



## TOWN OF ROCKLAND

Town Hall  
242 Union Street  
Rockland, Massachusetts 02370

February 19, 2020

Department of Housing & Community Development  
100 Cambridge Street, Suite 300  
Boston, MA 02114  
Attn: Kate Racer, Associate Director, Division of Housing Development

Re: Local Preference for Lydia Square Apartments – Phase I  
80 Norman Street, Rockland

Dear Ms. Racer:

Please accept the Town of Rockland's request to implement a local selection preference at Lydia Square Apartments – Phase I development. Specifically, the Town is requesting the maximum allowable, seventy percent (70%) local preference. This request is based on the need for access to affordable rental housing for local seniors, senior employees of the municipality and businesses located in the Rockland, and senior Veterans.

The Town's request is supported by its Housing Production Plan (RHPP), dated October 2016, relying both upon its general findings and, more specifically, the *Affordable Housing Goals and Strategies* outlined in the plan. A copy of the RHPP is attached herewith. The Town's demographics, specifically its increasing senior population coupled with its income statistics are clear indicators that a concerted effort to increase affordable housing opportunities for local seniors and Veterans must be a Town priority. Considering Rockland's aging population, appropriate rental stock will need to be available to meet the projected housing demand. The following data and projections are clear indicators of the need for a 70% local preference:

- Rockland households aged 60 years and older increased to 32% in 2010 and is expected to grow to 45% of the town's total households in 2030 (RHPP, Page 14 and Figure 4).

- Moreover, more than two-thirds (67.3%) of Rockland's elderly households (62+) are categorized as low income (see RHPP, Figure 32). Among these low-income elderly households, an alarming 81% are categorized as either very low income or extremely low income (see RHPP, Figure 32).

Demonstrating the lack of affordable housing in Rockland is the percentage of cost burdened households:

- An estimated 40% of all Rockland households experience cost-burden (Rockland has the second-highest rate of cost burden in the South Shore Coalition).

When looked at collectively, the projected number of senior households in Rockland over the next ten years, together with the existing levels of poverty and associated cost burden, a trifecta of barriers is realized, further supporting the importance of approving a 70% local preference at the Lydia Square Apartments to assist in meeting the affordable housing needs for Rockland seniors.

Rockland also realizes a demonstrated need for affordable senior Veteran housing.

- According to American Community Survey data for 2013-2017, military veterans make up 6.5% of Rockland's total population.
- Additionally, as noted in the attached letter from the Rockland Housing Authority, there are currently ninety-one (91) Rockland Veteran's on the waitlist.

Guided by the overall findings, the RHPP outlines specific goals and strategies which further support Rockland's request for a 70% local preference in the Lydia Square resident selection.

**Goal 1: Create opportunities to develop a more diverse housing stock to meet the needs of a changing demographic profile in the town (RHPP, pp. 58-63).**

*Strategies:*

- *Provide seniors and persons with disabilities with greater housing options in Rockland.*
  - *The housing needs and demand assessment identified a significant number of senior households in need of potential housing assistance due to cost burdens and related issues with maintaining their homes. There is an extensive waiting list for senior housing and there are only 84 units of senior housing available.*

- *Support aging in place/community initiatives.*
  - *Build and maintain working partnerships with human and health care services providers to better integrate linkages with older-adult housing developments as they are constructed.*

**Goal 2: Encourage affordable housing development to achieve exceed and maintain the Chapter 40B 10% goal.**

- *As of January 2016, Rockland's SHI rate is 6.34% (446 total units)*

**Goal 5: Identify sites that are most appropriate to accommodate Rockland's projected growth in housing:**

- *Redevelopment of land on Albion Court*

The Town of Rockland recognizes the importance of ensuring that the local selection preferences must not disproportionately delay or otherwise deny admission of non-local residents that are protected under state and federal civil rights laws. The Town encourages the project's developers to ensure that the Affirmative Fair Housing Marketing Plan (AFHMP) includes measures to prevent a disparate impact or discriminatory effect on its resident selection in consideration of Rockland's local preference.

In sum, Rockland continues to actively work on increasing its affordable housing stock in order to meet the needs of its residents by supporting proposals which, for all intents and purposes, move the town closer to achieving the adopted goals outlined in the RHPP. Approval by DHCD for a 70% local preference in the Lydia Square Apartments development project will support the municipalities' efforts to ensure housing choices for its residents. Accordingly, the Town of Rockland requests DHCD 's approval for a 70% local preference in support of the Town's affordable housing efforts.

Please do not hesitate to contact me with any questions or should you require additional information.

Sincerely,



Jennifer Constable

Assistant Town Administrator

cc (via email): Brian J. McMillin, President, NewGate Housing LLC

