

# Cost Impact Report

MBTA Communities Act  
Specific and Direct Costs

Prepared by :  
**Anne Brensley**

Prepared for :  
**State Auditor DiZoglio**

# Table of Contents

---

01 Summary

---

02 Requirements

---

03 Purpose

---

04 Methodology

---

05 Cost Impact

---

06 DCAMM: Cost Estimate Manual

---

07 Growth Development Continuum

---

08 Conclusion

---

09 Appendix A: Designer Base Fees

---

10 Appendix B: References



# 1. Summary

In 2021 the State of Massachusetts' legislature voted to enact MGLc 40A section 3A ("MBTA Communities Act"). The legislation mandated 177 municipalities to adopt a zoning ordinance or by law to designate at least one zoning district to permit multi-family housing as of right. The Executive Office of Housing and Livable Communities ("EOHLC") set parameters for the district that each municipality had to adhere to that were uniform across 4 different municipality sub-types.

The forced zoning by the state led to multiple lawsuits including a February 2024 lawsuit filed with the Supreme Judicial Court for the County of Suffolk by the Attorney General of Massachusetts against the Town of Milton to seek an order of enforcement, a filing of nine municipalities arguing the Act was an unfunded mandate and a motion for injunctive relief filed in Plymouth Superior Court, and lastly a settled lawsuit filed by Middleborough in which it was allowed to comply with the mandate by expanding its existing overlay district.

## **Milton Lawsuit Decision:**

The Court held the MBTA Communities Act is valid under Massachusetts law. The Legislature is entitled to require municipalities served by (or adjacent to) the MBTA, adopt zoning bylaws allowing "multifamily housing as-of-right" in at least one district near transit.

The challenge by the town (that the law was an improper delegation of power to the state housing agency) failed. The court found the law itself provided enough direction for implementation, and the agency's role did not violate separation-of-powers principles.

In addition, Although the mandate itself stands, the court ruled the “guidelines” EOHLC had issued to implement the law were promulgated in violation of the required rule-making procedures under the Administrative Procedure Act (APA). Because EOHLC did not follow the procedural steps (public notice, small business impact statements, etc.), the guidelines were legally ineffective and unenforceable as written. In January of 2025 the EOHCL made its 3<sup>rd</sup> revisions of the guidelines and updated them to adhere to the Court’s ruling.

### **Collective Lawsuit:**

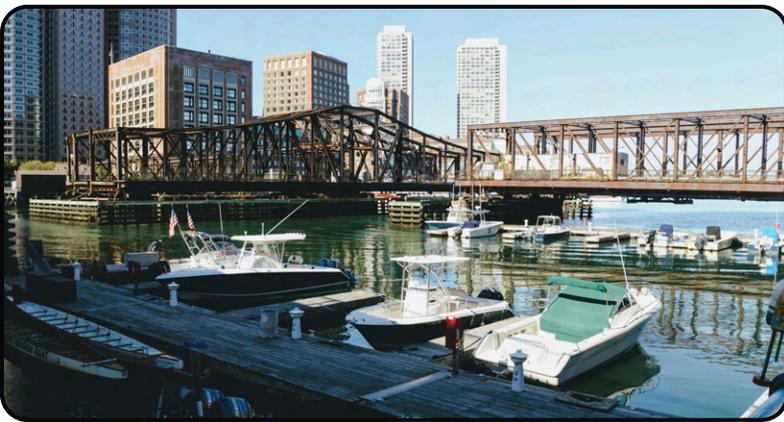
On June 6, 2025 Justice Mark Gildea of Plymouth Superior Court issued a decision on eight specially assigned legal cases relating to the MBTA Communities Act. A primary issue presented to the Court was whether 3A was an unfunded state mandate. The plaintiffs argued, “they will incur significant costs to improve their infrastructure to accommodate an influx of new resident if 3A is enforced and that the Commonwealth must appropriate sufficient funds to absorb the anticipated costs.” *Plymouth Court Decision pg 13*. The Court determined that because the costs alleged by the Municipalities were “anticipated possible costs” related to infrastructure, they were indirect costs and were not evidence 3A was unfunded. *Id. pg 15*. Further the Court stated, “As to purported direct costs stemming from large-scale infrastructure improvement, the Municipalities’ complaint do not set forth any specific, direct costs.” *Id. pg 16*. The Court concluded its decision stating, “...even if § 3A was an unfunded mandate, the Municipalities’ have merely alleged speculative averments regarding any anticipated costs. The Court’s ruling left open the question what “specific” and “direct” costs the Court would determine are imposed due to the 3A mandate and whether those costs had been appropriated by the state.

### **Town of Middleborough’s Satisfaction of 3A:**

The Town of Middleborough was successful in negotiating a solution with the state by having the state deem the town compliant with § 3A by expanding its already existing 40R zoning district. The town’s 40R district allows for, “more compact, mixed-use, walkable developments that are close to the downtown, public transportation, and with access to Interstate 495.

### **Lexington v. Commissioner of Education:**

MGL c 29§ 27C requires funding be provided at the same time the state’s mandate creates a new financial burden imposed on cities and towns. [Lexington v. Commissioner of Education](#), 393 Mass. 693, 473 N.E.2d 673, 1985 Mass.1985. Thus, 3A funding should have been appropriated by the state in 2021 to be a “funded mandate”. The 2021 fiscal budget for the state does not allocate any funds to 3A.



## 2. Imposed Requirement

**The MBTA Communities Act is codified in Section 3A of MGL c. 40A:**

Section 3A (a)(1): An MBTA community shall have a zoning ordinance or by-law that provides for at least 1 district of reasonable size in which multi-family housing is permitted as of right; provided, however, that such multi-family housing shall be without age restrictions and shall be suitable for families with children. For the purposes of this section, a district of reasonable size shall: (i) have a minimum gross density of 15 units per acre, subject to any further limitations imposed by section 40 of chapter 131 and title 5 of the state environmental code established pursuant to section 13 of chapter 21A; and (ii) be located not more than 0.5 miles from a commuter rail station, subway station, ferry terminal or bus station, if applicable.

### **Minimum Multi-family unit capacity Requirement:**

The administrator of the MBTA Communities Act is the EOHLC. In its active regulations, the following unit capacity is required by every municipality that must comply with the mandate:

Reasonably sized Multi-family zoning district must also be able to accommodate a reasonable number of Multi-family housing units As of right. For purposes of determinations of compliance with G.L. c. 40A, § 3A, EOHLC will consider a reasonable Multi-family unit capacity for each MBTA community to be a specified percentage of the total number of housing units within the community:

Category Percentage of total housing units

Rapid transit community 25%

Commuter rail community 15%

Adjacent community 10%

Adjacent small town 5%

**The minimum Multi-family unit capacity for each MBTA community has been determined as follows:**

- a. First, by multiplying the number of housing units in that community by 0.25, 0.15, 0.10, or .05 depending on the MBTA community category. For example, a Rapid transit community with 7,500 housing units is required to have a Multi-family zoning district with a Multi-family unit capacity of  $7,500 \times 0.25 = 1,875$  Multi-family units. For purposes of 760 CMR 72.00, the number of total housing units in each MBTA community has been established by reference to the most recently published United States Decennial Census of Population and Housing.
- b. Second, when there is a minimum land area applicable to an MBTA community, by multiplying that minimum land area (up to 50 acres) by G.L. c. 40A, § 3A's minimum gross density requirement of 15 units per acre. The product of that multiplication creates a floor on Multi-family unit capacity. For example, an MBTA community with a minimum land area of 40 acres must have a district with a Multi-family unit capacity of at least 600 ( $40 \times 15$ ) units.
- c. The minimum unit capacity applicable to each MBTA community is the greater of the numbers resulting from steps (i) and (ii) above, but subject to the following limitation: In no case does the minimum Multi-family unit capacity exceed 25% of the total housing units in that MBTA community.

**State “Specific” and “Direct” Costs:**

The Massachusetts Legislature did not define specific or direct costs within the 3A mandate. However, common law has defined “direct costs” of a state mandate as follows:

“Direct costs of a state mandate refer to the financial obligations imposed on cities or towns by statutes, rules, or regulations. These costs are exclusive of incidental local administration expenses. *City of Worcester v. Governor*, 416 Mass. 751, *Lynn v. Rate Setting Com.*, 21 Mass. App. Ct. 576.

For this **Cost Impact Report**, cost calculations are based on financial costs the state has accepted as directly related to pre-development of residential projects. Specifically, it borrowed calculations, definitions, and categories from the following:

1. The “Cost Estimating Manual” created by the Division of Capital Asset Management and Maintenance (“DCAMM”).
2. The pre-development stages and categories as defined by the state sponsored “Development Continuum”.
3. Accepted infrastructure costs as defined by the MBTA Communities Catalyst Fund.



## 3. Purpose

The purpose of this **Cost Impact Report** is to provide the 177 municipalities mandated to meet the requirements of 3A the following;

1. A guide to what “specific” and “direct” costs should be reimbursed by the state.
2. A cost calculation of Designer Base Fees that should have at the minimum been appropriated by the state at the time the act was imposed on the municipalities to fund the mandate.
3. An opportunity to understand what pre-development costs and specifically infrastructure costs the state has already identified as acceptable infrastructure costs for MBTA Communities Act related projects which are more than “speculative averments”.

## 4. Methodology

This **Cost Impact Report** used extremely modest assumptions in order to calculate a minimum cost impact.

In addition, it used the following method in chronological order to calculate the “Designer Base Fees” for all 177 municipalities required to comply with § 3A.

### 01

Utilized the Development Continuum to categorize direct and specific costs related to MBTA Communities Act development costs.

### 02

Used the 3A mandate requirements to estimate the construction costs to fulfill the required unit count for each community based on reasonable assumptions for unit size, unit-per-project count, and price per sft of construction.

### 03

Used DCAMM’s Designer Base Fees schedule to calculate the total designer costs for each municipality.

### 04

Double checked assumptions and calculations by looking at recently completed construction projects in each municipality.

# 5. Cost Impact

The Budget below only calculates the Designer Base Fees from DCAMM’s Cost Estimating Manual and does **NOT** include additional infrastructure costs.

**Assumptions:**

Construction cost per sft: \$250 (below \$350 avg psft)  
 Gross unit size: 900sft (share of common space included)  
 Avg Project # of units: 80  
 Avg Construction cost of each project: \$18mm  
 Designer Base Fee %: 5.9% (based on DCAMM’s estimating manual)

State leaders created the “Home for Everyone” initiative with a goal of producing 220,000 new housing units over the next 10 years.

According to the Healey Administration, the 3A mandate has already added 4,000 units in the pipeline with an additional 340 units required by the zoning mandate.

Designer Base Fees	\$4,490,290,328
Additional Infrastructure Costs (expected to increase)	\$0
Catalyst Fund Grant	-\$15,000,000
<hr/>	
<b>Unappropriated Funds</b>	<b>\$4,475,290,328</b>
<hr/>	
<b>Costs at 50% of Unit Production</b>	<b>\$2,237,645,164</b>
<b>Costs at 25% of Unit Production</b>	<b>\$1,118,822,582</b>

*It should be noted that funding for a state mandate has not previously included grant funds and no such examples have been found. However, for this report we have credited the Catalyst Fund Grant as appropriated funds to give a conservative cost calculation. The \$15mm is less than .003% of the required funding for this mandate*



## 6. DCAMM

### Division of Capital Asset Management and Maintenance

The Division of Capital Asset Management (“DCAMM”) offers 3A communities rules for estimating development and project related costs through its Cost Estimating Manual. In addition, DCAM offers guidelines for designer fees. Below is a clear definition of the manual’s purpose taken directly from the DCAMM

The Division of Capital Asset Management’s (DCAM) Office of Planning, Design and Construction (OPDC) is responsible for the cost throughout all phases of state building projects, from project initiation and Study to final Design and Construction. Architectural and engineering firms that prepare building studies, and develop final design and construction documents, will submit Cost Estimates and participate in cost control activities for each phase.

Rigorous Cost Management is essential throughout each project’s planning, design, and construction phase. This Consultants Estimating Manual contains forms and guidelines based on industry standards to enable consistency for DCAM Designers and Consultants in the Cost Management of OPDC projects. Once an initial budget has been established, DCAM will constantly monitor the project budget by employing a series of increasingly precise cost estimating techniques, matching the development of the project design through each phase. Submission formats and processes represent industry standard practices as they apply to DCAM projects.

## Designer Base Fees

The Designer Base Fees stated below have been taken directly from the “Guidelines for the Calculation of Designer Fees,” which was last updated in Feb of 2022. Group III includes fees for “apartments” which would best meet the description of development for housing under the MBTA Communities Act. “FLCC” or Fixed Limit Construction Cost is defined as the “maximum allowable construction cost established by the awarding authority.” The state has not established maximums for construction under the MBTA Communities Act so for calculation purposes, we have assumed any housing unit will be on average 900sft (gross) with a construction cost of \$250psft.

**Table 1: Designers Base Fee Table**

FLCC*	Group I	Group II	Group III
\$ 0	14.0%	11.7%	10.0%
\$ 375,000	14.0%	11.7%	10.0%
\$ 750,000	14.0%	11.7%	10.0%
\$ 1,125,000	12.7%	10.6%	9.0%
\$ 1,500,000	11.3%	9.5%	8.0%
\$ 2,625,000	11.2%	9.4%	7.9%
\$ 3,750,000	11.0%	9.2%	7.7%
\$ 5,625,000	10.3%	8.6%	7.2%
\$ 7,500,000	9.5%	8.0%	6.6%
\$ 11,250,000	9.0%	7.6%	6.3%
\$ 15,000,000	8.5%	7.2%	5.9%
\$ 26,250,000	8.3%	7.0%	5.8%
\$ 37,500,000	8.0%	6.7%	5.7%
\$ 93,750,000	7.8%	6.6%	5.6%
\$ 150,000,000	7.5%	6.5%	5.5%
\$ 175,000,000	7.3%	6.3%	5.3%
\$ 200,000,000	7.0%	6.0%	5.0%

*This Cost Impact Report used 5.9% for the Designer Base Fee % since the average project construction cost was \$18,000,000*

# 7. Development Continuum

## Community One Stop for Growth Development Continuum

The Community One Stop Continuum is the only framework offered by the state to outline the pre-development structure of real estate development. The Executive Office of Economic Development explains the model as:

This continuum separates economic development activities into two broad categories. The first, “Preparing for Growth,” includes the initial steps that typically need to occur before specific development projects can move forward, as well as community activation focused economic development activities. The second, “Catalyzing Specific Projects,” covers various forms of project-specific activities, particularly for projects that have private development identified.

The state’s Development Continuum can serve as a standard for predevelopment direct costs related to housing development. Though the Continuum references commercial and industrial projects as well, it segments housing pre-development and offers examples of development costs from the “Preparing for Growth” stage of development to “Catalyzing Specific Projects.” It lastly, provides examples for each type of project. Importantly, **designer fees are weaved throughout every category step.**

Applicant Type	Preparing for Growth			Catalyzing Specific Projects	
	Community Activation & Placemaking	Planning & Zoning	Site Preparation	Building	Infrastructure
<b>Public Entity</b>					
Municipal	All Programs	All Programs	All Programs	All Programs	All Programs
Other Public	All Programs	All Programs	All Programs	All Programs	All Programs
<b>Non-Public Entity</b>					
Non-Profit	N/A	N/A	Site Readiness Program	Underutilized Properties Program, TDI Equity Investment Program	N/A
For-Profit	N/A	N/A	N/A	Underutilized Properties Program, TDI Equity Investment Program	N/A

# The Development Continuum

## Preparing for Growth

### ➔ Community Activation & Placemaking

The Community Activation and Placemaking is a grant program that “support projects and programs aimed at identifying and enhancing community assets.” It’s Downtown Initiative program guidelines includes 9 categories of expenses related to the development of a Downtown. Below are the expenses that can apply to 3A communities:

- 
- Design (sign and façade program, concepts for streetscape design)
  - Economics of Downtown including reviews of market areas, feasibility studies, building reuse work and busines
  - Housing including housing plans, market analysis for suitable housing mix, zoning recommendations, and second story development assistance
  - Downtown mobility technical assistance including parking management plans, trolley feasibility plans, bus route analysis, and other request improving mobility in a downtown.

# The Development Continuum

## Preparing for Growth

### ➔ Planning & Zoning

The Continuum offers examples of the types of projects that may be required by zoning changes:

- 
- Create a housing production plan to better understand housing needs of the community and identify strategies to reduce gaps in existing housing relative to identified needs.
  - Economics of Downtown including reviews of market areas, feasibility studies, building reuse work and business.
  - Study the area with a ½ mile of a commuter rail station and create strategies to intensify development in that area.
  - Prepare a corridor study of a commercial area that runs through multiple towns and seeks land use alternatives to promote multi-modal access, introduce mixed-use and achieve more compact commercial development.
  - Review current zoning to identify and remove language that excludes certain housing types.

# The Development Continuum

## Preparing for Growth

### → Site Preparation

The continuum also gives examples of costs that may be incurred through improvements of a site that may be needed to “unlock development.”

- 
- Site Readiness Pre-Construction
    - Site Due Diligence
    - Site Plan Design
    - Market Study
    - Civil Engineering
    - Pre-Permitting/Permitting
  - Site Readiness Construction
    - Demolition
    - Site Acquisition, related tasks
    - Construction of site related upgrades

# The Development Continuum

## Catalyzing Specific Projects

### ➔ Building

Building is divided into 3 categories of which 2 can apply to the MBTA Communities Act. Specifically, the “Underutilized Property Rehabilitation” and “Housing Production”

- 
- Underutilized Property Rehabilitation
    - Building Condition Study
    - Development Feasibility Study
    - Code Compliance Study
    - Architectural or Engineering Plans
  - Housing Production
    - Support Housing Production
    - Support Housing Rehabilitation
    - Support Housing Preservation

\*\* Below are examples of the types of projects that meet the broad “support housing” definition:

#### Example Projects:

- A request to fit-out an incubator within a property that was previously vacant.
- A request to install an elevator in a city-owned property to open up second floor space for space for a new housing development.
- A request to convert a storefront from a production-only space to a more active storefront with a café and retail sales.

# The Development Continuum

## Catalyzing Specific Projects

### ➔ Infrastructure

In June of 2024, the state created the MBTA Communities Catalyst Fund as part of its FY2025-2029 Capital Investment Plan and seeded the fund with \$15mm spread over 3 years. The Fund is not an MBTA Communities Act reimbursement fund nor was it created at the time 3A was enacted. Rather, it is a grant program. However, the Fund's Guidelines define infrastructure related direct costs. Specifically, it makes reference to the Community One Stop for Growth Development Continuum and includes the following in infrastructure related costs:

- 1) Design and engineering of infrastructure projects
- 2) Construction of new improved infrastructure, including roadway/streetscape improvements, bridge/culvert repair or replacement, water/sewer, public utilities (gas, electric, etc.).

This aligns with the infrastructure expenses outlined in the MassWorks Infrastructure Program, HousingWorks Infrastructure Program, Rural Development Fund, and Housing Choice Grant Program. Specifically, The Continuum outlines infrastructure projects as the following:

Type/Focus of Projects Supported:

#### Infrastructure to Support Housing Growth (Residential Only)

- Pre-Construction - Design / Engineering Documents Only
- Construction
  - Roadway / Streetscape Improvements
  - Bridge / Culvert Repair or Replacement
  - Water / Sewer Infrastructure
  - Public Utility Project (Gas, Electric, etc.)

#### Public Infrastructure to Support Mixed-Use Development

- Pre-Construction - Design / Engineering Documents Only
- Construction
  - Roadway / Streetscape Improvements
  - Bridge / Culvert Repair or Replacement
  - Water / Sewer Infrastructure
  - Public Utility Project (Gas, Electric, etc.)

Example Projects:

- A request for water and sewer upgrades to a previously used site that will now be made into market rate housing.
- A request to update a culvert under a roadway leading to new private development for mixed use that creates new industrial space and rental housing.
- A request to repair at-risk municipal bridges that affect evacuation routes and/or access to commercial centers or transportation nodes.



## 8. Conclusion

The State of Massachusetts has not defined “specific” or “direct costs” for the MBTA Communities Act. However, state Courts have concluded “Direct costs of a state mandate refer to the financial obligations imposed on cities or towns by statutes, rules, or regulations. These costs are exclusive of incidental local administration expenses.” In addition, they have found those costs must be appropriated at the time a state mandated is imposed on municipalities and can be estimates.

The best reference for municipalities for reimbursements of specific and direct costs is provided by (1) The state’s Division of Capital Asset Management’s, Cost Estimating Manual, which includes a fee schedule for Designer Base Fees and (2) the MBTA Communities Catalyst Fund which sets rules for what qualifies as infrastructure costs related to the MBTA Communities Act. Both the DCAMM and the Catalyst Fund reference and align with the state’s Growth Development Continuum which acts as an umbrella for all pre-development costs related to commercial and residential housing development.

Based on the 3A mandate’s required zoning of over 344,000 residential units, the Designer Base Fees alone equates to over \$4.4B in costs utilizing the Cost Estimating Manual provided by the state. Since the state did not appropriate any funds at the time it imposed the mandate on municipalities this **Cost Impact Report** serves as the only clear calculation of the state’s appropriations deficit. This Report can be updated periodically to include additional infrastructure costs municipalities may identify.

This report does not purport to give legal conclusions regarding whether the MBTA Communities Act is a funded or unfunded mandate. However, it does aim to serve as a report usable for legal arguments.

Dec  
2025



## **9. Appendix A Designer Base Fees**

Municipality	MBTA Community Type	2020 Housing		Minimum multifamily district unit capacity requirement	Avg Gross Sft per unit	Total Sft of Construction	Est Construction Cost at \$250psft	Est. # of Projects (avg of 80 units each)	Avg # of Units Per Project	Designer Fee Costs
		Units	(Census PL-94)							
Abington	commuter rail	6,811		1,022	900	919,485	229,871,250	12.77	80	\$13,332,533
Acton	commuter rail	9,219		1,383	900	1,244,565	311,141,250	17.29	80	\$18,046,193
Amesbury	MBTA adjacent	7,889		789	900	710,010	177,502,500	9.86	80	\$10,295,145
Andover	commuter rail	13,541		2,031	900	1,828,035	457,008,750	25.39	80	\$26,506,508
Arlington	subway or light rail	20,461		5,115	900	4,603,725	1,150,931,250	63.94	80	\$66,754,013
Ashburnham	MBTA adjacent	2,730		750	900	675,000	168,750,000	9.38	80	\$9,787,500
Ashby	MBTA adjacent	1,243		750	900	675,000	168,750,000	9.38	80	\$9,787,500
Ashland	commuter rail	7,495		1,124	900	1,011,825	252,956,250	14.05	80	\$14,671,463
Attleboro	commuter rail	19,097		2,865	900	2,578,095	644,523,750	35.81	80	\$37,382,378
Auburn	MBTA adjacent	6,999		750	900	675,000	168,750,000	9.38	80	\$9,787,500
Ayer	commuter rail	3,807		750	900	675,000	168,750,000	9.38	80	\$9,787,500
Bedford	bus	5,444		1,089	900	979,920	244,980,000	13.61	80	\$14,208,840
Bellingham	MBTA adjacent	6,749		750	900	675,000	168,750,000	9.38	80	\$9,787,500
Belmont	bus	10,882		2,176	900	1,958,760	489,690,000	27.21	80	\$28,402,020
Berkley	MBTA adjacent	2,360		750	900	675,000	168,750,000	9.38	80	\$9,787,500
Beverly	bus	17,887		3,577	900	3,219,660	804,915,000	44.72	80	\$46,685,070
Billerica	bus	15,485		3,097	900	2,787,300	696,825,000	38.71	80	\$40,415,850
Bourne	MBTA adjacent	11,140		1,114	900	1,002,600	250,650,000	13.93	80	\$14,537,700
Boxborough	MBTA adjacent	2,362		750	900	675,000	168,750,000	9.38	80	\$9,787,500
Boxford	MBTA adjacent	2,818		750	900	675,000	168,750,000	9.38	80	\$9,787,500
Braintree	subway or light rail	15,077		3,769	900	3,392,325	848,081,250	47.12	80	\$49,188,713
Bridgewater	commuter rail	9,342		1,401	900	1,261,170	315,292,500	17.52	80	\$18,286,965
Brockton	bus	37,304		7,461	900	6,714,720	1,678,680,000	93.26	80	\$97,363,440
Brookline	subway or light rail	27,961		6,990	900	6,291,225	1,572,806,250	87.38	80	\$91,222,763
Burlington	bus	10,431		2,086	900	1,877,580	469,395,000	26.08	80	\$27,224,910
Cambridge	subway or light rail	53,907		13,477	900	12,129,075	3,032,268,750	168.46	80	\$175,871,588
Canton	bus	9,930		1,986	900	1,787,400	446,850,000	24.83	80	\$25,917,300

Carlisle	MBTA adjacent	1,897	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Carver	MBTA adjacent	4,701	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Chelmsford	MBTA adjacent	14,769	1,477	900	1,329,210	332,302,500	18.46	80	\$19,273,545
Chelsea	subway or light rail	14,554	3,639	900	3,274,650	818,662,500	45.48	80	\$47,482,425
Cohasset	commuter rail	3,341	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Concord	commuter rail	7,295	1,094	900	984,825	246,206,250	13.68	80	\$14,279,963
Danvers	bus	11,763	2,353	900	2,117,340	529,335,000	29.41	80	\$30,701,430
Dedham	bus	10,459	2,092	900	1,882,620	470,655,000	26.15	80	\$27,297,990
Dover	MBTA adjacent	2,046	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Dracut	MBTA adjacent	12,325	1,233	900	1,109,250	277,312,500	15.41	80	\$16,084,125
Duxbury	MBTA adjacent	6,274	750	900	675,000	168,750,000	9.38	80	\$9,787,500
East Bridgewater	MBTA adjacent	5,211	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Easton	MBTA adjacent	9,132	913	900	821,880	205,470,000	11.42	80	\$11,917,260
Essex	MBTA adjacent	1,662	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Everett	subway or light rail	18,208	4,552	900	4,096,800	1,024,200,000	56.90	80	\$59,403,600
Fitchburg	commuter rail	17,452	2,618	900	2,356,020	589,005,000	32.72	80	\$34,162,290
Foxborough	MBTA adjacent	7,682	768	900	691,380	172,845,000	9.60	80	\$10,025,010
Framingham	commuter rail	29,033	4,355	900	3,919,455	979,863,750	54.44	80	\$56,832,098
Franklin	commuter rail	12,551	1,883	900	1,694,385	423,596,250	23.53	80	\$24,568,583
Freetown	MBTA adjacent	3,485	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Georgetown	MBTA adjacent	3,159	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Gloucester	commuter rail	15,133	2,270	900	2,042,955	510,738,750	28.37	80	\$29,622,848
Grafton	commuter rail	7,760	1,164	900	1,047,600	261,900,000	14.55	80	\$15,190,200
Groton	MBTA adjacent	4,153	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Groveland	MBTA adjacent	2,596	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Halifax	commuter rail	3,107	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Hamilton	commuter rail	2,925	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Hanover	MBTA adjacent	5,268	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Hanson	commuter rail	3,960	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Harvard	MBTA adjacent	2,251	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Haverhill	commuter rail	27,927	4,189	900	3,770,145	942,536,250	52.36	80	\$54,667,103
Hingham	bus	9,930	1,986	900	1,787,400	446,850,000	24.83	80	\$25,917,300
Holbrook	bus	4,414	883	900	794,520	198,630,000	11.04	80	\$11,520,540

Holden	MBTA adjacent	7,439	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Holliston	MBTA adjacent	5,562	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Hopkinton	commuter rail	6,645	997	900	897,075	224,268,750	12.46	80	\$13,007,588
Hull	bus	5,856	1,171	900	1,054,080	263,520,000	14.64	80	\$15,284,160
Ipswich	commuter rail	6,476	971	900	874,260	218,565,000	12.14	80	\$12,676,770
Kingston	commuter rail	5,364	805	900	724,140	181,035,000	10.06	80	\$10,500,030
Lakeville	commuter rail	4,624	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Lancaster	MBTA adjacent	2,788	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Lawrence	commuter rail	30,008	4,501	900	4,051,080	1,012,770,000	56.27	80	\$58,740,660
Leicester	MBTA adjacent	4,371	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Leominster	commuter rail	18,732	2,810	900	2,528,820	632,205,000	35.12	80	\$36,667,890
Lexington	bus	12,310	2,462	900	2,215,800	553,950,000	30.78	80	\$32,129,100
Lincoln	bus	2,771	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Littleton	commuter rail	3,889	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Lowell	commuter rail	43,482	6,522	900	5,870,070	1,467,517,500	81.53	80	\$85,116,015
Lunenburg	MBTA adjacent	4,805	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Lynn	bus	36,782	7,356	900	6,620,760	1,655,190,000	91.96	80	\$96,001,020
Lynnfield	MBTA adjacent	4,773	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Malden	subway or light rail	27,721	6,930	900	6,237,225	1,559,306,250	86.63	80	\$90,439,763
Manchester	commuter rail	2,433	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Mansfield	commuter rail	9,282	1,392	900	1,253,070	313,267,500	17.40	80	\$18,169,515
Marblehead	bus	8,965	1,793	900	1,613,700	403,425,000	22.41	80	\$23,398,650
Marlborough	MBTA adjacent	17,547	1,755	900	1,579,230	394,807,500	21.93	80	\$22,898,835
Marshfield	MBTA adjacent	11,575	1,158	900	1,041,750	260,437,500	14.47	80	\$15,105,375
Maynard	MBTA adjacent	4,741	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Medfield	MBTA adjacent	4,450	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Medford	subway or light rail	25,770	6,443	900	5,798,250	1,449,562,500	80.53	80	\$84,074,625
Medway	MBTA adjacent	4,826	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Melrose	subway or light rail	12,614	3,154	900	2,838,150	709,537,500	39.42	80	\$41,153,175
Merrimac	MBTA adjacent	2,761	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Methuen	MBTA adjacent	20,194	2,019	900	1,817,460	454,365,000	25.24	80	\$26,353,170
Middleborough	commuter rail	9,808	1,471	900	1,324,080	331,020,000	18.39	80	\$19,199,160
Middleton	MBTA adjacent	3,359	750	900	675,000	168,750,000	9.38	80	\$9,787,500

Millbury	MBTA adjacent	5,987	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Millis	MBTA adjacent	3,412	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Milton	subway or light rail	9,844	2,461	900	2,214,900	553,725,000	30.76	80	\$32,116,050
Nahant	bus	1,680	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Natick	commuter rail	15,680	2,352	900	2,116,800	529,200,000	29.40	80	\$30,693,600
Needham	bus	11,891	2,378	900	2,140,380	535,095,000	29.73	80	\$31,035,510
Newbury	commuter rail	3,072	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Newburyport	commuter rail	8,615	1,292	900	1,163,025	290,756,250	16.15	80	\$16,863,863
Newton	subway or light rail	33,320	8,330	900	7,497,000	1,874,250,000	104.13	80	\$108,706,500
Norfolk	commuter rail	3,601	750	900	675,000	168,750,000	9.38	80	\$9,787,500
North Andover	commuter rail	11,914	1,787	900	1,608,390	402,097,500	22.34	80	\$23,321,655
North Attleborough	MBTA adjacent	12,551	1,255	900	1,129,590	282,397,500	15.69	80	\$16,379,055
North Reading	MBTA adjacent	5,875	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Northborough	MBTA adjacent	5,897	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Northridge	MBTA adjacent	6,691	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Norton	MBTA adjacent	6,971	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Norwell	MBTA adjacent	3,805	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Norwood	bus	13,634	2,727	900	2,454,120	613,530,000	34.09	80	\$35,584,740
Paxton	MBTA adjacent	1,689	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Peabody	bus	23,191	4,638	900	4,174,380	1,043,595,000	57.98	80	\$60,528,510
Pembroke	MBTA adjacent	7,007	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Plymouth	commuter rail	28,074	4,211	900	3,789,990	947,497,500	52.64	80	\$54,954,855
Plympton	MBTA adjacent	1,068	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Princeton	MBTA adjacent	1,383	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Quincy	subway or light rail	47,009	11,752	900	10,577,025	2,644,256,250	146.90	80	\$153,366,863
Randolph	bus	12,901	2,580	900	2,322,180	580,545,000	32.25	80	\$33,671,610
Raynham	MBTA adjacent	5,749	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Reading	bus	9,952	1,990	900	1,791,360	447,840,000	24.88	80	\$25,974,720
Rehoboth	MBTA adjacent	4,611	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Revere	subway or light rail	24,539	6,135	900	5,521,275	1,380,318,750	76.68	80	\$80,058,488
Rochester	MBTA adjacent	2,105	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Rockland	MBTA adjacent	7,263	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Rockport	commuter rail	4,380	750	900	675,000	168,750,000	9.38	80	\$9,787,500

Millbury	MBTA adjacent	5,987	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Mills	MBTA adjacent	3,412	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Milton	subway or light rail	9,844	2,461	900	2,214,900	553,725,000	30.76	80	\$32,116,050
Nahant	bus	1,680	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Natick	commuter rail	15,680	2,352	900	2,116,800	529,200,000	29.40	80	\$30,693,600
Needham	bus	11,891	2,378	900	2,140,380	535,095,000	29.73	80	\$31,035,510
Newbury	commuter rail	3,072	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Newburyport	commuter rail	8,615	1,292	900	1,163,025	290,756,250	16.15	80	\$16,863,863
Newton	subway or light rail	33,320	8,330	900	7,497,000	1,874,250,000	104.13	80	\$108,706,500
Norfolk	commuter rail	3,601	750	900	675,000	168,750,000	9.38	80	\$9,787,500
North Andover	commuter rail	11,914	1,787	900	1,608,390	402,097,500	22.34	80	\$23,321,655
North Attleborough	MBTA adjacent	12,551	1,255	900	1,129,590	282,397,500	15.69	80	\$16,379,055
North Reading	MBTA adjacent	5,875	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Northborough	MBTA adjacent	5,897	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Northridge	MBTA adjacent	6,691	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Norton	MBTA adjacent	6,971	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Norwell	MBTA adjacent	3,805	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Norwood	bus	13,634	2,727	900	2,454,120	613,530,000	34.09	80	\$35,584,740
Paxton	MBTA adjacent	1,689	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Peabody	bus	23,191	4,638	900	4,174,380	1,043,595,000	57.98	80	\$60,528,510
Pembroke	MBTA adjacent	7,007	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Plymouth	commuter rail	28,074	4,211	900	3,789,990	947,497,500	52.64	80	\$54,954,855
Plympton	MBTA adjacent	1,068	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Princeton	MBTA adjacent	1,383	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Quincy	subway or light rail	47,009	11,752	900	10,577,025	2,644,256,250	146.90	80	\$153,366,863
Randolph	bus	12,901	2,580	900	2,322,180	580,545,000	32.25	80	\$33,671,610
Raynham	MBTA adjacent	5,749	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Reading	bus	9,952	1,990	900	1,791,360	447,840,000	24.88	80	\$25,974,720
Rehoboth	MBTA adjacent	4,611	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Revere	subway or light rail	24,539	6,135	900	5,521,275	1,380,318,750	76.68	80	\$80,058,488
Rochester	MBTA adjacent	2,105	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Rockland	MBTA adjacent	7,263	750	900	675,000	168,750,000	9.38	80	\$9,787,500
Rockport	commuter rail	4,380	750	900	675,000	168,750,000	9.38	80	\$9,787,500



Dec  
2025



## 10. Appendix B References

# References

[MGLc 40A section 3A](#)

[Supreme Judicial Court Milton Decision](#)

[Plymouth Court Decision](#)

[Lexington v. Commissioner of Education](#)

[MGL c 29§ 27C](#)

[Worcester v. the Governor](#)

[Lynn v. Rate Setting Com.](#)

[Average Massachusetts Construction Costs](#)

["Home for Everyone" Initiative](#)

[Mass Housing Pipeline](#)

[DCAMM Cost Estimating Manual](#)

[Development Continuum](#)

[MBTA Communities Catalyst Fund](#)

Dec  
2025

# Let's Work Together

If you are leader in an MBTA Communities Act designated municipality and would like to include infrastructure costs into this report, please reach out so we can add that information to this report.



## Contact Us

 [info@anne2026.com](mailto:info@anne2026.com)