

# Regional Plan Association

Date: November 17, 2009

To: W. Michael Regan, Community Development Assistant Administrator

Office of Strategy and Policy, Department of Economic & Community Development

From: Amanda Kennedy, Associate Planner, Regional Plan Association, Stamford, CT

Re: Connecticut Draft 2010-15 State Long-Range Housing Plan

Thank you for the opportunity to comment on the Draft State Long-Range Housing Plan. We have one general comment on the Long-Range Housing Plan as well as notes on specific programs and policies within the plan. In general, geographical targets need to more precisely defined both locationally and in their relationship to employment, transit, and service opportunities. Our comments on the Draft Housing Needs Assessment centered on the need to better quantify the types of housing that meet the needs of Connecticut's future households in the near and long term. A comprehensive Housing Needs Assessment that projects household need regionally and by household age and size will enable the Long Range Housing Plan to better target program funding to meet program objectives. For example, moderate income rental housing might be a priority for communities like Stamford, where employment opportunities drive demand for housing. In rural communities that expect an expansion in the share of elderly households, DECD might prioritize housing support for elderly households. More informed decisions about funding prioritization will help the state to support a "vibrant and resilient economy" that "preserv[es] the state's natural resources and maximiz[es] use of previous investments in infrastructure and real estate." As the Draft Long-Range Housing Plan notes, "prioritization of geographies will be critical to the success of this effort. Assessing demand for the specific cities and towns will be critical." A revised Housing Needs Assessment will enable DECD to more precisely define the "geographic target" of each program.

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RPA supports:

- DECD's commitment to investing state funds in accordance with the State Plan of Conservation and Development and responsible growth strategies. As noted above, policy guidance can be more specific in locational criteria than is currently provided.
- Creation of a Responsible Growth for the 21<sup>st</sup> Century Fund and competition for funds that prioritizes towns that have adopted model zoning, have increased density, and are in close proximity to transit.
- HomeCT grants to non-profits working in communities that have re-zoned for higher densities through the incentive housing zone processes or other means.
- DECD support to assist municipalities in rezoning for mixed-use and transit-oriented development. DECD should work with ConnDOT in this initiative particularly as expanded transit services are rolled out as part of the New Britain Busway and New Haven/Hartford/Springfield Commuter Rail.
- Location Efficient Mortgage Program. CHFA's program can serve as a model for private lenders to redefine underwriting requirements in transit-served locations that better estimate a borrower's housing budget when transportation costs are reduced.
- "Learn Here, Live Here" program. We are pleased to see that this recommendation from the Economic Strategic Plan will be adopted. The first-time homebuyer trust fund specifically addresses Connecticut's unique challenge in retaining graduates educated in-state who then move to adjacent states for employment.

RPA requests clarification on the following:

- Expand on DECD's regionalism priorities. On page 6, the draft plan states that "the state will encourage regionalism and give priority for federal and state programs to those communities that form regional partnerships." What will be the objective of these partnerships and how will partnerships be rated?
- In regards to the Responsible Growth for the 21<sup>st</sup> Century Fund, clarify what is meant

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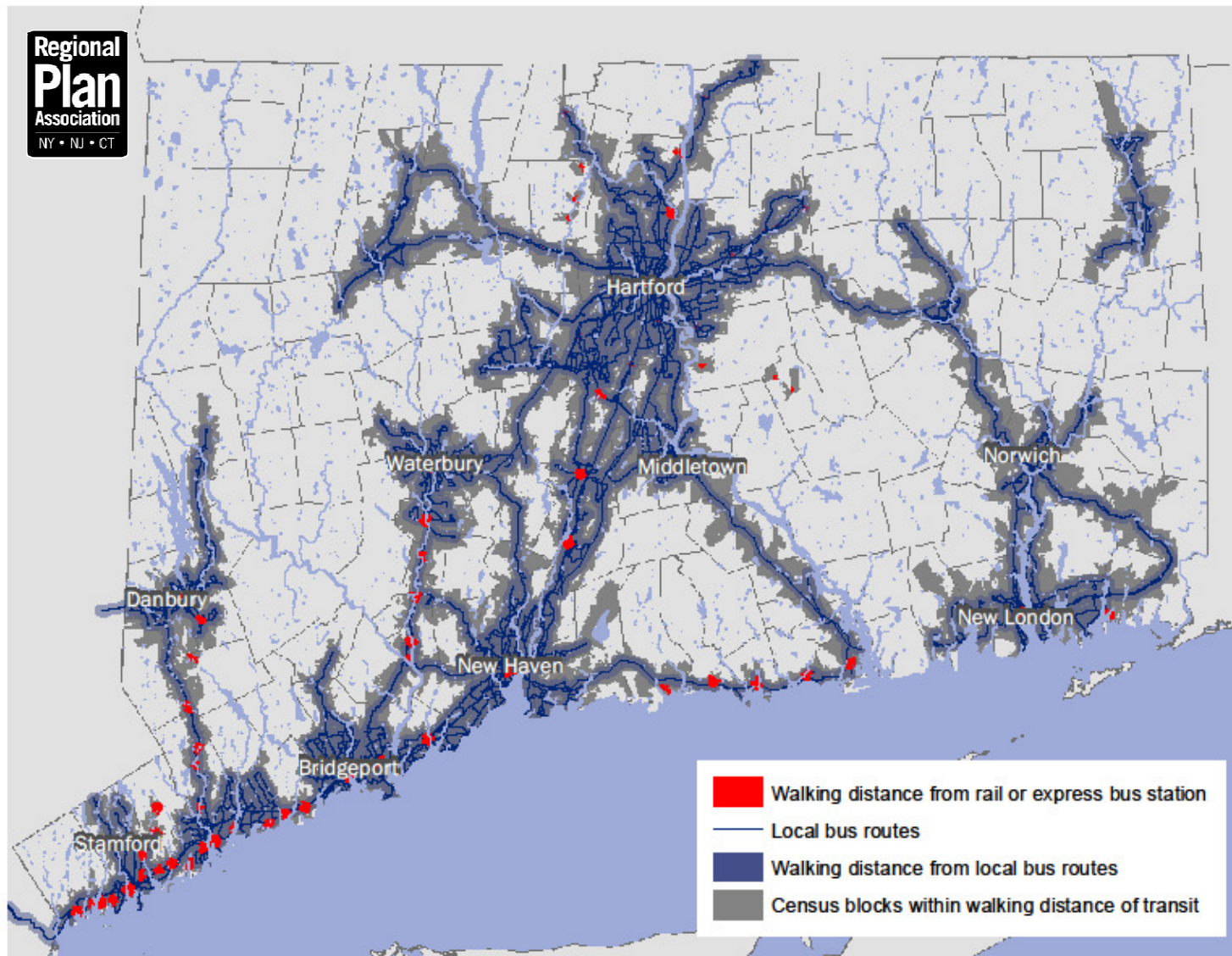
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by “model zoning.” Who will develop these model zoning regulations and what will be the criteria for certification? Although model zoning regulations can serve as a resource for communities looking to update decades-old regulations, model regulations must provide the flexibility for communities to calibrate policies to specific local conditions.

RPA urges DECD to reconsider the following:

- On the basis of a refined Housing Needs Assessment, we believe that DECD may want to choose different sets of housing priority populations for different regions, and to expand support for small households and senior households. Geographic targets should differentiate further than “statewide/rural/urban/suburban” to provide housing where it is most needed and provides households with access to educational and employment opportunities.
- DECD should refine its goal of producing new multifamily housing in “suburban” locations. While expansion of affordable housing opportunities in suburban locations is laudable, selected sites for expanded housing must correspond with responsible growth initiatives and provide households with transportation alternatives and access to job markets. New housing that places families far from educational and job opportunities and makes them dependent on private vehicles ultimately isolates low-income households from economic opportunity.
- DECD should re-commit to the goals of developing housing in transit-friendly locations. The Draft Plan concludes that “current opportunities for transit-oriented development are limited [because the state] does not have an established and well working system of public transit” (19). RPA's analysis disputes this conclusion. The map on the following page shows that 66% of Connecticut residents live within approximately ½ mile (10 minute) walking distance of a local bus route, express bus stop, or rail station. Access to transit must be a primary criterion for housing development. We urge DECD to consider proximity to bus lines as well as rail when evaluating transit access for new housing.

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Map of Transit Accessibility in Connecticut

66% of Connecticut residents live within ½ mile (10 minute walk) of a rail station or active bus route.