
Near Stadium Plaza	645, 590, 631, 600, 581, 626, 638, 639, 576 Rogers St	5.90	Retail/ Restaurant, Auto Service	RR	Redevelopment of one or more parcels into mixed use	
Hannaford	777 Rogers St	6.98	Retail/ Restaurant	RR	Redevelop into mixed use	
Stadium Plaza	802 Rogers St; 9, 17, 25 Groton St	11.69	Retail/ Restaurant	RR	Redevelop into mixed use	
Meadow Brook Center	181 Plain St; 211 Plain St	23.40	Retail/ Restaurant	HRC	Redevelop into mixed use	
Bleachery	5 Andrews St; 685 Lawrence St; 48 Newhall St; 605 Lawrence St; 577.R Lawrence St; 663 Lawrence St; 663.1 Lawrence St; 56 Newhall St; 669 Lawrence St	9.46	Warehouse, Vacant Land, Multifamily	TMU, LI	Development of underutilized sites into multi-family	Industrial use
Bunting Club	1 N Billerica Rd; 449 Boylston St	11.44	Vacant	TSF	Multi-Family Development	
Technology Drive	55, 59, 75 Technology Drive	20.68	Office	OP	Redevelop underutilized sites into multi-family	
10 Technology Drive	10 Technology Drive	5.48	Office	OP	Redevelop underutilized sites into multi-family	
1815 Middlesex St	1815 Middlesex St	0.83	Restaurant/ Retail	RR	Redevelop into mixed use	
Middlesex Plaza	13 Wood St; 657 Princeton Blvd	5.30	Restaurant/ Retail	RR	Redevelop into mixed use	
The Village Shopping Center and Nearby	1625, 1627, and 1695 Middlesex St	5.55	Restaurant/ Retail	RR	Redevelop into mixed use	

TABLE 17: PRIVATELY-OWNED LAND WITH POTENTIAL FOR AFFORDABLE HOUSING, CONTINUED

Site Name	Address	Acres	Current Use	Zoning District	Potential for Housing	Characteristics and Barriers
138 Highland Avenue at Parker Street	138 Highland Ave	0.43	Restaurant/ Retail	TMU	Redevelop into mixed use	
Crosspoint Area and Showcase Cinemas Parking	2, 110, 263 Industrial Ave; 50.1, 59 Lowes Way; 900 Chelmsford St; 32, 41 Reiss Ave	86.39	Office, Parking, Warehouse, Retail/ Restaurant	HRC, GI	Develop parking lots into mixed-use and multi-family including additional structured parking	
129 Branch Street	129 Branch Street	0.13	Warehouse	TTF	Redevelop into multi-family	No onsite parking
Payne Street	50 Payne St; 34 Payne St; 400 School St	2.51	Warehouse, Auto Service	TMU	Redevelop into mixed use or multi-family	Industrial Use, environmental issues
868, 886 Middlesex and 10 Queen St	10 Queen St; 868 Middlesex St; 886 Middlesex St	0.76	Vacant, Auto Service	TMU	Redevelop into multi-family or mixed use	Mostly vacant land
Shaw Stocking Mill and Nearby	21, 51 Nottingham St; 365, 325 Chelmsford St; 244.2, 256, 258.1, 264, 258, 244.1, 240, 244 Smith St; 34, 48 Shaw St	6.00	Warehouse, Vacant Land, Heavy Industrial, Retail/ Restaurant	LI, NB	Redevelopment underutilized sites into multi-family	Industrial use
Manufacturers Street	75, 95 Manufacturers St	1.70	Parking Lot	RR	Develop into multi-family	
Manufacturers Street	35 Manufacturers St	1.11	Vacant	TMU	Develop into multi-family	
65 and 67 Westford Street	65, 67 Westford St	0.28	Vacant	TMF	Develop into multi-family	
93-115 Chelmsford Street	93, 101, 109, 115 Chelmsford St	0.71	Office, Vacant, Parking	NB	Develop into mixed use	
Culligan Site	39 Chelmsford St	0.91	Warehouse	UMU	Redevelop into mixed use	Adjacent to RR
87 Hale Street	87 Hale St	2.29	Office	HRC	Redevelop into mixed use	
220 Howard Street	220 Howard St	1.58	Light Industrial	HRC	Redevelop into mixed use	
YMCA	35 YMCA Dr	2.79	Health Club	UMU	Redevelop into mixed use with first-floor YMCA	
Appleton Street Study Area	4, 8, 12, 15 Garnet St; 9, 15, 16, 21 Pearl St; 248, 218, 224, 230, 356, 388 Middlesex St; 170, 160, 173, 183, 220, 217, 223, 237, 247, 243, 231, 241, 235, 233, 251, 282, 274, 264, 256, 244, 263, 287 Appleton St; 76, 72, 75, 85, 97 South St; 291 Summer St; 99 South St; 129 Summer St; 3 Summer St Ct	6.22	Restaurant/ Retail, Vacant, Auto Service, Parking, Light Industrial, Office, Church, Multi-family, Warehouse	UMU, DMU	Redevelop underutilized parcels into mixed use, including larger multi-family structures abutting Thorndike Street	Parcel assembly may be required

TABLE 17: PRIVATELY-OWNED LAND WITH POTENTIAL FOR AFFORDABLE HOUSING, CONTINUED

Site Name	Address	Acres	Current Use	Zoning District	Potential for Housing	Characteristics and Barriers
21 George Street	21 George St	0.58	Office	DMU	Redevelop into mixed-use potentially including shared structured parking on adjacent parcels	
Central Plaza mall	55 Church St	6.74	Retail/ Restaurant	DMU	Redevelop into mixed-use	
500 Pawtucket Street	500 Pawtucket St	0.77	Retail/ Restaurant	INST	Redevelop into mixed use	
The Franco	357 Pawtucket St	3.90	Multi-family	TMU	Infill in parking areas	
305 Pawtucket St	305 Pawtucket St	0.29	Single family	TMU	Redevelop into multi-family	
Mt. Vernon - Broadway "Soucy" site	232, 234, 268 Mt. Vernon St; 498, 452 Broadway St; 5 Farnham St	2.31	Vacant	UMF, UMU	Redevelop into multi-family	Former industrial
Transfiguration Greek Orthodox Parking Lot	104, 116, 124 Salem St; 1, 5 Hancock Ave	1.21	Parking	UMF	Develop homes over parking	
777 Merrimack Street	777 Merrimack St	0.16	Vacant	UMF	Develop into housing	Tax title land
705 and 731 Dutton Street	705 Dutton St; 731 Dutton St	1.38	Light Industrial, Warehouse	LI	Redevelop into multi-family	Industrial
615 and 651 Dutton Street	615 Dutton St; 651 Dutton St	0.82	Warehouse, Parking	LI	Redevelop into multi-family	Industrial
66 Broadway Street (Macheras Service Mart)	66 Broadway St	1.28	Auto Service	UMU	Develop housing over parking or undeveloped land	Industrial
520 Merrimack Street	520 Merrimack St	0.31	Parking	UMU	Develop into multi-family or mixed use	
489 Merrimack Street (Santander Bank)	489 Merrimack St	0.66	Office	UMU	Redevelop into mixed use	
300-322 Merrimack St (Shell and VIP)	322 Merrimack St; 300 Merrimack St	0.55	Auto Service	UMU	Redevelop into mixed use	Industrial
Mass Mills 4	169.1, 169.2 Bridge St	1.18	Vacant mill	DMU	Redevelop into multi-family	Access

Publicly-owned Land

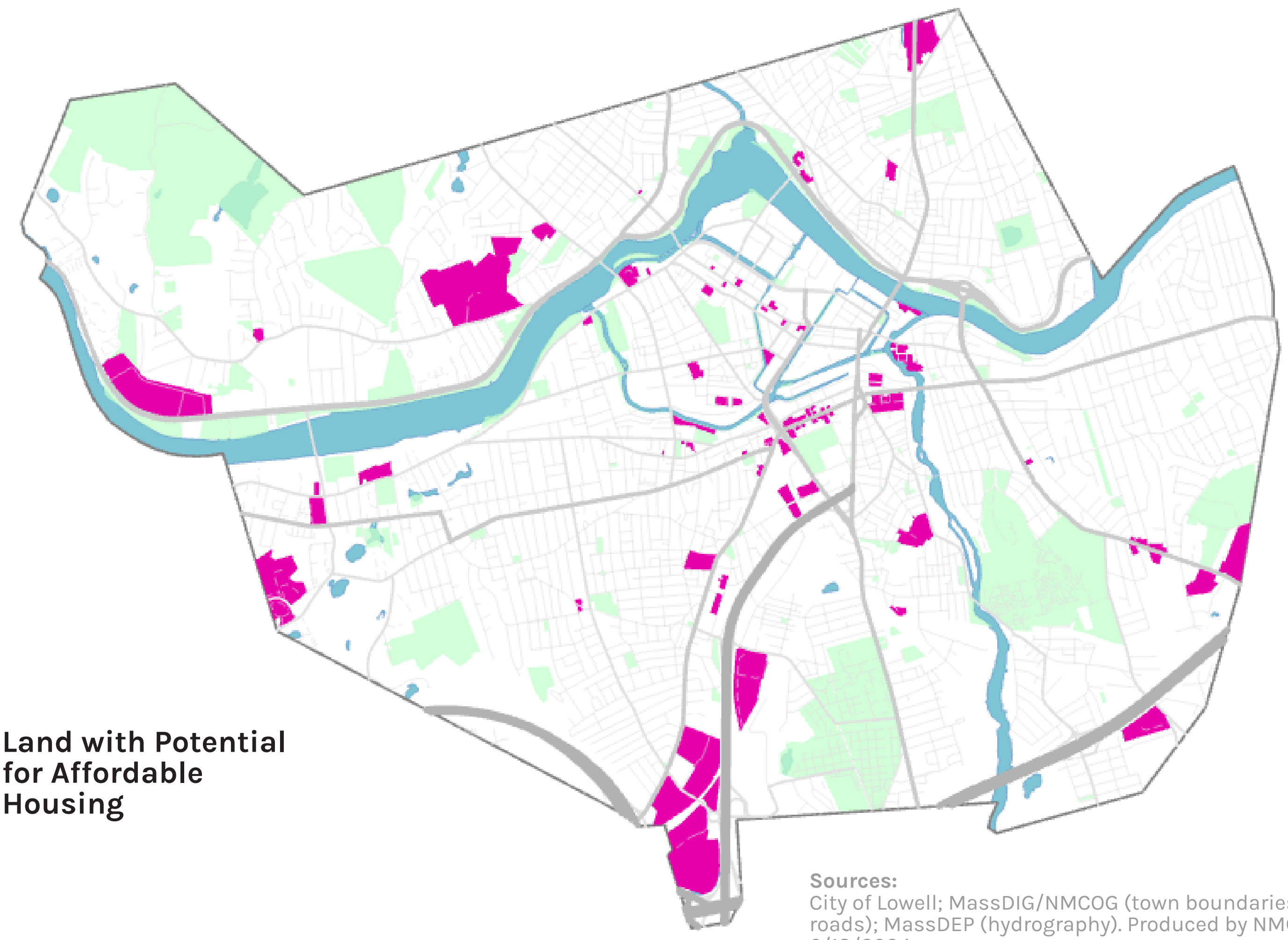
EOHLC Guidelines state that strategies should include "Identification of municipally owned parcels for which the municipality commits to issue requests for proposals (RFP) to develop SHI Eligible Housing, including information on appropriate use of the site, and a timeline for the issuance of an RFP. DHCD [now EOHLC] can provide some assistance in the development of such an RFP" (c.4)

This list includes both City-owned and State-owned land. The plan recommends developing a RFPs to develop affordable housing on the City-owned land after appropriate planning processes are complete (see **Action 1.5**). The plan recommends working with state agencies to determine the possibility of mixed-use developments on state-owned land.

TABLE 18: PUBLICLY-OWNED LAND WITH POTENTIAL FOR AFFORDABLE HOUSING

Site Name	Address	Acres	Current Use	Zoning District	Potential for Housing	Characteristics and Barriers
105 Whidden Street	105.1 Whidden St	1.26	Vacant	TTF	Develop into mutli-family	May have environmental issues
LRTA Site	105.1, 111, 85 Thorndike St; 20 Chelmsford St	1.68	Parking Garage, Vacant	UMU	Develop multi-family over parking structure/on vacant land	Ledge, slopes, adjacent to RR
5 Thorndike Street	5 Thorndike St and ROW	0.90	Vacant	UMU	Develop into mixed use or multi-family	Slopes, access, adjacent to RR
Warren Street Courthouse	41 Hurd St	1.30	Vacant courthouse	DMU	Redevelop into multi-family	
LHA Property at Merrimack and Decatur St	22 Decatur St; 18 Decatur St; 730 Merrimack St; 734 Merrimack St	0.25	Vacant	UMU	Develop into housing integrated into adjacent property/parking	
LHA Property at 681 Merrimack Street	80 Cabot St; 681, 691, 701 Merrimack St	0.53	Vacant, Parking	UMU	Develop into housing	
Smith Baker Center	412 Merrimack St	0.30	Vacant church	UMU	Redevelop into housing	Historic

MAP 17: LAND WITH POTENTIAL FOR AFFORDABLE HOUSING



Land with Potential for Affordable Housing

Sources:
City of Lowell; MassDIG/NMCOG (town boundaries, roads); MassDEP (hydrography). Produced by NMCOG 6/18/2024

Proposed Modifications to Zoning Districts

The Executive Office of Housing and Livable Communities (EOHLC) Guidelines state that strategies should include "The identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating SHI Eligible Housing developments to meet its housing production goal. Zoning indicates a community's interest in the types of uses to be encouraged. The zoning strategy should identify points where the zoning needs to be changed to accommodate additional dwelling units: Can density be increased? Can accessory apartments be accommodated? Are upper story residential units allowed in commercial districts? In identifying geographic areas, communities must ensure that any constraints can be overcome in a timely and cost-effective manner. Additionally, communities should consider the Commonwealth's Sustainable Development Principles at: http://www.mass.gov/hed/docs/dhcd/cd/smartgrowth/sdprinciples.pdf." (c.1).

Table 19 lists all Implementation Strategies that would either modify or create recommendations to modify zoning with the intent of creating affordable units.

TABLE 19: PROPOSED MODIFICATIONS TO ZONING DISTRICTS

Order of Priority	Actions	Action Type/ Mechanisms	Key Findings Addressed	Status	Timeframe	City Steward and Partners
1.1	Engage communities to identify priority development sites for multifamily housing	New Study and Plan	Change, Housing Costs, Anti-Discrimination, Vision	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, Planning Board; NMCOG
1.3	Allow housing or mixed use projects in the Regional Retail and High Rise Commercial districts	Zoning Change	Change, Housing Costs	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board
1.8	Evaluate citywide zoning, including a study of nonconforming structures to restore by-right dimensional standards in blocks where many nonconforming structures exist	Zoning Change	Change, Housing Costs, Vision	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board
1.9	Study use of HDIP program against peers and make best practice adjustments if necessary	City programs and operations	Change, Housing Costs, Opportunity	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD
2.1	Adjust key zoning regulations to reduce barriers to special housing typologies	Zoning Change	Change, Housing Costs, Affordable Housing Need	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board; NMCOG
2.2	Expand housing choice in all residential areas by an Accessory Dwelling Unit (ADU) ordinance and mixed-use nodes	Zoning Change	Change, Housing Costs, Opportunity, Possibility	In Progress	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board; NMCOG
4.1	Study and develop a Housing First incentive zone located near transit and well-connected areas or service providers	Zoning Change	Housing Costs, Affordable Housing Need, Partnerships	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, Planning Board
5.4	Conduct an Inclusionary Zoning (IZ) market study and develop an appropriate IZ ordinance	Zoning Change	Housing Costs, Affordable Housing Need	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—DPD, Planning Board

Regional Collaborations

The guidelines also encourage establishing and participating in regional collaborations. Table 20 lists all Implementation Strategies that could or do involve collaborating across the City's boundary.

TABLE 20: PROPOSED REGIONAL COLLABORATIONS

Order of Priority	Actions	Action Type/ Mechanisms	Key Findings Addressed	Status	Timeframe	City Steward and Partners
1.6	Participate in regional initiatives such as *At Home in Greater Lowell* that include plan development, implementation, and community engagement activities and education	Regional Partnership	Change, Housing Costs, Affordable Housing Need	Ongoing	Near Term (0 - 5 yrs)	City of Lowell-DPD; NMCOG
2.4	Continue to work with developers of all types of low-income housing with an emphasis on missing age groups and AMI ranges	Other Regulatory/ Policy	Housing Costs, Affordable Housing Need, Anti-Discrimination	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—DPD
3.3	Work with National Grid to understand how many units and of what tenure could benefit from retrofits, and develop a program to target the gap	Other Regulatory/ Policy	History	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD, DPW (Sustainability); Local Community Based Organizations (Community Teamwork, etc.); State Programs and Utilities
4.5	Initiate or participate in a Housing Needs Awareness Campaign to inform and educate about the affordable housing shortage	City Program	Affordable Housing Need, Partnerships, Anti-discrimination, Communication	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office, DPD; Local Partnership (Community Teamwork, House of Hope, LTLC, Salvation Army, etc.)
4.6	Develop and strengthen a single point of intake through the Hunger and Homelessness Commission	City Program	Affordable Housing Need, Partnerships	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office, Hunger and Homelessness Commission; Local Community Based Organizations (Community Teamwork, House of Hope, LTLC, Salvation Army, etc.); State Agencies
4.7	Work with federal partners to reduce administrative burdens that may hinder intake and supports to people experiencing homelessness	Regional Partnership	Affordable Housing Need, Partnerships	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—City Manager's Office; State Agencies; Community Based Organizations (Community Teamwork, House of Hope, LTLC, Salvation Army, etc.)
5.2	Conduct an in-depth inventory of deed-restricted affordable housing units	Other Regulatory/ Policy	Housing Costs, Affordable Housing Need, Partnerships, Communication	New Initiative	Near Term (0 - 5 yrs)	City of Lowell—DPD; NMCOG
5.11	Work with community organizations to explore the role and benefits of a Community Land Trust	Local Partnership	Affordable Housing Need, Partnerships	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD; Regional Community Based Organizations
6.2	Conduct additional study into barriers for first-time homebuyers	New Study and Plan	Opportunity, Possibility, Anti-Discrimination	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD
6.3	Conduct an educational Campaign for housing options	City Program	Opportunity, Possibility, Communication	New Initiative	Medium Term (5 – 10 yrs)	City of Lowell—DPD
7.3.	Require land use board, Council, and staff receive training on fair housing laws	City programs and operations	Anti-Discrimination, Communication	Ongoing	Near Term (0 - 5 yrs)	City of Lowell—DPD, Land Use Boards and Committees