2023

Regional Housing Needs Assessment



Nashua Regional Planning Commission

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NRPC would also like to acknowledge the assistance of our RHNA Sounding Board. Members included:

Thomas Monahan, Owner The Monahan Companies

Matt Sullivan, Community Development Director City of Nashua

Michele Decoteau, Town Planner Town of Brookline

Michael Reinke, Executive Director Nashua Soup Kitchen & Shelter

Danielle Masse, Planning Board Town of Pelham

Bob Mack, Welfare Director City of Nashua

Reginald Moreau, Owner DAR Builders

Scott Slattery CED Field Specialist/County Office Administrator Hillsborough County Office, University of New Hampshire

Jennifer Vadney, Neighborhood Development Director Neighborworks Southern New Hampshire

Jayson Hennessey, NRPC Commissioner
Town of Amherst

Brian Groth, Town Planner Town of Hudson

Cooperative Extension

Julian Long, Urban Programs Manager City of Nashua

Dave Hennessy, NRPC Commissioner Town of Pelham

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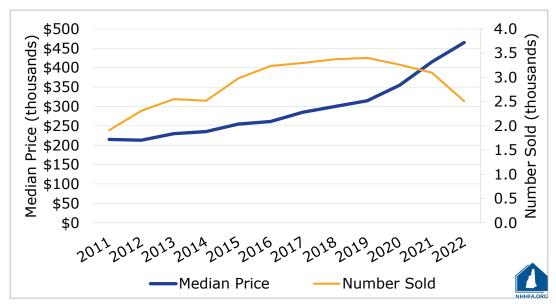
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I. FORWARD

The demand for housing in the Nashua Regional Planning Commission (NRPC) area has far outstripped supply over the past several years resulting in significant increases in housing costs for both owners and renters. Indeed, the lack of available housing, especially rental units, is challenging the ability of many people to find housing at all. According to the New Hampshire Housing Finance Authority (NHHFA), the vacancy rate for all rental units in the Nashua area dropped from an already low 2.8% in 2011 (5% is considered to be a healthy vacancy rate) to 0.3% in 2022. The vacancy rate for studio apartments and for 3- and 4-bedroom units is effectively 0%.

The home-buying market is also suffering from an extremely low inventory of homes available for sale. The Multiple Listing Service (MLS) Housing Inventory indicates the average number of months to absorb current properties listed for sale dropped from over nine months in 2011 to less than one month by 2023. Generally, a six-month supply is considered to be a healthy market. The relationship between the number of homes available on the market and home prices is clearly illustrated in the graph below.

Home Sales in the Nashua Region from 2011 to 2022

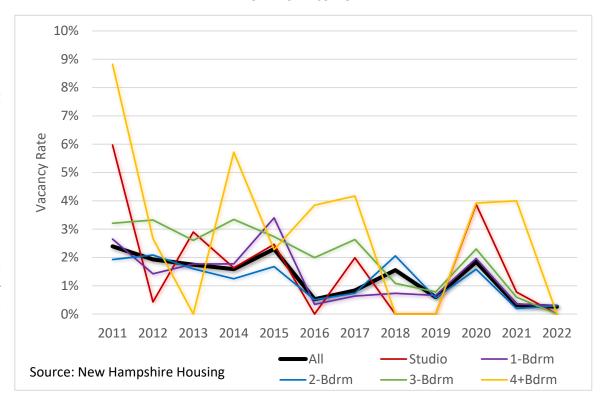


Sources: MLS Residential Property Sales data collected by New Hampshire Housing

Given the lack of overall inventory, it is not surprising that housing costs have escalated sharply in recent years. The median purchase price for owner-occupied homes in the region increased from \$216,000 in 2012 to \$435,000 in 2022, an increase of 101%. That said, 48% of all homes on the market and almost 80% of condominiums are considered to be affordable to home-ownership households earning 100% of the median income. With the sales price of new homes approaching \$500,000, however, only 10% of them are affordable median-income to home ownership households. Increasing the supply of affordable homes for sale, therefore, will be challenging.

On the rental side, the combined impacts of soaring prices and low inventory are much more significant. Between 2013 and 2022, median monthly rents for all unit types in the region increased from \$1,169 to \$1,904 with two-bedroom units averaging \$1,980. The cost of a one-bedroom unit, however, rose at a much sharper rate. Rents for one-bedroom units now average \$1,863 per month and the average cost for a studio unit is \$1,525. Based on the most recent available estimates, only 35.2% of all units and 15.6% of two-bedroom are at or below the affordability threshold of \$1,650 per month. As a result of the lack of affordable units. 48.1% of all renter households in the region are now considered to be "cost-burdened" meaning that they spend 30% or more of their income on housing.

Nashua Regional Rental Vacancy Rates by Number of Bedrooms from 2011 to 2022



For the housing market to return to a healthy balance, a significant increase in the availability of housing units of all types will be required. Fortunately, there are a number of alternatives for new housing development, including multi-family housing, which can be developed in ways that meet demand while protecting the character of our communities and the quality of life for our residents. This Regional Housing Needs Assessment provides a comprehensive overview of housing- and demographic-related data and analyses, a review of the needs of certain subpopulations such as people and families experiencing homelessness, as well as housing development targets for each community in the Nashua Region. The plan culminates with a series of alternative housing strategies for meeting the region's diversity of housing needs.

II. INTRODUCTION

A. Overview of the Regional Housing Need Assessment (RHNA)

Shelter is one of the most basic human needs. Having a place to call home that is safe, decent, and affordable is one of the highest priorities of most if not all people. At the community and regional level, an adequate supply of a diversity of housing types and sizes is critical to ensuring that current residents and future generations can remain in their communities as their needs change due to age, marital status, family size, physical ability, and other life changes. Economically, it is also important that a region maintain a housing supply suitable to attract the workforce necessary to support the region's economy and to provide essential services to its communities.



In recognition of the importance of housing to all communities, NH RSA 672 III-e states that:

"All citizens of the state benefit from a balanced supply of housing which is affordable to persons and families of low and moderate income.

Establishment of housing, which is decent, safe, sanitary, and affordable to low- and moderate-income persons and families is in the best interests of each community and the state of New Hampshire and serves a vital public need. Opportunity for development of such housing shall not be prohibited or unreasonably discouraged by use of municipal planning and zoning powers or by unreasonable interpretation of such powers"

Preparing a Regional Housing Needs Assessment is one of NRPC's most important responsibilities and one of the few statutorily required duties of a regional planning commission. New Hampshire RSA 36:47, II states that:

"...each regional planning commission shall compile a regional housing needs assessment, which shall include an assessment of the regional need for housing for persons and families of all levels of income. The regional housing needs assessment shall be updated every 5 years and made available to all municipalities in the planning region."

Most NRPC communities also recognize the importance of housing and include a housing section in their master plans. The Regional Housing Needs Assessment, therefore, is also meant to aid member communities in complying with RSA 674:2, III (I), which states that a town's master plan may include:

"A housing section which assesses local housing conditions and projects future housing needs of residents of all levels of income and ages in the municipality and the region as identified in the regional housing needs assessment performed by the regional planning commission pursuant to RSA 36:47, II, and which integrates the availability of human services with other planning undertaken by the community."

In addition to the statutes stated above, and in accordance with RSA 674:59, I, the State also require that:

"In every municipality that exercises the power to adopt land use ordinances and regulations, such ordinances and regulations shall provide reasonable and realistic opportunities for the development of workforce housing, including rental multi-family housing."

NRPC, along with eight other regional planning commissions within the state, the New Hampshire Housing Finance Authority, and the New Hampshire Office of Planning and Development coordinated their activities beginning in late 2021 and throughout 2022, to produce a state-wide housing needs assessment, as well as individual housing needs assessments for each region.

In addition to evaluating current conditions and projecting future needs, the purpose of this document is to provide actionable, realistic solutions for municipalities, businesses, developers, housing-focused entities, and other stakeholders on ways they can help meet the projected needs of their communities. As an enhancement to this year's update and based on recommendations from the New Hampshire Council for Housing Stability's 2021-2024 Strategic Plan, all RPCs will provide strategies for meeting the housing needs of specific sub-populations and communities of interest when conducting their Regional Housing Needs Assessments.

This RHNA has been undertaken in partnership with the New Hampshire Office of Planning and Development and was funded by the American Rescue Plan Act (ARPA) State and Local Fiscal Recovery Fund Grant. It is a requirement of the ARPA funds received by the State of NH to include Fair Housing and Equity Assessment (FHEA) elements in the RHNA. This comprehensive addition will help communities better understand what the existing barriers to housing access are, how barriers are disparately impacting diverse groups across the region, and what they can do to address such disparities.



Over 85% of residents surveyed in the region would prefer to live in a detached single-family home. The example pictured above is typical of newer homes built in the region in recent years.

"I would like to see the future of housing become more creative. We have a tendency to stick to the norm. Why not initiate something that is out of the town's comfort zone and try something different. Let's look at what research shows us to have a high level of success and emulate that information."

Comment from the general RHNA survey.

B. Description of the region

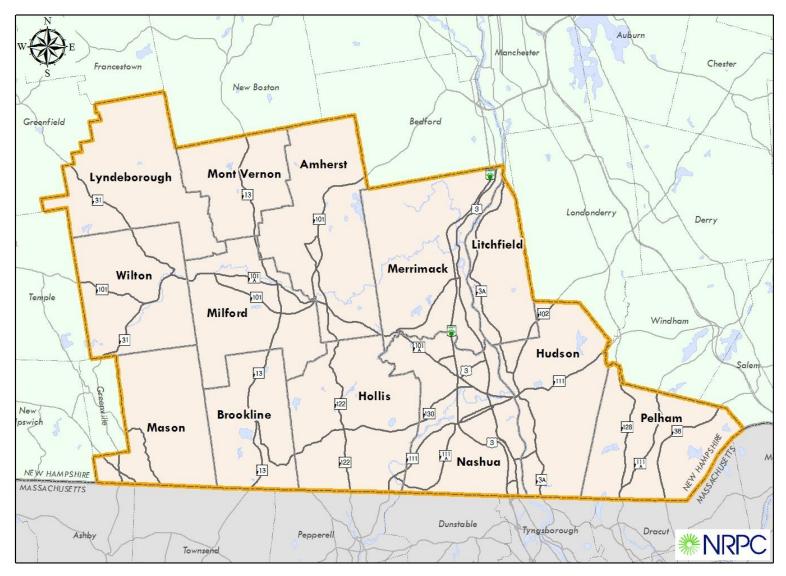
There are thirteen communities in the Nashua Regional Planning Commission (NRPC) region: Amherst, Brookline, Hollis, Hudson, Litchfield, Lyndeborough, Mason, Merrimack, Milford, Mont Vernon, Nashua, Pelham, and Wilton - all of which are in Hillsborough County. The NRPC Region is made up of a diverse landscape comprised of urban, suburban, and rural communities. Our more urban communities are centered around vibrant downtowns, often featuring historic mill buildings, legacies of New England's industrial history. The City of Nashua, with over 90,000 residents, is the second largest city in New Hampshire and is the business and commercial hub of the region. Our more rural communities feature charming traditional New England town centers together with extensive wetlands, woodlands, and active farmland.



View of Brookline Center - one of the region's rural-residential communities. Photograph by Seth Dewey Photography

Generally, low-density residential development has characterized growth in the region's outlying communities, while higher-density development has occurred in the City of Nashua, along the F.E. Everett Turnpike/DW Highway corridor in Merrimack, in west-central Hudson and in the center of Milford. Located only 40 miles north of Boston, the region's proximity to the Boston MSA has been the driving factor in stimulating the region's growth since the mid-20th century and has had a direct impact on the region's housing market. Other attributes that make the Nashua Region an attractive location include its proximity to the mountains, lakes, beaches, and other recreational and cultural attractions that New Hampshire offers.

Map 1. The NRPC Region



C. RHNA Components, Sections, and Methodology

This housing needs assessment provides data on current and future housing needs. The information provided is intended to inform the public of the region's housing conditions and the data included is intended to be used by municipalities in planning for a development of balanced housing stock. This assessment includes the analysis of historical trends and existing conditions and makes projections of future conditions as well as inventories of housing needs. The assessment also includes the identification of tools and techniques which communities can use to further balance housing based on proven successful housing solutions identified within New England and across the nation. The assessment activities also included extensive outreach to residents in every community within the region. This outreach was conducted through surveys, focus groups, a public project website, and direct communications through email, targeted social media, and public press releases. The RHNA contains seven broad sections as outlined below:

- 1.) <u>existing demographic conditions</u> including population and household trends, public school enrollment, employment, commuter patterns and communities of interest;
- 2.) <u>existing housing unit trends and characteristics</u> including housing supply, building permit activity, occupancy, tenure and vacancy rates, age of housing stock, and assisted housing;
- 3.) <u>housing market, costs and affordability</u> including household income, home values, rental costs, market trends, and cost-burdened households;
- 4.) Fair Housing;
- 5.) <u>housing supply targets</u> for both population and housing units, regional fair share of workforce housing, and housing preferences;
- 6.) strategies for meeting local housing needs including Accessory Dwelling Units and "Missing Middle" housing, and
- 7.) <u>resources for meeting local needs</u> including alternative housing and regulatory options, local tools and resources, and state and federal programs.

The data used in this report comes primarily from the 2010 and 2020 US Census and the American Community Survey (ACS). However, it should be noted that ACS data tends to have larger margins of error. In some cases, it has been noted within the document's text that ACS data should be more carefully considered. In addition to Census and ACS data, this assessment also utilizes information from the New Hampshire Housing and Finance Authority (NHHFA). In many cases, NHHFA is collecting their data directly from community departments and representatives, research agencies, internal and external housing experts, and community members. Public input was obtained through a comprehensive resident survey, an employer survey, focus groups with residents and individual interviews with various social services providers.

III. ANALYSIS OF HISTORICAL/EXISTING CONDITIONS AND TRENDS



An understanding of the current housing supply, types of housing, availability, affordability, population projections, shifting demographics and migration patterns, can be used to better predict future housing needs for both the region and individual member communities. Further, this information can be utilized to help establish and carry out policies that address and seek to improve the quality of life within the region.

There are certain factors that have an enormous impact on the supply and demand of housing in an area. The supply and cost of housing are influenced by the availability of necessary infrastructure, such as public water and sewer, and access to transportation routes. Employment opportunities and income levels also impact demand for housing and people's ability to afford adequate housing.

New market-rate apartments under construction in downtown Nashua

In addition, NHHFA has cited the 5L's which impede adequate housing development: land, labor, lumber, laws, and loans (NHHFA, 2019). As a result, NHHFA suggests that the state, its regions, and municipalities must critically consider areas where housing development is possible (land), what the current conditions are for workforce availability (labor), what are the development costs (lumber), what are the regulatory practices that discourage or slow housing development (laws), and what type of financing is available to developers and borrowers (loans). These factors have shaped and influenced the state of housing within the Nashua Region and will seemingly continue. The region's housing conditions are defined by demographic and economic trends. Housing need is influenced by population growth, housing stock, and the earning potential of the population.

The RHNA uses Census data to determine the degree to which population, income, and housing stocks have changed over time up to now. Within population data is a breakdown of cohorts into age, gender, race, as well as other more specific groups. Income data is also used to define what proportion of household budgets are being used on housing and if households of specific income levels are being concentrated in ways that could result in low-income populations being underserved. The assessment also uses this data to define "communities of interest." To put it another way – population groups that are vulnerable to unfair treatment relative to housing.

The assessment identifies the region's housing inventory and characteristics. Housing stock characteristics such as number of total units, quantity of units by building type, units built in any given year, unit age, size, number of bedrooms, unit locations, if the housing is owned or rented, sale price, and rents are collected from the past and the current timeframe to establish trends in housing. The availability and affordability of housing within the region are calculated based on factors such as vacancy rates, prices, and the proportion of income households are spending on available housing. Data allows trendlines for housing affordability to be determined along specific household incomes and among communities of interest.



Historic Home in Hudson's Town Residence District

A. Demographic & Socioeconomic Trends

1. Total Population

The 2020 Census recorded 217,543 residents in the Nashua Region. Between 2010 and 2020, the Nashua Region's population growth rate was 5.7%, an increase of 11,778 residents. This is higher than both the county's population growth rate of 5.5% and the statewide population growth rate of 4.6%. Though all communities in the Nashua Region grew between 2010 and 2020, growth rates varied considerably between communities. Brookline had the highest growth rate at 13%, well over double the regional rate of growth, followed by Pelham at 10.3% and Hollis at 8.6%. Lyndeborough (1.1%), Litchfield (2.5%), and Hudson (3.8%) had the lowest percentage growth rates.

Nashua, the region's largest community and the state's 2nd largest city, experienced the greatest numerical population gain adding 4,828 net residents, far exceeding all other communities, and reaching an all-time population high of over 91,000. Pelham, Merrimack, and Milford each added more than 1,000 residents. On the opposite end, the more rural communities of Mont Vernon, Mason, and Lyndeborough added the fewest residents, totaling only 260 across all three towns.

Figure 1. Population Changes between 2010 and 2020, by Municipality

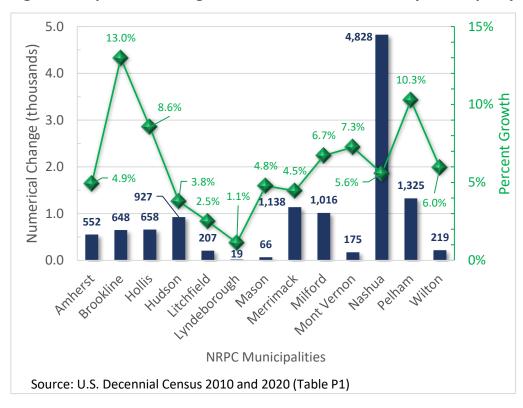


Table 1. Population Changes between 2010 and 2020, by Municipality

Municipality	2010	2020	Numeric Change	Percent Change
Amherst	11,201	11,753	552	4.9%
Brookline	4,991	5,639	648	13.0%
Hollis	7,684	8,342	658	8.6%
Hudson	24,467	25,394	927	3.8%
Litchfield	8,271	8,478	207	2.5%
Lyndeborough	1,683	1,702	19	1.1%
Mason	1,382	1,448	66	4.8%
Merrimack	25,494	26,632	1,138	4.5%
Milford	15,115	16,131	1,016	6.7%
Mont Vernon	2,409	2,584	175	7.3%
Nashua	86,494	91,322	4,828	5.6%
Pelham	12,897	14,222	1,325	10.3%
Wilton	3,677	3,896	219	6.0%
NRPC Total	205,765	217,543	11,778	5.7%
Hillsborough County	400,721	422,937	22,216	5.5%
New Hampshire	1,316,470	1,377,529	61,059	4.6%

Source: U.S. Decennial Census 2010 and 2020 (Table P1)

2. Net Migration

Migration accounted for just over half (50.5%) of the Nashua Region's overall population increase of 11,778 between 2010 and 2020 for a total of 5,971 people. Migration played a particularly significant role in faster-growing towns and in communities with relatively older populations. In fast-growing towns like Brookline and Pelham, migration accounted for 64.7% and 74.9% of the total population increase, respectively. In Mont Vernon, migration accounted for 84% of total growth and in Hollis, 106% of the town's total population increase was due to migration since there were 42 more deaths than births over the period. In some slowergrowth communities such as Litchfield and Lyndeborough, there was a net out-migration of residents. Statewide, migration accounted for 89% of total population growth, meaning that natural increase was a much more significant contributor to the region's growth. As the population ages and birth rates fall, it is expected that migration will play an increasingly significant role in population growth.

Table 2. Net Migration between 2010 and 2020, by Municipality

NRPC Municipalities	2010 Total Population	2020 Total Population	Change in Population (2010-2020)	Total Net Migration
Amherst	11,201	11,753	552	268
Brookline	4,991	5,639	648	413
Hollis	7,684	8,342	658	700
Hudson	24,467	25,394	927	321
Litchfield	8,271	8,478	207	-19
Lyndeborough	1,683	1,702	19	-32
Mason	1,382	1,448	66	17
Merrimack	25,494	26,632	1,138	242
Milford	15,115	16,131	1,016	845
Mont Vernon	2,409	2,584	175	147
Nashua	86,494	91,322	4,828	1,972
Pelham	12,897	14,222	1,325	993
Wilton	3,677	3,896	219	104
NRPC Total	205,765	217,543	11,778	5,971

Data Source: US Decennial Census (2010-2020); NH Department of State (Vital Statistics)

3. Population Projections

The New Hampshire Office of Planning and Development projects that the population of the Nashua Region will increase by 16,087 (7.39%) to a total of 233,603 by 2030. This increase would be at a rate considerably higher than that of the prior decade and would be attributable almost entirely to migration. By 2040, the region's population is projected to increase at a lesser rate (3.6%) to 241,922 residents. This decline in growth rates is anticipated due to declining rates of natural increase as the region's population continues to

age. It should be noted, however, that while the overall increases projected for the region may be reasonable for planning purposes in the short-term, there are many factors that could impact migration that are difficult to project at this point, including the potential impacts of hybrid and remote work and climate-related migration. It should also be noted that projections for individual communities bear little relation to historic growth rates. Population projections for the region and each NRPC community are provided in Table 3 on the following page.



Families enjoying the playground at Benson Park in Hudson

Table 3. Population Projection to 2050, by Municipality

	2020	Population Projection			Population Change	
Municipality	Census	2030	2040	2050	2020-2030	2020-2050
Amherst	11,753	12,625	13,043	13,075	7.42%	11.25%
Brookline	5,639	6,017	6,198	6,212	6.71%	10.16%
Hollis	8,342	8,940	9,227	9,249	7.17%	10.87%
Hudson	25,394	27,313	28,232	28,302	7.56%	11.45%
Litchfield	8,478	9,119	9,426	9,449	7.56%	11.45%
Lyndeborough	1,702	1,831	1,892	1,897	7.56%	11.45%
Mason	1,448	1,557	1,610	1,614	7.56%	11.45%
Merrimack	26,632	28,581	29,514	29,585	7.32%	11.09%
Milford	16,131	17,286	17,840	17,881	7.16%	10.85%
Mont Vernon	2,584	2,779	2,873	2,880	7.56%	11.45%
Nashua	91,322	98,159	101,435	101,683	7.49%	11.35%
Pelham	14,222	15,233	15,717	15,754	7.11%	10.77%
Wilton	3,896	4,190	4,331	4,342	7.56%	11.45%
NRPC Total	217,543	233,630	241,339	241,922	7.39%	11.21%

Source: NH Office of Planning and Development (State, County, and Municipal Population Projections: 2020-2050)

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4. Population by Age

As discussed briefly above, the composition of the population by age group has important implications for overall population growth. Perhaps more importantly, it also has important implications for the region's housing needs since age is closely related to household size and type and, therefore, demand. Particularly, older people are more likely to need housing that accommodates constrained physical ability and other age-related needs.



Figure 2. Regional Population Change by Age between 2010 and 2020

Source: American Community Survey 5-Year Estimates 2006-2010 and 2016-2020 (Table S0101)

As can be seen in the graph above, there were significant changes in the population age composition between 2010 and 2020. The two oldest age groups - "55-64 Years" and "65+ Years" both grew significantly, by 53.1% and 33.8%, respectively, for an increase of 20,101 persons. Early career age groups - "20-24 years" and "25-34 years", grew moderately by 12.1% and 15.4%, respectively, totaling 4,961 persons. On the other end, the youngest age group "0-19 Years" decreased by -11.0%, a net decline of 6,137 people. Similarly, the midto-late career age groups "35-44 Years" and "45-54 Years" shrunk by 18.8% and 11.3%, respectively, a decrease of a total of 10,108 persons. Clearly, the number of families with children is declining, which may reflect both declining birth rates as well as a lack of affordable housing options for younger families. The aging of the population may also suggest a growing need for age-appropriate housing alternatives.



People aged 55 to 64 and 65+ are the fastest-growing age groups in the region

5. Population by Race

Within the context of housing, race and ethnicity are evaluated primarily as a factor in assessing segregation or fair housing-related issues, since it is assumed that housing choices and needs do not tend to vary by race or ethnicity. That said, there is a correlation between race, ethnicity, and income, which does have implications for housing affordability and accessibility. As can be seen in Figure 3 on the next page, the non-Hispanic white population makes up a large majority of the region's population at 81.0% followed by "Hispanic or Latino of any race" at 8%.

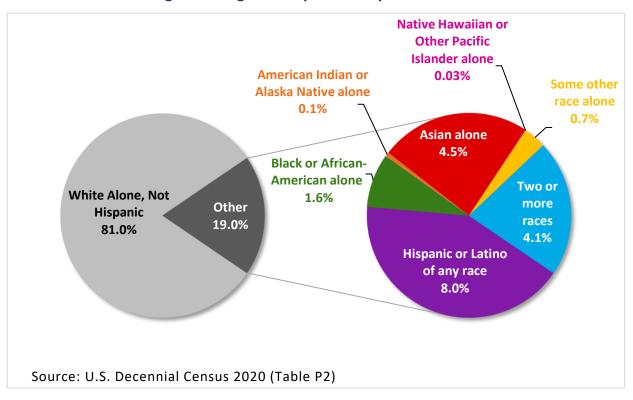
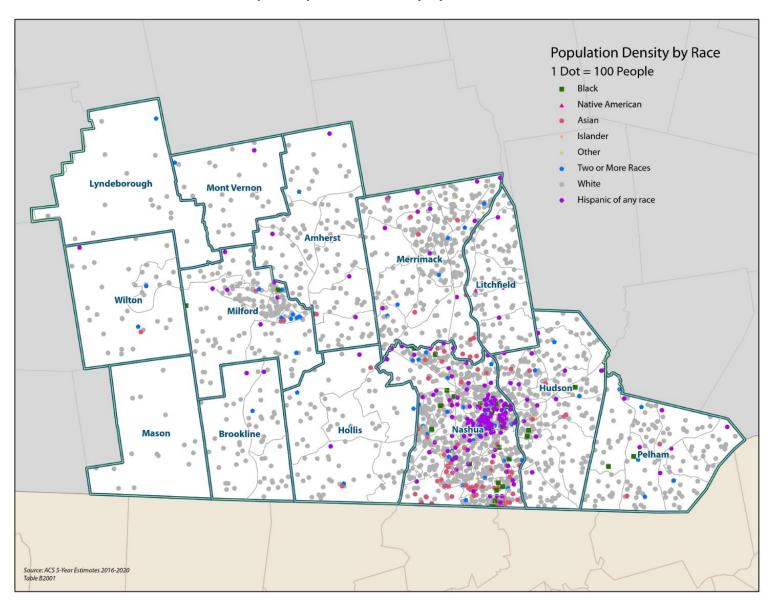


Figure 3. Regional Population by Race in 2020

The distribution of the region's non-Hispanic white population generally conforms to the overall population density across NRPC municipalities. As can be seen on Map 2 on the following page, however, minority populations are far more likely to be concentrated in certain areas. These concentrations include a notable cluster of Hispanic/Latino people in and around downtown Nashua and a concentration of Asian (mostly South Asian) people in south Nashua and in the western part of Hudson. In addition, there are small clusters of Asian populations across the Town of Merrimack.

Map 2. Population Density by Race in 2020



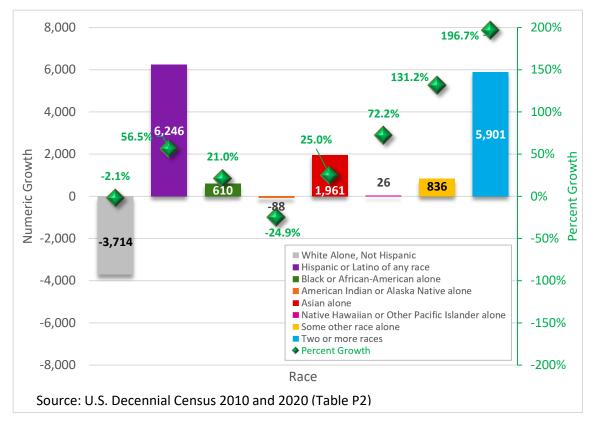


Figure 4. Regional Population Change by Race between 2010 and 2020

Among the NRPC municipalities, Nashua is by far the most diverse community in the Region, with a 29.7% share of races other than non-Hispanic white. Seven other towns have about 11-12% share of races other than non-Hispanic white, and the remaining five towns have about 9-10%.

As can be seen in Figure 4, while non-Hispanic whites still make up a significant majority of the regional population, the region is diversifying, most notably with an increase in the Hispanic population and people who identified as two or more races. Between 2010 and 2020, the population of "Hispanic or Latino of any race" and people identified with "Two or more races" grew the most.

The populations of "Asian alone" and of "Black or African-American alone" grew moderately while the populations of "White alone, not Hispanic" and of "American Indian or Alaska Native" declined. Despite the small numerical increases in the "Hawaiian or Other Pacific Islander alone" population and people identified with "Some other race alone," their percent growth is significant due to the small population sizes in 2010.

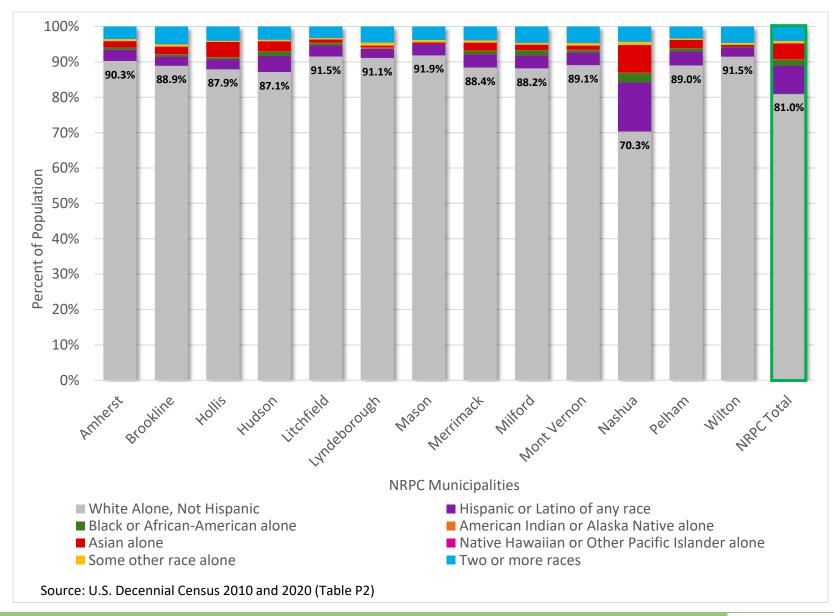


Figure 5. Population by Race in 2020, by Municipalities

6. Households

"Household" is a term used to describe people who occupy a single housing unit. Understanding the characteristics of a community's household composition and how household composition is changing has important implications for housing needs and preferences. The US Census Bureau splits household composition into two primary categories: family households and non-family households. Family households consist of married couples or single householders living with other family members. Non-family households consist of those living alone or those living with unrelated people.

Householder living alone 25.2% Female householder, no partner, not 8.6% alone Male householder, no partner, not 4.1% alone Cohabitating couple 7.7% Married couple 54.5% 20% 40% 0% 60% Percent of Households Source: American Community Survey 5-Year Estimates 2016-2020 (Table DP02)

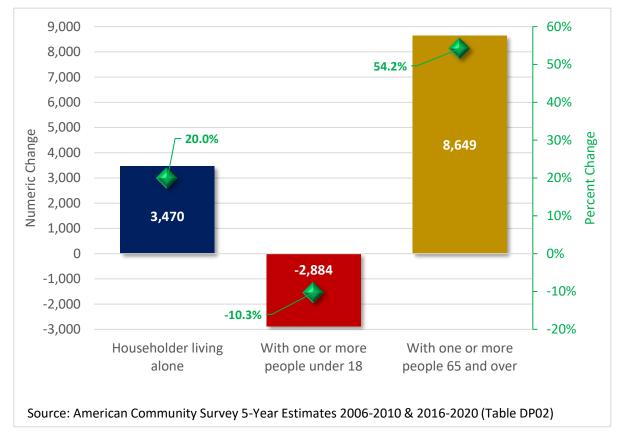
Figure 6. Regional Households by Composition in 2020

As can be seen in Figure 6, most households in the region are married couples, at 54.5%. Cohabitating (unmarried) couples make up 7.7% and householders living alone make up 25.2%. A total of 13.0% are single householders without a partner but not alone (e.g., single householders with one or more children, single householders with one or more parents) – of which 8.6% are female householders and 4.1% are male householders.

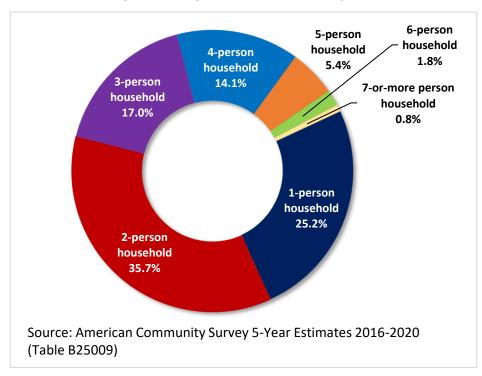
"Household with one or more people 65 and over" in the region bv 54.2% increased (8,649 households), while "Householder living alone" increased by 20.0% (3,470 households). On the other end, "Household with one or more people under 18" decreased by 10.3% (-2,884 households). These trends reflect an aging population and lower birth rates, and also lead to smaller households. In response, the region will need more housing suitable for senior citizens including handicapped-accessible housing as well as additional smaller units to accommodate the growing number of people living alone.

It is important to note, however, that people in smaller households do not necessarily desire smaller homes and older people do not necessarily seek to live in senior housing.

Figure 7. Regional Households Change by Selected Criteria between 2010 and 2020







More than 50% of the households in the Nashua Region are 1-person households (25.2%) and 2-person households (35.7%). 17.0% are 3-person households, 14.1% are 4-person households, and the remaining 8.0% are households with 5 or more people. The regional average household size is 2.57. Among NRPC municipalities, Brookline has the largest average household size at 3.10, followed by Pelham at 2.94. Notably, Brookline and Pelham are also the fastestgrowing NRPC communities. Wilton has the smallest average household size at 2.29. Communities with a higher percentage of single-family homes tend to attract more families with children. Perceptions of school district quality are also a factor. Areas with larger concentrations of multi-family housing such as parts of Nashua and Milford tend to have smaller household sizes. Areas with high concentrations of older homes and/or senior housing tend to have more older residents who typically live in one- or two-person households. These patterns can be seen in Map 3.

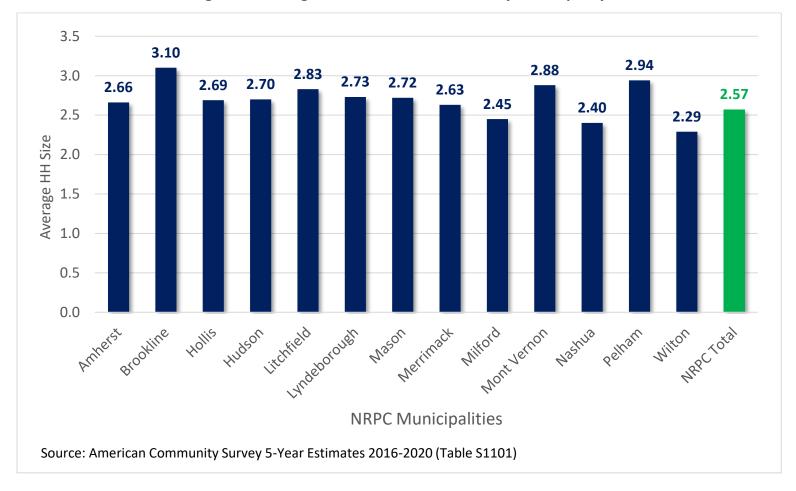
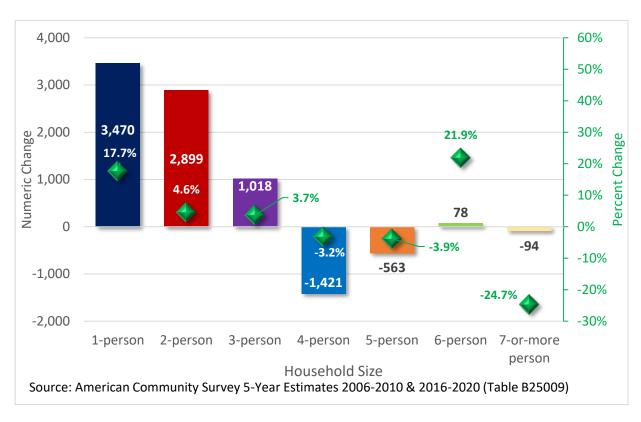


Figure 9. Average Household Size in 2020, by Municipality





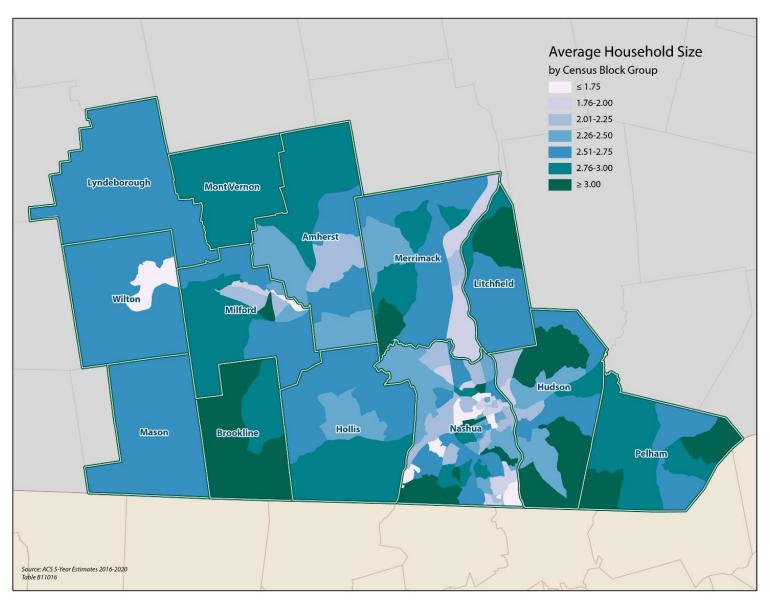
Between 2010 and 2020, one-person households increased by 3,470 households or by 17.7% — the largest increase of any household category. Two-person households, the largest overall category in total number, increased by 2,899 households or by 4.6%, followed by three-person households which grew by 1,018 households or 3.7%.

The largest decline was the 1,421-household or -3.2% drop in four-person households and the 563 drop household or (-3.9%) in five-person households.

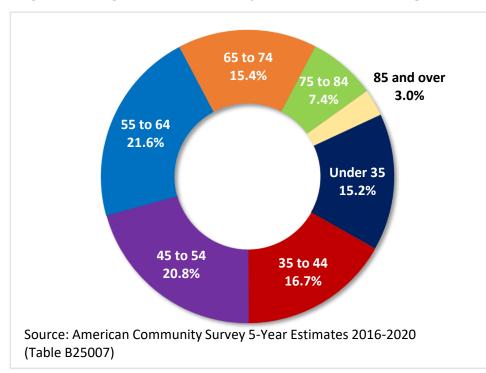
There was a slight increase in sixperson households, however, the trend toward smaller households is predominant.

These changes suggest that the demand for additional housing units generally exceeds the rate of population growth, and that the demand for smaller housing units is likely increasing.









21.6% of all households in the region have a head of household between the ages of "55 to 64", 20.8% have a head between "45 to 54", 16.7% have a head between "35 to 44", 15.4% have a head between "65 to 74", 15.2% have a head "Under 35", 7.4% have a head between "75 to 84", and 3.0% have a head between "85 and over".

As shown in Figure 12, between 2010 and 2020, the regional head of household age changed in a notable pattern – a general decrease in the lower age groups and a general increase in the older age groups. The two age groups consisting of the bulk of the working age population – "35 to 44" and "45 to 54" decreased by 23.2% and 16.4%, respectively. On the other end, the two next age groups – "55 to 64" and "65-74" increased by 25.8% and 53.9%, respectively. These trends correlate closely with the increase in smaller households and a decrease in larger households and households with children, as demonstrated in the preceding tables and figures.

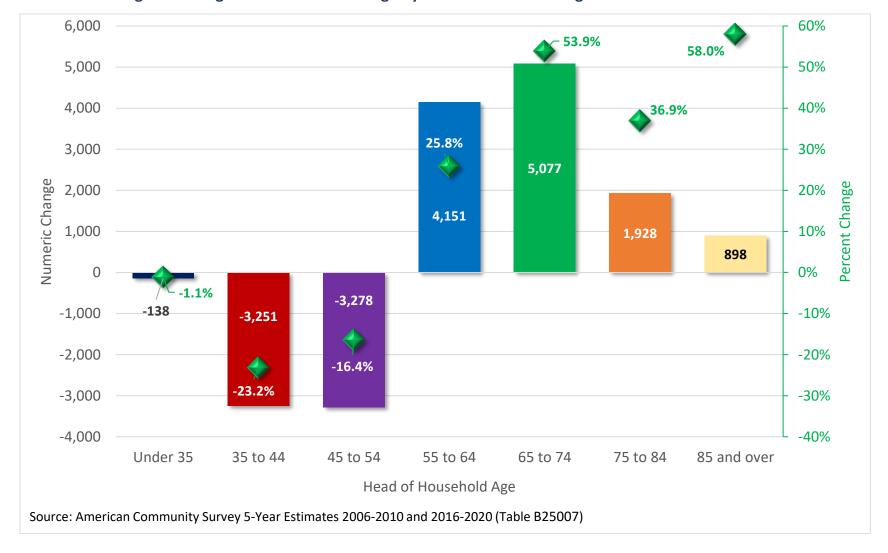


Figure 12. Regional Household Change by Head of Household Age between 2010 and 2020

7. Income

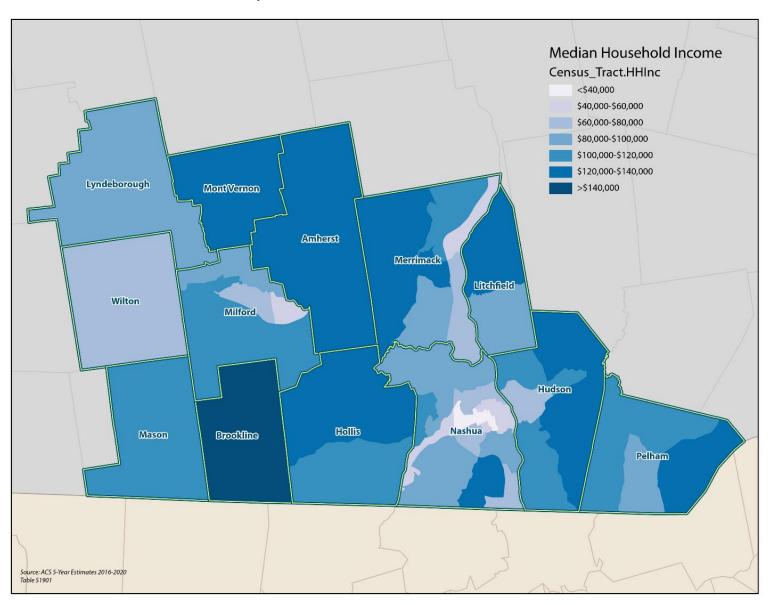
Median household incomes in most NRPC communities are higher than the state and county median incomes. This is especially true in the higher-income towns of Brookline, Amherst, Hollis, and Mont Vernon. On the other end of the spectrum, Milford, Nashua, and Wilton were below both the county average and statewide average. In general, owners' median household incomes were significantly higher than that of renters. For Renter Households, the median household income in Wilton is far below state and regional averages at \$27,222 and is the lowest in the Nashua Region. Because the overall number of renters in Wilton is small, this suggests a concentration of low-income renters, likely in the downtown area. Pelham (\$35,045) and Hudson (\$40,893) also have median renter household incomes below state and county In all communities, the income medians. disparity between renter and owner households is considerable, though that disparity is far wider in some communities such as Wilton and much less pronounced in Nashua, Merrimack and Milford which have larger numbers of higherend rental housing.

Table 4. Median Household Income in 2022, by Municipality

Municipalities	All Households	Owners	Renters
Amherst	\$136,006	\$145,021	\$51,104
Brookline	\$142,033	\$144,737	\$65,536
Hollis	\$131,745	\$138,034	\$55,875
Hudson	\$110,227	\$116,771	\$40,893
Litchfield	\$112,386	\$119,858	\$70,833
Lyndeborough	\$98,125	\$101,000	\$68,125
Mason	\$102,647	\$106,042	\$75,536
Merrimack	\$108,422	\$112,403	\$52,350
Milford	\$74,285	\$103,365	\$48,048
Mont Vernon	\$125,551	\$126,581	\$72,000
Nashua	\$73,785	\$98,689	\$50,025
Pelham	\$108,223	\$117,014	\$35,045
Wilton	\$76,462	\$92,404	\$27,222
Hillsborough County	\$82,099	\$106,773	\$48,056
New Hampshire	\$77,923	\$94,989	\$45,468

Source: American Community Survey 5-Year Estimates 2016-2020 (Table B25119)

Map 4. Median Household Income in 2022



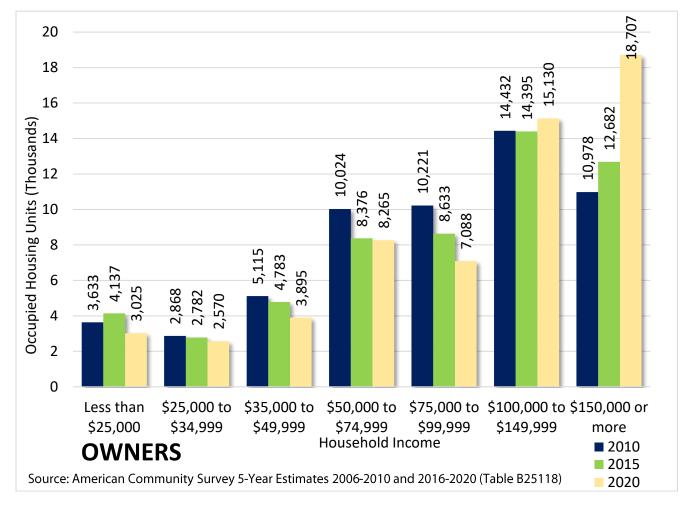


Figure 13. Regional Owners' Household Income Level between 2010 and 2020

Household Income levels for both owners and renters had generally shifted higher from 2010 to 2020. However, the upshift in owners' household income was generally higher than the upshift in renters' household income. Household income for owners increased among income groups above \$100,000 and decreased among income groups below \$100,000. The "\$150,000 or more" income group saw the largest increase.

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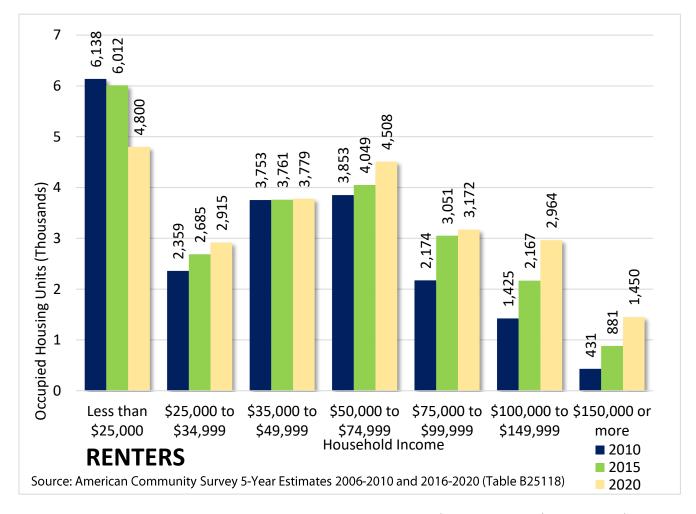


Figure 14. Regional Renters' Household Income Level from 2010 to 2020

Household income for renters increased in all income groups except "Less than \$25,000". The "\$100,000 to \$149,999" income group saw the largest numeric increase, while the "\$150,000 or more" income group saw the largest percentage increase.

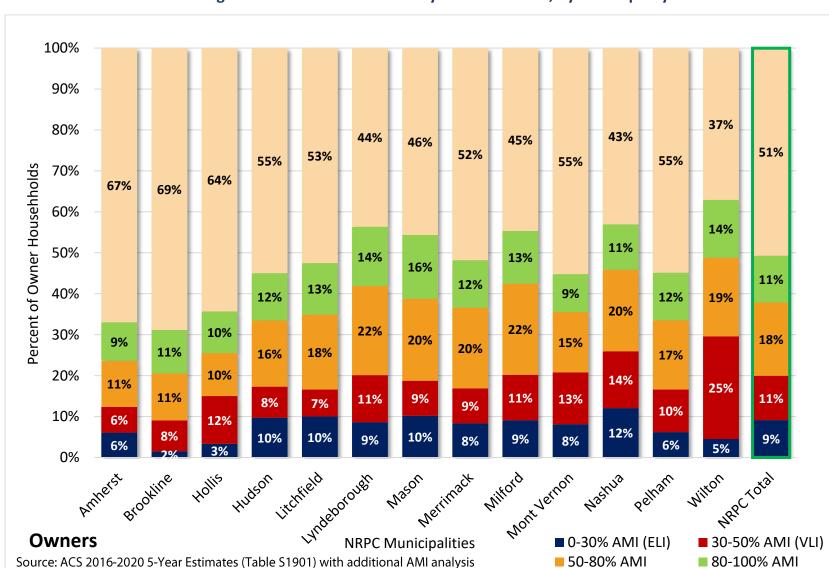
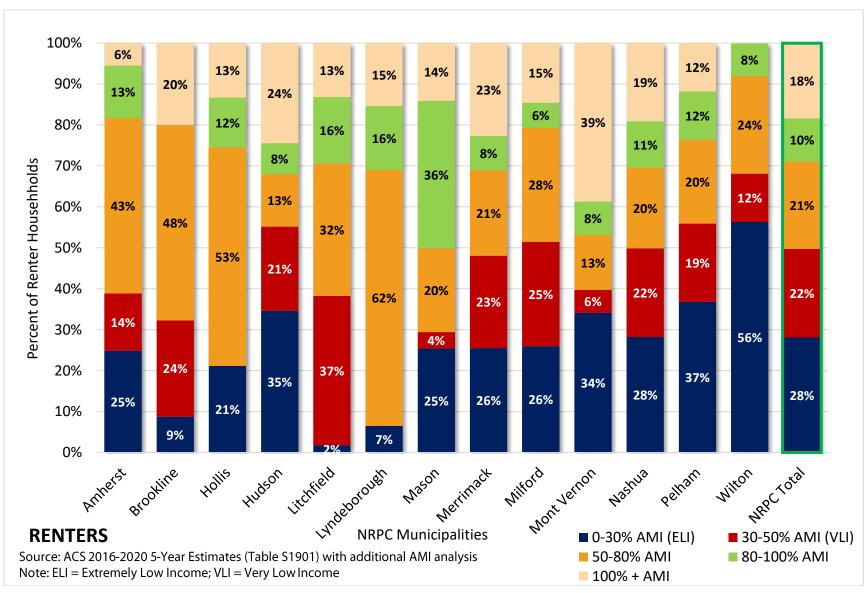


Figure 15. Owner Households by Percent of AMI, by Municipality

Note: ELI = Extremely Low Income; VLI = Very Low Income

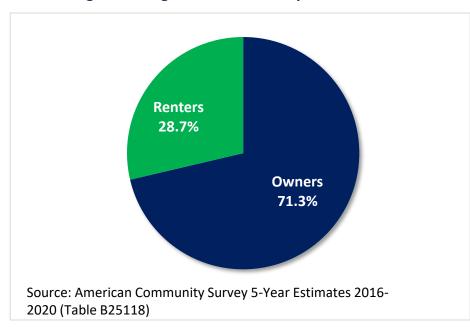
■ 100% + AMI





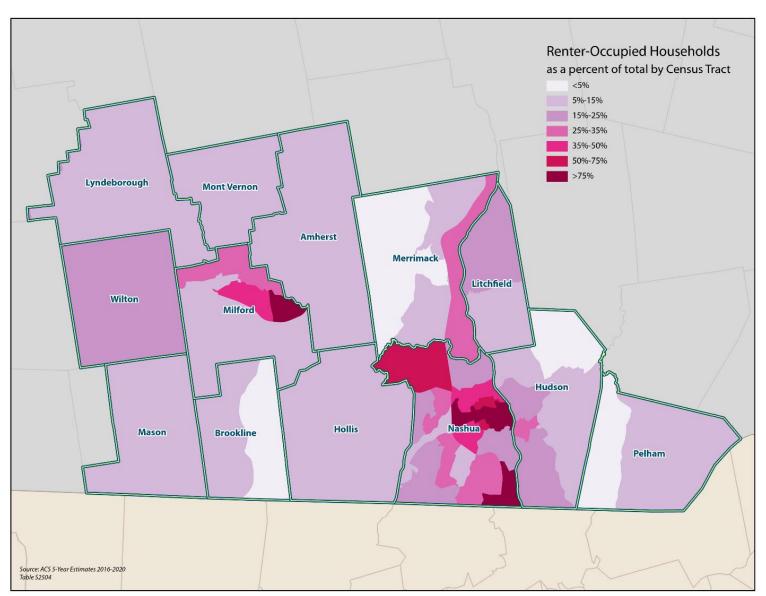
8. Household Tenure

Figure 17. Regional Households by Tenure in 2020



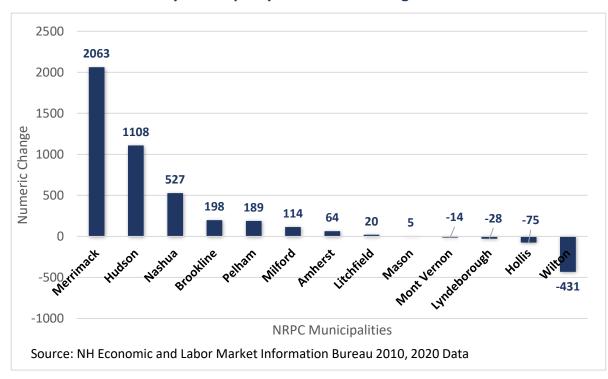
A substantial majority, more than two-thirds, of the region's households live in owner-occupied homes and in most NRPC communities, the figure is 85% or higher. As can be seen on Map 5, the highest concentrations of renters are found around downtown Nashua, in Merrimack east of the F.E. Everett Turnpike, around downtown Milford, in southeast Nashua and northwest Nashua along 101A. Renter households make up 75% or more of total households in central Nashua. Not surprisingly, areas with high concentrations of renter households also have high concentrations of multi-family housing and access to public water and sewer. On the other end of the spectrum, the eastern part of Brookline, the western part of Merrimack, the northern part of Hudson, and the eastern part of Pelham had the least renter-occupied households, at less than 5%.





9. Employment

Figure 17. Numeric Change in Employment between 2010 and 2020, by Municipality and in Descending Order



Changes in employment levels have a significant impact on the demand for housing. Between 2010 and 2020 total employment in the Nashua labor market area grew from 91,049 to 94,789, a net increase of 3,740 jobs or 4.1%. Merrimack experienced by far the largest increase at 2,063 jobs or 14.0%, followed by Hudson at 1,108 jobs or 10.8%. Wilton experienced the highest numeric and percent decline in employment at 431 jobs or -31.9%.

Though job growth in the region between 2010 and 2020 was significant, jobs increased at a lower rate than the overall population growth rate of 5.6%. Since the region did not experience population growth based on natural increase, this suggests that new residents are moving to the region for reasons

other than employment and are either commuting jobs to outside of the region, working remotely, or are retired. As can be seen on the following pages, commuting times in the Nashua Region are significant and growing.

Table 5. Employment Change between 2010 and 2020, by Municipality

		20	10			20	20		_	010 to 202 neric Cha		2010 to 2020 (Percent Change)		
Municipality	Total	Private	Gov't	% of NRPC Total	Total	Private	Gov't	% of NRPC Total	Total	Private	Gov't	Total	Private	Gov't
Amherst	4,470	3,872	598	4.9%	4,534	3,973	561	4.8%	64	101	-37	1.4%	2.6%	-6.2%
Brookline	516	327	189	0.6%	714	530	184	0.8%	198	203	-5	38.4%	62.1%	-2.6%
Hollis	1,920	1,432	488	2.1%	1,845	1,409	436	1.9%	-75	-23	-52	-3.9%	-1.6%	-10.7%
Hudson	10,274	9,348	926	11.3%	11,382	10,482	900	12.0%	1,108	1,134	-26	10.8%	12.1%	-2.8%
Litchfield	826	486	340	0.9%	846	515	331	0.9%	20	29	-9	2.4%	6.0%	-2.6%
Lyndeborough	111	75	36	0.1%	83	52	31	0.1%	-28	-23	-5	-25.2%	-30.7%	-13.9%
Mason	163	120	43	0.2%	168	125	43	0.2%	5	5	0	3.1%	4.2%	0.0%
Merrimack	14,687	13,515	1,172	16.1%	16,750	15,702	1,048	17.7%	2,063	2,187	-124	14.0%	16.2%	-10.6%
Milford	6,254	5,456	798	6.9%	6,368	5,727	641	6.7%	114	271	-157	1.8%	5.0%	-19.7%
Mont Vernon	156	77	79	0.2%	142	72	70	0.1%	-14	-5	-9	-9.0%	-6.5%	-11.4%
Nashua	48,137	43,484	4,653	52.9%	48,664	44,116	4,548	51.3%	527	632	-105	1.1%	1.5%	-2.3%
Pelham	2,183	1,697	486	2.4%	2,372	1,905	467	2.5%	189	208	-19	8.7%	12.3%	-3.9%
Wilton	1,352	1,164	188	1.5%	921	726	195	1.0%	-431	-438	7	-31.9%	-37.6%	3.7%
NRPC Total	91,049	81,053	9,996	100%	94,789	85,334	9,455	100.0%	3,740	4,281	-541	4.1%	5.3%	-5.4%

Source: New Hampshire Economic and Labor Market Information Bureau 2010, 2020 Data

10. Commuting patterns

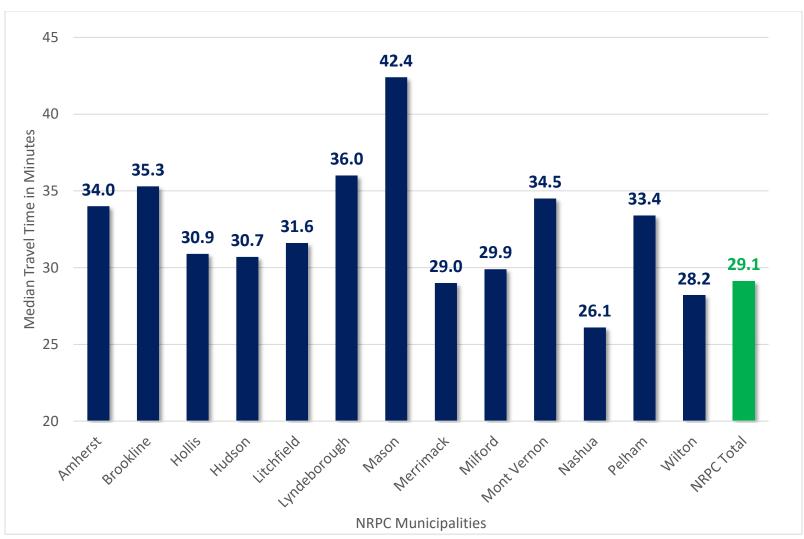


Figure 18. Median Commute Time in 2020, by Municipality

Source: American Community Survey 5-Year Estimates 2016-2020 (Table B08303)

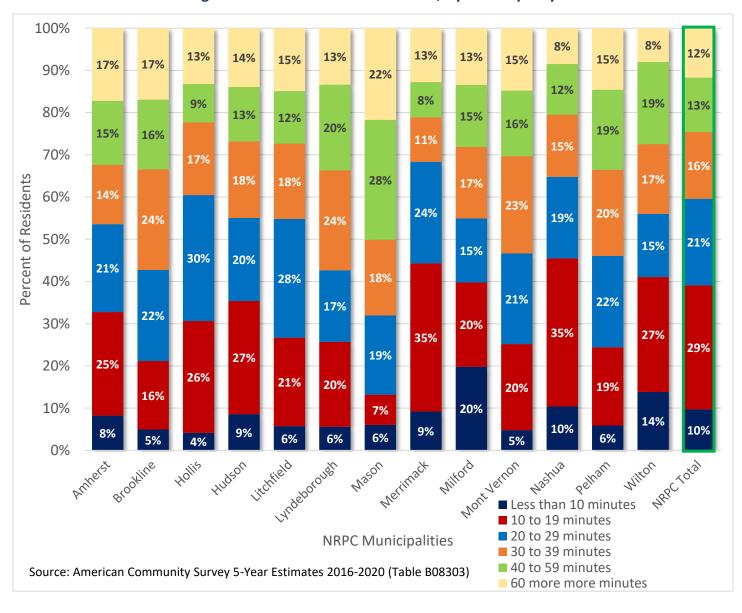
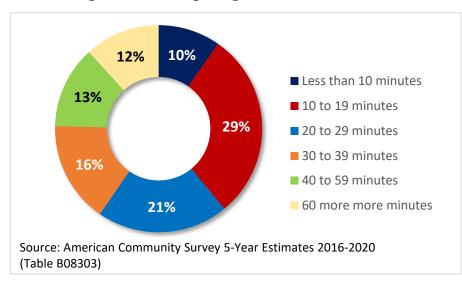


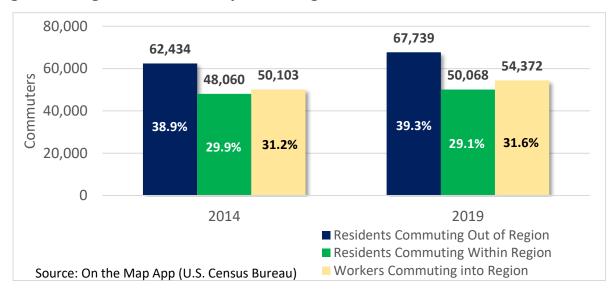
Figure 19. Commute Times in 2020, by Municipality

Figure 20. Average Regional Commute Times



The regional median commute time is 29.1 minutes. Among NRPC municipalities, Nashua has the shortest commute time and Mason has the longest. These observations appear reasonable given Nashua is the regional job center and regional transportation hub while Mason is a community farther away from Nashua and is not on a major highway. Other similar communities also have longer commute times including Brookline, Lyndeborough, Mont Vernon, and Pelham. It is striking to note that only 10% of the region's workers commute for ten minutes or less, 41% commute for thirty minutes or more and 12% have a commute time of 60 minutes or longer. As can be seen in the figure below, the percentage of workers commuting out of the region is also growing.

Figure 21. Regional Commuter by Home Origin and Work Destination in 2014 and 2019



11. School Enrollment Trends

Despite overall population growth, total K-12 school enrollment in the region declined by 10.6%. between 2013 and 2021. This trend corresponds with an overall decline of the 0 to 18 age group and declining fertility rates. The sharp drop between 2019 and 2020, however, is likely due in part to a shift to private schools and home schooling because of pandemic-related remote learning impacts. It is uncertain whether this shift will reverse with the return to in-person instruction in all the region's school districts. Despite declining enrollment trends, the view that new housing will result in a financial burden to local schools persists.

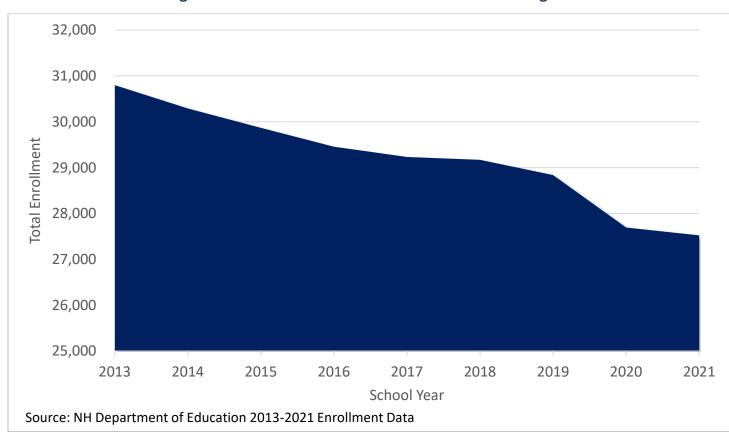
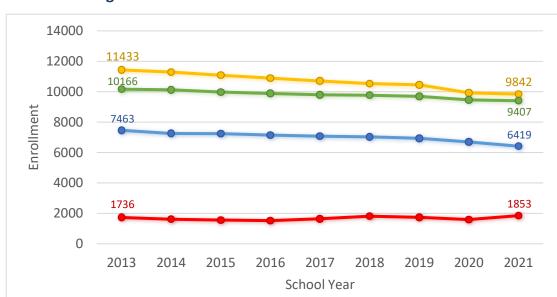


Figure 22. Total School Enrollment in the Nashua Region



K-Readiness — Elementary (1-5) — Middle (6-8) — High (9-12)

Source: NH Department of Education 2013-2021 Enrollment Data

Figure 23. K-12 School Enrollment from 2013 to 2021

Though overall school enrollment is declining, one exception is the uptick in K-Readiness. This increase, though modest, could impact future enrollment in upper grades. It is also important to note that while overall enrollment has dropped by 3,277 region-wide, there is considerable variation by community. In general, the region's smaller towns experienced less decline, and Mason actually gained one student. Nashua's overall enrollment dropped by over 1,000 with an especially large drop in 2020. Hudson had the largest proportional decline with a loss of 793 students and was the only community to see a drop in every year since 2013. On the other hand, enrollment in Brookline is trending upward.

Brookline was the fastest-growing NRPC community between 2010 and 2020, has the largest average household size and is currently the region's most affluent community in terms of household income. Pelham, the second fastest-growing community, however, experienced a significant net decline; an indication that factors other than growth also influence changes in enrollment.

Table 6. Change in K-12 School Enrollment from 2014 to 2021, by Municipality

School Year	2014	2015	2016	2017	2018	2019	2020	2021	Total
Amherst	-49	-22	47	-19	-16	11	-65	69	-44
Brookline	-42	-1	4	-32	43	6	5	14	-3
Hollis	-13	-32	32	-6	17	-23	-31	5	-51
Hudson	-223	-47	-111	-96	-75	-125	-81	-35	-793
Litchfield	-26	-24	-38	-42	-1	3	-68	-8	-204
Lyndeborough	3	-2	2	-13	0	-2	0	-4	-16
Mason	-9	10	7	-11	-10	6	-1	9	1
Merrimack	-37	-133	-66	74	-10	58	-185	22	-277
Milford	-89	-91	-73	-7	-39	-15	-119	7	-426
Mont Vernon	1	13	-32	7	-21	-3	1	-17	-51
Nashua	-9	-23	-151	-29	69	-184	-613	-130	-1070
Pelham	3	-52	-23	-32	-39	-67	-15	-88	-313
Wilton	-17	-21	-9	-16	18	3	27	-15	-30
NRPC Total	-507	-425	-411	-222	-64	-332	-1145	-171	-3277

Source: NH Department of Education 2013-2021 Enrollment Data

Table 7. School Enrollment per Unit by Housing Type

Housing Type	New Hampshire	Greater Nashua PUMA
Mobile Home or Trailer	0.23	0.14
One-family house detached	0.50	0.55
One-family house attached	0.37	0.58
2 Apartments	0.35	0.49
3-4 Apartments	0.40	0.43
5-9 Apartments	0.32	0.32
10-19 Apartments	0.24	0.30
20-49 Apartments	0.20	0.18
50 or More Apartments	0.07	0.08
Boat, RV, van, etc.	1.15	0.00
All Housing Types	0.42	0.45

With overall public-school enrollments dropping in almost all communities, the average number of students enrolled in public schools per dwelling unit, also known as the generation rate, is also declining. The table to the left provides estimates of student enrollment by housing type. These generation rates are useful in planning for future school facility needs based on growth and are a critical component in establishing impact fees for public school facilities. It is common for people to overestimate student generation rates. Often these are based on outdated assumptions of family composition. As of 2020, the region's average household size was 2.57 people per household and only 39.1% of all households have three or more people.

Data Source: Analysis using ACS 5-Year (2016-2020) Microdata Sample

IV. HOUSING UNIT TRENDS AND CHARACTERISTICS

A. Housing Unit Characteristics

The total number of housing units in the Nashua Region increased by 7.4% between 2010 and 2020, and by 18.6% between 2000 and 2020. The rate of growth, however, varied considerably by community. Between 2000 and 2010 and between 2000 and 2020, the towns of Brookline, Hollis, Litchfield, Milford, Mont Vernon, Pelham all exceeded regional growth rates. Brookline, Pelham, and Mont Vernon have been growing at an especially significant rate. The lowest growth rates over the 20-year period were in Merrimack, Nashua, and Wilton; however, Nashua followed by Merrimack experienced the largest numerical increases at 4,276 and 1,550 net new units, respectively.



New Multi-family Construction in Nashua

The percentage change in the number of units by community since 2000 is shown in Figure 24 on the following page. The total number of units in each community together with the number of units added since 2020 is shown subsequently.

It should be noted that not all communities are reporting new Accessory Dwelling Units (ADUs) as new units, which will likely reduce the unit count in those communities.

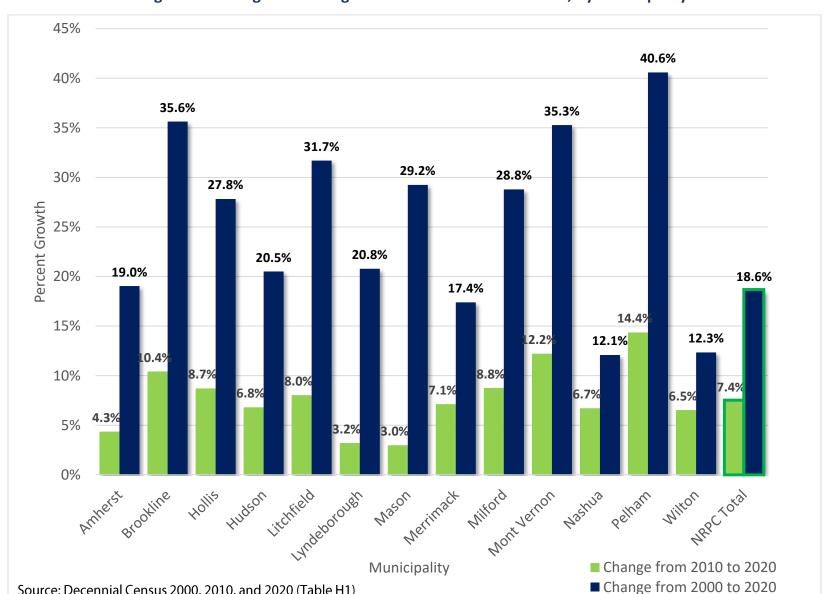


Figure 24. Change in Housing Units between 2000 and 2020, by Municipality

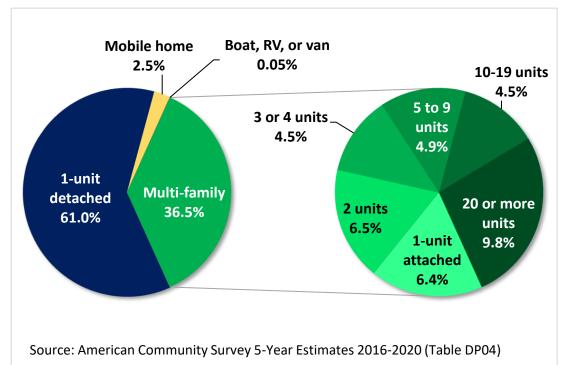
Source: Decennial Census 2000, 2010, and 2020 (Table H1)

Table 8. Change in Housing Units between 2000 and 2020, by Municipality

AA aan baba a Baas	Total Housing Units				rom 2000 2020	Change fr to 20		Share of Region			
Municipality	2000	2010	2020	Numeric	Percent	Numeric	Percent	2000	2010	2020	
Amherst	3,752	4,280	4,466	714	19.0%	186	4.3%	5.0%	5.2%	5.0%	
Brookline	1,384	1,700	1,877	493	35.6%	177	10.4%	1.9%	2.1%	2.1%	
Hollis	2,491	2,929	3,184	693	27.8%	255	8.7%	3.3%	3.5%	3.6%	
Hudson	8,165	9,212	9,839	1,674	20.5%	627	6.8%	10.9%	11.2%	11.1%	
Litchfield	2,389	2,912	3,146	757	31.7%	234	8.0%	3.2%	3.5%	3.5%	
Lyndeborough	587	687	709	122	20.8%	22	3.2%	0.8%	0.8%	0.8%	
Mason	455	571	588	133	29.2%	17	3.0%	0.6%	0.7%	0.7%	
Merrimack	8,959	9,818	10,517	1,558	17.4%	699	7.1%	12.0%	11.9%	11.9%	
Milford	5,316	6,295	6,846	1,530	28.8%	551	8.8%	7.1%	7.6%	7.7%	
Mont Vernon	720	868	974	254	35.3%	106	12.2%	1.0%	1.1%	1.1%	
Nashua	35,387	37,168	39,663	4,276	12.1%	2495	6.7%	47.3%	45.0%	44.7%	
Pelham	3,740	4,598	5,258	1,518	40.6%	660	14.4%	5.0%	5.6%	5.9%	
Wilton	1,451	1,530	1,630	179	12.3%	100	6.5%	1.9%	1.9%	1.8%	
NRPC Total	74,796	82,568	88,697	13,901	18.6%	6129	7.4%	100.0%	100.0%	100.0%	

Source: U.S. Census 2000, 2010, 2020 (Table H1)





Note: 1-unit attached housing units are 1) separated by a ground-to-roof wall, 2) have a separate heating system, 3) have individual meters for public utilities, and 4) have no units located above or below. The last criterion most likely differentiates 1-unit attached housing from 2-unit multi-family housing. Unfortunately, based on these criteria, ADUs are not counted as units separated from the primary residence.

The majority of all housing units in the Nashua Region, 61%, were single-family detached homes, followed by multi-family housing at 36.5% and mobile homes at 2.5%. Among the types of multi-family housing, the largest share, 9.8% was in buildings with 20 or more units, 6.5% was housing in buildings with 2-units, and 6.4% was 1-unit attached housing, and the remaining 14.1% was roughly evenly split between buildings with between 3 and 19 units.

Between 2010 and 2020, the Nashua Region had a net increase of 4,129 housing units. Of the units added, single-family detached units saw the largest numerical increase at 1,946 units (3.9%), while "20 or more units" saw the largest percentage increase – 1,379 units (19.7%). Most of the larger multi-family projects developed were in Merrimack and Nashua. Though single-family detached dwellings still dominate the region's housing market at 61% of total units, they represent a smaller share of the overall increase in units added at 47.1%.

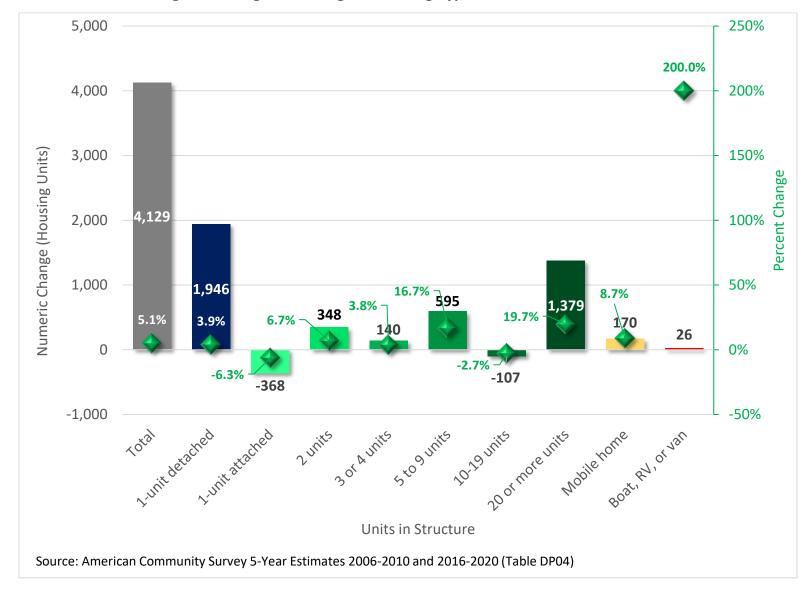


Figure 26. Regional Change in Housing Types between 2010 and 2020

Table 9. Single-Family Housing Building Permit from 2010 to 2020, by Municipality

na status Pa	Single-Family Permits by Year												
Municipality	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
Amherst	17	12	5	1	10	14	40	31	24	24	36		
Brookline	12	7	14	26	21	22	16	16	18	20	39		
Hollis	12	4	12	19	18	15	9	16	31	51	29		
Hudson	44	13	25	50	42	71	69	75	54	12	32		
Litchfield	11	6	9	16	9	15	11	2	7	14	31		
Lyndeborough	0	5	0	2	6	3	1	1	3	2	3		
Mason	4	2	1	0	4	1	3	7	5	5	3		
Merrimack	9	15	8	14	19	17	37	37	31	57	58		
Milford	16	15	6	16	14	28	49	60	74	52	115		
Mont Vernon	6	6	6	7	10	5	5	12	24	14	4		
Nashua	31	52	48	76	59	54	57	57	51	53	29		
Pelham	7	5	34	30	27	50	97	90	51	45	20		
Wilton	2	0	1	4	4	2	8	8	15	18	4		
NRPC Total	171	142	169	261	243	297	402	412	388	367	403		

Data Source: NH Department of Planning and Development (2000-2020 Building Permit Data collected from municipality)

Table 10. Multi-Family Housing Building Permit from 2010 to 2020, by Municipality

		Multi-family Permits by Year											
Municipality	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
Amherst	0	0	28	0	2	0	2	4	14	10	4		
Brookline	0	0	0	0	2	0	2	3	0	0	12		
Hollis	0	0	1	0	0	0	0	6	4	4	2		
Hudson	0	1	7	11	0	8	4	15	16	8	94		
Litchfield	2	8	8	6	8	0	2	47	4	7	0		
Lyndeborough	0	0	0	0	0	2	0	0	0	1	1		
Mason	0	0	0	0	0	0	0	0	0	0	0		
Merrimack	10	3	6	3	4	0	2	0	200	358	77		
Milford	2	1	0	0	0	0	1	124	0	5	5		
Mont Vernon	0	0	0	0	0	0	0	0	0	0	0		
Nashua	12	36	289	164	292	56	182	114	166	14	2		
Pelham	13	7	3	10	8	6	0	10	43	11	17		
Wilton	0	3	-2	0	3	-2	0	-2	0	5	1		
NRPC Total	39	59	340	194	319	70	195	321	447	423	215		

Data Source: NH Department of Planning and Development (2000-2020 Building Permit Data collected from municipality)

B. Housing Tenure

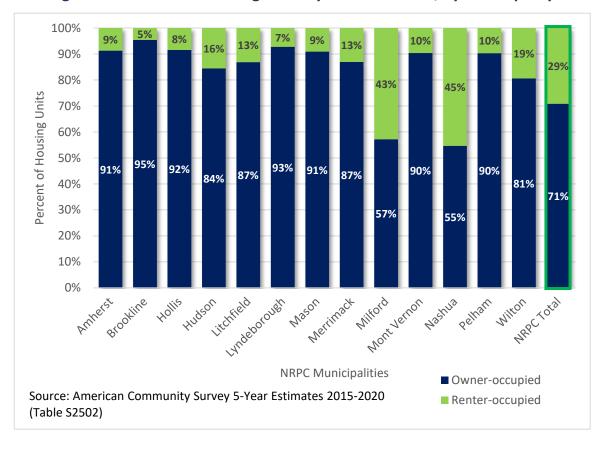


Figure 27. Percent of Housing Units by Tenure in 2020, by Municipality

Out of the 82,800 occupied units in the Nashua Region, 58,680 units (70.9%) owner-occupied were and the remaining 24,120 units (29.1%) were renter-occupied. Note that owneroccupied dwelling units include both single-family and multifamily dwellings. Among the NRPC municipalities, all except Milford and Nashua had a larger share of owner-occupied housing than the regional average, typically between 85-90%. Brookline had the highest share of owner-occupied housing, at 95.4%, whereas Wilton stood out among this group with only 80.6%. On the other end, Milford and Nashua had the lowest share of owner-occupied housing, at 57.2% and 54.7%, respectively.

Over the past 10 years, renter-occupied housing grew at a far higher rate than owner-occupied housing, an increase of 19.8%.

This may reflect the disproportionately larger increase in home purchase prices over increases in monthly rents, which have kept many renters out of the homeownership market. Owner-occupied housing grew by a relatively modest rate of 2.5% since 2010.

Figure 28. Regional Change in Housing Units by Tenure between 2010 and 2020

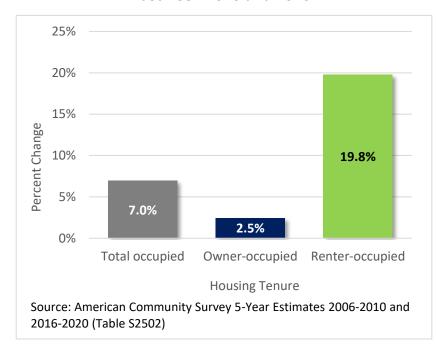


Figure 29. Regional Housing Units by Tenure



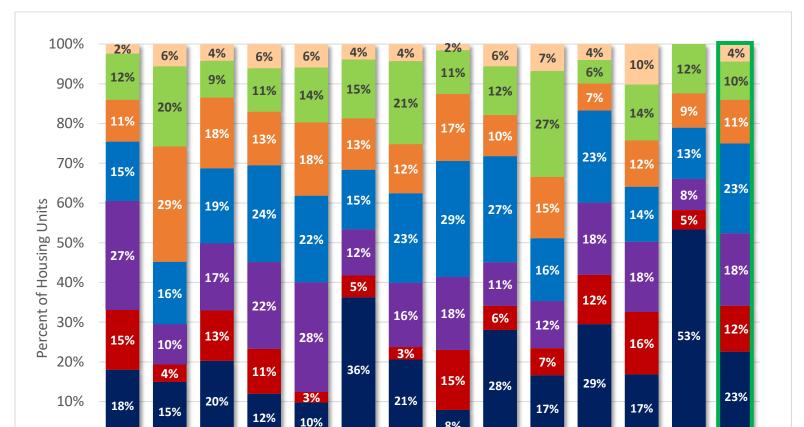
C. Housing Stock Age

Age of the housing stock can be an indication of housing quality or conditions. Older homes are more likely to contain potential threats to resident health such as lead paint, asbestos, mold, or lead pipes. They may also suffer from deterioration, substandard electrical systems, outdated plumbing, substandard septic systems, and other challenges. Older homes can also be more costly to maintain, which has implications for housing affordability. On the other hand, purchase prices and rents in older buildings can also be more affordable. It is notable that the region's largest concentrations of low-income households tend to overlap with the census tracts with the highest concentrations of pre-1960-built housing. It is also important to stress, however, that the region contains a wealth of well-maintained older homes that contribute greatly to the character of our communities and offer housing and lifestyle choices less available in other parts of the country. The image on the left depicts an older multi-family dwelling that shows evidence of deterioration. The historic homes in Amherst Village on the right are a critical part of the town's classic New England Character.

The largest concentrations of pre-1960 housing are found in the region's older, more urbanized areas such as neighborhoods around downtown Nashua, Milford, and Wilton. Overall, Wilton had the highest percentage of housing built before 1960 at 53.3% and Lyndeborough had the next highest percentage at 36.3%. The relatively high percentage of older housing stock in these communities also reflects lower overall rates of new housing development.







Mason

Source: American Community Survey 5-Year Estimates 2016-2020 (Table S25034)

NRPC Municipalities

Wilford

■ Pre-1960

1980-89

2010 or later

Figure 30. Age of Housing Units in 2020, by Municipality

0%

MarcTotal

1970-79

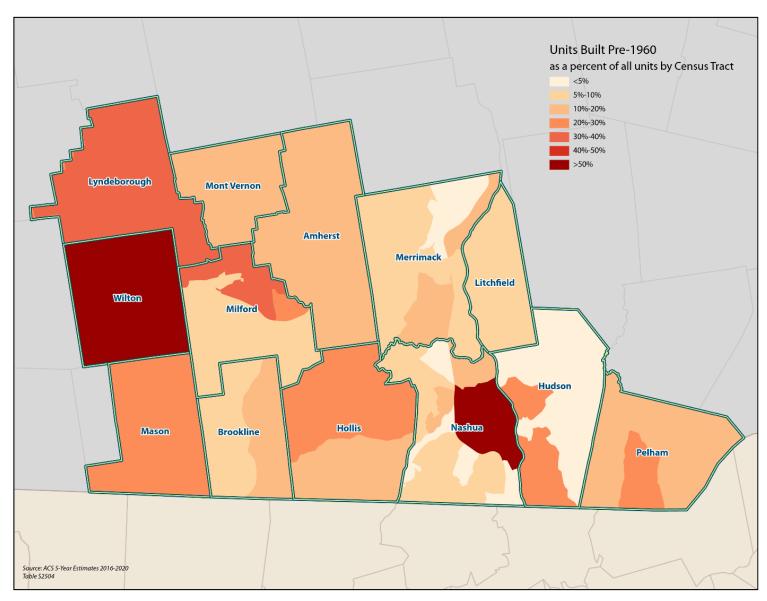
2000-09

Wilton

1960-69

1990-99





D. Senior Housing

The housing needs and preferences of the region's older population are highly diverse and varied depending on lifestyle, income, wealth, age, physical ability, and other factors. Housing offerings targeted to seniors in the region range from age-55-plus independent living communities to assisted living facilities and nursing homes. Responses to the RHNA surveys indicate that most of the region's seniors prefer to remain in their own homes as opposed to living in an age-restricted community. Others opt to live with family either as part of a single household or in an accessory dwelling unit. For those seeking alternative independent living options, the region has many age-55-plus developments which typically offer single-level homes or multi-level homes with first-floor principal bedrooms in a condominium community where all or most outdoor maintenance is provided. Some also offer amenities such as clubhouses and walking trails. Historically, many communities in the region incentivized the development of age-restricted housing. Though in recent years, many of these incentives have been rolled back due to concerns related to the level of development, challenges in enforcing age restrictions, and the cost of the units offered. Purchase prices for homes in many 55+ communities tend toward the high end of the market.





Single-family home in a 55+ community in Merrimack, above left. Income-restricted senior housing in Nashua, above right.

"I'm 75, own my home and if I wanted to move, I couldn't afford to. Own a 7 rm home, 1/2 acre. To go to a 4 rm condo would eat up profits from my home"

Comment from the general RHNA survey. One survey question asks about housing intentions for retirement – 37.9% intend to stay in their current home, whereas 21.3% want to downsize, and 9.0% want to move to a 55+

For seniors who lack the income or assets to afford homes in such developments, there are several lower-cost alternatives including income-restricted units. NRPC has identified 36 senior housing developments in the region offering a total of 1,424 income-restricted units. Though most of these are located in the City of Nashua, income-restricted senior housing is available in the towns of Amherst, Hollis, Hudson, Merrimack, Milford, Pelham and Wilton. Many of these units are also open to low-income adults with disabilities.



The Hunt Community Assisted Living in Nashua

As people age, the likelihood that some level of assistance will be required to support daily functions increases. Assisted living alternatives in the region include the Hunt Community, the Huntington, and Benchmark Senior Living at Nashua Crossing. Typically, these facilities offer full-service dining, fitness facilities, housekeeping, social activities, and other support services. They also offer a continuum of housing options ranging from independent living to memory and nursing home care.

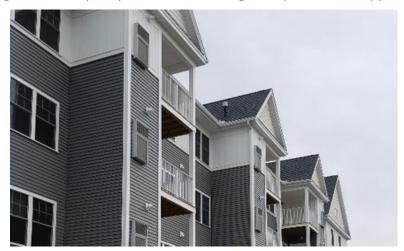
Since the 55-64 and 65+ age groups are the fastest-growing population cohorts, demand for senior housing of all types in the region will likely increase.

A list of income-restricted senior housing is included in Appendix B.

E. Income-restricted/Workforce Housing (Non-Age-Restricted)

As noted in Chapter VII, only 35.2% of all units and 15.6% of two-bedroom rental units are considered to be affordable for low-income renter households earning 60% or less of the median income (for a family of three) and more than 48%, or 11,000 renter households in the region are considered to be "cost-burdened" meaning that they pay more than 30% of their income on housing. For many individuals and families, securing an income-restricted rental unit where the rent is typically capped at 30% of household income, can be the key to achieving financial stability. The Nashua Region currently provides an estimated 1,346 units of project-based income-restricted affordable or workforce housing available to individuals and families in addition to the 1,424 income-restricted units for seniors mentioned above. These units range from small efficiency or studio apartments to three and even four-bedroom units.

As is true for senior housing, the largest number of units by far are in the City of Nashua and most of these units are concentrated in neighborhoods adjacent to the downtown area. Affordable income-restricted housing, however, is also available in Amherst, Hudson, Litchfield, Merrimack, and Milford. While the number of income-restricted units provided is substantial, demand far outstrips supply. Additional income-restricted units for general occupancy currently approved or under development include 43 units being developed by Neighborworks Southern NH in a mixed-use building on Main Street in Nashua, 48 apartments including 43 affordable units approved in Merrimack, and a small development on Bridge Street in Nashua. A list of income-restricted housing developments for general occupancy in the Nashua Region is provided in Appendix B.





The recently completed Marshall Street Apartments near downtown Nashua, pictured above left, offer 152 units of one-, two-, and three-bedroom income-restricted workforce housing. The townhouses to the right offer 45 two- and three-bedroom affordable workforce housing units in Merrimack.

V. HOUSING MARKET, COST AND AFFORDABILITY

The demand for housing in the Nashua Region has far outstripped supply over the past several years, resulting in significant increases in housing costs for both owners and renters. Indeed, the lack of available housing, especially rental units, is challenging the ability of many people to find housing at all. According to the New Hampshire Housing Finance Authority (NHHFA), the vacancy rate for all rental units in the Nashua area dropped from an already low 2.8% in 2011 (5% is considered to be a healthy vacancy rate) to 0.3% in 2022. The vacancy rate for studio apartments and for 3- and 4-bedroom units is effectively 0%.

The home-buying market is also suffering from an exceptionally low inventory of homes available for sale. The Multiple Listing Service (MLS) Housing Inventory indicates the average number of months to absorb current properties listed for sale dropped from over nine months in 2011 to less than one month by 2023. Generally, a six-month supply is considered to be a healthy market. The relationship between the number of homes available on the market and home prices is clearly illustrated in the graph below.

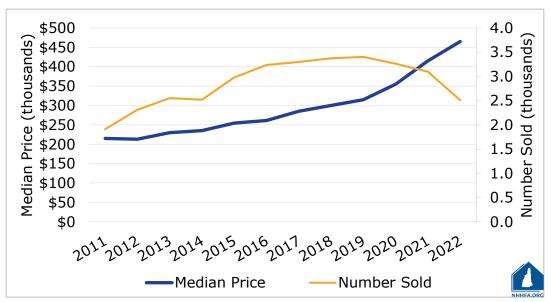


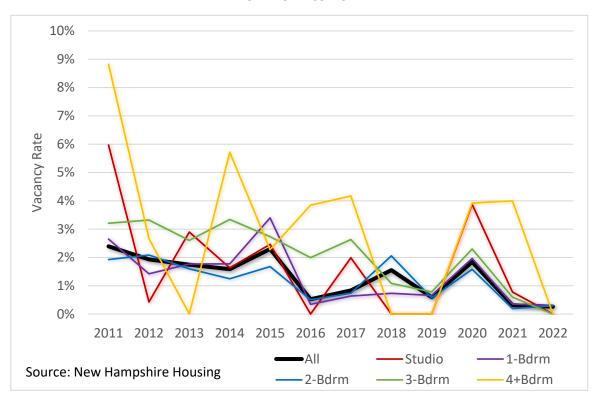
Figure 31. Home Sales in the Nashua Region from 2011 to 2022

Sources: MLS Residential Property Sales data collected by New Hampshire Housing

Given the lack of overall inventory, it is not surprising that housing costs have escalated sharply in recent years. The median purchase price for owner-occupied homes in the region increased from \$216,000 in 2012 to \$435,000 in 2022, an increase of 101%. That said, 48% of all homes on the market and almost 80% of condominiums are considered to be affordable to home ownership households earning 100% of the median income. With the sales price of new homes approaching \$500,000, however, only 10% of them are affordable to median income ownership households. Increasing the supply of affordable homes for sale, therefore, will be challenging.

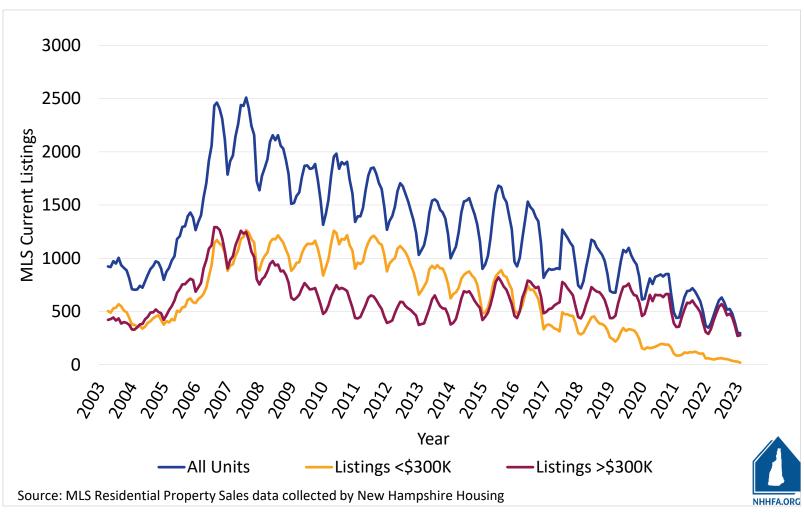
On the rental side, the combined impacts of soaring prices and low inventory are much more significant. Between 2013 and 2022, median monthly rents for all unit types in the region increased from \$1,169 to \$1,904 with two-bedroom units averaging \$1,980. The cost of a one-bedroom unit, however, rose at a much sharper rate. Rents for one-bedroom units now average \$1,863 per month and the average cost for a studio unit is \$1,525. Based on the most recent available estimates, only 35.2% of all units and 15.6% of two-bedroom are at or below the affordability threshold of \$1,650 per month. As a result of the lack of affordable units. 48.1% of all renter households in the region are now considered to be "cost burdened" meaning that they spend 30% or more of their income on housing.

Figure 32. Nashua Regional Rental Vacancy Rates by Number of Bedrooms from 2011 to 2022



For the housing market to return to a healthy balance, a significant increase in the availability of housing units of all types will be required. Fortunately, there are a number of alternative strategies for new housing development, including multi-family housing, which can be developed in ways that meet demand while protecting the character of our communities and the quality of life of our residents. Several of these alternatives are described in Section X, Strategies, which includes an overview of various housing-related organizations and available programs that can help to address the region's diversity of housing needs.





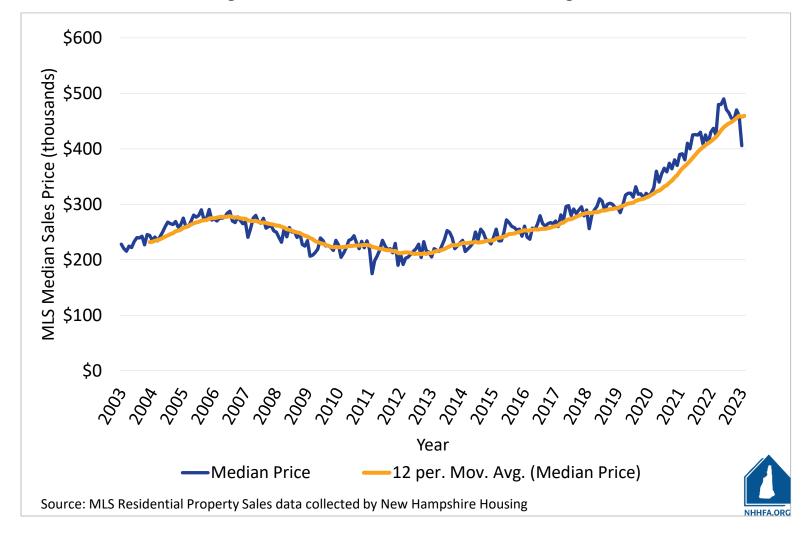


Figure 34. Median Sales Prices for the Nashua Region

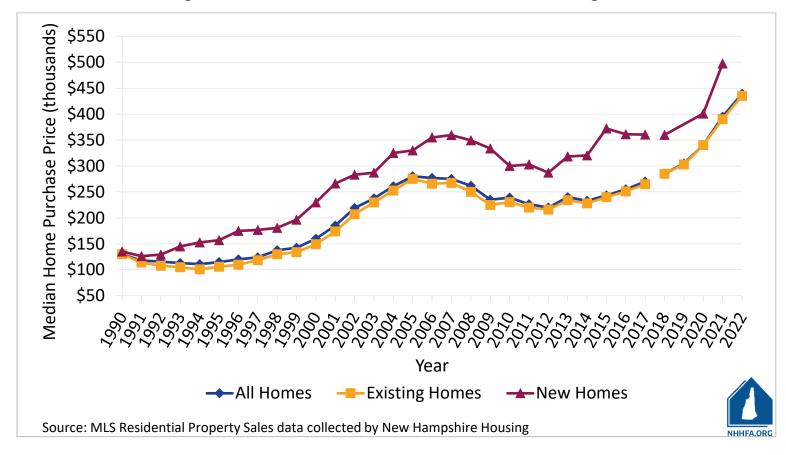


Figure 35. Median Home Purchase Price for the Nashua Region

The housing market was at an uncertain juncture in 2022. The market had been red hot since the onset of the COVID-19 pandemic, which was after a decade-long trend of rising home prices since the recovery from the 2008 Mortgage Crisis. Likewise, the U.S. economy has been expanding since then, except for the temporary dip during the pandemic. Fueled by strong housing demand and low interest rates, as well as a chronic undersupply of new homes, home sales and median housing prices reached new heights (and the absorption rate hit a new low) year after year until now, near the end of 2022.

The inflation surge and rapidly increasing interest rates in 2022, as well as ever-growing homebuyer fatigue from an ever more competitive housing market, have begun to dampen homebuyer demand. In addition, homebuyers who could afford to wait paused their home search in fear of paying peak prices just before the housing market trend reverses course. However, when home sellers begin to see fewer offers and bidding wars, realizing that the rate of increase in housing prices is slowing, some potential sellers are incentivized to delist or hold onto their property. Importantly, many potential sellers refinanced their homes when interest rates were at historic lows. With low monthly payments and substantial equity, many current homeowners have little incentive to sell. Further, the high cost of building materials, supply chain issues, and a labor shortage, have caused many homebuilders to ease home production. All of these factors combine to decrease the supply of available housing. So even though demand is lessening to some degree, the downward pressure on supply is causing the housing prices to continue to increase.

"Trying to buy a starter home right now is incredibly difficult, even with no debt and good salaries. The last house we bid on had 27 bids. There is too much competition."

Comment from the general RHNA survey.





New Duplex under construction in Nashua above left. An existing single-family home in Mont Vernon is shown to the right.



Figure 36. Primary Purchase Price Frequency in the Nashua Region – New Homes & All Units

Source: The Warren Group. Filtered and analyzed by New Hampshire Housing.

[^] Estimated maximum price using 30% of income, 5% downpayment, 30-year mortgage at 3.79%, 0.8 points, PMI, estimated 2022 taxes for each area and hazard insurance. Interest rate is the average of the 30-year Freddie Mac interest rate for January-March 2022.



Figure 37. Primary Purchase Price Frequency in the Nashua Region – Condominiums & All Units

Source: The Warren Group. Filtered and analyzed by New Hampshire Housing.

^ Estimated maximum price using 30% of income, 5% downpayment, 30-year mortgage at 3.79%, 0.8 points, PMI, estimated 2022 taxes for each area and hazard insurance. Interest rate is the average of the 30-year Freddie Mac interest rate for January-March 2022.

Figure 36 and Figure 37 on the previous pages show that approximately 48% of homes purchased were affordable to homeownership households of four earning 100% of the median income, which is the threshold used in the state's definition of ownership workforce housing. For condominiums, the figure is almost 80% of all purchases.

Figure 38 and Figure 39 on the next page show that, overall, most homeowners are not cost burdened, and those that are cost-burdened have likely been in their homes for some time since they would be unlikely to qualify for a mortgage at their current income levels. Further given the strength of the housing market, most cost-burdened homeowners could sell their homes if financially necessary. As of 2020, 41.8% of owner households with a mortgage spent less than 20 percent of their income on housing costs, and 31.8% spent 20.0 to 29.9 percent. The remaining 26.4% spent 30 percent or more of their income on housing costs. In contrast, 69.6% of owner households without a mortgage spent less than 20 percent of their income on housing costs, and 13.2% spent 20.0 to 29.9 percent. The remaining 17.2% spent 30 percent or more of their income on housing costs. In both cases, spending 30% or more of the household income on housing costs is considered unaffordable.



"I am very fortunate to have downsized to a small ranch home over 5 years ago. I would not be able to afford to do so as well as pay for necessary upgrades today."

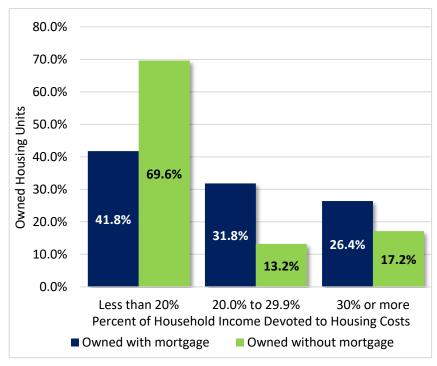
Comment from the general RHNA survey. One survey question asks about housing cost – 57.2% are paying less than 30 percent of household income on housing cost, 30.0% are paying between 30 to 50 percent on housing cost, and 6.8% are paying more than 50 percent on housing cost. 3.2% do not pay for housing and 2.8% answered "I don't know".

Figure 38. Regional Share of Owner Households by Housing Cost Burden, in Owned Housing Units

18,000 16,000 14,000 Owned Housing Units 12,000 10,000 16,923 8,000 12,500 6,000 12,892 10,693 4,000 2,000 3,078 2,369 0 Less than 20% 20.0% to 29.9% 30% or more Percent of Household Income Devoted to Housing Costs ■ Owned with mortgage Owned without mortgage

Source: American Community Survey 5-Year Estimates 2016-2020

Figure 39. Regional Share of Owner Households by Housing Cost Burden, in Percentage of Owned Housing Units



Source: American Community Survey 5-Year Estimates 2016-2020

Figure 40. Gross Rent by Number of Bedroom in 2022, by Geography (Statewide, Nashua NH HMFA, and City of Nashua)

NEW HAMPSHIRE STATEWIDE

2022 GROSS REN	2022 GROSS RENT										
	Sample Size	Rent Range	Median								
0-Bedrooms	433	\$275 - \$2,379	\$1,082								
1-Bedrooms	2,980	\$301 - \$2,638	\$1,248								
2-Bedrooms	4,633	\$339 - \$3,520	\$1,584								
3-Bedrooms	1,344	\$388 - \$4,000	\$1,620								
4+ Bedrooms	272	\$920 - \$4,785	\$1,828								
All Units	9,662	\$275 - \$4,785	\$1,510								

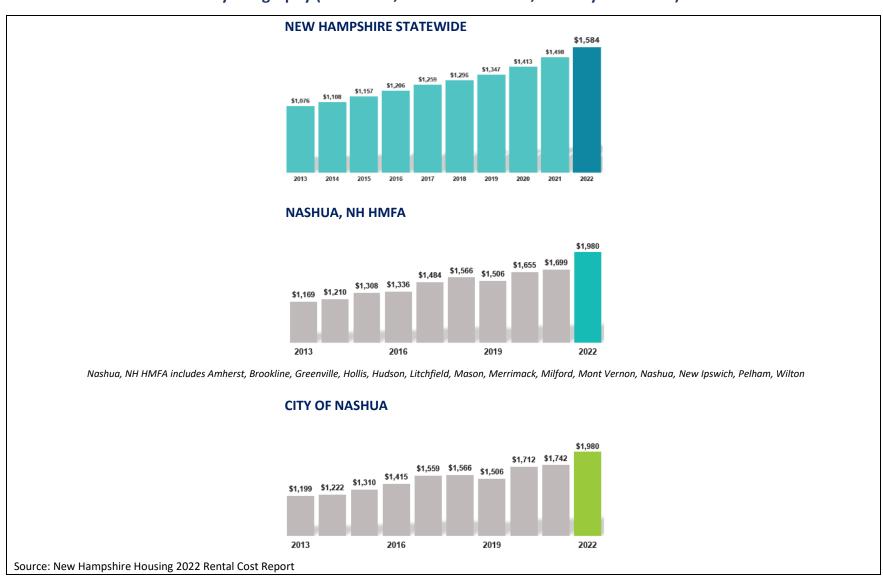
NASHUA,	NASHUA, NH HMFA										
	Sample Size	Rent Range	Median								
0-Bedroom	32	\$672 -\$1,939	\$1,525								
1-Bedroom	516	\$524 -\$2,638	\$1,863								
2-Bedroom	976	\$695 -\$3,321	\$1,980								
3-Bedroom	182	\$1,000 -\$3,020	\$1,890								
4+ Bedrooms	26	\$1,166 -\$3,845	\$2,295								
All Bedrooms	1,732	\$524 -\$3,845	\$1,904								

Nashua, NH HMFA includes Amherst, Brookline, Greenville, Hollis, Hudson, Litchfield, Mason, Merrimack, Milford, Mont Vernon, Nashua, New Ipswich, Pelham, Wilton

CITY OF NASHUA										
	Sample Size	Rent Range	Median							
0-Bedroom	20	\$672-\$1,759	****							
1-Bedroom	439	\$524-\$2,328	\$1,863							
2-Bedroom	738	\$695-\$2,673	\$1,980							
3-Bedroom	123	\$1,166-\$3,020	\$1,985							
4+ Bedrooms	23	\$1,166-\$3,000	\$2,132							
All Bedrooms	1,343	\$524-\$3,020	\$1,944							

Source: New Hampshire Housing 2022 Rental Cost Report

Figure 41. Median Monthly Gross Rent for 2-Bedroom Units from 2013 to 2022, by Geography (Statewide, Nashua NH HMFA, and City of Nashua)



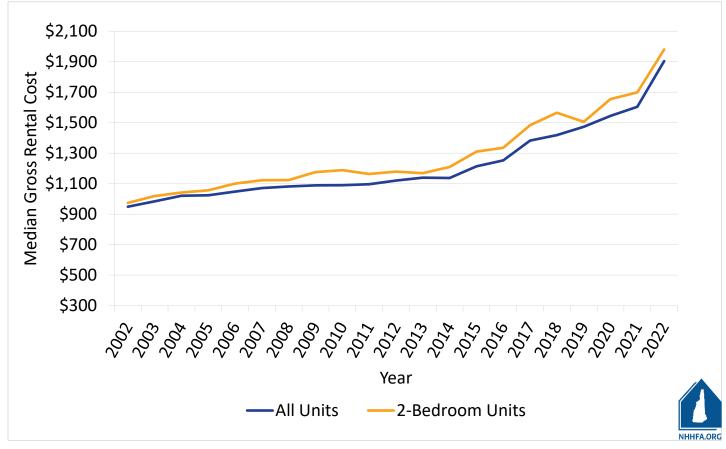


Figure 42. Median Gross Rents for the Nashua Region

Source: NH Housing Residential Rental Cost Survey Data

Table 11. NRPC Regional Median Gross Rent from 2011 to 2022, by Number of Bedrooms

Bedroom	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
All	\$1,096	\$1,120	\$1,139	\$1,137	\$1,214	\$1,253	\$1,383	\$1,419	\$1,473	\$1,544	\$1,604	\$1,904
0	\$644	\$650	\$677	\$672	\$698	\$712	\$722	\$1,035	\$997	\$900	\$1,309	\$1,525
1	\$948	\$953	\$985	\$1,023	\$1,028	\$1,093	\$1,125	\$1,283	\$1,260	\$1,285	\$1,342	\$1,863
2	\$1,164	\$1,179	\$1,169	\$1,210	\$1,310	\$1,336	\$1,484	\$1,566	\$1,506	\$1,655	\$1,699	\$1,980
3	\$1,455	\$1,432	\$1,405	\$1,491	\$1,519	\$1,496	\$1,522	\$1,592	\$1,715	\$1,825	\$1,795	\$1,890
4+	\$1,522	\$1,695	\$1,499	\$1,817	\$1,747	\$1,579	\$1,942	\$2,035	\$2,057	\$2,064	\$2,059	\$2,295

Source: NH Housing Residential Rental Cost Survey

While the 2022 statewide median gross rent was \$1,510, the median gross rent in the Nashua, NH HMFA was significantly higher, at \$1,904, and even more so within the City of Nashua, at \$1,944.

Table 11 above and Figure 43 on the following pages provide a breakdown of 2022 median gross rent by rental unit types, and the median gross rent for 2-bedroom units between 2013 and 2022.

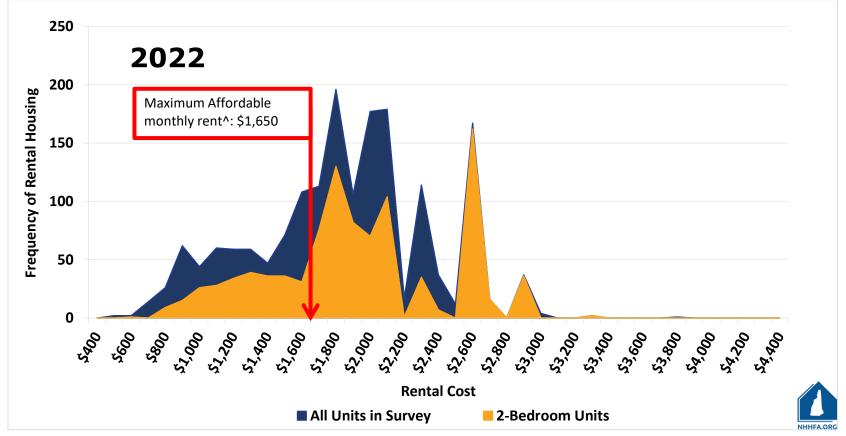


Figure 43. Rental Cost Frequency in the Nashua Region

Source: New Hampshire Housing Residential Rental Cost Survey

[^] Estimated maximum gross monthly rental cost (rent + utilities), using 30% of income.

Figure 43 shows that only 35.2% of all units were affordable to households of three earning at or below 60% of the median income. For two-bedroom units, the figure is an astonishingly low 15.6%. Due to the lack of affordable units, over 11,000 renter households are "cost burdened", meaning that they spend more than 30% of their income on housing.

Figure 44 and Figure 45 below show almost half of all renter households (48.1%) spent 30% or more of their income on housing costs, which is considered unaffordable. Among remaining renter households, 27.4% spent "20.0% to 29.9%" and 24.5% spent less than 20%. The overall level of cost-burdened households (renters) was high across the Nashua Region. Given the high percentage of cost burdened rental households, a priority needs to be placed on developing additional multifamily rental units generally, including subsidized units.

"It is very unaffordable right now for people my age in their mid to late twenties to afford decent housing. I plan to live with my parents for the 2 years still because I cannot afford to get a decent apartment for a reasonable price in Nashua or anywhere around me."

Comment from the general RHNA survey.

Figure 44. Regional Share of Renter Households by Housing Cost Burden, in Rented Housing Units

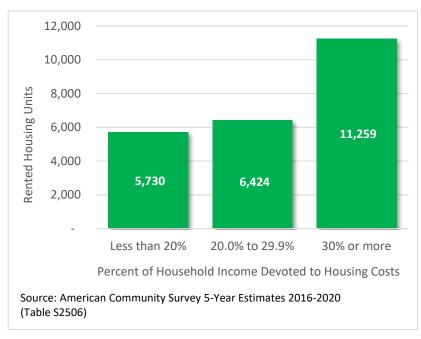
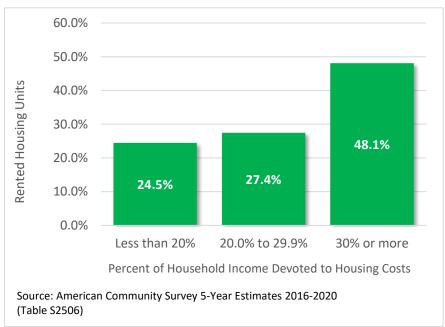


Figure 45. Regional Share of Renter Households by Housing Cost Burden, in Percentage of Rented Housing Units



VI.COMMUNITIES OF INTEREST

A. People Experiencing Homelessness

Addressing the needs of individuals and families experiencing homelessness or at risk of homelessness is one of our most pressing challenges. The homeless population includes people who are currently unsheltered as well as people who may have temporary shelter but lack permanent housing, including people living temporarily with family or friends (couch-surfing) and people staying in homeless shelters or other forms of emergency housing. There are many reasons people become homeless. Some are lower wage workers living paycheck to paycheck and are an illness or injury or sudden expense away from inability to pay rent. Some are young people who have aged out of foster care and have suffered from adverse childhood experiences that impacted their social and emotional health. Others find themselves homeless as the result of divorce or the breakup of a domestic relationship, are victims of domestic violence, or suffer from substance use disorder or severe mental illness. These factors are not mutually exclusive and many individuals experiencing homelessness are impacted by multiple challenges.

The NRPC General Survey conducted in 2022 revealed that a surprisingly large percentage of people, approximately 23%, have been impacted by homelessness. 5.43% of survey respondents indicated that they had personally experienced homelessness, 15.97% had a close family member or friend who experienced homelessness and 1.60% were impacted in some other way. While eliminating all causes of homelessness is not likely, at least in the short-term, we can reduce the frequency and duration of homelessness through the combined efforts of the region's nonprofit and governmental organizations, many of whom work together as part of the Continuum of Care.

Overall, the Nashua Region appears to have an adequate supply of shelter beds, especially with the recent addition of expanded accommodations for homeless men, women and families at the new Nashua Soup Kitchen and Shelter facility on Spring Street. What is lacking is permanent supportive housing for those who need longer-term assistance to achieve stability in addition to affordable permanent housing options for individuals and families. As noted in pervious sections, the need for additional studio and one-bedroom units is particularly acute, as is the need for additional units of income-restricted housing affordable to both individuals and families. Other

"A friend who has unreported employment could not cosign an apartment. The waiting list for Section 8 is too long. The workforce housing won't even talk to us."

Comment from a RHNA focus group discussion. Results from the general RHNA survey shows 16.1% have a close family member or friend who has experienced homelessness and 5.4% have personally experienced homelessness.

barriers to accessing housing include the many landlords' unwillingness to accept Section 8 housing vouchers, low credit ratings, a history of past evictions, and prior incarceration. Some of these challenges can be addressed through outreach and education, while others may require legislation to achieve meaningful change.

The following table provides an estimate of the number of people in the region experiencing homelessness. It should be noted that this is likely an undercount because people with either or both temporary and unstable shelter are difficult to identify.

Table 12. Homeless Population Measures in 2020 and 2021, by Municipality

						Sub-Populations Served				
Measure	Year	NH	Manchester	Nashua Balance of Single Persons in Families		Chronically Homeless	Veterans			
People Experiencing Homelessness	2021	4,682	1,714	768	2,556	n/a	1,245	889	365	
People Experiencing Homelessness	2020	8,958	3,021	1,620	4,317	3,078	1,578	597	400	
Overall Homelessness Total)	2020	4,656	1,739	778	2,139	n/a	n/a	n/a	n/a	

Data Source: US Department of Housing and Urban Development Continuum of Care Summary & NH Coalition to End Homelessness

The next section is an overview of some of the organizations that assist people who are at risk or are experiencing homelessness in the Nashua Region. Descriptions of the mission of and services provided by these organizations also provide a snapshot of the myriad challenges at the root of homelessness.

1. Nashua Soup Kitchen & Shelter

The Nashua Soup Kitchen and Shelter (NSKS) was opened in 1981 and provides food, emergency shelter, and a wide range of supportive services to individuals and families throughout Greater Nashua. Many individuals who are experiencing homelessness utilize NSKS, including families. NSKS clients struggle to find housing that is affordable and of good quality, which typically requires Section 8 vouchers that allow people to rent market-rate housing at affordable rates. NSKS has been working hard to increase access to affordable units available to their clients.





Aside from housing and food, NSKS assists with utilities, car repairs, and other expenses like phone bills. NSKS struggles to assist their clients due to the lack of affordable housing in the region in general, and a lack of affordable studio apartments in particular.

NSKS offers free meals, including dinner seven days per week and breakfast Monday through Friday, to anyone in need at their facility immediately to the east of downtown Nashua on Quincy St. (pictured at the bottom left). The facility also offers a food pantry on weekdays offering fresh fruit, vegetables, meat, eggs, dairy and nonperishable items to people in need. Special and seasonal offerings include holiday food boxes, backpacks for school kids, books, household cleaning products and other similar items.

In support of personal care, personal hygiene items are provided in toiletry bags during the week as available. Laundry facilities and showers are also available for unhoused people during the week along with other supportive services.

Earlier this year, NSKS consolidated and expanded their shelter services in a long-vacant former parochial school in downtown Nashua (pictured at the upper left). Known as the Spring Street Shelter, the completely retrofitted and renovated building provides emergency shelter accommodations for 18 single men, 14 single women and a 48-bed family shelter with flexible suites that can accommodate between 10 and 12 families. In addition, the facility also offers 11 efficiency units of permanent supportive housing. Significantly, support services also include health care as well as education and employment assistance and financial services.

The Nashua Soup Kitchen & Shelter's Soup Kitchen and Pantry on Quincy Street is pictured on the left, the new Spring Street Shelter is pictured above to the left.

2. Harbor Homes



Buckingham Place, pictured above, provides 20 units of transitional housing for veterans.

Harbor Homes is another non-profit serving low-income and vulnerable populations in the Nashua Region. While Harbor Homes works throughout the state, their primary focus is the greater Nashua area serving Nashua, Amherst, Brookline, Hollis, Hudson, Litchfield, Merrimack, Milford, Mont Vernon, Mason, Manchester, and Wilton. They provide residential, primary, and behavioral health care, and supportive services to more than 1,200 low-income individuals and families who are homeless, at risk of homelessness, or living with mental illness and other disabilities each year.

Harbor Homes emphasizes a holistic approach to providing food, shelter, and basic needs to help families maintain sustainable independence. The agency focuses on providing affordable housing, health care, mental health care, workforce development and employment assistance, supportive services for veterans and homeless prevention (Harbor Homes, 2019).

Currently, Harbor Homes provides housing vouchers specifically for non-elderly disabled households. Therefore, a qualifying factor is that the head, co-head, spouse, or sole member is between the age of 18 and 61 and disabled. Harbor Homes is in the process of screening households that are chronically homeless. In 2022 Harbor Homes obtained a total of 225 Mainstream Housing Choice vouchers to be distributed to those who qualify. In addition, Harbor Homes manages three facilities in Nashua serving differing populations in need as described below.

- Buckingham Place: This attractive facility, located on Spring Street in downtown Nashua, provides 20 units of fully accessible one- and two-bedroom units of transitional housing for veterans.
- Dalianis House: The Dalianis House, also located in downtown Nashua, provides 40 one-bedroom and studio units for homeless veterans.
- Keystone Hall: Keystone Hall is a residential treatment facility with 66-beds for people recovering from substance use disorder. The facility offers primary, psychiatric, and mental health care in addition to other services.

3. Rise Above Sober Living

Rise Above Sober Living Facility serves people of all walks of life over the age of 18, in the Greater Boston and Southern New Hampshire region. They assist individuals that are working to maintain sobriety and require a safe and affordable living situation, some of which have been previously incarcerated. It can be extremely difficult for clients to find rentals on their own, even if they have maintained sobriety for a long time, due to absence or lack of credit or criminal records. It is difficult for clients to pass background checks and compete in the housing market, as there are large volumes of individuals without prior convictions also seeking housing, especially in 2022.

Rise Above provides decreased rent and other expenses and utilizes other agencies to better assist their clients. Most of the funding for these services is provided by grants and other organizations; without these grants it can be exceedingly difficult for clients to get a job and/or maintain housing due to preexisting circumstances. Funding sources include the New Hampshire Coalition of Recovery Residences and the Community Action Partnership of New Hampshire, which utilizes the New Hampshire Emergency Rental Assistance Program. As of 2022, Rise Above owns and leases out about 280 beds, both single and double rooms located in Massachusetts and New Hampshire within their 25 buildings. Rise Above requires that clients arrive at least 30 days sober and in New Hampshire there are a lack of treatment centers overall to assist those seeking sobriety. Rise Above is working to improve their quality of services by opening more residential programs with treatment centers and more sober living houses in Nashua and beyond. For the clients of Rise Above, not only are Section 8 housing vouchers hard to come by, but New Hampshire also lacks affordable and inclusive housing. Improvements to housing for those in these types of situations can assist in ending the cycle of struggling with addiction and gives clients the tools to become active members of society.

4. Bridges Domestic and Sexual Violence Support

Bridges spans Southern New Hampshire and seeks to involve survivors of domestic or sexual abuse to learn in local schools and workplaces while aiming to heal and create support to assist clients in rebuilding their lives through Bridge's emergency shelter and other community resources. As of 2022, Bridges noted a considerable increase in the number of single women without children using their resources, which has increased significantly in the last two years.

Bridge's clients require certain assistance that cannot be found everywhere. Bridges clients rely on counseling and mental health services, which at times can have exceptionally long waitlists regardless of time-sensitive matters. Housing assistance has similar issues, clients are met with long waitlists, and for those who can receive housing vouchers, the amount the vouchers cover generally is never enough to compete with the current housing market. Regardless of the passing of New Hampshire's Section 8 Non-

Discrimination Bill, clients are constantly turned away due to absence/lack of credit or background check reports. Many of Bridge's clients are victims of financial abuse and need the time to recover financially from their situation.

Bridges utilizes the Housing First Program; YMCA NH Housing First Project is funded through the NH Coalition Against Domestic and Sexual Violence (NHCADSV) which is supported by Victims of Crime Act (VOCA) funding that is administered through the NH Department of Justice. Bridges Transitional Housing Program, which runs on a two-year basis, is like Section 8 but is readdressed every two years to better fit the current needs of clients. The Transitional Housing Program is from the Office on Violence Against Women Grant Fundings. Bridges also provides counseling or medical copay assistance, gift cards for groceries, trac phones, etc.

Bridges is seeking to expand and own other shelters and housing, which is difficult with the current housing shortage and unaffordable prices. Bridge's clients struggle to find housing assistance especially if they do not have children. Many landlords do not favor the Transitional Housing Program; therefore, they end up discarding applications from those who apply through the program. Nashua simply does not currently have the supply to support the need for housing in 2022. Bridges would like to expand on their non-emergency housing and/or preventative housing which can be utilized without such a tedious process to get assistance.

Many Bridges clients flee to New Hampshire from other parts of the country, including internationally, for safety. It is common for landlords to require proof of income that is three times monthly rent, making obtaining housing impossible for many without financial assistance. Even with housing assistance, housing vouchers are not as useful as they could be. Bridges uses its shelter and others on an as-needed basis with most shelter stays lasting about 3-6 months. However, more recently individuals are staying for upwards of two years or more at a time, which then increases the waitlist for all. Bridges must rely on other shelters and the Transitional Housing Program in order to continue to serve those who are victims of domestic and/or sexual violence.

5. Front Door Agency

The Front Door Agency, Inc. is a 501(c)(3) nonprofit organization focused on assisting individuals and families as they transition from crisis to self-sufficiency by providing a hand-up opportunity to those at risk of homelessness. The agency's mission is to:

"[] provide a holistic approach to break the cycle of poverty by assisting individuals and families to stabilize, transform, and become empowered to ultimately achieve sustainable independence. We accomplish this by offering an integrated service delivery approach that fosters education and addresses the obstacles that hinder acquiring and maintaining affordable housing and the attainment of self-sufficiency."



The Norwell Home on Concord Street, Nashua

As described on their website, the agency provides a transformational housing program that helps single or expectant mothers between the ages of 18 - 35 take control of their lives and work toward self-sufficiency. Initially, Front Door clients move into the Norwell Home, an eight-unit safe, cooperative living environment in Nashua's North End neighborhood. Each family gets their own suite with two bedrooms and a bathroom. The shared kitchen, living and recreational ensure that families have the support of others who are also taking their first steps toward independence. When families enter Phase 2 of the program, they move from the Norwell Home into their own apartment but still receive the comprehensive case management provided in Phase 1 as they continue to work toward their educational or professional goals.

Families can remain in this phase for up to two years and affordable housing is provided in Caroline's House (4 units with a fenced-in yard), Victory House (5 units with onsite parking and a fenced-in yard) or on Concord Street (1 unit) next to their main office. As families move into the final phase of the program, Front Door continues to provide assistance through education and job training. The agency also provides affordable housing at their Amherst Site (2 units) with limited support services.

6. St. Gianna's Place

St. Gianna's Place prioritizes the safety and health of homeless pregnant women through their assistance with basic needs and urgent situations (i.e., car repairs) and even for educational support (i.e., scholarships). Clients can reside at St. Gianna's Place during pregnancy and up to a year following the birth of their child. St. Gianna's Place does not own the property but utilizes one house that can accommodate up to four women with their infants and one other child under the age of 2.

Overall economic stability is difficult to achieve for clients at St. Gianna's Place, as many individuals require housing, transportation, food, baby supplies, childcare, mental health care, medical and dental care, parenting and budgeting education, and interpersonal relationship skills. Clients at St. Gianna's Place are referred to other agencies for assistance with housing after the year post-birth

ends. These include Supplemental Nutritional Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF), Women, Infants, and Children Nutrition Program (WIC), Budget Buddies, Our Place, Real Options (Women's Health Center in Manchester) and outsource to other agencies for mental health treatment. Many residents at St. Gianna's are in the market for longer-term transitional housing and subsidized/ Section 8 apartments. The organization begins the process of finding housing for clients as soon as they enter the program through their Case Management Support. In the future, St. Gianna's is planning to open an additional 3 beds, with the third floor of their building being opened on September 22nd, 2022.

Although many of the residents are St. Gianna's Place are deemed lucky to find temporary housing, that still leaves many women with no option but to be turned away. Increasing the communication between emergency shelters and transitional housing programs would allow for struggling individuals to have more than one option when things do not work out for them with housing initially, which has the potential to keep more people off the streets. The state lacks availability of emergency family shelters for pregnant women.

The overall understanding of domestic violence plays a key role in who ends up at St. Gianna's Place. There currently is not a definition for domestic violence that is abstract enough to apply to everyone's situation. Many women do not understand the definition of domestic violence and in turn, fewer women are likely to use services like St. Gianna's, simply because they are unaware that their circumstances qualify as Domestic Violence. It can be considered common that individuals do not utilize federal, state, and local resources because they are unaware that they qualify and in turn they generate through the cycle of suffering.

7. Southern New Hampshire Rescue Mission

The Rescue Mission is a faith-based non-profit organization that provides food assistance including three community meals per day for anyone in need and an emergency shelter for up to 45 men in Nashua's Tree Streets neighborhood. Recently, the Rescue Mission opened a 25-bed women's shelter in Nashua's French Hill Neighborhood.

8. <u>Southern New Hampshire Services</u>

Southern New Hampshire Services (SNHS) is the region's federally designated *Community Action Agency* serving both Hillsborough and Rockingham Counties. SNHS operates over 60 programs focused on addressing issues related to poverty.



The Rescue Mission's new facility for women

To assist people experiencing homelessness, SNHS "provides short-term assistance to help prevent eviction, help in securing new housing for those who are suddenly homeless, and information & referrals for individuals and families in need of emergency shelter" as noted on their website. In addition, the agency operates Mary's House in downtown Nashua. Mary's House provides permanent supportive housing accommodations for up to 40 women. SNHS operates a companion facility, Robinson House, for men in Manchester. To quality, individuals must be eligible for Section 8 assistance.

9. Family Promise of Southern New Hampshire

Family Promise is a faith-based non-profit organization with a mission to "end homelessness, one family at a time, because every child deserves a home. Through safe housing and education, Family Promise guides families as they break the cycle, and rise from homelessness to sustainable independence." In 2021, the organization completed work on the rehabilitation and conversion of the former Infant Jesus parochial school in Nashua's Crown Hill neighborhood, into a shelter for up to 24 homeless families. Family Promise offers a multi-step program designed to help families achieve long-term self-sufficiency and stability.

10. Stepping Stones

Stepping Stones is a non-profit organization focused on assisting some of our most vulnerable populations, homeless youth. The organization's mission is to provide: "supportive services to youth facing homelessness in the Greater Nashua Area." Their program is focused on helping the young people they serve "transform their lives and get on the path to becoming self-sufficient adults." Stepping Stones currently operates a drop-in center in Nashua's Millyard District that provides food, bathroom access with showers, a place to rest and a place to keep their belongings. Many of the young people they serve have aged-out of foster care with nowhere to go or have run away from abusive environments. Recently, the organization has begun to pursue a location to develop a shelter and transitional housing facility, also in the Millyard. Once completed, this facility will help fill a critical gap in homeless services in the region.

11. Marguerite's Place

Marguerite's Place is dedicated to providing support services for women and children experiencing homelessness. The organization provides ten furnished units of transitional housing in Nashua's Tree Streets neighborhood together with assistance in obtaining employment, medical help, financial services, and permanent housing.

12. Informal Transitional Housing

As is clear in the descriptions of the emergency and transitional housing alternatives described on the preceding pages, many housing-insecure people will not qualify for certain services because they are not included in the target population for a given program or organization, or because they are unwilling or unable to adhere to certain program requirements. Many housing-insecure people with access to at least some financial resources find temporary housing informally through privately owned rooming houses or Single Room Occupancies (SROs). Often, SROs are former hotels or motels with rooms rented on a weekly basis. Typically, there are no, or low, upfront deposits required and little or no background checks reducing barriers to entry.



Well-known examples of SROs in Nashua Region include the Laton House, pictured to the left, and a former YMCA building, both of which are located in downtown Nashua. Several other smaller rooming houses are scattered throughout central Nashua and other communities. Inexpensive but still functional motels can also serve similar purposes.

B. Persons with Disabilities

Persons with disabilities are a community of concern because many people with physical disabilities require housing that is accessible for people with mobility challenges. These include Americans with Disabilities Act (ADA) accessible entrances and exits, ADA-compliant ramps, elevators in multi-family buildings, wide doorways, fully accessible bathrooms, and other accommodations. Vision impairments may trigger the need for larger print or braille signage, and audio-based communications. It is also noteworthy that as people age, they are more likely to experience physical disabilities that may impair mobility, vision, or hearing. With an aging population, the need for accessible housing will likely increase.





"My child has severe autism. So being mindful of her sensory issues and safety is an issue with what we can afford."

Comment from the general RHNA survey. Results from the survey show 11.5% one or more category of disability and 0.6% caring for person with disabilities in household.

Table 13. Persons with Disabilities between 2015 and 2020, by Municipality

	20	15	2020				
Municipality	Persons With a Disability	Percent of Total Population	Persons With a Disability	Percent of Total Population			
Amherst	1,048	9.32%	806	7.10%			
Brookline	244	4.78%	242	4.49%			
Hollis	514	6.65%	598	7.50%			
Hudson	2,370	9.65%	2,661	10.49%			
Litchfield	658	7.87%	672	7.80%			
Lyndeborough	118	6.91%	162	9.34%			
Mason	148	10.65%	112	7.36%			
Merrimack	2,168	8.49%	2,239	8.51%			
Milford	1,781	11.83%	1,738	11.12%			
Mont Vernon	114	4.35%	243	9.23%			
Nashua	10,340	11.96%	11,983	13.57%			
Pelham	1,095	8.35%	1,374	9.87%			
Wilton	441	11.98%	503	13.32%			
NRPC Total	21,039	10.14%	23,333	10.91%			

C. Other Communities of Concern

Other communities of concern include senior citizens and low-income households which are described in Section V, deinstitutionalized individuals, people suffering from substance use disorder and people suffering from mental illness. For the latter three groups, there is a lack of good data available to articulate housing-related needs.

VII. HOUSING NEEDS PROJECTIONS

In support of the statewide efforts of all nine Regional Planning Commissions to update their Regional Housing Needs Assessments, the New Hampshire Community Development Finance Authority (CDFA) engaged the nationally known firm Root Policy Research, to prepare a common methodology for developing a Fair Share Housing Distribution for every community in every region of the state. The Fair Share Housing Production Model was created to assist New Hampshire's Regional Planning Commissions (RPCs) and municipalities determine the housing production needed to meet current and future demand.

As noted in their final report (see appendix A): "The output from the model is the number of housing units that are needed to accommodate population growth and support employment growth and move New Hampshire's housing market toward a more stable and functioning state. Housing unit targets are provided for five-year increments in 2025, 2030, 2035, and 2040. Stabilization of the housing market is achieved through adding production to achieve a 5% rental vacancy and a 2% ownership vacancy rate. This stabilization factor is averaged throughout the 2020 to 2040 period to best reflect the cyclical nature of housing development (v. front-loading the units needed as of 2022). The model presents *cumulative* housing production targets for 2025, 2030, 2035, and 2040. For example, 2025 housing production targets represent projected need to accommodate demand between 2020 and 2040 (v. need between 2035 and 2040)."

These housing production targets are presented for all owners, and for owners below and above 100% the area median income (AMI) for a 4-person household; and for all renters and renters below and above 60% AMI for a 3-person household. The AMI is the regional AMI for the NRPC region developed for use in this model based on the AMIs published by the U.S. Department of Housing and Urban Development (HUD). The methodology developed by Root Policy Research that resulted in Table 14 on the following page does not break out the current municipal fair share of regional need for workforce housing and therefore shouldn't be relied on for current compliance with the state's Workforce Housing Law, RSA 674:58 – 61.

It is important to stress that the housing production targets shown in Table 14 are intended to address the total number of housing units needed if the region and its communities were to add a sufficient number of housing units to reach optimal vacancy levels as well as accommodating new households formed by natural increase, changes in household composition, and through projected migration. NRPC Municipalities are encouraged to use these targets as guidance in developing local master plans and in developing and administering their local zoning ordinances and land use regulations.

¹ AMI is the median income for households. This statistical measure — literally the income of the household in the exact middle of all households when distributed from lowest to highest — is a better measure than the average, which can be skewed by very low or very high incomes.

Table 14. 2030 Housing Development Targets by Municipality

Municipality	2025	Renters Below 60% AMI	Renters Above 60% AMI	Owners Below 100% AMI	Owners Above 100% AMI	2030	Renters Below 60% AMI	Renters Above 60% AMI	Owners Below 100% AMI	Owners Above 100% AMI
Amherst	274	30	59	64	120	499	55	109	117	218
Brookline	119	13	26	27	53	217	23	49	49	96
Hollis	192	16	46	47	83	351	30	86	85	150
Hudson	600	71	125	167	237	1,095	130	230	304	431
Litchfield	197	20	44	57	76	358	37	81	103	138
Lyndeborough	42	3	11	13	15	76	5	20	24	27
Mason	35	2	9	11	13	64	5	16	20	23
Merrimack	628	69	136	181	242	1,146	126	251	330	439
Milford	391	46	82	122	142	713	84	151	221	257
Mont Vernon	60	6	14	17	24	110	10	26	30	43
Nashua	2,272	244	496	722	810	4,145	449	914	1,310	1,472
Pelham	239	38	40	80	81	435	70	74	145	146
Wilton	95	14	17	32	32	174	25	32	59	58
NRPC Total	5,143	570	1,107	1,540	1,926	9,383	1,047	2,039	2,796	3,500
	000=	Renters	Renters	Owners	Owners		Renters	Renters	Owners	Owners
Municipality	2035	Below 60%	Above 60%	Below 100%	Above 100%	2040	Below 60%	Above 60%	Below 100%	Above 100%
Municipality	657	AMI	AMI	AMI	AMI		AMI		ABAI	A B 41
Amherst		71	1 4 🗆	153		756		AMI 170	AMI	AMI
Dunnaldina		74	145	152	285	756	87	170	174	326
Brookline	287	31	65	64	285 126	330	87 37	170 76	174 73	326 144
Hollis	287 462	31 40	65 114	64 111	285 126 196	330 532	87 37 48	170 76 133	174 73 127	326 144 223
Hollis Hudson	287 462 1,441	31 40 174	65 114 306	64 111 397	285 126 196 563	330 532 1,659	87 37 48 206	170 76 133 357	174 73 127 454	326 144 223 642
Hollis Hudson Litchfield	287 462 1,441 472	31 40 174 49	65 114 306 108	64 111 397 135	285 126 196 563 180	330 532 1,659 543	87 37 48 206 58	170 76 133 357 126	174 73 127 454 154	326 144 223 642 205
Hollis Hudson Litchfield Lyndeborough	287 462 1,441 472 100	31 40 174 49 7	65 114 306 108 27	64 111 397 135 31	285 126 196 563 180 35	330 532 1,659 543 115	87 37 48 206 58 8	170 76 133 357 126 31	174 73 127 454 154 36	326 144 223 642 205 40
Hollis Hudson Litchfield Lyndeborough Mason	287 462 1,441 472 100 84	31 40 174 49 7 6	65 114 306 108 27 22	64 111 397 135 31 26	285 126 196 563 180 35 30	330 532 1,659 543 115 97	87 37 48 206 58 8	170 76 133 357 126 31	174 73 127 454 154 36 30	326 144 223 642 205 40 34
Hollis Hudson Litchfield Lyndeborough Mason Merrimack	287 462 1,441 472 100 84 1,507	31 40 174 49 7 6	65 114 306 108 27 22 334	64 111 397 135 31 26 431	285 126 196 563 180 35 30 573	330 532 1,659 543 115 97 1,736	87 37 48 206 58 8 7	170 76 133 357 126 31 26 390	174 73 127 454 154 36 30 493	326 144 223 642 205 40 34 652
Hollis Hudson Litchfield Lyndeborough Mason	287 462 1,441 472 100 84 1,507	31 40 174 49 7 6 169 113	65 114 306 108 27 22 334 201	64 111 397 135 31 26 431 289	285 126 196 563 180 35 30	330 532 1,659 543 115 97 1,736 1,080	87 37 48 206 58 8 7 201	170 76 133 357 126 31 26 390 234	174 73 127 454 154 36 30 493	326 144 223 642 205 40 34 652
Hollis Hudson Litchfield Lyndeborough Mason Merrimack Milford	287 462 1,441 472 100 84 1,507	31 40 174 49 7 6	65 114 306 108 27 22 334	64 111 397 135 31 26 431	285 126 196 563 180 35 30 573	330 532 1,659 543 115 97 1,736	87 37 48 206 58 8 7	170 76 133 357 126 31 26 390 234 41	174 73 127 454 154 36 30 493	326 144 223 642 205 40 34 652
Hollis Hudson Litchfield Lyndeborough Mason Merrimack Milford Mont Vernon	287 462 1,441 472 100 84 1,507 938 145	31 40 174 49 7 6 169 113	65 114 306 108 27 22 334 201 35	64 111 397 135 31 26 431 289	285 126 196 563 180 35 30 573 335 57	330 532 1,659 543 115 97 1,736 1,080	87 37 48 206 58 8 7 201 133 16	170 76 133 357 126 31 26 390 234	174 73 127 454 154 36 30 493 331 45	326 144 223 642 205 40 34 652 381
Hollis Hudson Litchfield Lyndeborough Mason Merrimack Milford Mont Vernon Nashua	287 462 1,441 472 100 84 1,507 938 145 5,451	31 40 174 49 7 6 169 113 14	65 114 306 108 27 22 334 201 35	64 111 397 135 31 26 431 289 40	285 126 196 563 180 35 30 573 335 57 1,918	330 532 1,659 543 115 97 1,736 1,080 167 6,272	87 37 48 206 58 8 7 201 133 16	170 76 133 357 126 31 26 390 234 41 1,417	174 73 127 454 154 36 30 493 331 45	326 144 223 642 205 40 34 652 381 65 2,181

VIII. FAIR HOUSING

The Fair Housing Act (FHA) was passed by Congress in 1968 to address housing discrimination that was pervasive throughout American communities at the time. Discrimination at that time was often overt, such as covenants that prohibited the sale or lease of housing to members of specific racial or ethnic groups, practices such as *Redlining* and *Blockbusting* together with more subtle forms of discrimination that nevertheless had deep and long-lasting impacts on housing choice. The FHA prohibits discrimination on the basis of race, color, national origin, religion, and sex as well as disability and familial status. In New Hampshire, protected classes include the seven federally protected classes as well as protections for people from discrimination on the basis of age, marital status, sexual orientation, and gender identity. Though much of the more egregious housing discrimination practices of the past have been curtailed if not eliminated, discrimination continues to exist, including practices such as refusing to rent to people with Section 8 housing vouchers (see Section IX) and the legacy of past discrimination remains a force that shapes today's housing market as well as the composition of our communities.

The identification and analysis of barriers to equal housing access is a key component of addressing the region's housing needs, though for most of the region's communities, data is limited. However, the RHNA does include relevant information on the geographic distribution of people in the region by race (Section III, subsection 5) and Income (Section III, subsection 7) as well as relevant data related to age and disability in Sections III and IX. For a comprehensive overview, refer to the Analysis of Impediments to Fair Housing Choice in New Hampshire https://www.nhhfa.org/wp-content/uploads/2021/04/2020-Analysis-Impediments-Fair-Housing-ChoiceNH.pdf prepared by the NHHFA and updated in 2020. The tables and figures on the following pages provide information on housing-related discrimination complaints by municipality.



Table 15. Fair Housing Complaints between 2014 and 2022, by Municipality

M un icipality	2014	2015	2016	2017	2018	2019	2020	2021	2022	2014-2022 Total
Amherst										-
Brookline										-
Hollis										-
Hudson			1	1		1		1		4
Litchfield			1							1
Lyndeborough						1				1
Merrimack		1	1			4	3	1		10
Mason										-
Milford	4	2	9	2		1	1	1		20
Nashua	17	9	12	8	17	10	8	11	6	98
Pelham	1		1	1						3
Peterborough	2	1		2	1	1	1			8
Wilton										-
NRPC Total	24	13	25	14	18	18	13	14	6	145

Table 16. Fair Housing Complaints by Type in the Nashua Region between 2014 and 2022

Type of Fair Housing Complaints	2014	2015	2016	2017	2018	2019	2020	2021	2022	2014-2022 Total
Color, Mental Health Disability, Race									1	1
Color, Race							1			1
Familial Status		2	2	1		1	2	1		9
Familial Status, Mental Health Disability	1									1
Mental Health Disability	10	3	7	2	5	5	4	3		39
Mental Health Disability, National Origin		1						1	1	3
Mental Health Disability, Physical Disability	1			3	5	4		3		16
Mental Health Disability, Physical Disability, Race			1							1
Mental Health Disability, Sex, State: Sexual Orientation		1								1
National Origin		1	7	4	1		1	2	1	17
National Origin, Race						1			1	2
Physical Disability	7	2	1		5	3	1	1	1	21
Physical Disability, Race		1								1
Race	2		7	1	1	2	3	2		18
Race, Familial Status								1	1	2
Religion				1						1
State: Age, Mental Health Disability, Physical Disability		1								1
State: Age, Physical Disability, Mental Health Disability	1									1
State: Sexual Orientation						1				1
NRPC Total	22	12	25	12	17	17	12	14	6	137

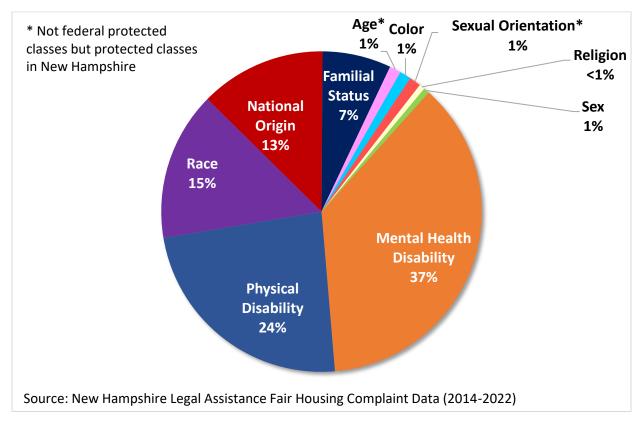


Figure 46. Fair Housing Complaints by Type in the Nashua Region between 2014 and 2022

Overall, the number of complaints received appears to be proportional to the number of rental units available in the respective municipalities. Of the different types of complaints by protected class, mental health disability had the highest occurrence (37%), followed by physical disability (24%), race (15%) and national origin (13%), and familial status (7%). Other types of complaints included age, color, sexual orientation, sex, and religion.

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IX. STRATEGIES

The housing market and demographic data highlighted in prior sections demonstrate that the region needs more housing of all types; however, the need for multi-family housing in general and for studio and one-bedroom units in particular is especially acute. In addition, there is a significant housing need for very-low-income individuals and families who are unlikely to be able to find decent, safe, and affordable housing at market rates as well as for permanent housing for people experiencing homelessness including supportive housing. For the later population groups, some level of subsidy and on-going support will be required. The communities in the Nashua Region are diverse and include urban, suburban, and rural areas. As such, there are no one-size-fits-all solutions to increasing the overall supply and diversity of housing in the region.

To address the region's housing challenges successfully, it is essential that communities strive to implement strategies to expand housing supply and diversity in ways that avoid straining local infrastructure, respect the integrity of established neighborhoods and are consistent with community character. All communities should examine their zoning ordinances and regulations to identify ways to expand opportunities for the development of a diversity of housing types. Alternatives to consider include proving greater flexibility for Accessory Dwelling Units (ADUs), including allowing detached ADUs, allowing housing to be developed at higher densities in appropriate areas including smaller multi-family buildings in and adjacent to existing town center and downtown areas, permitting the conversion of vacant or obsolete schools, churches and commercial buildings into multi-family housing, permitting the development of higher-density housing on vacant commercial and industrial land for which there is little demand, expanding opportunities for manufactured housing including expansion of existing mobile home parks and allowing mobile homes on all lots that permit conventional single-family homes, and expanding existing zoning districts that allow multi-family housing.

This section illustrates a wide range of housing alternatives from ADUs to large multi-family buildings. The examples illustrated focus on the development of housing types serving different populations that are appropriate under a variety of local conditions with an emphasis on so-called "missing middle" housing that can integrate well into established neighborhoods and rural areas as well as in more urbanized areas. It should also be noted that many of the examples shown are "in-fill" developments meaning that they are constructed on vacant lots within established neighborhoods at densities consistent with the surrounding area.

A. Accessory Dwelling Units (ADUs)

ADUs are possibly the simplest way to add housing units in existing neighborhoods and can help to meet the acute need for smaller studio and one-bedroom units. All NRPC communities allow ADUs – some by right and some by special exception, and five communities allow detached ADUs under some conditions. ADUs are complete dwelling units with permanent, separate cooking and bathing

facilities. ADUs are often referred to as in-law apartments, garage apartments, basement apartments, or granny flats. They can be carved out of the main building, or created in an existing garage or outbuilding, or newly constructed as a free-standing building.

Under the state law, RSA 674:71-73, which went into effect on June 1, 2017, accessory dwelling units (ADUs) means:

"a residential living unit that is within or attached to a single-family dwelling, and that provides independent living facilities for one or more persons, including provisions for sleeping, eating, cooking, and sanitation on the same parcel of land as the principal dwelling unit it accompanies." (NH RSA 674, 2019)

Municipalities that adopt a zoning ordinance pursuant to the authority granted by RSA 674, must allow ADUs as a matter of right, by a conditional use permit or special exception in all zoning districts that permit single-family dwellings. Regardless of how ADUs are allowed, the municipality cannot impose greater dimensional standards on homes with ADUs than it does for homes without ADUs. The state also leaves it to the Town's choice as to whether or not the ADU can be attached or detached.

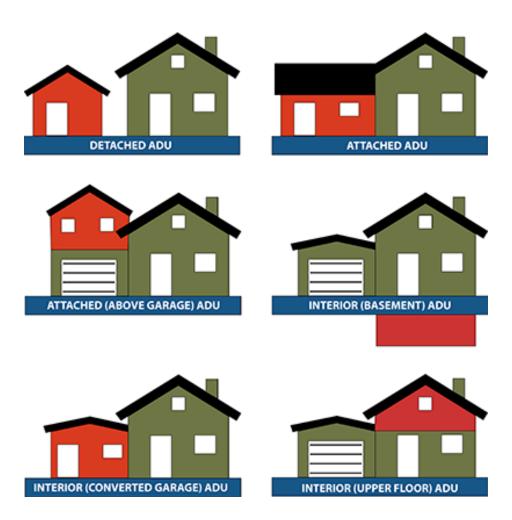
ADUs in existing houses are often referred to as 'attached' and those in outbuildings are referred to as 'detached.' Some land use codes place stricter requirements on detached ADUs or do not permit them at all. We recommend allowing both on any existing lot of record, and not requiring additional land area for the construction of a detached ADU.

ADUs are a wonderful tool for allowing residents to age in place. Creating a smaller, more accessible unit allows an older person to remain in their current location, but in a way that is safer and more manageable for them by meeting their needs (smaller, on a single floor, with accessible interiors, and easier access to the outdoors) either within their existing house, in an existing outbuilding, or in a new purpose-built structure. With an ADU, an elderly person or couple can remain in the community, with all the social support that provides, and they can retain their house, often the most significant financial asset for a household. Creating a rental unit increases income for the retiree, allowing them to both pay their taxes and maintain their building.

Residents may choose to remain in the larger portion of their house and rent the newly created smaller unit. These units may be more affordable than new, market-rate rental units since they are created out of existing housing stock. As noted above, 28% of all households are single people, for whom a small ADU may be the perfect choice. Because ADUs are typically constructed by the homeowners themselves rather than by a developer, the process for approval and construction needs to be straightforward. Communities are encouraged to allow them by right, to avoid the need to apply to the Zoning Board of Adjustment or the Planning Board, or for any kind of Conditional Use Permit.

How to size ADUs is something with which municipalities often struggle: how big can an ADU be? This can be contentious and will sometimes cause someone who wants to create an ADU to give up. One way to deal with this is to allow any existing outbuilding on the lot to be converted to an ADU. Another is to consider any new ADU with less than 50% of the living area of the existing, main dwelling to be accessory. In any event, the goal should be to allow ADUs without complicated bureaucratic processes.

Since ADUs are typically created by a homeowner who may be in straitened financial circumstances, some jurisdictions, notably Montpelier VT, have created revolving loan funds to assist in the construction of ADUs. If a town or city chooses to do this it is best to simply make the funds available without extensive means testing, with terms that the loan is to be repaid at the sale or transfer of the building.



"We have an ADU, and it is rented (at a real, not-family rate) to my adult daughter. There is no housing that she can afford otherwise."

Comment from the general RHNA survey.

Source: <u>American Planning Association knowledge Center</u>

B. Missing Middle Housing

1. Duplexes





Duplexes are simply buildings that have two dwelling units. They can be configured in a variety of ways, side by side, stacked, or front to back. They can be divided so that each unit is legally separated and can be sold independently. They are often recommended to first-time homebuyers as a way of affording a house, since a portion of the rental income can be counted toward the necessary income to qualify for a mortgage. The side-by-side duplex in the upper left is located in Pelham Center.

The stacked duplex to the left in Milford presents a narrow gable end to the street, making it a particularly discrete version of multifamily housing. The image below shows an attractive example of a purpose-built stacked duplex.







The example on the left is under development in Nashua. This duplex is an in-fill project consisting of two duplex buildings on a vacant lot in a dense urban neighborhood. This example has a form similar to a large single-family home and could fit well into almost any environment. Though it was built at a density consistent with the neighborhood, a density variance was required. The example in the lower left is a "condex" recently built in Hudson. A condex is a two-unit condominium that provides two adjacent home ownership units.

Duplexes are commonly owner-occupied with one unit used as a rental. As noted above, this can help to off-set housing costs for the owner which can make duplexes an affordable home-ownership alternative. In some cases, duplexes are investor-owned, and both of the units are rentals and in other cases, both units are owner-occupied. Importantly, duplexes can readily be developed with or without public sewer. Given their small scale and range of tenure options, duplexes are a particularly desirable option for increasing housing diversity without unduly impacting a community's character or infrastructure.

All NRPC communities permit duplexes in at least some zoning districts, though usually with a substantially larger lot site requirement, and the region has numerous duplexes of all kinds. Communities are encouraged to allow duplexes in all areas that allow single-family homes subject to the availability of sewer or septic system requirements in unsewered areas. Design guidelines can help ensure that newly constructed duplexes are consistent with the character of the area.

2. Small Multi-Family Buildings



Triple Decker in Nashua's Tree Streets Neighborhood

Small multi-family buildings are common in established urban neighborhoods and in historic town centers which often have a mix of single-family, duplex, and multifamily forms.

Though not common in the Nashua area, Triple-Deckers are a distinctly New England housing form. Usually free-standing with one apartment per floor, they have the advantage of providing windows on all four sides to maximize light and air. The units are relatively large at 1,000 square feet or more making them popular for families. Triple-Deckers are most appropriate in a more urban context, but triples in general can be comfortable neighbors in hamlets, villages, and small towns. The classic example of a Triple-Decker shown on the left is located in Nashua's Tree Streets neighborhood.

Though Triple-Deckers are well-known, Triples can take a variety of forms. Often, they take the form of a large single-family home that has been converted into a Triple. These are usually located in older neighborhoods and are often nonconforming. Where zoning allows, however, they can be purpose-built as new market rate or affordable housing. Like all of our other middle housing examples, they are house-sized. Examples of Triples of varying styles can be found throughout the region. Like Triples, Fourplexes are typically house-sized buildings suitable for placement almost anywhere. They can be repurposed or purpose-built, and, because of the number of units, are one of the best ways to achieve naturally occurring affordable housing. Fourplexes created from existing large houses, as well as well-designed new purpose-built examples, fit well into neighborhoods, small towns, and more urban contexts.





The house to the left was originally a single-family home converted to a three-family in Pelham Center. The well-maintained building fits well within the historic character of the town's typically New England town center area. Above to the right is a single-family converted to a multi-family building in Wilton in a neighborhood of mixed single-family, duplex, and multi-family buildings.

By keeping the individual apartments on the small side, small apartment buildings can be inserted into existing neighborhoods in cities and towns and into village centers. They are less appropriate in the rural districts, or in very small hamlets or villages unless they take the form of connected farmsteads. Even though small apartment buildings are more urban in form, they are still more or less the size of a large house. It is important, however, for clear design guidelines to be established so that newly constructed small multi-family buildings can be developed in a way that is compatible with neighborhood character.

Three examples of houses converted to multi-family homes are shown on the following page. To the left is a historic Victorian mansion in Hudson that has been converted into a multi-family building but remains a landmark in the community. Another building in Hudson in the upper right, was originally built as a duplex but has been converted to six units. The connected farmhouse in the bottom right is a multifamily conversion located near downtown Wilton.









To the left is a recently constructed six-unit building near downtown Nashua. Though not appropriate in a rural or historic town center environment, buildings of this scale fit well in mixed character or commercially developed areas.

Small multifamily buildings, both newly-constructed and repurposed, are not projects which attract large commercial developers, which makes eliminating barriers crucial. These are projects which are typically undertaken by a small local contracting firm: two women in a van, three guys and a dog in a pickup truck. If the permitting process is onerous or uncertain these projects will not get built.

We know that the longer it takes to permit a project the more likely it is to be abandoned. If we want to add these neighborly buildings to our communities, it is important to make the process as quick and straightforward as possible.

3. Townhouses

Townhouses, or rowhouses, are a series of identical or nearly identical single-family dwellings which are attached side to side. They have many advantages over free-standing single-family dwellings: they are more energy efficient, use less land, and can be built using the International Residential Code for buildings, rather than requiring International Building Code standards for multifamily. In the Nashua Region, townhouses are often developed as condominiums which can provide opportunities for homeownership at a lower cost than single-family homes, though they are also developed as rental units. Townhouses are a form best suited to small towns and larger urban contexts and would feel out of place in small town centers.



Contemporary Townhouses in Hudson



The townhouse condominiums shown above were recently constructed in Nashua on General Industrially Zoned land in an area that no longer has an industrial character. Communities should evaluate whether vacant commercial and industrially zoned land may be better suited to multi-family residential development. Developing multi-family homes on land that has limited market value for commercial or industrial use provides a way for communities to accommodate more housing while minimizing impacts on established neighborhoods.

4. Farmsteads





A farmstead is a term for a group of rural buildings such as a main house, several barns of varying sizes, and perhaps a small cottage or two. They are a common sight in New England and can be repurposed or newly built for multifamily housing. A common well and septic can be constructed to serve the entire group of buildings. In towns and villages which have already adopted some form of cluster zoning or conservation subdivision standards, farmsteads are a good model, rather than scattering single houses over the entire parcel. Farmsteads are often comprised of a series of connected buildings that include the big house, little house, backhouse, and barn - the iconic New England connected farm. These buildings are characterized by a series of connected buildings which had particular uses when they were working farms. Now they can be repurposed (or newly built) as appropriate multifamily structures in rural areas.

There are several examples of connected farm buildings in the region including some that have been converted to multifamily structures or to mixed-use commercial/residential uses. The connected farmhouse above left in Litchfield is large enough to be a three or four-plex. To the lower left is a connected farmhouse in Lyndeborough.

Many connected farmhouses in rural areas are on large lots that can be converted to multi-family uses at densities consistent with the surrounding area. Connected farmhouses on large lots can also easily meet septic and well requirements.

5. Cottages

Cottage is an amorphous term generally used to mean a single-family dwelling of between 400 and 1200 square feet. They can be used as accessory dwelling units, grouped into cottage courts, or stand alone on an individual lot. Cottages can be developed on fee-simple lots or as part of a condominium development to provide home-ownership opportunities or as part of a rental development. They tend to be more popular than other forms of missing middle housing, particularly when grouped together as a cottage court or pocket neighborhood. Cottage courts are groups of small cottages on a single lot. Parking is behind the cottages, not in front like a motel, and the space enclosed by the buildings is common outdoor space. The following photos show examples of cottages used as accessory buildings as well as examples in cottage neighborhoods, both newly constructed and long-standing.



Backyard Cottage in Nashua (non-conforming).



The cottages to the upper and lower left are part of newly developed New England cottage communities. The lots are 50 feet wide, and the cottages are approximately 20 feet apart. If fire-proof assemblies are used on the side walls the cottages can safely be placed even closer together, making these neighborhoods an even more efficient use of infrastructure.

Below is a simple backyard cottage in Portsmouth. It is used as an ADU. This is a freestanding cottage of about 800 square feet. It is a comfortable size for tucking into a back or side yard or using to create a cottage court.





If your community wants to have new middle housing the first step is to allow multifamily by right wherever appropriate. This does not have to mean that you allow any multifamily: you need to establish in the code that what is allowed is house-sized multifamily, not big apartment blocks. There are a number of ways to do this. The most comprehensive, and most expensive and complicated, is to adopt a form-based code for the neighborhoods where you want to encourage middle housing. A form-based code describes all the possible permitted buildings for an area, regulating their physical form rather than their use. They are a wonderful tool, but they require considerable effort to write and see through to adoption. For an explanation of form-based codes from the Form-Based Codes Institute at Smart Growth America, visit https://formbasedcodes.org/.

An approach that might be considered "form-based code light" is to allow four or six units by right everywhere but establish a maximum building footprint. For this approach, you identify the largest single-family house in a neighborhood or an appropriately sized existing missing middle multifamily building and set its footprint as the maximum.

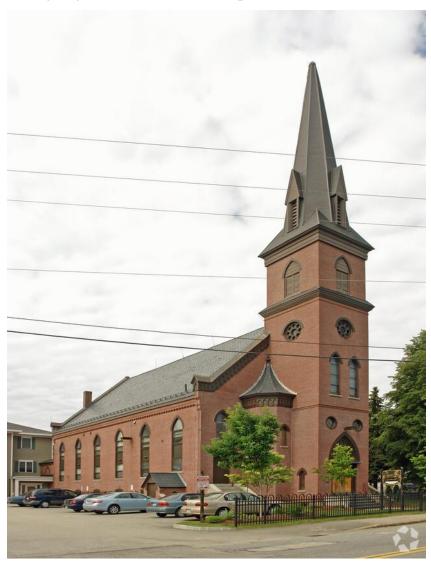
For example, if a neighborhood has a three-story single-family house measuring 40 feet by 60 feet (a not unusual size for a big colonial or Victorian) your code would read "Multifamily dwellings of up to four units and limited to a footprint of no more than 2400 square feet are allowed by right. The front of the building may be no more than 40' long as measured parallel to the street. Maximum height is not to exceed three stories measured at the eave." This ensures that the new buildings will suit the scale of the neighborhood.

The note about the frontage length is crucial because our experience of the street is largely determined by this. Think about how unfriendly big, blank walls are to walk next to. If we are trying to add housing in a seamless way it is important to keep the new buildings house-sized, not industrially sized. Similarly with the height restriction: keep the buildings at the same scale as the existing houses.

A third method of making sure new buildings are going to be good neighbors is to approve a collection of house plans that closely match your existing buildings. This is generally done through an overlay zone, known as a pattern zone. You can find articles about and examples of pattern zones online, including at the Congress for New Urbanism website https://www.cnu.org/.

A fourth method of attempting to restrict new buildings to an appropriate scale is to have a maximum lot coverage percentage or a floor area ratio, a ratio between the building's floor area and the lot it is built on. These are much less effective methods of ensuring that the new buildings are appropriately scaled because not all lots are the same size. If your town adopts a code restricting multifamily to 40% coverage, excluding parking, the new building is going on a one-acre lot that could be a 16,800-square-foot building. Much too big for an established neighborhood. This approach is not recommended.

C. Repurposed Civic Buildings



Repurposing civic buildings such as vacant schools and churches is an ideal way of providing additional multi-family housing. Since the buildings already exist and are often an important part of the community's historic fabric, they can be converted to residential uses with little to no impact on neighborhood character. If the buildings are historic, they can benefit from federal Historic Tax Credits and New Hampshire's 79-E tax incentive program (See Section X). To the left is the historic St. Casimir Church in Nashua that was converted to affordable housing together with a new addition. The property Below is a former school, also in Nashua, converted to senior housing. Examples of buildings such as these can be found in most communities.



D. Mixed Use



Mixed commercial/residential uses in downtown Milford.

Mixed commercial and residential uses in the same building or on the same lot were once common throughout the region, especially in established downtowns and town centers. While some communities such as Nashua both permit and encourage mixed-use development in its downtown, in many communities, existing mixed-use buildings are nonconforming and new development or the conversion of existing single-use buildings to mixed-use can be challenging.

Communities are encouraged to explore whether there are opportunities to allow new mixed-use development in town center areas and in commercial zoning districts and to examine local land use regulations to determine whether they can be modified to allow mixed-use by right or as a conditional use in appropriate areas.

Nashua's downtown districts allow mixed-use development by right and buildings that comply with required use, dimensional and design requirements can obtain a building permit without the need for Planning or Zoning Board approval.





Mont Vernon's General Store, above left, is on the ground floor of a mixed-use building in the village area. The Monument Square Market in Hollis Center and Village Store in Lyndeborough are also mixed-use properties. These examples would not be permitted under existing regulations. Below is the Martha's Exchange Building in downtown Nashua with retail on the first floor and apartments above.





E. Commercial/Industrial Conversions

Many communities have vacant or underutilized commercial buildings that could be converted to residential uses. In recent years, the impact of remote and hybrid work has increased the vacancy rate for commercial office space. Meanwhile, the rise of on-line shopping has led to a decrease in demand for retail commercial space. One of the most significant examples of office-to-residential conversion is 1000 Elm Street in downtown Manchester. The iconic 20-story building is undergoing conversion by developers Brady Sullivan, into 155 market-rate apartments with ground-level retail. Other significant Manchester examples include the conversion of the five-story building at 1230 Elm into 100 units and the conversion of the former Citizen's Bank building. The Nashua Region is also experiencing commercial to residential conversions. Two recent examples are shown below. The example to the left is permitted under existing zoning. The example to the right required a variance.





The long-vacant Indian Head Bank building in downtown Nashua, above left, is undergoing conversion to 22-market rate apartments. Brady Sullivan is converting the former Brookstone headquarters in Merrimack into 90 new apartments. While it is important for a

community to have vibrant commercial areas to support its tax base and provide access to needed goods and services for its residents, properties with a history of vacancy or underutilization can be good candidates for conversion with little to no impact on established residential neighborhoods.

As is true for existing commercial land and buildings, many communities have industrially zoned land that has failed to develop or buildings and sites that may once have been viable for industrial use but are no longer suitable. The classic example of an outmoded industrial building form are the region's 19th and early 20th-century mill buildings. Because of their floor depths and column spacing as well as interior features such as exposed brick walls and hardwood floors, however, former mill buildings such as the examples shown below, are often excellent candidates for conversion to residential use. Clocktower Place in Nashua's Millyard was converted to 326 apartments including 136 affordable units in the 1990s. The Henry Hanger building, below right, is undergoing conversion into 80 market-rate apartments. Other recent conversions include Cotton Mill Square and the Lofts, both in Nashua's Millyard, which together provide over 300 apartments including 55 affordable units. The Millyard examples all took advantage of federal historic tax credits.





In addition to vacant and underutilized buildings, many communities have industrial-zoned areas that have not fully developed due to lack of access to highway networks, lack of public sewers, and other constraints. In some cases, vacant industrial sites such as these,

including Brownfields sites, can be good candidates for residential development, especially multi-family residential development. The Residences at Executive Park Drive in Merrimack, shown below, is a 280-market rate unit development completed in 2020. Executive Park Drive was planned as an office park in an industrially-zoned area but was never fully developed. A variance was required. A redevelopment of the former Mohawk Tannery property in Nashua, a long-contaminated brownfields site, is proposed to be cleaned-up and redeveloped into 543 multi-family units with 230 rentals (including 38 affordable units) and 316 condominiums according to a recent press release issued by the City. The property will need to rezoned.



X. Tools and Resources for Meeting Local Housing Needs

A. Inclusionary Housing

Inclusionary housing programs are a way of encouraging private developers to provide housing for moderate-, low- and very-low-income households in exchange for density bonuses or zoning changes. Generally, a residential developer seeking a higher density than normally allowed under the zoning ordinance would be required to set aside a certain percentage of the units for lower-income households. Many inclusionary housing programs also require a certain percentage of the units to be designated for elderly or handicapped households. Depending on the ordinance, developers interested in applying for a density bonus or zone change apply either to the local zoning board of adjustment or to the planning board. New Hampshire statutes require inclusionary housing programs to be voluntary and ordinances typically apply only where the municipality attempts to use zoning as an incentive to provide for a recognized need within the community. The developer receives an incentive, usually increased density, which provides the impetus for developing the desired housing type. The percentage of units that must be set aside for target groups could vary based on the local ordinance.

In general, most ordinances require the below-market-rate units to be provided within the site. The units may be smaller than market rate and may lack some amenities but may not be recognizably different from the other units in the development. Some ordinances allow below-market-rate units to be clustered within a portion of the development. Other ordinances encourage the below-market-rate units to be distributed throughout the complex.

Because most ordinances require below-market-rate units to be provided on-site, the maintenance, management and marketing of the units remains a private responsibility. Local ordinances usually include a provision requiring that below market units, whether rental or owner-occupied, remain at below market levels for a fixed period of time. The time period can vary from 10 to 99 years. Municipalities, however, must take the responsibility of ensuring that below market units remain at target levels. This is particularly difficult for below-market-rate owner-occupied housing as the resale of the property must be regulated to ensure that a lower or moderate-income family can purchase the unit while allowing the seller to capture some equity from the property. In most cases, the monitoring of inclusionary housing programs is the responsibility of a local housing authority, community development department, or planning department.

The greatest constraint to implementing an inclusionary housing program in the region's municipalities is the difficulty of administering the program. Although market studies have been done which indicate that developments with below-market-rate units do not suffer from lowered real estate values, public perception is difficult to overcome. Another barrier is the difficulty of amending zoning ordinances to allow for the flexibility to provide density bonuses in many municipalities. The greatest advantages to inclusionary

housing programs are that the below-market-rate units are generally built, managed, and maintained by private developers. The municipality avoids having to maintain an inventory of housing to manage and avoids the difficulty of locating sites and building needed housing.

By including a small number of moderate- and low-income units within a mix of market rate units, the community avoids the problems associated with over-concentration. The families that occupy the units are integrated with the greater community and are provided with the same level of maintenance and the same public facilities and services as the general population. Furthermore, programs that also encourage the provision of elderly and handicapped housing, as well as three-bedroom rental units, allow for an even greater integration of household types. In this way, the housing needs of most family types, including various age and income groups, can be accommodated within a single residential development with only minimal public sector involvement.

The City of Nashua recently adopted a Mandatory Inclusionary Housing Ordinance that requires 10% of units in both ownership and rental projects with 50 to 99 total units to be affordable to households at 80% of the median income and 5% affordable to households at 100% of median income anywhere in the city. For projects with 100 or more units, 10% of the units must be affordable to households at 80% of the median income and 10% affordable to households at 100% of the median income. In the Downtown area, for projects with 50 to 99 total units, 7.5% of the units must be affordable to households at 80% of the median income and 10% for projects with 100 units or more. Communities interested in implementing an Inclusionary Housing Ordinance should consult the *Innovative Land Use Planning Techniques Handbook*, published by the NH Department of Environmental Services, which includes a model ordinance and background information for New Hampshire municipalities.

B. Manufactured Housing (Mobile Homes)

Manufactured housing, as defined in RSA 674:31, is a term that includes what are traditionally known as trailers or mobile homes. Although state legislation has been adopted that requires all municipalities to provide reasonable opportunities for the location of manufactured housing, many communities still severely restrict such housing. This is often due to aesthetic considerations as well as the association of manufactured housing with lower-income groups. In general, manufactured housing is situated either in higher-density parks, on individual lots or in manufactured housing subdivisions. In rural areas in particular, manufactured housing has historically been one of the most important forms of affordable housing.

In the Nashua Region, there are twenty-one mobile/manufactured home parks including parks in Amherst, Brookline, Hollis, Hudson, Litchfield, Merrimack, Milford, Mont Vernon, and several in Nashua. Within these manufactured housing/mobile home parks, there are about 1,369 units. A list of manufactured housing/mobile home parks is provided in Appendix B.



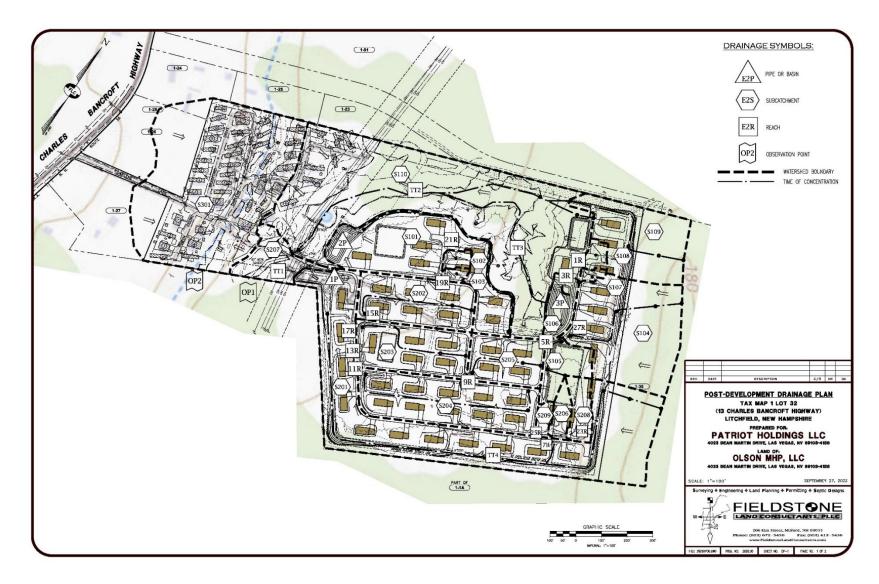


Manufactured housing/mobile home parks can provide an important housing alternative for low and moderate-income groups. In most cases, the homes themselves are owned by the residents, but the lots are rented. In privately owned parks, residents can face eviction if the land is sold and, given the lack of available sites, are often unable to move their units. To mitigate this threat, the New Hampshire Community Loan Fund has led an effort to encourage residents to form resident-owned cooperatives to purchase their parks. One-third, or seven, of the manufactured/mobile home parks in the region are resident-owned cooperatives.

Mobile homes on individual lots or within subdivisions are only a limited form of affordable housing due to the high land costs and restrictive zoning. Although a manufactured home on an individual lot may be only 10% less expensive than a conventional home on a similar lot, this can make the difference in affordability for many moderate-and middle-income families.

In early 2023, a 55-unit expansion of the 44-unit Olsen's Mobile Home Park in Litchfield was approved. The new units will be situated on 10,000 sq. ft. lots serviced by community septic systems and private roads. The expansion plans (shown on the following page) also include substantial investments to improve conditions for existing residents including upgraded septic systems, roads, and utilities. The new units will consist primarily of double-wide units, such as the examples to the left, which are almost indistinguishable from ranch-style conventional homes. All the new units will be workforce housing units.

NRPC communities are encouraged to permit mobile homes on any lot that allows conventional single-family homes with the possible exception of historic districts and other similar areas, and to provide reasonable opportunities for the expansion of existing parks and the development of new parks in appropriate locations.



Olsen's Mobile Home Park Expansion Plan – Litchfield, NH, approved in 2023

C. Local Agency Support

In addition to the above tools and resources available statewide, there are several organizations within the Nashua Region that can provide valuable support to people in need of housing assistance. The principal housing-related organizations in the Nashua Region are as described on the following pages.

1. Municipal Welfare

For many people in need of housing assistance, the first step is to apply for assistance from their city or town. Under New Hampshire law, all municipalities are required to provide assistance, including housing assistance, to qualifying individuals. NH RSA 165:1 states that:

"Whenever a person in any town is poor and unable to support himself, he shall be relieved and maintained by the overseers of public welfare of such town, whether or not he has residence there."

The form of assistance provided through municipal Welfare can include direct payments to landlords to help cover rent and assistance with paying utilities. For people experiencing homelessness, municipalities can cover the cost of temporary placement in a motel. Direct cash assistance, however, is not provided. Communities with Welfare directors and other professional staff such as Nashua, also function as case managers helping to connect people to available state and federal benefits including SNAP (formerly known as Food Stamps), Financial Assistance to Needy Families (FANF), Social Security benefits and fuel assistance. In addition to financial assistance, Welfare directors and staff work with a variety of public agencies and nonprofit organizations to get people into the housing that they need whether that is a temporary shelter, transitional housing, supportive housing and ultimately, into permanent housing solutions. Many of these community partners are described below and in Section VI-A, starting on page 80.

2. Nashua Housing Authority

Historically, housing authorities were formed principally to develop lower-income rental housing and to conduct urban renewal activities using financing and subsidies from the U. S. Department of Housing and Urban Development. Nashua Housing Authority oversees the local distribution of federal low-income Section 8 and Housing Choice Voucher programs for the City, working to place low-income individuals and families in affordable housing. According to the City of Nashua's 2010 Analysis of Impediments to Fair Housing and as reiterated by multiple sources as recently as 2014, the Nashua Housing Authority has a total of 662 housing units that it owns and manages including 188 for elderly residents, 221 for those with disabilities, and 253 for families.



Monahan Manor, pictured above, a Nashua Housing Authority redevelopment project, will provide 205 -incomerestricted units for low and very low-income households.



Infill Duplex developed by Neighborworks in Nashua to provide an affordable homeownership opportunity while fostering neighborhood stability.

The NHA properties include thirteen developments throughout Nashua, five of which are "scattered sites." The authority also has 853 housing choice vouchers, 75 of which are for locations outside the City of Nashua (City of Nashua, 2010).

3. Neighborworks Southern New Hampshire

NeighborWorks Southern New Hampshire is a non-profit organization dedicated to helping individuals and families in Southern New Hampshire region by providing access to quality housing services, revitalizing neighborhoods, and supporting opportunities for personal empowerment. Neighborworks assists many different people from financially disadvantaged households. They have 504 apartments for those seeking affordable rentals, they accept Portable Vouchers and have 6 units for Project-Based Voucher apartments as of September 2022. They currently have 19 properties containing 504 apartments and offer a Homeownership Program, in which Neighborworks buys the land and builds the house to sell to first-time homebuyers.

In recent years NeighborWorks has expanded its service area to include the Nashua region and acquired the former Neighborhood Housing Services of Greater Nashua. Additionally, in Southern New Hampshire they completed a \$5 million renovation project to rehabilitate five buildings in Manchester. In the Nashua Region, Neighborworks developed Casmir Place in Nashua (2006) and Hidden Pond Apartments in Amherst (fall 2013), purchased two residential buildings (8 units) on McLaren Ave and Ledge St in Nashua to begin capital improvements and energy upgrades totaling \$450,000 (2019). In 2020 the Merrimack Townhomes were developed and in 2022, Neighborworks began to wrap up the Nashua Tree Street Properties.

Neighborworks has been working with residents of Nashua's Tree Streets on various community initiatives including NeighborFest, a celebration of community among neighborhood residents, and the Neighborhood Mural Initiative, a project to fuse local art with significant historical events.

Other major programs include:

- Homeownership: Help underserved families understand critical components of home ownership, including financial responsibilities, maintenance, and repair; home ownership as an opportunity to improve economic viability; and guidance and assistance in the loan process;
- Affordable housing development: Develop affordable housing for sale or rent for low- and moderate-income families and individuals;
- Resident services: Involve tenants and other community residents in the civic life of the community and provide a variety of enrichment services.

4. Southern New Hampshire Services

Southern New Hampshire Services (SNHS) assists low-income members of the region achieve self-sufficiency through a series of child development initiatives, health, food and nutrition, housing, workforce development, energy, volunteer, community, and multicultural services programs. Through their programs to prevent and address homelessness, SNHS provides shorter-term assistance to those that are at risk of eviction or utility termination, connects homeless persons with the local service system, and provides supportive housing for the homeless. Mary's House, located in Nashua, NH, consists of forty rehabilitated apartments for homeless women. SNHS Management Corporation, a housing management subsidiary of SNHS, provides specialized elderly housing services, sponsors supportive housing for homeless projects, and serves as general contractor for construction projects that include low-income housing development and rehabilitation. Working with the City of Nashua Lead Paint program, SNHS conducts outreach and education relative to the dangers of lead paint and benefits of abatement. Lastly, within the housing programs, SNHS provides supportive elderly housing to low-income senior citizens and has 6 properties with a total of 248 units in the City of Nashua (SNHS, 2019).

5. Greater Nashua Habitat for Humanity



Greater Nashua Habitat for Humanity, an affiliate of Habitat for Humanity International, was formed in 1994 according to their website. Habitat builds affordable houses for qualifying low- and moderateincome families using donated labor, materials, and in some cases land as well as through grants and fundraising. As noted on their website, "Successful applicants purchase their Habitat home with 0% interest mortgage provided by Nashua Habitat with monthly payments capped at 30% of the families' monthly income. Each mortgage payment in turn funds future homes. The future homeowner volunteers 350 of sweat equity hours, including building their home and other activities; also provides a small down payment; and attends financial budgeting classes."

Recent Habitat project in Nashua

In addition, Habitat operates a Critical Home Repair Program that provides repairs focused on health, safety, and code-related improvements for low- and moderate-income homeowners and nonprofit organizations. Habitat has constructed homes in Amherst, Hudson, Wilton, and Nashua. Their current project is a duplex planned in Nashua's French Hill neighborhood.

D. STATE AND FEDERAL PROGRAMS

Within the State of New Hampshire, most federal and state housing programs are administered through the New Hampshire Housing Finance Authority (NHHFA). The NHHFA programs are described below. In addition to these programs, Veterans Administration (VA) and Federal Housing Administration (FHA) loans are available through those agencies.

1. Section 8 Housing Choice Voucher Program

This rental assistance program provides a direct subsidy to the owner of rental housing to allow low-income families to occupy privately owned and maintained housing units without spending in excess of 30% of their total annual household income for shelter. Qualification is based on income and fair market rent guidelines established by the US Department of Housing and Urban Development (HUD). The intent of the program is to allow for federal housing assistance to low-income households without building government-owned and operated housing. The owner of a unit qualified under the program is paid the difference between what the tenant can pay and the actual rent. Limited funds have restricted the program to very low-income female-headed households and very low-income elderly households. The program is administered by HUD through the NHHFA. Program eligibility and assistance are based on income and household size. To be placed on the program, applicants must have incomes below 30% AMI, however, NHHFA is able to accept a limited number of admissions for applicants with incomes below 50% AMI.

The Housing Choice Voucher (HCV) Program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. In the state, the local Public Housing Authority (PHA) offices are responsible for administering the program by accepting applications, determining eligibility, and issuing vouchers based on the family's needs (NHHFA).

Input from New Hampshire Housing Finance Authority (NHHFA) gives insight into the Housing Choice Voucher Section 8 (HCV) Program in the state. To qualify for the HCV Program applicants must meet NH Section 8 income requirements as defined by the Housing and Urban Development (HUD) to qualify for the program. According to NHHFA, as of 2022 there are currently 11,473 HCVs statewide administered by 18 Public Housing Authorities. NH Housing administers 4,226 HCVs statewide. All HCVs are portable, there are 601 HCVs in use in the region. This does not include HCVs administered by the Nashua Housing Authority (NHA), which has its own allocation of HCVs. Out of the vouchers that have been distributed, 51 are project-based vouchers, where the assistance is attached to the unit, rather than to the family occupying the unit. NH Housing received 24 statewide vouchers effective 10/1/2022 and additional vouchers are allocated by HUD. A PHA can use up to 20 percent of its authorized voucher units to project-based units in a specific project if the owner agrees to either rehabilitate or construct the units, or the owner agrees to set aside a portion of the units in an existing development.

Most of the clients NHHFA serves are looking to obtain apartments at affordable rental prices. Clients locate apartments through landlord referrals, Zillow, and other online apartment search databases. Utilizing other agencies is important for most affordable housing service providers to better serve individuals and families in these communities. NHHFA makes referrals to 211 (United Way of Greater Nashua) for other services the household may need, including NH Legal Assistance for legal advice and referral.

2. Section 8 New Construction and Substantial Rehab Program

The New Construction and Substantial Rehabilitation Programs provide assistance to developers to rehabilitate existing rental housing or to construct new rental housing within HUD guidelines. The maximum term of assistance provided by HUD under the New Construction and Substantial Rehabilitation Programs for a project financed with the proceeds of a loan insured by the Federal Housing Administration is 20 years. Rather than allowing the Section 8 certificate to be used by a qualifying family to obtain housing in any qualifying rental unit, the program attaches the Section 8 certificate to the unit. This program encourages the construction of new rental housing for very low-income households. The voucher program merely provides a subsidy for existing units without increasing the housing stock available to low-income families.

3. Housing Choice Voucher Homeownership Program

New Hampshire Housing offers the option for households currently receiving a Housing Choice Voucher to apply it towards homeownership for first-time homebuyers. There are eligibility requirements established by HUD and New Hampshire Housing. Generally, for those under the age of 62, the household head must have been employed for at least 30 hours a week for a full year, earn minimum wage, have established credit, and had a bank account for at least 6 months. Choosing to use a voucher for homeownership increases the mortgage a household can afford.

4. Emergency Housing Program

This program aids households in imminent danger of eviction due to financial difficulty with short-term assistance when local welfare programs are unable to offer assistance. New Hampshire Housing's Emergency Housing Program supports approximately 25 households at a time for a maximum of 3 months. Households must first seek any other possible source of assistance before turning to this program and their household income must be below 50% of the area median income.

5. Low-Income Housing Tax Credits

Low-Income Housing Tax Credits (LIHTC) encourage private investment in new, affordable rental housing and is the most commonly used affordable multi-family rental financing mechanism today. Projects are selected by NH Housing on a competitive basis and the use of the LIHTC requires that a project provide a minimum of 20% of its units to households earning up to 50% of the area median family income (AMFI). Alternatively, at least 40% of its units may be offered to renters at or below 60% of AMFI. The balance of the units may be rented at prevailing market rents. Mixed-income projects may be feasible in stronger rental markets. Typically, an LIHTC

development will be affordable to households earning 40-60% of AMFI. Most of today's LIHTC projects are not subsidized with project-based Section 8 contracts, though tenants holding vouchers may use them in such projects and may be necessary for those earning less than 40% AMFI to afford rents. Therefore, many of today's "subsidized rental housing" cannot reach the households with the lowest incomes, however, LIHTC rental housing does, support a vital component of workforce rental housing.

The maximum LIHTC allocation that any single general occupancy project may receive in any single funding round is \$800,000. The maximum LIHTC allocation that any single age-restricted project may receive in any single funding round is \$600,000. From 2014 through 2018, the State received and allocated between \$2.1 and \$3.4 million per year (\$2.8 million on average) to affordable housing projects across the state. Some of the more recent assisted housing projects in the area since 2010 include (NHHFA, 2019):

- Cotton Mill, Nashua (2011-2012)
- Pine Valley Mill, Milford (2013)
- Salmon Brook Senior, Nashua (2015)

6. Federal Historic Preservation Tax Credit

Historical structures are key components to downtowns, village centers and rural settings across the region. The New Hampshire Division of Historical Resources administers the federal tax credit program in New Hampshire. The federal law provides a federal income tax credit equal to 20% of the cost of rehabilitating a historic building for commercial use – even residential properties or outbuildings have been, or can be, adapted to serve as income-producing uses. To qualify for the credit, the property must be a certified historic structure on the National Register of Historic Places or contributing to a registered historic district. Non-historic buildings built before 1936 qualify for a 10% tax credit. Substantial rehabilitation is necessary and must meet the Secretary of the Interior's Standards for Rehabilitation. Applications for the credits are available through the State's historic preservation office. Investment in the rehabilitation and continued use of these buildings makes a substantial contribution to preserving community character and maintaining a vibrant local economy.

7. New Market Tax Credits

The New Markets Tax Credit (NMTC) program is administered by the US Department of Treasury and was designed to increase the flow of capital to businesses and low-income communities by providing a modest tax incentive to investors. NMTC investors provide capital to community development entities, and in exchange are awarded credits against their federal tax obligations, Investors can claim their allotted tax credits in as little as seven years – 5% of the investment for each of the first three years and 6% of the project

for the remaining four years- for a total of 39% of the NMTC project. The credit is currently set to expire at the end of 2019, but two bills (H.R. 1680 and S.750) have been proposed to extend the program and are awaiting a decision from Congress.

8. Construction Lending Program

The Construction Lending Program provides construction financing for multi-family rental projects utilizing other New Hampshire Housing funding. In addition, funds may be used in certain circumstances to bridge investment from Low-Income Housing Tax Credit investors. Rates and terms are competitive with the market, and this program offers the convenience and cost savings of a single source of financing for an affordable housing rental project.

9. Special Needs Housing Program

The Special Needs Housing Program is designed to provide financing for projects serving populations that need more intense services than are typically provided in traditional rental housing. The financing may be primary or gap lending that is frequently structured on a deferred payment basis. Developers of these projects are typically service providers of such diverse groups as the homeless, the mentally or physically challenged, women and children in crisis, and families and children in need of transitional housing.

10. Tax-Exempt Bonds Financing and Portfolio Preservation Program

The Tax-Exempt Bond Financing and Portfolio Preservation Program is designed to provide construction and/or permanent debt financing through the sale of tax-exempt or taxable bonds and equity financing through the use of the 4% Low-Income Housing Tax Credit. The program is well-suited for the preservation of existing subsidized housing. Projects using this program typically have an income stream that allows the project to service significant long-term debt.

11. Community Development Block Grants

Community Development Block Grant (CDBG) funds can be combined with other funds to support the creation of housing units or can be used for related community needs such as encouraging home ownership, developing infrastructure, revitalizing downtown, rehabilitating rental housing, and other uses that have a primary benefit to households earning less than 80% of AMFI. This program is sponsored by HUD and managed by NH's Community Development Finance Authority (CDFA). Grants are available to municipalities or counties, and non-profits if they have partnered with and are applying through a municipality. Grants are awarded for up to

\$500,000 per applicant each year and NH receives approximately \$8-10 million annually, approximately half of which goes to housing and public facilities projects.

12. Opportunity Zones

The Opportunity Zones incentive is a new community investment tool established by Congress in the Tax Cuts and Jobs Act of 2017 to encourage long-term investments in low-income urban and rural communities nationwide. Opportunity Zones are low-income census tracts nominated by governors and certified by the U.S. Department of the Treasury into which investors put capital to work financing new projects and enterprises in exchange for certain federal capital gains tax advantages. As of 2018, the State of New Hampshire has identified 27 census tracts throughout the state, 2 of which are located in the Nashua Region (both in Nashua).

Qualifying for the Opportunity Zones incentive, the location and resident income limit are considered. For location, the housing structure must be located within the Housing Opportunity Zone. For resident income limit, the housing structure must have 1) no less than one-third of housing units designated for households with an income of 80% or less of the area median income, or 2) the housing units shall be designated for households with incomes as provided in RSA 204-C:57, IV. which ranges from at least 50% of the units being affordable to persons of very low, low, or moderate income to at least 20% of the units being affordable to persons of very low income. A qualifying structure is eligible for tax assessment relief for a period of up to 10 years, beginning upon issuance of the certification of occupancy.

13. Public Land/Affordable Rental Housing Program

The Public Land/Affordable Rental Housing Program is a state program passed by the General Court in 1986 (RSA 204-D). The program allows surplus public land to be transferred without consideration to the NHHFA for the development of low-income housing. The intent of the program is to remove the land cost from the cost of development to allow for the construction of low-income housing that can be economically feasible. The NHHFA will self-finance, construct and manage the housing. The greatest limitation facing the program is the availability of properly zoned surplus lands.

14. Federal Home Loan Bank of Boston Affordable Housing Program

The Federal Home Loan Bank of Boston offers both grants and loans to member institutions that are working with developers of affordable rental or home-ownership opportunities. In general, Affordable Housing Program (AHP) for ownership initiatives must benefit households earning less than 80% of AMFI; the use of funds for rental developments is limited to projects having at least 20% occupancy by households at or below 50% of AMFI. For 2019, the subsidy limits for any one AHP application is \$650,000 in direct

subsidy and \$1 million in total subsidy, including the subsidized advance interest-rate subsidy. FHLBank Boston awarded approximately \$19.4 million in grants, loans, and interest-rate subsidies to support 30 affordable housing initiatives in New England and other parts of the country in 2021. These projects, funded in part through the Affordable Housing Program (AHP), will create or preserve 1,216 rental and homeownership units for individuals and families earning up to 80% of the area median income. Below are the 2021 approved initiatives by the state (FHL Bank Boston).

15. Single-Family Mortgage Program

The Single-Family Mortgage Program is by far the most significant State housing program. The program provides low-interest loans for first-time homebuyers within established housing price and income guidelines. The program is financed through the issuance of tax-exempt bonds by the NHHFA. In general, a first-time homebuyer applies for a NHHFA loan through a conventional mortgage institution and is generally approved if the applicant as well as the home qualifies. Loan products offered include funds for down payment and closing costs, low or no private mortgage insurance, purchase and rehabilitation programs, emergency home repair, voucher-assisted mortgages, and a tax credit program. The program provides assistance to a large number of first-time homebuyers; and as of April 2014, increased its income limit to \$110,000 for all communities, counties and family sizes, capturing all families below the median income level.

16. Home Help NH

HomeHelpNH is a statewide foreclosure counseling initiative sponsored by the New Hampshire Department of Justice, New Hampshire Banking Department and New Hampshire Housing Finance Authority. The initiative's goal is to help at-risk homeowners find solutions through free, comprehensive pre- and post-foreclosure counseling. Over the course of the first year of this three-year statewide initiative funded through the National Mortgage Servicing Settlement, HomeHelpNH counselors assisted more than 800 households and provided approximately 5,600 hours of free foreclosure guidance on mortgage modifications, mortgage document review, credit and budgeting analysis, rental help, and legal service referrals to at-risk households.

17. Federal Housing Administration and Veterans' Administration Loans

These Federal Government programs are not administered through the NHHFA. Rather than provide low-interest loans, the programs provide assistance to qualifying home buyers primarily by 1) allowing for a higher percentage of household income to be devoted to housing costs; 2) providing mortgage insurance or guarantees; and 3) by allowing for down payments as low as 5%. Both programs are

far less restrictive than NHHFA single-family home programs and are less limited in terms of funding. These programs provide essential assistance to moderate-income households throughout the Nation.

18. USDA Rural Development Housing and Community Facilities Programs

USDA's Housing and Community Facilities Programs help rural communities and individuals by providing loans and grants for housing and community facilities. Within the Nashua Region, all communities except Hudson, Merrimack, and Nashua, are eligible for USDA's Rural Housing programs. Funding and programs assist with single-family home purchases, apartments for low-income persons or the elderly, housing for farm laborers, and community facilities such as childcare centers, fire and police stations, hospitals, libraries, nursing homes, and schools.

19.NH RSA 79-E - The Community Revitalization Tax Relief Incentive

The Community Revitalization Tax Relief Incentive provides temporary tax relief for a property owner to rehabilitate or replace their building in a village or downtown area. The tax relief program is authorized under state law RSA 79-E, and so the program is often referred to as "79-E." Though it is a state law, the program must be adopted locally to go into effect. To be eligible for the tax relief, the property owner must provide a "public benefit." Eligible public benefits include the creation of housing in town centers, preservation of the existing building stock, economic development in town centers, and more. For any 79-E project, a covenant specifying the public benefit owners will provide is placed on the property's deed.

Under the program, a property owner can apply to the Board of Selectmen, Town Council or Aldermen to delay an increase in property taxes caused by the increase in valuation from rehabilitation for up to 5 years. The tax relief does not decrease the property owner's taxes or provide permanent tax relief. Following expiration of the tax relief, the property is taxed at its full market value, taking into account the rehabilitation. A property owner can apply for the tax relief only if:

- The building is located in the community's downtown district (or equivalent neighborhood business district), as defined by the community (see Considerations for further detail).
- The rehabilitation costs at least 15% of the building's pre-rehab assessed value, or \$75,000, whichever is less.
- The rehabilitation is consistent with the municipality's master plan or development regulations.

XI. CONCLUSION

The RHNA is intended to be a tool to assist the region's communities in developing local master plans and to serve as a data resource for municipalities, nonprofit housing and social services organizations, developers, and other stakeholders. The RHNA provides a comprehensive overview of population trends, existing housing characteristics and conditions, market trends, and future housing needs. There is also a specific focus on populations of interest such as people experiencing homelessness. Further, it is a tool to assist municipalities in complying with New Hampshire's Workforce Housing statute (RSA 674:58-61).

As can be seen in the preceding sections, the demand for housing in the region exceeds supply and as a result, the region has experienced significant increases in housing costs for both owners and renters. The lack of available housing, and rental housing in particular, is acute and vacancy rates are at historic lows. For the housing market to return to a healthy balance and accommodate projected population growth, an additional 9,383 units of housing will be required by 2030 (from the base year of 2020) including over 1,000 units of affordable rental housing and 2,000 units of affordable ownership housing. These numbers are daunting and would require a 60% increase in the number of permits issued over the preceding decade. It is also important to note that under current market conditions, the development of rental housing affordable to low-income households will require subsidy.

Fortunately, there are a number of alternatives for new housing development, including multi-family housing, which can be accomplished in ways that meet demand while protecting the character of our communities and the quality of life of our residents. Many of these alternatives are outlined in Section IX – Strategies, which focuses largely on lower-impact alternatives such as Accessory Dwelling Units (ADUs), "missing middle" housing, infill, and reuse or redevelopment of vacant or underutilized buildings and sites. There are also several local housing programs, agencies, and social service organizations that can help meet the region's needs for workforce housing and housing for people experiencing housing insecurity, homelessness, and other challenges. These are described in Sections VI and X.