

HOUSING  
NEEDS  
**UPDATE**  
Provincetown  
Massachusetts

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Prepared for the  
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## I. INTRODUCTION

The Town of Provincetown engaged consultant John Ryan, Principal of Development Cycles in East Montpelier, VT to prepare a summary update of key changes affecting the availability of and need for community housing options in Provincetown, MA. This update uses the 2006 Housing Needs Assessment prepared by Development Cycles as its baseline.

In performing this update, the consultant returned to the sources of information used in the initial housing needs assessment in 2006, and looked to provide the most up to date new information available. Sources include the U.S. Census of Population and Housing and the American Community Survey for demographic information; the MA Department of Workforce Development (DWD) to track changes in local jobs and wages; the U.S. Department of Housing & Urban Development (HUD) for estimates of household income by family size as well as Fair Market Rent (FMR) by bedroom size. The Provincetown Housing Authority, The Community Builders, and Community Housing Resource provided information on waiting lists and rental housing costs. Banker & Tradesmen provided information on home sales. The website for Sweetbriar Realty provided information on current homes for sale. A variety of on-line sources provided data on current market rentals.

This update retains the same definitions used in 2006 for terms to describe the community's housing need, namely:

- “Workforce Housing” acknowledges the community’s larger goal of creating a sustainable year-round economy that will support a stable population of year-round residents. Workforce housing is housing to support year-round working residents at an affordable cost given the wage structure of the local job market.
- “Community Housing” describes housing created or acquired with the help of the Town that provides housing stock that is reserved for residents and which does not trade on the open market. The goal of community housing is to provide a core of housing whose value is pegged to the earnings of those residents who perform the critical work of the community. Community and Workforce housing are used more or less interchangeably in this assessment. The community itself will need to define the specific characteristics of selection to meet their community workforce needs (i.e. income restrictions, residency requirements, type of critical employment, rental or ownership).
- The primary focus of the consultant’s review is year-round Provincetown residents as well as year-round employees working in Provincetown but

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living elsewhere. The needs for seasonal housing are considered only as they impact the supply and cost of housing that supports residents year-round.

- By its very nature, a Housing Needs Assessment focuses on those households who do not already own a home. This includes current renters and newly forming households. These are the key groups who typically struggle most to find secure affordable housing, be it rental or ownership.

At the community’s request, the consultant looked at needs for a broad range of household incomes, defined in this Update as follows:

- “Very Low Income” residents whose household income is less than 50 percent of the non-PMSA portion of Barnstable County’s Area Median Income (AMI) for a household of their size as estimated each year by the U.S. Department of Housing & Urban Development (HUD).
- “Low-Mod Income” households earning between 50 and 79 percent of HUD’s AMI adjusted for household size;
- “Moderate Income Residents” earning between 80 and 99 percent of HUD’s AMI; and
- “Median Income Residents” earning between 100 and 120 percent of HUD’s AMI.

Figure I.1 indicates the current upper limit of those HUD estimates of Area Median Income.

Fig. I.1  
**HUD Income Limits**  
Provincetown, FY 2013

Household Size	Very Low Income (50%)	Low-Mod Income (80%)	Moderate Income (100%)	Median Income (120%)
1 person	\$28,700	\$45,100	\$57,400	\$67,700
2 persons	\$32,800	\$51,550	\$65,600	\$77,300
3 persons	\$36,900	\$58,000	\$73,800	\$88,400
4 persons	\$40,950	\$64,400	\$81,900	\$98,000

**SOURCE:** HUD

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As with the original assessment, this update has a number of limitations to consider when reviewing the findings and recommendations provided:

- The study assumes relatively stable conditions will persist over the next several years. Specifically, it assumes that neither Massachusetts nor the United States will suffer a major decline or depression.
- The study based all dollar amounts on the 2013 value of the dollar unless otherwise noted. In order not to overstate the available levels of need, the projections are not adjusted to reflect the effects of future inflation.
- The information, estimates and opinions contained in this report were derived from sources considered to be reliable. The consultant assumes the possibility of inaccuracy of individual items and for that reason relied on no single piece of information to the exclusion of other data, and analyzed all information with a framework of common knowledge and experienced judgment.

## II. WORKFORCE RENTAL NEED

The following section looks at key changes in demand for year-round rental housing since 2006

### 1. Changes in Employment & Wages

The following highlights key employment changes since 2006.

- The average number of local jobs in town stayed the same from 2006-2012 but there was a 13.3% decline in the average number of employed residents: this almost certainly means that an increasing number of workers are commuting to Provincetown from other communities.
- Provincetown registered a significant increase in the community's already high unemployment rate, averaging 23.4% in 2012 compared to 6.7% statewide.
- Local employers paid a 22% increase in average weekly wage from \$545/ week in 2006 to \$666/ week in 2013. This rate of increase is higher than the state or county, but the town's average wage is still only 56.9% of the statewide average.
- The concentration of low-wage local jobs continues moving from 67.4% of all jobs in 2006 to 73.0% in 2012. By comparison, 46.1% of jobs in Barnstable County are in these low-wage sectors, while only 25.1% of jobs are in these sectors statewide.

Fig. II.1

### **Summer- Winter Employment**

Provincetown, 2006-2012

	Feb	July	Annual Average
<i>2006</i>			
Labor Force	2,423	2,160	2,228
Employed	1,672	2,077	1,834
Unemployment Rate	31.0%	3.8%	17.7%
<i>2013 through October</i>			
Labor Force	2300	1907	2,074
Employed	1422	1817	1,589
Unemployment Rate	38.2%	4.7%	23.4%

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<i>Change 2006-2013</i>			
Labor Force	-123	-253	-154
Employed	-250	-260	-245
Unemployment Rate	+7.2%	+0.9%	+5.7%

SOURCE: MA DWD, 12/13

Fig. II.2

**Average Wage & Percent Jobs in Low Wage Industries**

Provincetown, Barnstable County & Massachusetts, 2006-2012

	Provincetown	County	Massachusetts
<i>2006</i>			
Average Weekly Wage	\$545	\$700	\$1,008
% Statewide Average	54.4%	69.9%	100.0%
% Low Wage Jobs*	67.4%	40.6%	24.3%
<i>2012</i>			
Average Weekly Wage	\$666	\$785	\$1,171
% Statewide Average	56.9%	67.0%	100.0%
% Low Wage Jobs*	73.0%	46.1%	25.1%
<i>Change 2006-2012</i>			
Average Weekly Wage	22.0%	12.1%	16.2%
% Statewide Average	4.6%	-4.1%	n/a
% Low Wage Jobs*	8.3%	13.5%	3.3%

\* Jobs in Retail Trade, Leisure & Hospitality and Other Service sectors (all pay less than 80% of statewide average wage)

SOURCE: MA DCS/DUA, 12/13

## 2. Demographic Changes

The following highlights a number of key demographic changes among Provincetown renters that bear upon current housing need:

- Population & Households:** According to the US Census, Provincetown lost close to 500 residents (-6.0%) from 2000 to 2010. Over the same decade, the town declined by 92 households, or 5.0%. The number of residents living alone declined from 977 to 933 (54.3% of all households); the number of households with children under 18 dropped from 175 to 131; and the number of households with a resident 65 and over stayed about the same.



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- Tenure: During the last decade the number of renter households dropped by 68, or 8.2%. Renters now constitute 44% of the town’s year-round households.
- Renters, By Household Type: There has been a decline in all types of renter households since 2000.
- Renter Household income by AMI: There has been an increase in the concentration of renters earning less than 80% of Area Median Income since 2006, according to models developed by the consultant. In 2006, an estimated 355 or 52.5% of non-elderly renter households earned less than 80% of the AMI; today, that number has grown to 370 or 58.5%.
- Rent Burden: Despite a drop in overall renters from 2000-2010, the number of renters paying more than 35% of their gross income for housing has increased from 346 to 463, or from 41% to 59% of all renters. All age groups have increased in concentration of rent burden, with younger renters <35 years old growing fastest in this regard.

Fig. II.3

**Renters Households, by Household Type**

Provincetown, 2000-2011

	Provincetown 2000	Provincetown 2010	Change 2000- 2010
Live Alone	520	510	-10
Married Couple Family	110	92	-18
Single Parent Family	64	50	-14
Other	157	130	-27
<b>Total</b>	<b>851</b>	<b>782</b>	<b>-69</b>

**SOURCE:** U.S. Census 2000, STF-3, H73, 2010 QT-H2. 2007-2011 ACS B25011 adjusted

Fig. II.4

**Model of Non-Elderly Renter Households, by Percentage of AMI**  
Provincetown, 2006-2013

	2006 HHs	% of Renters	2013 HHs	% of Renters
Less than 50% of AMI	186	27.5%	196	31.0%
50-79% of AMI	169	25.0%	174	27.5%
80-99% of AMI	118	17.5%	106	16.7%
100-120% of AMI	51	7.5%	42	6.6%
More than 120% of AMI	152	22.5%	115	18.2%
<b>Total</b>	<b>676</b>	<b>100.0%</b>	<b>633</b>	<b>100.0%</b>

**SOURCE:** Development Cycles, 8/06, 12/13

Fig. II.5

**Renters Paying 35 Percent or More of Income for Housing**  
By Age of Householder, Provincetown 2000-2011

	2000	% (Within Age Cohort)	2012	% (Within Age Cohort)
Under 35 Years Old	41	40%	40	62%
35-64 Years Old	239	40%	340	60%
65 and Over	66	44%	83	56%
<b>Total</b>	<b>346</b>	<b>41%</b>	<b>463</b>	<b>59%</b>

**SOURCE:** U.S. Census 2000, STF-3, H96, 2011 ACS B25072 adjusted to match 2010 US Census totals for renter households.

### 3. Rental Market Changes

Key changes in the rental market over the past seven years include:

- **CHR Notification List:** Compared to 2006 data, Community Housing Resource’s current notification list indicates a 15% increase in households seeking the rental housing they manage and a substantial drop in the numbers looking for ownership housing. CHR officials explain that the organization only recently “scrubbed” their list of applicants who were no longer in the area or still interested in housing so that the change says more about their administrative process than about the historic reality. In addition, the lack of CHR ownership housing to purchase helps explain the drop in interest for that option. CHR’s “up-to-date” list includes 329 households seeking rental housing and 109 households interested in being notified if an affordable home owning opportunity arises. Of the total households on their

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notification list 181 live in Provincetown; 58 in Truro; 33 in Wellfleet; 55 live in other communities on Cape Cod; and 55 live off-Cape.

- PHA Waiting List: The Provincetown Housing Authority's Waiting List for elderly housing has grown from 51 to 62 since 2006, though the number of local residents on that list has not changed much in that time. The Agency now separates out disabled applicants under 60 years of age: that group totals 53 of whom nine currently live in Provincetown. Its current waiting list for family housing now totals 19 one-bedroom, 89 two-bedroom, and 77 three-bedroom applicants for the family units they manage. Of these 185 applicants, only ten live in Provincetown currently.
- Province Landing: The Community Builders manages Province Landing at 90 Shank Painter Road, a development first that opened in 2011. According to their property manager, the original rent up had more than 500 total applicants. Forty-five of the 50 initial occupants were Provincetown residents or employees. All the rest had prior ties to the community. TCB closed the wait list for the project and maintains a current list of over 350 applicants.
- Market Rents: The median price one-bedroom rent has increased faster than average wages since 2006 (28% compared to 22% for wages). Two bedroom units have increased at the same rate as wages, while three-bedroom units have increased more slowly than wages in this time period. Local housing and social service professionals suggest the availability of year-round and even winter rentals has declined sharply in the last several years.
- Additions to Rental Housing inventory: Since 2006, there have been two new additions to the town's affordable housing inventory. Province Landing and 83 Shank Painter Road have added a total of 63 new rental units. Both projects rented up immediately with 8-10 times the number of applicants as apartments available. Sally's Way in North Truro also came on line this year with 16 affordable units. The four one-bedroom units attracted more applicants (49) than did the 12 two- and three-bedroom units (41). CHR reported working through their entire list of applicants for this project before finding qualified tenants for their three-bedroom units.
- Reductions from Town's Rental Stock: According to the Town's Assessor, there have been 376 condominium units permitted since FY 2007. The vast majority of these units are conversions of small multi-family properties to second homes. These units constitute a not insignificant share of the town's remaining rental stock. The number of such conversions has declined after averaging more than 100 units/year from FY 2006-2008. In the past 3½ years, there have been 125 such conversions.

Fig. II.6  
**Waiting List Information**  
Provincetown 2006-2013

	Studio/ One Bedroom	Two Bedroom	Three Bedroom	Total
<i>Community Housing Resource</i>				
<i>Notification List for Housing, 2006</i>				
To Rent	190	81	24	295
To Purchase	181	107	32	320
<i>Notification List for Housing, 11/2013</i>				
To Rent	184	104	57	345
To Purchase	81	33	19	109
<i>Provincetown Housing Authority</i>				
<i>Waiting List for Housing, 2006</i>				
Elderly	51	0	0	51
Scattered Site Family	19	165	148	329
Foley House (SRO)	8	0	0	8
<i>Waiting List for Housing, 11/2013</i>				
Elderly	62			62
Disabled/ Under 60 <sup>1</sup>	53			53
Scattered Site Family	19	89	77	185
Foley House (SRO)	5	0	0	5
<i>The Community Builders</i>				
<i>Waiting List for Province Landing</i>				350

<sup>1</sup> PHA breakdown for Under 60 Disabled was not collected in 2006.

NOTE: Duplication almost certainly occurs between the three lists.

SOURCE: CHR and PHA, 5/06 & 12/13

Fig.II.7  
**HUD Fair Market Rents & Current Year-round Market Rents**  
Provincetown, 2013

# of Bedrooms	HUD FMR FY 2013	Current Median Market Rent	2006 Median Market Rent	Difference 2006-2013
1	\$945	\$1,150	\$900	27.8%
2	\$1,267	\$1,450	\$1,200	20.8%
3	\$1,657	\$1,800	\$1,600	12.5%

SOURCE: HUD FMRS, CHR, Craigslist, Realtor Listings & Cape Cod Times, 8/06 & 12/13

Fig. II.8  
**Changes in Affordable Rental Housing Inventory**  
Provincetown, 2006-2013

Project Name	Year 1 <sup>st</sup> Occupied	# of Affordable Units	AMI Range Served
Province Landing	2010	50	<30% to 80% AMI
83 Shank Painter Road	2011	13	<30% to 80% AMI

**SOURCE:** Interviews with Housing Managers, 12/13

Fig. II.9  
**Condominium Filings**  
Provincetown, FY2006-FY2013 YTD

Year	Units	Year	Units
FY 2013 YTD	33	FY 2009	40
FY 2012	30	FY 2008	110
FY 2011	23	FY 2007	98
FY 2010	42	Total	376

**NOTE:** Not all condominiums are residential conversions; however, according to the Building Inspector, the vast majority are conversions of smaller multi-family homes. **SOURCE:** Provincetown Building Inspector, 12/13.

#### *4. Summary: Workforce Rental Housing*

It was the consultant’s view in 2006 that Provincetown had a critical shortage of affordable year-round rental housing. Despite the addition of two new affordable rental developments on Shank Painter Road, Provincetown’s need for community’s workforce rental housing has only deepened since 2006. The continued loss of multi-family rental units to condominium conversion has significantly outpaced the production of new rental units. The concentration of renters paying more than 35% of their income for rent has gone from 44% in 2000 to 59% in 2010. The community has fewer renter households; fewer employed residents, both winter and summer; and a greater concentration of renters who earn less than 80% of Area Median Income. Waiting lists dwarf the number of available units, even when only local residents are considered. Since 2006, the trend toward single person occupancy has continued and perhaps as a result, the cost of a one-bedroom apartment has outpaced the growth in wages. Until the number of new units annually outpaces the number of units lost to conversion, it is hard to see how this situation improves.

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The Table below represents the consultant’s estimate of the change in the number of rental housing units needed to address the rental housing shortage in Provincetown. In the consultant’s view, there is a greater need for units to serve renters earning less than 50% of AMI; a slightly reduced need for renters earning greater than 50% of AMI. The focus of this need continues to center on one-bedroom units.

The needed year-round rental housing continues to embrace a range of bedroom sizes and income levels. Given the demographics, waiting list, and survey information reviewed, the consultant recommends that roughly 50 percent of the housing should serve those very low income workers earning less than 50 percent of the AMI; 25 percent should serve those “low-mod” residents earning between 50-79 percent of AMI; another 20 percent is needed for moderate income renters earning between 80-99 percent of AMI; and 5 percent is needed to serve those between 100 and 120 percent of AMI.

Fig. II.10  
**Changes in Workforce Rental Housing Need**  
Provincetown 2006-2013

Income Limit	2006 Total	2013 Total	Change 2006-2013
<50% of AMI	80-100	85-110	+5
50-79% of AMI	50-65	45-60	-5
80-99% of AMI	50-60	45-55	-5
100-120% of AMI	20-25	20-25	0
<b>Total</b>	<b>200-250</b>	<b>190-240</b>	<b>-10</b>

**SOURCE:** Development Cycles, 2006 & 2013

### III. WORKFORCE OWNERSHIP NEED

The following section summarizes changes in the homeownership housing market in Provincetown since 2006 and analyzes the gap between the income for Provincetown’s non-owning residents and workforce, and the cost of housing today.

#### 1. Current Housing Market

The following represent an update of key need indicators for residents hoping to move into ownership housing.

- Median Home Prices: According to the Warren Group, the median price single family home this year sold for \$775,000, while the median priced condominium for \$370,000. Single-family home values have risen slightly since 2006, while condominiums have lost 2.6% of their value since 2006. During that same period, the average wage paid for jobs in Provincetown increased by 2.2% annually. Interest rates during that time period have also declined significantly. The number of sales transactions is also down sharply since 2006.
- Homes Currently on the Market: Sweetbriar Realty’s website provided Multiple Listing Service (MLS) listings for 152 single-family homes or condominiums for sale in Provincetown on December 5, 2013. The median asking price for a studio or one-bedroom unit is \$389,000, with two-bedroom properties asking \$469,000, and three or more bedrooms asking \$879,000. This pricing is roughly comparable to asking prices in July 2006.

Fig. III.1

#### **Median Home Price**

Provincetown, 2006-2013 (through 10/31)

	2006	2013- 10/31	Change 2006- 2013
Single Family	15 @ \$727,000	40 @ \$775,500	+166.7% +6.7%
Condominium	164 @ \$380,000	91 @ \$370,000	-44.5% -2.6%

**SOURCE:** The Warren Group, 12/13

Fig III.2  
**Condominiums Currently On the Market**  
Provincetown December 2013

Bedroom Size	#	Median	Lowest Quartile of Pricing
Studio/ One Bedroom	44	\$389,000	\$279,000
Two Bedroom	68	\$469,000	\$389,000
Three Bedroom	40	\$879,000	\$619,000

SOURCE: Sweetbriar Realty, 12/5/13

## 2. Gap Analysis

A first-time buyer looking for entry-level year-round ownership housing is looking at a market that offers the following:

Bedrooms	Lowest Quartile of Pricing
Studio/ One Bedroom	\$279,000
Two Bedroom	\$389,000
Three Bedroom	\$619,000

Provincetown renters at 80-120% of AMI, have borrowing power ranging between \$165,000 and \$355,900 depending on income family size and mortgage program (see III.3). Figure III.4 represents the difference in dollars between what a buyer at the top of their AMI scale can afford and what it would actually cost to purchase a home today at the bottom quarter of the Provincetown market.

Fig. III.3  
**Borrowing Power, by Household Size and AMI**  
Provincetown, 2013 estimate

Persons in Household	One	Two	Three	Four
<i>MHP Soft Second</i>				
@ 80 Percent of AMI	\$165,500	\$196,600	\$219,500	\$243,000
@ 90 Percent of AMI	\$188,300	\$230,000	\$316,100	\$323,000
<i>Conventional Financing</i>				
@ 120 Percent AMI	\$251,300	\$298,000	\$323,300	\$355,900

SOURCE: MHP Web Site Mortgage Calculator, 12/13



Fig. III.4  
**Down Payment Needed to Purchase**  
Provincetown, Dec 2013

	One Person 1 bdrm	Two Person 1 bdrm	Two Person 2 bdrm	Three Person 2 bdrm	Four Person 3 bdrm
@ 80% of AMI	\$113,500	\$82,400	\$192,400	\$179,500	\$376,000
@ 90% of AMI	\$90,700	\$49,000	\$49,000	\$72,900	\$296,000
@ 120% of AMI	\$27,700	\$13,950	\$13,950	\$65,700	\$263,100

**Note:** Based on Condominiums on Market, 12/5/13

@ Lowest Quartile Asking Price **SOURCE:** Sweetbriar Realty MLS Listings (12/5/13), MHP Mortgage Calculator (www.mhp.net)

### 3. Ownership Need Summary

Given somewhat higher incomes, slightly lower prices and significantly lower interest rates, working residents today have a roughly \$50,000 smaller gap between what they can mortgage and what the bottom quartile of the current market offers when compared to 2006. Part of this greater buying power has been diminished by much tighter underwriting standards than were in place in 2006.

For a resident earning at 80% of AMI, today, the down payment needed to buy a two-bedroom condominium ranges from \$179,500 to \$192,400 based on household size. At 80% of AMI, buying a three-bedroom condominium at the lowest quartile of price requires a down payment of \$376,000 for a four-person household. For those seeking anything but the smallest one-bedroom condo, the home-buying reality in Provincetown remains as it was in 2006; a market that provides no opportunity for homeownership to most low, moderate or even middle-income first-time homebuyers.

Given the smaller renter population, a reduction in renters earning between 80-120% of AMI, and the smaller number of renters seeking notification of community housing to purchase, the consultant sees a reduced demand for deed-restricted community ownership housing. Whereas, the 2006 study indicated an immediate need for 40 units to serve a population earning less than 120% of AMI, the consultant sees a need for 24 to 30 such units today, split evenly between those affordable to residents earning < 80% of AMI, 80-99% of AMI, and 100-120% of AMI.

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As was so in 2006, affordable ownership opportunities need to be priced well below market rates to serve the current first-time buyer population. To provide a realistic opportunity for purchase, the consultant recommends studio and one-bedrooms ranging in price around \$150,000- \$200,000; two bedrooms around \$200,000- \$250,000; and three bedrooms from \$250,000- \$350,000. These represent similar pricing to that recommended in 2006. Deed restrictions will be continue to be needed to keep the homes from appreciating beyond what is affordable to the community's core workforce as time passes.

Fig III.5  
**Changes in Ownership Housing Needs**  
Provincetown 2006-2013

Income Limit	2006 Total	2013 Total
<80% AMI	12	8-10
80-99% AMI	13	8-10
100-119% AMI	15	8-10
<b>Total</b>	<b>40</b>	<b>24-30</b>

**SOURCE:** Development Cycles, 5/06 & 12/13

#### IV. SENIOR HOUSING NEED

The following summarizes a number of key characteristics of senior housing need in Provincetown.

- **Senior Population:** From 2000-2010, the number of Provincetown residents 65 and over dropped by 11, to 599. At the same time, the number of senior households increased slightly from 427 to 444.
- **Tenure:** In 2000, 115 of the community’s senior households rented their home. All but six lived alone. In 2012, the number of senior renters remains unchanged, while the number of two-person senior renters has increased by six. It is important to note that over 60 of these senior households live in market rate rental housing.
- **Income:** The following models the income of households with a householder at least 65 years old, by percentage of Area Median Income, based on data included in the 2010 US Census and 2011 American Community Survey. A total of 183 or just over 40% of Provincetown senior households earn less than 50% of AMI. This number includes roughly 90% of senior renters. Another 78 senior households earn between 50-79% of AMI and could qualify for some forms of affordable rental housing. These numbers have changed only slightly since 2006.

Fig. IV.1

#### **Model of Senior Households, By Percentage of AMI**

Provincetown 2013

	HUD Limit	One Person	%	HUD Limit	Two Person	Percent
Less than 50% of AMI	\$28,700	125	46%	\$32,800	58	33%
50-79% of AMI	\$45,100	48	18%	\$51,550	30	17%
80-99% of AMI	\$57,400	44	16%	\$65,600	40	23%
100-120% of AMI	\$67,700	26	10%	\$77,300	17	10%
> 120% of AMI	>\$67,700	27	10%	>\$77,300	29	17%
<b>Total</b>		<b>270</b>	<b>100%</b>		<b>174</b>	<b>100%</b>

**SOURCE:** Development Cycles, 12/13

Since 2006, there has been no new senior rental housing developments built in Provincetown, though some seniors have found rental housing at the new non-restricted developments in Provincetown and Truro. The 2006 Housing Needs Assessment recommended the creation of 40 additional units of housing

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for seniors with incomes below 120% of AMI. The consultant sees that need being relatively unchanged, with slightly more of the focus on seniors earning less than 80% of AMI.

Fig IV.2  
**Changes in Senior Housing Needs**  
Provincetown 2006-2013

Income Limit	2006 Total	2013 Total
<80% AMI	12	16
80-99% AMI	13	12
100-119% AMI	15	12
<b>Total</b>	<b>40</b>	<b>40</b>

**SOURCE:** Development Cycles, 5/06 & 12/13