Correspondence RE: Cornwall Affordable Housing Plan Draft
10/20/2021

1) Letter from David Colbert received October 18, 2021
2) Email from Susan Edholm received October 18, 2021
3) Email from Nicholas Daifotis received October 19, 2021
4) Letter from Margie Purnell received October 20, 2021

From Dave Colbert. Received 10/18/2021

Dear Cornwall Affordable Housing Plan Committee,

I applaud your efforts: well done! My suggestions, below, all involve clarifications or potential additions.

Thanks for your work,

Dave Colbert

Page 9
Covid has been such a huge changer in our world. Include some text regarding how that has changed things in Cornwall (like current and recent school statistics)? This would help make the document more up to date. These shifts do not alter the need for affordable housing...

Page 18

I have several comments:

-This is my major suggestion. How about trying to allow 2-family housing "in specific areas" of Town? This is different from accessory apartments and multi-family housing, both of which continue to be owned by a single family, and might have more impact.

-Goal #1. Allow multi-family housing.
This reads as a potential Town-wide proposal (compared to the next goal which includes the words "in specific areas". Is this the intention?

-Co-housing option: thanks for including this. I think it has real potential.

-Goal #3. I have heard anecdotally that building rental units as accessory apartments may not be cost-effective for developers around here? If true, easing accessory apt requirements may not do as much for housing as hoped? It might more allow wealthy residents to build 2 big houses instead of one...

Page 26

I wonder if adding some text that helps readers understand that those big gray areas likely indicate our large population that have primary residences elsewhere?

Page 28
Affordability statistics. How was 67% arrived at (42+11=53)

Page 30
Include a note mentioning this data is pre-pandemic? Again, it would be great to have some text acknowledgment that Covid has changed Cornwall democraphics, perhaps long-term. Perhaps include this in the Population change graphs, in the text that goes along with "-29%"?

Gordon Ridgway

From: Susan Edholm [redacted]
Sent: Monday, October 18, 2021 1:36 PM
To: Gordon Ridgway
Subject: Cornwall Affordable Housing Plan Feedback

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you to the CAHP Steering Committee for an amazingly detailed plan and all of your hard work. I did not see any way to use the Feedback Form as posted, only as a guide for conversation.
I found two typos : 1. pg 6 left side, last paragraph: 'state of Federal' (should be state or Federal ?)
: 2. pg 12 : 'There Are Currently No Long Rentals . . .' (after Long, shouldn't it say 'Term' ?) It's hazy about what is meant by Long Rentals, I didn't feel that was explained well. Just how long is a Long Rental ?
Comments & Questions:

1. It took some extra mental digestion to understand some of the graphs, however it helped for comprehending the facts.
2. Pg.11: What is a housing wage ? : Q: How many hours worked, in a week, is the housing wage based on ?
3. Pg. 15: I really like: Increase Public Awareness: Annually conduct a town-wide Housing Forum. Also: Establish a Cornwall Housing Commission and a Housing Coordinator.
4. Pg. 18: 2nd paragraph, 4th bullet point: Q: Why is the 'BOS' establishing and administering (especially the latter) an Affordable Housing Fund ? I am thinking this would best be done by the Housing Commission, since they would administer the Housing Trust Fund.
5. Appendix II: Partnership for Strong Communities Housing Data 2020
Profiles: Cornwall. Data comes from 2014-2018. Cornwall and the area have experienced many housing changes since then, so I didn't feel confident on the facts here. Q: Can the Steering Committee explain further about the percent of all homes occupied by owners, renters, vacant ? Looks like 45% are vacant ? Please explain what is meant by 'vacant'. Can any of those considered 'vacant' be repurposed? Wanting more details !
6. In regards to the number of Senior Living units expected to build, I think, considering the projected increase in our senior population, the number of units may need to be higher. It would be useful information to find out just how many people currently living in Cornwall, aged 60 and older, are thinking of aging in place at their homes if able, and how many know they will need to downsize, change, living situations.

Regards,

Susan Edholm
[redacted]

Gordon Ridgway

From: Nicholas Daifotis [redacted]
Sent: Tuesday, October 19, 2021 10:13 AM
To: cwlselectmen@optonline.net
Subject: Affordable Housing Plan

Although I am in agreement with the numerical objectives as laid out in the plan, I believe the proposed changes to the Zoning code are extremely aggressive. As proposed such Changes would lead to a very negative outcome as it relates to Housing density in Cornwall. Not only would it change the Rural character of the town it would do irreparable damage to the Quality of life.

Nicholas Daifotis
Cornwall Bridge, CT
[redacted]

Marguerite W. Purnell

Cornwall Affordable Housing Plan Steering Committee
Cornwall Town Hall
Cornwall, CT 06753

October 19, 2021

RE: Comments on *Cornwall Affordable Housing Plan*
September 29, 2021 Draft

Dear Cornwall AHP Steering Committee members,

Thank you for all your work to produce the 9/29/21 draft of Cornwall's first Affordable Housing Plan (AHP). I am an interested member of the Cornwall community with land use experience, and I have followed your efforts over the last 8+ months. Having read through the first draft, I offer the following comments for your consideration.

GENERAL COMMENTS

A. The general tone of the document is somewhat gloomy and sounds much like almost every other town in Northwest Connecticut. The actual fact is that Cornwall did not suffer a decline in population over the last 10 years, though many other towns in our region did. I urge the Steering Committee to gently rewrite (and expand) the Data Assessment/Demographic Assessment section currently found on page 6 of the draft to include a more robust analysis of demographic trends including broader US trends versus CT's trends versus Cornwall's trends and those of a few neighboring towns (especially those that have similar population numbers). It's important to put these demographic trends into context, because this draft sounds as though the problem is Cornwall's (or NW CT's) when it's more a function of the underlying demographic trends in the US.

   Also, consider adding a separate section (perhaps on the left side in a text box) that summarizes the unusual impact of the recent pandemic: how that has impacted the region and whether those impacts are expected to continue or abate (admittedly, this is a tough nut to crack since we have no crystal ball, but it's worthy of at least its own write up since it has skewed housing issues and pricing so greatly). At present the pandemic is mentioned in a few different places, but mostly as an aside.

B. Streamline and refine the goals on the top of page 14. Is there really a need to differentiate between local residents, workers, first-time homebuyers or seniors? Yes, the intent is admirable, but what Cornwall wants/needs are a number of smaller housing units that are

manageable in size and cost (whether to buy or rent) that remain as such in perpetuity (or at the very minimum, 10 year increments). Also, consideration of P&Z changes is not really a goal; instead it's a strategy to achieve a goal and as such need not be listed as one of the AHP goals. So, why not cut directly to the chase?

How about something like this instead?:

- Increase the number of rental units.
- Increase first-time homebuyer options.
- Increase housing options for seniors [looking to down-size and/or age in place].
- Promote and enhance support for Cornwall's affordable housing efforts.

If there is agreement to consolidate the draft goals, then the strategies section on the next page should be rearranged/edited accordingly.

C. The strategy on page 15 (third goal, second bullet) "Encourage the state to set aside its $60 land-use permitting fee on land use applications to a Housing Trust Fund to support Affordable Housing (Town/State)" is unfortunately completely unrealistic. That is never going to happen since these funds (absent $2 that goes to Towns for their own processing fees) goes into the General Fund. As such, this suggestion should be dropped from the AHP.

   If Cornwall wants to support state legislation, then there are two recommendations that the AHP might want to include:

   - Support the **Community Investment Act** and insist that its funds are not swept into the General Fund when the going gets tough in Hartford.
   - Support enabling legislation that would allow creation of a real estate conveyance fee that would allow municipalities to use the funds in a variety of ways that are determined and controlled by the municipality (i.e purchase of open space, climate resilience projects and perhaps even affordable housing efforts (such as a dedicated Housing Trust Fund)). Environmental groups have been working on this enabling legislation for a long time, but with an exclusively environmental focus. Prior efforts have not yet borne fruit, but the effort continues. Note: without such enabling legislation, municipalities cannot undertake such efforts.

D. All data sources/references should be properly (and consistently) cited in the text. At present some are cited, some are partially cited (i.e. including the source but not the date), while others are not cited at all.

E. Any terminology used should be used consistently in the text (i.e the POCD is referred to as the POCD in some areas or the Town Plan in others). To minimize any confusion, one term (I'd make the case it should be "POCD" in this case) should be used throughout.

F. Consider adding a reference list at the end of the document (before the appendices).

G. Consider adding a definitions list/glossary, preferably at the end of the document (though it could also be at the beginning) instead of sprinkling them throughout the document. All terms requiring definition could then be found easily in one spot. This would also free up the left side of the page for tables, charts, photos and quotes.
    - Two related suggestions:
        i. **Bold** the first occurrence of a term (and add a hyperlink to the definition) that is defined in the definitions section.
        ii. Define pretty much everything. For those of us who are familiar with these issues, the text is understandable, but for those who are just coming to this issue, it will be more helpful for them to have all definitions at their fingertips. Assume that the audience for this document is new to the subject.

H. Consider numbering (or gently reformatting) each of the major section headings. At present the headings for the major sections (located at the top right of each page) are less visible (smaller text and not bold) than the subheadings in each of the sections. Additionally, some major section headings names are different than in the Table of Contents; they should be identical. It's all a little counterintuitive and confusing, but perhaps that's just me...

I. Consider increasing the font size of the document. The font size is small when printed, and while it's apparent that this is intended to be read predominantly online (i.e. the inclusion of various hyperlinks), in order to be accessible for as many readers as possible, the font size should be increased.

J. Consider expanding the section on the *Cornwall Housing Corporation*. The CHC is a wonderful asset to the Town of Cornwall, but the information contained in the draft AHP is far too generic. It would be helpful for the AHP to have some additional information and statistics regarding the CHC efforts through the years, especially since a number of the AHP's draft recommendations specifically involve the CHC. Here are a few relevant questions:
    - Of those on the waiting lists for Kugeman and Bonney Brook, what percentage are current Cornwall residents? What percentage are former Cornwall residents?
    - How many of Kugeman Village's current renters were Cornwall residents before they moved to Kugeman?
    - How many of Bonney Brook's current renters were Cornwall residents before they moved to Bonney Brook?
    - What was the timetable for the development of Kugeman and Bonney Brook from initial concept to completion of construction? The CHC website has a typo on the Kugeman page so it appears that this number was -6 years (i.e. impossible). Knowing these numbers will allow the Steering Committee to plan realistic affordable housing unit goals if projects such as these are to be pursued in the future.
    - Is there a waiting list for the Parcel Program?
    - Does the Parcel Program currently have any properties available?
    - At present do any of CHC's 12 Parcel Program houses qualify to be counted as Affordable Housing per the state guidelines? It would be helpful for this rationale to

be explained. Might one or more of these homes qualify in the future? Might that be a goal of the AHP or a future AHP? Or might another goal of the AHP be to urge the State to include programs like this (even with its higher income limits) for smaller rural towns where 10% affordability (per the state's strict definition) is difficult to achieve.

- What is the turnover rate for the houses in the Parcel Program? Do these homes actually function as starter homes for young families (i.e. do they move on to buy another home in town or do they tend to stay in their Parcel Program house) or downsizing homes for Seniors (i.e. how many seniors have moved into a Parcel Program house)?
- When were each of these 12 houses added to Cornwall's housing stock? A table with this information would be quite helpful. Apparently 4 of the houses were already constructed and subsequently donated.
- How long does it take from Parcel Program property acquisition to certificate of occupancy (for those houses that were built as Parcel Program houses)?
- Does "attainable" housing have any meaning beyond Cornwall? If so, what?

K. Add a section on the efforts of *Habitat for Humanity of NW CT.*

THE CORNWALL AHP FEEDBACK FORM

Responding to the specific questions posed in your feedback form:

*Do you think that the **MEASURES OF SUCCESS** that we have selected for the five (5) year plan are reasonable? If no, what unit goal target would you pick and why?*

No, they are not reasonable. 30 units in 5 years is far too ambitious for a small town like Cornwall, even if these units are to be a mix of ownership, rental and "attainable".

Instead, Cornwall should hew to the recommendation found in the 2020 POCD: 25 units in 10 years. The AHP goal for the first 5 years could be 10 units (or so) and then increased to 15 units (or so) for the second 5-year period because it takes time to plan, fund and permit, then implement various projects. If Cornwall exceeds these initial goals, that would be icing on the cake! But when starting out, why not ensure consistency among Cornwall's planning documents and determine housing goals accordingly?

Also, the AHP planning time frame should be structured to tie into that of Cornwall's 10 year POCD cycle. The AHP should actually be incorporated into the POCD. Thus the first AHP might run from 2021-2026, but consider having the following AHP (since a 5-year cycle is required by the legislation) run from 2026 to 2030 (to coincide with Cornwall's next POCD).

Lastly, consider adding a section to Cornwall's AHP that would look well beyond the 5-year planning timeframe that the 2017 legislation stipulated. Similar to a Town's long term capital plan, the AHP could add a brief chart with *tentative* goals for 25 years (in 5 year increments). As the AHP is revised every 5 years, these numbers could then be tweaked according to Cornwall's needs including success (or heaven forfend, lack thereof) in meeting the most recent 5-year goals.

Did we forget any strategies that could ***INCREASE FIRST-TIME HOMEBUYER OPTIONS TO SUPPORT YOUNG FAMILIES AND THEIR CHILDREN****?*

Yes, Habitat for Humanity of NW CT. Even if one Habitat home is constructed every 7 years (assuming annual rotation through participating towns), the numbers add up over time.

Did we forget any strategies that could ***INCREASE THE AVAILABILITY OF HOUSING OPTIONS FOR SENIORS****?*

Yes, consider developing/enhancing a Cornwall based program that provides various retrofits (i.e ramps, railings, bathroom components etc.) to allow Seniors to remain safely in their own homes. Funding for such a program could be sought from area Foundations.

Does the Chore Service provide any assistance of this type (i.e. actual physical retrofits)? If so, then add support for the Chore Service to the AHP.

Did we forget any strategies that could ***INCREASE THE NUMBER OF RENTAL UNITS AVAILABLE FOR RESIDENTS AND WORKERS****?*

Yes, deed restrictions. These are particularly applicable to Accessory Dwelling Units (ADUs), especially those that are not attached to the main residence. At present there are many pre-existing ADUs in Cornwall that have not yet been (but potentially could be) included in the official (i.e. Affordable Housing Appeals List) tabulation of Cornwall's Affordable Housing. Certainly not all property owners would consent to encumber their property with a deed restriction, but there may be a number who would.

Additionally, PA 21-29 stipulated that a time period of "not less than 10 years" is the minimum time for such deed restriction that could either be extinguished or renewed after ten years. 10 years is a much more palatable time period than the 30 or 40 years that had been required before. The AHP committee could track these units over the years to determine which ones still met the guidelines. It would be expected that there would be some ongoing fluidity of this tally, given this potential 10 year cycle.

The Steering Committee should make an effort to <u>quantify the number of ADUs in Cornwall and incorporate those numbers into Cornwall's first AHP</u>.

Perhaps there's even a way to incentivize deed restrictions. Other Towns in CT have explored these options. This might be an area to explore over the next 5 years when an update to Cornwall's first AHP will be due.

*Did we forget any strategies that would **ENABLE MORE HOUSING OPTIONS THROUGH ZONING AND PERMITTING CHANGES**?*

I urge great caution when it comes to consideration of zoning & permitting changes. Well intentioned land use changes can (and have) result(ed) in dramatic unintended consequences in a number of NW CT area towns. Numerous towns are embroiled in lengthy and costly litigation when residents perceive their "quiet enjoyment" and/or property values are threatened.

Even something as supposedly innocuous as relaxing the maximum "floor area" of an ADU (currently 1,200 SF in Cornwall) or allowing ADUs on a property on which the owner does not reside has created ongoing problems in other towns. For example, consider one NW CT business that offers short term high end rentals (think luxury Airbnb rental). Over the short time it has operated, it has scooped up 16+ modest-moderate priced homes and/or ADUs (previously suitable for young families or seniors) and now rents them out as pricey short term rentals...effectively taking these properties off the market. I think all would agree that a 1-bedroom cottage that rents for over $6,500/month is far from affordable.

*Did we forget any action steps that could **INCREASE PUBLIC AWARENESS OF CORNWALL'S HOUSING EFFORTS**?*

Yes, in conjunction with the proposed Annual Forum, develop and disseminate an Annual Report that details progress on the AHP.

Are there any concepts within the Affordable Housing Plan that aren't clear?

Yes, please define (and add to a glossary) the following terms at least (there may be others as well): ADA, AMI, CHFA, co-housing, HUD, USDA etc.

Yes, the following statement/conclusion on page 9 is spurious and should be rethought/reworded.

> "This trend has further limited the housing options, especially the available rentals, for local workers and young people as the increased demand has driven up rents and limited the supply of housing options."

In reality the "vacant" homes were never included as part of the "rental" stock in Cornwall, so that's not the trend that's contributing to the squeeze. It's more a function of the pandemic in general.

Yes, is a *Community Revolving Loan Fund* (pg. 17) the same as or different from the currently proposed *Housing Trust Fund* (pg.15)?

There are a few other typos, formatting glitches and nits, but until a second draft is released, there's no need to get into the weeds on those details until the conceptual issues have been refined and incorporated, if indeed anything else is to be incorporated.

I had hoped to get this to you well in advance of your meeting on October 20th, but other responsibilities popped up unexpectedly. So, please excuse the timing. Thank you in advance for your consideration of these comments.

Sincerely,

Marguerite Purnell