

JUL - 8 2016

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GRAFTON, MA**

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RE: Elmrock Estates

FletcherTilton.com

Dear Chairperson Thomas and Members of the Board:

This office has been retained by a group of individuals residing in the Brigham Hill Road area with proximity to the proposed Elmrock Estates development. We understand that your Board has been requested to provide comments pertaining to the request of the developer, Fieldstone Realty, LLC, to MassHousing for Project Eligibility as defined in the applicable regulations at 760 CMR 56.04.

Your comments to MassHousing are critically important at this early juncture. It is the obligation of MassHousing to determine whether the site of the proposed project is generally appropriate for residential development, taking into consideration municipal actions previously taken to meet affordable housing needs and whether the conceptual project design is generally appropriate for the site. In the event that MassHousing determines, as detailed in 760 C.M.R. 56.04(4), that the site is not generally appropriate for residential development or the project design is not generally appropriate and refuses to issue Project Eligibility, Fieldstone Realty, LLC will not be authorized to file an application for a comprehensive permit with the Grafton Zoning Board of Appeals.

For the reasons more fully set forth below, we believe that your Board should strongly recommend that MassHousing not issue Project Eligibility for Elmrock Farms in its current configuration as such development is inconsistent with the Town of Grafton Housing Production Plan dated July, 2013 and approved by the Massachusetts Department of Housing and Community Development on October 3, 2013, is inconsistent with the Grafton, Massachusetts Open Space and Recreation Plan of 2007 (which is in the process of being updated), is inconsistent and counter to other important community goals of open space preservation for which the Town of Grafton has been actively engaged in the Brigham Hill area and, finally, fails to recognize the strides that the Town of Grafton has taken to date to achieve a meaningful improvement in the affordable housing stock within the Town.

The issuance of Project Eligibility is often the point in which a community can have the greatest impact on whether the developer will proceed with a comprehensive permit pursuant to General Laws Chapter 40B. While the Board recently heard from a different developer on June 21, 2016 concerning the potential of doing a Local Initiative Program (for a rental development), Elmrock Estate represents the more contentious type of approach to a Chapter 40B development and represents simply a land grab by a developer trying to maximize profit on a parcel otherwise limited in its development potential. The Board of Selectman, by issuing a request to MassHousing that Project Eligibility not be granted for good and valid community planning reasons, does not in any fashion rob or impair your ability to work proactively either with the developer or through a contentious Zoning Board of Appeals process if, as and when a Comprehensive Permit is sought for the site. We suggest that the analysis is whether in light of Grafton's extensive efforts to promote affordable housing and its past history in dealing with comprehensive permits of many types, is this particular development in this particular location in the overall best interest of the Town. Given the investments to date by private individuals, the Grafton Land Trust and Community Harvest Project in the Brigham Hill area which efforts advance other laudable and important community goals of open space preservation and public access, we strongly suggest that the answer is that Elmrock Estates is the wrong development in the wrong location.

I. ELMROCK ESTATES IS INCONSISTENT WITH THE HOUSING PRODUCTION PLAN OF THE TOWN OF GRAFTON.

Grafton went through the time, energy and effort to create a specific Housing Production Plan and have same approved by the Department of Housing and Community Development in 2013. A Housing Production Plan sets forth the mechanism by which the community intends, in a strategic and thoughtful manner, to make progress toward its statutory minima of affordable housing. Section V of the Housing Production Plan (copy of which is attached as Exhibit A) sets forth a very specific housing production program so as to create approximately one hundred forty two (142) affordable units over a five (5) year period. The Housing Production Plan focused on the expansion of rental units for the reasons set forth in the plan and, more importantly, the development of affordable units in connection with a Village Mixed Used Development and the Fisherville Terrace Development.

The Town continues to work in both of these directions. The Fisherville Terrace comprehensive has been recently extended and provides for a total of the potential

of eighteen (18) affordable units. The Board recently met with a developer proposing fifty four (54) rental apartments known as Prentiss Place. With the exception of these larger scale developments, all of the other goals set forth in the Housing Production Program were for smaller infill type of developments and none were the magnitude sought by Elmrock Estates.

The Town continues to work in various ways with developers to expand affordable housing production in the manner consistent with the Housing Production Plan. The intrusion of a large scale subdivision on a lot that is wholly inconsistent with such development is contrary to the goals, purposes and intent of the Housing Production Plan.

II. ELMROCK ESTATES IS INCONSISTENT WITH THE GRAFTON OPEN SPACE AND RECREATION PLAN.

While no one would question the importance to the Town of Grafton in developing affordable housing, it does not represent the exclusive goal of the community. The Open Space Plan of 2007 identified certain priorities and Priority Areas for open space preservation in Grafton. One of those areas is referred to as the Western Corridor Priority Area. The report stated:

“The Western Corridor contains four (4) large Grafton Land Trust parcels and a large Department of Fisheries and Wildlife Parcel extending in from Millbury, separated by mostly forested land. The corridor includes the proposed Brigham Hill Estates flexible development which includes a large open space portion that, in the proposal, would be transferred to the Grafton Land Trust. Conservation restrictions should be sought for other parcels in the Western Corridor.”

The proposed development of Elmrock Estates is smack in the middle of the Western Corridor, literally surrounded by properties restricted to open space purposes.

The importance the proposed site has in relation to the aggregation of open space in Town is made abundantly clear by the attached depiction of various open space parcels in the Brigham Hill Road area. The exhibit literally speaks a thousand words. The adverse impact the proposed development will have on the adjoining properties which are perpetually reserved for open space cannot be understated. Such a development would be in direct contravention to the Open Space Plan.

III. GRAFTON HAS DONE ITS FAIR SHARE FOR AFFORDABLE HOUSING.

The Planning Department maintains a very comprehensive listing of the projects with affordable housing units part of the development in Grafton attached as Exhibit C. Given the size of the community, it is demonstrative of a true commitment by the community to promote affordable housing. The inventory of comprehensive permits and affordable housing developments demonstrates a number of projects in the various evolution of affordable housing from projects that are completed and sold and subject to deed riders to those in which there is an ongoing lottery for new homes to those in which comprehensive permit has been issued but not yet effectuated. This is in addition to the units owned or maintained by the Grafton Housing Authority which are demonstrated on a separate report attached as Exhibit C. All of these ongoing projects are in conjunction with the Prentiss Place development that was before the Board of Selectman on June 21, 2016 and will be proceeding in one form or another as an approximately fifty four (54) unit rental development. This body of work demonstrates that Grafton has already made its commitment and put its resources behind creation of affordable housing. Further, what Exhibit C reflects is that the Board of Selectman's opposition to Project Eligibility for Elmrock Estates is not consistent with a "not in my backyard" attitude. Grafton has and continues to support and work with affordable housing developers on sites that are appropriate for such development. The efforts at Fisherville Terrace might be one of the shining success stories in that effort. There is a simple recognition that Elmrock Estate is not a Project generally appropriate for residential development of this nature and can otherwise be achieved on more appropriate sites, particularly in the area of mixed use or Chapter 40R developments.

Further, the Zoning By-Law in Grafton is replete with examples by which the Town has promoted affordable housing as part of well thought out developments. For example, all Major Residential Developments must provide at least 10% units set aside as affordable housing, demonstrating an intent to share the costs and benefits of affordable housing throughout all new developments in the community. Additionally, the creation of the Fisherville Smart Growth Overlay District reflects the Town's judgment that this area of Grafton is particularly suited for the development of affordable housing projects combined with mixed use and smart growth initiatives. Specifically, the increased percentage requirement of affordable units for construction in the Overlay District and the waiver of certain zoning requirements for suitable projects demonstrate the Town's determination that development of affordable housing should be a priority in this area of the Town. "Smart Growth," which both the Commonwealth and the

Jennifer Thomas, Chairperson

Grafton Board of Selectman

July 7, 2016

Page 5

Town encourage through the creation of districts such as the Fisherville Overlay District, has as a key element accessible, affordable, and sensibly located development of new housing options to promote and preserve diversity in the Town.

IV. CONCLUSION

It is incumbent upon the Board of Selectman to make it clear and unambiguous that the proposed Elmrock Estates project is not of a type or nature that is appropriate for the specific area proposed and is not consistent with the way the Town has worked to develop a careful balance between open space and affordable housing needs. The Board needs to be adamant that the development of Elmrock Estates is counterproductive to a well thought out and implemented open space plan as evidenced on Exhibit B. In no uncertain terms the Town should communicate its objections to the grant of Project Eligibility to Elmrock Estates.

I look forward to the opportunity to make a presentation concerning this correspondence to you Board at its July 12th meeting.

Very truly yours,



Mark L. Donahue

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Enclosures

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EXHIBIT A

Section V HOUSING PRODUCTION GOALS

The Massachusetts Department of Housing and Community Development (DHCD) is administering the Housing Production Program in accordance with regulations that enable cities and towns to prepare and adopt an affordable housing plan that demonstrates production of an increase of .50% over one year, or 1.0% over two-years, of its year-round housing stock eligible for inclusion in the Subsidized Housing Inventory.²⁹ Grafton will have to produce approximately 36 affordable units annually to meet these production goals. If DHCD certifies that the locality has complied with its annual production goals, the Town may, through its Zoning Board of Appeals, deny comprehensive permit applications without opportunity for appeal by developers.

Using the strategies described in Section VI, the Town of Grafton has developed a Housing Production Program to chart affordable housing production activity over the next five (5) years. The projected goals are best guesses at this time, and there is likely to be a great deal of fluidity in these estimates from year to year. The goals are based largely on the following criteria:

- To the greatest extent possible to promote greater public benefits, at least fifty percent (50%) of the units that are developed on Town-owned parcels should be affordable to households earning at or below 80% of area median income, depending on project feasibility. The rental projects will also target households earning at or below 60% of area median income and lower depending upon subsidy program requirements.
- Projections are based on no fewer than four (4) units per acre. However, given specific site conditions and financial feasibility it may be appropriate to decrease or increase density as long as projects are in compliance with state Title V and wetlands regulations.
- Because housing strategies include some development on privately owned parcels, production will involve projects sponsored by private developers through the standard regulatory process or the "friendly" comprehensive permit process. The Town will continue to work with these private developers to fine-tune proposals to maximize their responsiveness to community interests and to increase affordability when feasible.
- The projections involve a mix of rental and ownership opportunities. The Town will work with private developers to promote a diversity of housing types directed to different populations with housing needs including families, seniors and other individuals with special needs to offer a wider range of housing options for residents.

²⁹ Massachusetts General Law Chapter 40B, 760 CMR 31.07 (1)(i).

**Table V-1
Grafton Housing Production Program***

Strategies by Year	Affordable Units < 80% AMI	Ineligible for SHI	Total # Units
Year 1 – 2013			
Scattered site development and Town-owned property/Suzanne Terrace (ownership)	2	0	2
Conversion of existing housing to long-term affordability (ownership)	2	0	2
Accessory apartments (rental)	0	4	4
Emergency assistance (ownership)	0	5	5
<i>Subtotal</i>	4	9	13
Year 2 – 2014			
"Friendly 40B" development (ownership)	18	0	72
Scattered site development and Town-owned property/ Hennessey II (ownership)	1	0	1
Scattered site development and Town-owned property/Webber–East Street (ownership)	1	0	1
Conversion of existing housing to long-term affordability (ownership)	2	0	2
Group home (special needs rental)	8	0	8
Accessory apartments (rental)	0	4	4
Emergency assistance (ownership)	0	5	5
<i>Subtotal</i>	30	9	93
Year 3 – 2015			
"Friendly 40B" development (rental)**	20	0	20
Affordable housing on nonconforming Lots (ownership)	2	0	4
Village mixed-use development (rental)	10	0	40
Inclusionary zoning (ownership)	6	0	60
Conversion of existing housing to long-term affordability (ownership)	2	0	2
Accessory apartments (rental)	0	4	4
Emergency assistance (ownership)	0	5	5
<i>Subtotal</i>	40	9	135
Year 4 – 2016			
Fisherville Mill 40R (mix of ownership and rental)	48	10	240
Accessory apartments (rental)	0	4	4
Emergency assistance (ownership)	0	5	5
<i>Subtotal</i>	48	19	249
Year 5 – 2017			
Covered under Year 4			
Accessory apartments (rental)	0	4	4
Emergency assistance (ownership)	0	5	5
Village mixed-use development (rental)	10	0	40
Flexible development (ownership)	10	0	40
<i>Subtotal</i>	20	9	89
Total	142	55	330

* Final determination of the use of existing Town-owned parcels for new affordable housing is subject to a more thorough feasibility analysis of site conditions and Town Meeting approval. If any of the preliminarily identified existing Town-owned properties are finally determined infeasible or do not obtain approval from Town Meeting, it is anticipated that the projected numbers of affordable units would be met through the acquisition of privately owned properties, private development or other Town-owned property.

** All units count in SHI for Chapter 40B rental projects.

Section VI HOUSING STRATEGIES

The Town of Grafton has made significant progress in building its capacity to promote affordable housing since it developed its first Affordable Housing Plan in 2006, implementing key strategies that were included in that Plan including the following:

- *Establishment of the Grafton Affordable Housing Trust* in 2007, which replaced the Affordable Housing Committee that was responsible for the 2006 Affordable Housing Plan. The Trust subsequently developed Housing Trust procedures through a Declaration of Trust.
- *Capitalization of the Trust Fund* of approximately \$313,000 as of April 2012. This funding has come principally from the Town's Community Preservation Committee (CPC), which automatically has transferred 10% of its annual funding to the Housing Trust. The CPC also welcomes individual proposals for special housing initiatives through its standard application process.
- *The designation of the Assistant Planner as the key point person* for supporting the efforts of the Affordable Housing Trust and their oversight of Housing Plan preparation and implementation.
- *Community outreach efforts* to showcase affordable housing including a new brochure, annual housing workshops, and special community forums for new initiatives in particular (40R district, new mixed-use village zoning, proposed projects, etc.). The Town is also working to enhance its website, planning an email subscription system to disseminate important information to the public. Interested parties can sign-up to receive email updates regarding particular activities such as Housing Trust events, announcements, and upcoming lotteries for affordable units.
- *Preparation of a Local Initiative Program (LIP) Procedures Manual* that detailed the respective roles and responsibilities of the Housing Trust, Planning Department and other local leaders for insuring that all state requirements are being met to create and retain affordable units, including those related to project marketing and lotteries.
- *Development of an affordable housing database* that provides information on all units included in the SHI, including detailed information on use restrictions to better monitor of affordable units.
- *Creation of the Fisherville Smart Growth Overlay District (FSGOD)* as part of a Chapter 40R program to revitalize the older Fisherville Mill site. The Overlay District has been approved by Town Meeting and the state. Development will include a range of housing opportunities, rental and ownership, along with a mixed-use development component, will promote compact design, the preservation of open space and a variety of transportation options.
- *Work with local developers to encourage the production of new housing units* including support for projects using the flexible zoning provision or comprehensive permits such as Dendee Acres, Peters Estates, Fisherville Terrace, 123 Ferry Street, etc.
- *Increased coordination of municipal staff* through regular meetings among various offices to improve communication and cooperation on key Town programs, policies and projects, including those related to affordable housing.

- *Purchase of 30 Tulip Circle* by the GAHT to protect the affordability of this affordable unit had been foreclosed.
- *Designation of a Town-owned parcel at Suzanne Terrace for affordable housing* that will be conveyed by the GAHT to a qualified developer following the issuance of a Request for Proposals (RFP).

The Town remains committed to a continued pursuit of these important outreach and development strategies and will build on this progress through the actions described in Section VI.A through D below. The strategies also reflect state requirements that ask communities to address all of the following major *categories of strategies* to the greatest extent applicable:³⁰

Identification of zoning districts or geographic areas in which the municipality proposes to modify current regulations for the purposes of creating affordable housing developments to meet its housing production goal;

- Explore mixed-use and transit-oriented development (strategy VI.B.4)

Identification of specific sites for which the municipality will encourage the filing of comprehensive permit projects;

- Make suitable public land available for affordable housing (strategy VI.B.1)
- Promote mixed-use and transit-oriented development (strategy VI.B.4)

Characteristics of proposed residential or mixed-use developments that would be preferred by the municipality;

- Promote mixed-use and transit-oriented development (strategy VI.B.4)
- Amend flexible zoning by-law to encourage affordable housing (strategy VI.A.4)
- Amend accessory apartment by-law (strategy VI.A.1)
- Adopt inclusionary zoning (strategy VI.A.5)
- Partner with private developers on “friendly” 40B projects (strategy VI.B.3)
- Allow affordable housing on nonconforming lots (strategy VI.A.3)
- Support small, scattered site private development (strategy VI.B.2)

Municipally owned parcels for which the municipality commits to issue requests for proposals to develop affordable housing.

- Make Town-owned land available for affordable housing (strategy V.B.1)

Participation in regional collaborations addressing housing development

- Help qualifying existing residents access housing assistance through regional entities

It should be noted that a major goal of this Plan is not only to strive to meet the state’s 10% goal under Chapter 40B, but to also to serve local needs. Consequently, there are instances where housing initiatives might be promoted to meet these needs that will not necessarily result in the inclusion of units in the Subsidized Housing Inventory (examples include the promotion of accessory apartments or providing assistance for emergency repairs).

³⁰ Massachusetts General Law Chapter 40B, 760 CMR 56.03.4.

Within the context of these compliance issues, local needs, existing resources, affordability requirements and the goals listed in Section II.C of this Plan, the following housing strategies are proposed. *It is important to note that these strategies are presented as a package for the Town to consider, prioritize, and process, each through the appropriate regulatory channels.*

The strategies are grouped according to the type of action proposed – Planning and Regulatory Reform, Housing Development, Housing Preservation, and Direct Assistance – and prioritized. Year 1 and 2 actions are those that will begin within the next two years, most of which will involve some immediate actions. Those strategies included in the Year 3 to 5 category will involve focused attention after the next couple of years, working towards implementation after Year 2 but before Year 5. A summary of these housing strategies is included as Table I-1 and descriptions are offered in Sections VI.A through D below.

A. Implement Planning and Regulatory Reforms

Housing production is contingent not only on actual development projects but also on the planning and regulatory tools that enable localities to make well informed decisions to *strategically guide* housing creation. To most effectively and efficiently execute the strategies included in this Plan and meet production goals, greater flexibility will be needed in the Town's Zoning By-law, and new tools will be required to capture more affordable units.

The Zoning By-law includes a minimum lot requirement of at least an acre as well as frontage, setback and other requirements that may not be conducive to affordable housing and create the likely need for regulatory relief for any residential development that includes affordable units, most likely through the “friendly” comprehensive permit process that overrides local zoning, overlay districts or other special zoning provisions. Additionally, the Zoning By-law incorporates a number of provisions that while intended to encourage affordable housing, have not provided sufficient incentives to realize actual new affordable units and should be revisited and revised as necessary.

The Town of Grafton should consider the following planning and zoning-related strategies to promote the creation of additional affordable units. These actions can be considered as tools that the town will have available to promote new housing opportunities, each applied to particular circumstances and providing a powerful group of resources when available in combination.

1. Amend Accessory Apartment By-law

Current Status: The current Zoning By-law allows accessory apartments through a special permit. Since 1998, 34 accessory apartments have been permitted in compliance with the By-law in Grafton, however it is generally recognized that there are unpermitted accessory apartments in town as well.

Accessory units are helpful in meeting a number of public policy objectives as they:

- Enable homeowners to capture additional income, which is particularly important for elderly homeowners or single parents where such income may be critical to remaining in their homes. Also, some young families or moderate-income households might be able to afford homeownership if they could count on income from an accessory apartment.
- Provide appropriately sized units for growing numbers of smaller households.
- Offer inexpensive ways of increasing the rental housing stock at lower cost than new construction and without loss of open space, without significant impact on the surrounding

neighborhood, and without additional Town services such as streets or utilities. There are, however, issues regarding the adequacy of the existing septic system when a new bedroom is added.

- Provide companionship, security and services for the homeowner, from shoveling the sidewalk for an elderly owner to babysitting for a single parent.
- Offer good opportunities for keeping extended families in closer contact.
- Generate tax revenue in a locality because accessory units add value to existing homes.

Next Steps: In order to promote new accessory units the Town should consider amending its Zoning By-law as follows:

- Allow accessory units as-of-right based on specified conditions of the by-law;
- Extend use to detached structures or separate additions;
- Extend availability to investor-owned properties; and
- Consider amnesty provisions for existing but illegal units.

There are many variations of accessory apartment by-laws that have been adopted in other communities. The Grafton Planning Board can explore other by-laws and work on an amendment that will best meet the needs of the community and promote affordability. For example, the Town of Wellfleet has an accessory apartment program that insures that units are affordable and occupied by qualifying tenants without requiring deed restrictions or lottery lists for occupants. Consequently, while the units cannot be included in the SHI they are regulated to insure affordability.

Timetable: Years 1 to 2

Resources Required: Time of the Planning Board to prepare the zoning amendment and coordinate the necessary approvals with the support of the Planning Department.

2. Review Existing Local Initiative Program (LIP) Policy

Current Status: The Town of Grafton's Affordable Housing Committee, now disbanded and replaced by the Affordable Housing Trust, developed a Local Initiative Program (LIP) Policy to encourage the production of permanently affordable housing for local residents in 2007. The LIP Policy established standards and procedures for the Committee to review and act upon LIP applications, in fact to guide "friendly" Chapter 40B developments and provide a helpful tool for promoting greater cooperation with private for profit and non-profit developers on affordable housing production. The LIP Policy is intended to achieve the following benefits:

- Compliance with the standards and guidelines will insure that affordable housing proposals are treated fairly and objectively and will minimize the time needed to reach consensus.
- Advances the implementation of this Housing Plan, which relies on private development to support production goals.
- Provides a tool for the Town to work with developers to modify proposals to lessen negative impacts on surrounding neighborhoods.
- Helps resolve issues of density and site design before submission of formal applications in order to facilitate approval of LIP proposals by other municipal boards and departments.

This Housing Plan incorporates production goals that identify development opportunities leading to the production of at least .50% of the year-round housing stock per year of at least 36 units, an ambitious goal that will require the Town to work cooperatively with developers to boost the level of affordable housing. To this end the Housing Trust, working cooperatively with the Planning Board and Zoning Board of Appeal, should consider revising its LIP Policy to better support the development of new units and provide adequate guidance on what projects will be acceptable to the community and less likely to cause prolonged and often litigious battles. This Policy should help both non-profit and for profit housing developers better plan for residential development that will be in line with what the community seeks in affordable housing related to scale, siting, density, levels of affordability, location, design, etc. Through such guidelines the developer “wins” because there is greater predictability in what the Town is willing to approve, and the Town “wins” because it gets new affordable units that meet locally established development criteria that help it meet local needs and production goals.

Next Steps: The Affordable Housing Trust, in coordination with the Planning Board and Zoning Board of Appeal, should review the current LIP Policy, make appropriate revisions, and then share them with the Board of Selectmen, Conservation Commission, Board of Health, and other interested boards and committees for their review and comment. The LIP Policy can then be finalized and made public.

Timeframe: Years 1 to 2

Resources Required: The donated time of local officials and various Town boards and committees and the Grafton Planning Department.

3. Allow Affordable Development on Noncomplying Lots

Current Status: There are parcels of vacant land that at this time cannot be developed because they do not meet the precise dimensional requirements of the Zoning By-law such as minimum lot size as well as front, rear and side yard requirements. It is likely that many of these parcels could in fact be suitably developed as housing. Smaller lots will encourage the construction of smaller homes under appropriate guidelines to provide some housing options that are not currently being created by the private market as starter housing or homes for empty nesters interested in reducing their living space and home maintenance.

Next Steps: The Grafton Affordable Housing Trust might explore what other communities are doing with respect to these undersized lots and work with the Planning Board to prepare a zoning amendment to enable these lots to be developed based on specific criteria. One potential model is to allow such lots to be developed by Special Permit or through a by-law similar to what is included in Dennis’ Affordable Housing By-law, one section that relates specifically to affordable lots.³¹ The Dennis by-law allows the development of lots that do not meet minimum lot size requirements and are not protected as nonconforming lots by law because they are in common ownership with adjoining lots. These lots may be built on if they meet the other following requirements:

- Each lot contains at least 10,000 square feet of land area and satisfies other applicable Board of Health requirements but cannot be located within a Zone II Water Recharge Area.
- Each lot must have safe and adequate access to a public or private way.
- Each lot is similar in size and shape to lots immediately adjacent to and across the street from the lot to be separated.

³¹ Dennis Zoning By-law, Section 4.9.

- Cannot be developed into a structure of more than three-bedrooms with a minimum of 5,000 square feet of land area for each bedroom.
- The applicable setbacks will be determined by establishing an average setback based upon the principal structures on the lots immediately adjacent to and across the street from the lot to be built upon as a separate lot.
- Where two lots are held in common ownership, one of the two must be deed restricted as affordable in perpetuity. Where more than two lots are held in common ownership, the second, third and fifty percent of the remaining lots to be built upon under the Special Permit must be deed restricted as permanently affordable (i.e., the fourth lot may be market rate, fifth affordable, sixth market rate, etc.).
- The by-law states that it will not prevent a lot owner from building a house and then transferring it to an income-eligible family member by gift or inheritance, provided that the restriction is recorded prior to the issuance of the building permit and that the lot owner or immediate family member has owned the lot as of October 18, 2005. It should be noted that state guidelines under the Local Initiative Program forbid the transfer of such property by ownership or rental to family members and still be included in the Subsidized Housing Inventory.

Timetable: Years 3 to 5

Resources Required: The Housing Trust, with staff support from the Planning Department, should coordinate this effort with the Planning Board and other appropriate local officials in determining the feasibility of implementing this strategy in Grafton, drafting the zoning amendment and coordinating the necessary approvals towards implementation.

Projected Number of Affordable Units Produced: 2 units

4. Amend the Flexible Development By-law to Better Promote Affordable Housing

Current Status: Major Residential Development Standards are allowed under Special Permit in all residential districts for Flexible Development "in which the single-family dwelling units are clustered together into one or more groups on the lot and the clusters are separated from each other and adjacent properties by permanently protected open space."³² This provision also offers density bonuses if a proposed development "through the quality of its site selection, programming and design, displays a conscious effort to comply with the purposes of Flexible Development."³³ These density levels include increases over the number of dwelling units that would be allowed on the property based on current subdivision requirements of: "(a) 15% of the total permitted under that section if the proposed development complies with at least six of the Design Guidelines specified in Section 5.3.13; (b) 20% of the total permitted under that section if the proposed development complies with at least nine of the Design Guidelines; and (c) 25% if the proposed development complies with all of the Design Guidelines."³⁴ The Design Guidelines include a provision for affordable housing when at least 10% of the units are created as affordable based on the definition in M.G.L. Chapter 40B, however, the by-law has not effectively produced such units and greater incentives should be offered to facilitate affordable housing development to help meet local needs and production goals.

³² Grafton Zoning By-law, Section 5.3.1.

³³ Grafton Zoning By-law, Section 5.3.5.2.

³⁴ Grafton Zoning By-law, Section 5.3.5.2.

Next Steps: The Grafton Planning Board should explore what other communities are doing with respect to these more flexible zoning provisions and consider making changes that would provide greater incentives for producing affordable housing under this by-law such as greater density bonuses and the flexibility to build other housing types besides single-family homes. For example, a model by-law has been produced by the Metropolitan Area Planning Council, Massachusetts Audubon, and others in the Green Neighborhood Alliance, adopted by a number of Massachusetts's communities. The state's Smart Growth Toolkit under the Executive Office of Energy and Environmental Affairs also has a model available for review.

Timetable: Years 3 to 5

Resources Required: The Housing Trust, with staff time from the Planning Department, should coordinate this effort with the Planning Board and other appropriate local officials in determining how best to revise the zoning by-law and coordinate the necessary approvals.

Projected Number of Affordable Units Produced: 10 units

6. *Adopt Inclusionary Zoning*

Current Status: Inclusionary zoning is not currently included in Grafton's Zoning By-law, but it has been proposed in the past and rejected by Town Meeting. Some claim that the proposed by-law had not been adequately presented to local leaders or community residents at the time and did not offer any density bonuses as appropriate incentives for its use.

The inclusionary zoning mechanism has been adopted by more than one-third of the communities in the state to insure that any new development project over a certain size includes a set-aside in numbers of affordable units or funding to support the creation of affordable housing. This by-law applies to development that meets local zoning requirements, but many communities have wisely determined it appropriate to incorporate density bonuses in their by-laws. Many of the municipalities that have inclusionary zoning in place are reaping the rewards of these actions through the creation of actual affordable units or cash contributions to the locality for investment in affordable housing production. Most of the by-laws include mandated percentages of units that must be affordable, typically 10% to 15% and density bonuses. Many also provide developers with the option of providing cash in lieu of actual units and some also allow development of affordable units off-site.

Next Steps: The Town should consider making appropriate changes in the draft inclusionary by-law that was submitted in the past and resubmit a revised version for Town review and reconsideration. There are a variety of by-laws that have been adopted in localities throughout the state that vary considerably based on requirements, and the Grafton Planning Board, with support from the Housing Trust, should explore these models and prepare a zoning amendment that is best suited to the community. This amendment should be presented at a series of public meetings and then to Town Meeting for adoption.

Timeframe: Years 3 to 5

Resources Required: Time of the Planning Board to prepare the by-law and coordinate the necessary approvals with staff support from the Planning Department. The monitoring of projects to insure continued affordability based on use restrictions would be the responsibility of the project sponsor and coordinated by the proposed Housing Trust with staffing support by the Assistant Planner. All affordable units added through such a by-law would need to be registered with the state to be included

as part of the Town's Subsidized Housing Inventory, applied through the Local Initiative Program (LIP) administered by DHCD (see Appendix 3 for details on the Local Initiative Program, Local Action Units in particular).

Projected Number of Affordable Units Produced: 6 units

B. Housing Development

The affordable housing production strategies can be divided into three (3) general categories of development:

1. Development of Public Property

There are identified Town-owned parcels that might be developed to create new affordable housing including both ownership and rentals.

2. Scattered-site Private Development

This Plan also incorporates smaller-scale infill development of privately owned lots that will have relatively fewer impacts on any single neighborhood as affordable housing creation will be spread geographically throughout town. Additionally, the promotion of affordable accessory apartments (see strategy V.A.2) and the development of buildable but nonconforming lots (see strategy V.A.4) through an amended by-law would also result in new units without significant impacts to the built or natural environment.

3. Larger-scale Private Development

In order to meet production goals, it will be essential for Grafton to continue to work cooperatively with private developers, for profit and non-profit, in the creation of affordable housing. As indicated in strategy VI.A.3. above, the Town has already established a Local Initiative Program (LIP) Policy in an effort to provide guidance on what type of housing proposals are likely to be acceptable to the Town and have negotiated with developers towards insuring that new development will satisfy local needs and priorities. There are opportunities for Grafton to promote mixed-use development in its village centers and near the commuter rail station as well as to encourage adaptive reuse of underutilized nonresidential buildings into residential use. The use of the "friendly" 40B process is also a key component of the Town's housing production strategy.

The following strategies provide the basic components for the Town to meet its housing production goals:

1. Make Town-Owned Land Available for Affordable Housing

Current Status: The contribution or "bargain sale" of land owned by the Town but not essential for municipal purposes is a component of production goals and the Town, through a previous Town-owned Land Committee, has identified a list of potential Town-owned parcels that might potentially be developed as affordable, included in Table VI-1. Final determination of the use of these parcels for affordable housing is subject to a more thorough feasibility analysis of site conditions, the costs of which can be covered by CPA or Housing Trust Funds, and Town Meeting approval. The Town has already approved the conveyance of its property at 11-13 Suzanne Terrace for affordable housing at the August 13, 2012 Planning Board meeting.

In addition to currently owned Town parcels, the Town of Grafton may decide that it will acquire privately owned sites for the purposes of protecting open space and developing some amount of housing, including affordable housing, through clustering any development on a portion of the site in conformance with smart growth principles. Small, scattered sites owned by the Town can also be designated for affordable housing. Moreover, the Town might be able to acquire property through the tax foreclosure process and then obtain Town Meeting approval for conveyance to the Housing Trust.

Next Steps: The Housing Trust should conduct a preliminary feasibility analysis on existing Town-owned parcels, starting with those listed in Table VI-1, or on sites identified at a later time that might potentially include some amount of affordable housing. If this analysis indicates that housing might likely be accommodated on any particular parcel, the Trust should request approval from the Board of Selectmen and Town Meeting to convey them to the Housing Trust for affordable housing development.

Following the necessary approvals, the Housing Trust in coordination with the Town's Chief Procurement Officer, the Town Planner and potentially a housing consultant, should prepare a Request for Proposals (RFP) to solicit interest from developers based on the Town's specific project requirements and select a developer based also on identified criteria included in the RFP. It is likely that the projects will require densities or other regulatory relief beyond what is allowed under the existing Zoning By-law, and the designated developer may be able to obtain this relief through normal channels, if community support is assured, or use the "friendly" comprehensive permit process through DHCD's Local Initiative Program (LIP). Additionally, the Housing Trust will need to be an advocate for the project, helping the selected developer secure necessary financing and political support.

**Table VI-1
Town-owned Properties with Potential for Affordable Housing Development**

	Address	Assessor Map/Lot #	Total Parcel Acres/ Buildable Housing Acres*	Estimated # Housing Units/ Affordable Units**	Comments <i>(Provided by the Town-owned Land Committee with some updated info from the Planning Dept.)</i>
1	13 Suzanne Terr.	37/26	20,648 sq. ft.	2/2	Combine 2 properties; approved at the August 13, 2012 Planning Board meeting.
	11 Suzanne Terr.	37/27	23,739 sq. ft.		
2	14 Sunset Lane	26/85	6,500 sq. ft.	1	Check deed for restriction
3	322 Providence Rd.	124/1	18,530 sq. ft.	2/1	
4	30 Waterville St.	19/96	39,700 sq. ft.	4/2	(Recheck with Town Counsel regarding possible restriction)
5	51 Upton St.	75/1A	40,645 sq. ft.	4/2	Current location of the Town DPW Barn; abutting parcel to the north also owned by the Town but very wet.
6	2 Windle Ave.	11/49	52,272 sq. ft.	6/3	
7	39 Snow Road	37/101	60,000 sq. ft.	6/3	(Possibly combine with old Snow Rd. R.O.W.)
8	22 Greany Dr.	37/115A and 37/118A	60,200 sq. ft. and 81,893 sq. ft.	114/57	(Possibly combine properties)
	7 Institute Rd.	28/100 and 29/16	15 acres and 10.3 acres		
9	25 Worcester Street	65/54	2.3 acres	10/5	
10	71 Barbara Jean St.	97/71	2.4 acres	10/5	Frontage on Fitzpatrick and Barbara Jean; wet but potentially buildable area at the rear of the lot but would require a wetlands crossing.
11	15 Powerline Dr.	98/122	3.5 acres	14/7	(Town Counsel to review)
12	Hudson Ave. and Millbury St.	73/35	4.4 acres	18/9	
13	4 and 6 Upton St.	74/90 and 7/89	0.33 acres and 11.6 acres		Purchased by the Town in July 2011 per authorization of Town Meeting.
14	104 Creeper Hill Rd.	17/8A	15.2 acres		Purchased by Town at May 14 2012 Town Meeting

* The number of acres set-aside for housing is estimated to be approximately half of available acreage and thus a best guess at this time of the buildable area and in recognition of Town concerns for maintaining some amount of open space in most developments, including infrastructure requirements such as possible water and sewer treatment facilities, and in some cases accommodating other uses on site as well.

** Assumes an average of four units per acre with 50% of the units affordable.

Timetable: Years 1 to 2

Resources Required: The Housing Trust, supported by the Planning Department, will work with the Town's Chief Procurement Officer and possibly a consultant to prepare a Request for Proposals, coordinate the developer selection process and monitor development and construction, marketing and tenant/owner selection and occupancy. In addition to costs of coordinating development, resources will most likely be required to help subsidize the development and CPA or Housing Trust funding might be key to supporting some predevelopment costs as well as serving as a gap filler in project financing. It should also be noted that developments of publicly owned property typically involve a substantial land subsidy where the property is conveyed to the designated developer based on a nominal or highly discounted price to make affordable housing financially feasible.

Projected Number of Affordable Units Produced: 4 units

2. Support Private Scattered-Site Housing

Current Status: There are relatively small infill parcels that are geographically spread throughout Grafton that might accommodate limited numbers of new housing units in support of production goals and local needs. The Town, for example, is planning to build a duplex at 11-13 Suzanne Terrace with a selected developer and organizations, such as Habitat for Humanity, continue to look for donated land on which to build. Organizations that support special needs housing are active throughout the area and may have an interest in developing additional group homes in Grafton. There are also excellent models of small "friendly" comprehensive permit projects that have been developed in other communities that have produced affordable units without adverse neighborhood impacts. Also, accessory apartments, while not eligible for inclusion in the Subsidized Housing Inventory, will still help diversify Grafton's housing stock by providing small relatively affordable rental units, and thus should be encouraged (see strategy VI.A.1).

Next Steps: The Town can work with for profit and non-profit developers as well as with abutters of vacant land to develop new infill housing on available vacant sites scattered throughout town. The Town can play a helpful role in supporting developers in applying for subsidies to insure that at least some of the units are affordable and can be included in the Town's Subsidized Housing Inventory; can negotiate "friendly" Chapter 40B projects through DHCD's Local Initiative Program, for example; and can encourage abutters to create affordable housing on vacant adjacent lots. Resources to support such development can be accessed through CPA or Housing Trust Funds as well as a number of state and federal agencies. Moreover, with prescribed changes in the Zoning By-law (see strategy VI.A.1), accessory apartments can be better promoted as well as the development of currently nonconforming lots (see strategy VI.A.3).

Timeframe: Years 1 to 2

Resources Required: The donated time of members of the Housing Trust and staff time from the Planning Department to provide technical support for property owners, developers and service providers in encouraging new unit development on infill lots or through accessory apartments and group homes. Perhaps a certain amount of CPA or Housing Trust funding might be set-aside as an incentive for creating such units.

Projected Number of Affordable Units Produced: 8 plus the 4 units counted under strategy B.1 above.

3. Partner with Private Developers on "Friendly" 40B Projects

Current Status: The Town, previously through the Affordable Housing Committee and now through its Affordable Housing Trust, has been committed to working with developers of Chapter 40B comprehensive permit projects, to help guide new development and negotiate changes that will better reflect local policies (see strategy VI.A.2) and priorities.

Next Steps: The Affordable Housing Trust will continue to be the first point of contact for developers who are interested in pursuing any affordable housing development including "friendly" Chapter 40B comprehensive permit projects. The Housing Trust will provide early input on preliminary project plans and suggest changes, where appropriate, to guide project development. The Housing Trust, with support from the Planning Department and the developer, will also work with the Board of Selectmen's Office to prepare applications to DHCD for participation in the state's Local Initiative Program (LIP),³⁵ the "friendly" 40B Program.

There may also be opportunities to capture additional affordable units through these projects, beyond the 25% level prescribed by Chapter 40B, by committing Trust Fund resources to purchase a couple of market units. It should also be mentioned that this strategy could also be applied to other types of developments involving the inclusion of affordable zoning such as those using the flexible zoning provisions or proposed inclusionary zoning by-law.

This approach was used effectively in Sudbury through their Housing Trust and would involve the following major steps in implementation:

- *Prepare and Issue a Request for Proposals (RFP)*
State Chapter 30B procurement rules are now being interpreted as requiring RFP's for any housing units that a municipality plans to acquire. In this context, the Housing Trust would issue an RFP, providing appropriate notification in local papers and the state's Central Register. The Town would also send the RFP directly to the developers of the 40B projects that have been approved by the ZBA in recent months or are nearing approval. The RFP would include a summary of program goals as well as the maximum subsidy amount available. It would require that the developers, if interested, submit a short proposal that would include the number of units, purchase price, amount of subsidy per unit required, the timeframe for getting to closing, etc. The developers would also have to agree to affirmatively market the additional affordable units as part of their planned marketing efforts.
- *Select Project*
Based on the selection criteria included in the RFP, the Housing Trust would select the most advantageous proposal.
- *Meet with the Developer*
As soon as possible following developer selection, the Housing Trust would invite the selected developer to a meeting to discuss logistics and next steps towards the Trust "buying down" one or more market units in the project, to in effect convert them to affordability and inclusion in the SHI.

³⁵ See Appendix 3 for details on the Local Initiative Program (LIP).

- *Prepare and Submit an LAU Application to DHCD*
The Housing Trust, working with the selected developer, would prepare the Local Action Unit (LAU) application that is part of the state's Local Initiative Program (LIP) and submit it to DHCD for approval. This application would include an updated Affirmative Fair Housing Marketing Plan and Regulatory Agreement.
- *Provide Subsidy to Qualifying Purchasers at Closings*
Following approval of the LAU application and implementation of the Marketing Plan, the Housing Trust would work with the developer and provide the agreed upon subsidy for the unit(s) in time for unit occupancy.
- *Insure Units Are Included in SHI*
The Housing Trust, with staff support from the Planning Department, would coordinate efforts with the developer, or its designated marketing agent, to insure that the additional affordable units are included in the SHI.

Timetable: Years 1 to 2

Resources Required: Donated time of the Housing Trust, staff time from the Planning Department, and Housing Trust funding if any units are included in a buy down strategy that would convert market units in 40B developments to affordable ones.

Projected Number of Affordable Units Produced: 38 units

4. Explore Opportunities for Mixed-Use and Transit-Oriented Development

Current Status: In the context of good town planning and smart growth, the likely location for denser development, certainly for providing housing for smaller households and seniors, is in commercial areas and near transportation nodes. Grafton recently approved a by-law to promote mixed-use development in South Grafton that also allows multi-family development of up to eight (8) units per acre.

There are also opportunities for promoting mixed uses in other areas of town such as near the commuter rail station where residential units would add to the vitality of the area; provide housing for small households in easy walking distance to goods, services and transportation; and reduce the amount of traffic. Because of these reasons and existing financial tools, many communities are promoting mixed-use development and Transit-Oriented Development (TOD) as part of the "smart growth" policies that are increasingly gaining favor in urban, suburban and rural settings. Some of the opportunities for adaptive reuse of existing structures might also be conducive to mixed residential and commercial uses as are prospects for redeveloping some of the underutilized state-owned parcels in the northern section of town.

Next Steps: The Town should encourage the use of its new Village Mixed-Use District, working with developers and local landowners to promote its application through actual new development or the redevelopment of existing properties. The inclusion of affordable housing could be promoted through "friendly" 40B development or other incentives. Areas outside of the new Village Mixed-use District would also benefit from new mixed-use development such as the one adjacent to commuter rail station.

The Town can work with developers to help them secure necessary financing, advocating for approval of state funding sources such as District Improvement Financing, Urban Center Housing Zones, Tax

Increment Financing, and housing subsidy programs to help make new mixed residential and commercial development economically feasible, including the integration of affordable units.

Timetable: Years 3 to 5

Resources Required: Donated time of the Housing Trust and Planning Board as well as staff time of the Planning Department to work with developers and property owners on implementation of new mixed-use zoning, insuring that all requirements are met and the affordability restrictions of the affordable units are enforced.

Projected Number of Affordable Units Produced: 68 units

C. Housing Preservation

Housing production is critical, but the Town also needs to be concerned that it does not lose current as well as future units counted as part of its Subsidized Housing Inventory. Moreover, in addition to building new affordable units, the Town is interested in preserving the most affordable segments of its existing housing stock to the greatest extent possible, converting units to long-term affordability where feasible.

1. Monitor Affordability of Subsidized Housing Inventory (SHI)

Current Status: Most of the units in the existing SHI have deed restrictions in perpetuity (see Table III-21), or the affordability restrictions will be extended in the case of Green Acre Estates, which is being refinanced through the state's Chapter 40T Program.³⁶ Nevertheless, the Town needs to be concerned that affordable homeownership units, when up for resale, are sold to qualifying homebuyers to maintain continued and long-term affordability.

Next Steps: It is important to insure that all affordable housing units that are produced continue to remain a part of the Town's Subsidized Housing Inventory for as long a period as possible. The Housing Trust should closely monitor developments with affordable units, and the Town should work in coordination with the monitoring agent, such as CHAPA, on conducting the necessary outreach to insure that there are sufficient numbers of applicants on a Ready Buyers List to purchase units as they become available for resale.

Timeframe: Years 1 to 2

Resources Required: Donated time of members of the Housing Trust with staff support from the Planning Department.

2. Convert Existing Housing Units to Affordability

Current Status: The Town should not overlook the potential of working with for profit, non-profit and local residents on strategies to convert existing unsubsidized units to state-defined "affordable" units.

³⁶ Chapter 40T, which passed in 2009, has several provisions aimed at giving tenants of affordable housing plenty of notice and resources if their landlord decides to pursue the conversion of the property to market rate after affordability restrictions have expired. One of these provisions gives DHCD the right of first refusal when a building with affordable units comes up for sale. DHCD does not buy the properties outright, but relies on a pre-approved list of affordable housing developers with whom it works to help acquire and manage the property, insuring extended and long-term affordability.



EXHIBIT B

EXHIBIT C

Town of Grafton
 Projects with Affordable Housing Units
 Status Report: June 17, 2016

Project Name	Developer	# Units Approved	Monitoring Agent	Town Contact	Notes
Craftsman Village Grafton, LLC (formerly known as 123 Ferry Street) Ferry Street South Grafton	Weston Development Group, Inc.	24 Units 6 affordable units; 2 or 3 bedrooms 18 market rate units; 2 or 3 bedrooms	Not Determined	Board of Selectmen	Project under new ownership and management. Construction has not begun as of June 2016.
Fisherville Terrace Off Main Street South Grafton	Fisherville Terrace LLC	72 Single Family Houses 18 affordable units; 3 bedrooms, 2 baths 54 market rate units; 3 bedrooms, 2 baths	Not Determined	Board of Selectmen	Comprehensive Permit renewed through the end of 2016.
Flint Pond Estates Off Creeper Hill Road, North Grafton	Springwood Development www.flintpondestates.com	72 Townhouse Units 18 affordable units; 3 bedrooms 54 market rate units - mbed	DHCD / LIP Director Boston, MA	Board of Selectmen	Ongoing lottery for new homes and resale of existing units. Contact the developer directly.
High Point Estates Off Adams Road, Grafton	Adams Road Trust www.highpointestates.info	75 Single Family Houses 19 affordable houses 56 market rate houses	Community Housing, Inc. Lowell, MA	Board of Selectmen	Ongoing lottery for new homes. Contact the developer directly. Resale of affordable units handled privately.
Hilltop Farms Off Milford Road South Grafton	Hilltop Farms, LLC Project complete; individual UDR restricted units by current owners and coordinated by CHAPA	260 Townhouse Condominium Units 68 affordable units • 36 units – 3 bedrooms • 32 units – 2 bedrooms 192 market rate units	CHAPA Boston, MA	Original Deed Riders: Grafton Housing Authority Resale / new UDR: Board of Selectmen	Project is complete and all units are sold. Deed rider requires owners of affordable units to sell with to another affordable buyer. Property owners responsible for own resale often with assistance from CHAPA (Citizen's Housing and Planning Association). See CHAPA website for more information: www.chapa.org

Town of Grafton
 Projects with Affordable Housing Units
 Status Report: June 17, 2016
 Page 3

Project Name	Developer	# Units Approved	Monitoring Agent	Town Contact	Notes
Peters Estates Peters Way off 69 Pleasant Street Grafton	Etre Builders, Inc. Project complete; sale Individual UDR restricted units by current owners and coordinated by DHCD	10 Single Family Houses 1 Duplex Townhouse 2 affordable units; 2 BR 9 market rate houses; 4 BR	Director, LIP Program DHCD	Planning Board	Units negotiated as part of a Special Permit approval (SP2006-3) Both units sold in late 2009; one sold to a local preference buyer.
Providence Road Commons 195 Providence Road, Grafton	Providence Road Commons, LLC Richard (Rick) Lukasevicz (508) 839-7766	36 Condominium Units 9 affordable units; 3 BR 27 market rate units; 3 BR	No agreement executed to date	No agreement executed to date	Comprehensive Permit issued. Project under construction. Developer having difficult time finding affordable buyers.

Town of Grafton
Projects with Affordable Housing Units
 Status Report: June 17, 2016
 Page 3

The following is a list of properties owned and managed by the Grafton Housing Authority. For more information please contact:

Grafton Housing Authority
 Barbara Marsden, Executive Director
 P.O. Box 91, 10 Maxwell Drive
 North Grafton, MA 01536
 (508) 839-6089 graftonha@verizon.net

Name	Address / Location	Number of Affordable Units
Forest Lane Apartments	Off Worcester Street, North Grafton	108
Maxwell Court	Corner of Snow Road and Worcester Street North Grafton	40
McHale Drive	Off Providence Road, Grafton	6
Veteran's Circle	Off Messier Street, South Grafton	16

Private Developments with Affordable Units

Name / Contact Information	Address / Location	Number of Affordable Units
Green Acres Grafton Housing Associates 13 Zgonis Drive South Grafton, MA 01560 (508) 839-5605	Zgonis Drive Off Main Street, South Grafton	108

