

Regional Housing Plan - Response to Public Comment			
Town	Page Number	Comment	Response
Essex		add Tyche logo	Change made.
Essex	Exec Summary	add "the" before Region	Change made as follows: During the 2021 creation of the Lower Connecticut River Valley Plan of Conservation and Development 2021-2031 (RPOCD), it was acknowledged that the Region must address housing options to increase diversity amongst the residents. In pursuit of this goal, RiverCOG created the Regional Housing Plan (RHP) as a comprehensive approach to addressing the Region's unmet housing needs.
Essex	Header on Executive Summary Pages	not sure you need Section 0, may be just have Executive Summary	Change made.
Essex	7	Baseline Assessment paragraph- add "the" before Region	Change made as follows: The baseline assessment first considers the Region's demographics, economic conditions, and current housing stock. This assessment helps determine the gap between those currently living and working in the Region and the type of housing that is readily available. The assessment provides a foundation for determining the Region's existing housing needs.
Essex	12 & 13	Page 12 and 13 appear to be the same information	Change made.
Essex	40	I don't believe the photo provided is the Blue Oar but instead is the restaurant "Between the Bridges"	Change made.
Durham		The Housing Plan is a welcome and an impressive accomplishment. How can Durham and Middlefield become included in this plan?	Durham and Middlefield were included in the Regional Housing Plan analysis and regional recommendations.
Westbrook	general	At their July 11, 2022 meeting the Westbrook Planning Commission reviewed the Draft	Noted.
		Regional Housing Plan and voted to support the Plan	Noted.
Westbrook	13 & 14	dupes of pg 12	Change made.
Westbrook	27	household size - provide data for household size in 2010 for reference to the shrinking regional household size. Income – What was household income in 2010 for comparison?	Comparisons to 2010 data were added for both household size and income.
Westbrook	28	Jobs and Workforce – These paragraphs are somewhat confusing. One paragraph refers to 67,000 jobs and an additional 24,000 self employed workers and the next paragraph refers to 76,000. Possibly some clarification needed.	This was a typo and has been corrected.
Westbrook	31	Tenure – Include the statistics on the # of rental units in the Region. Rents – What is the takeaway on the rental rate data – Are these considered high, moderate or low?	Tenure There are very few rental opportunities in the Region. Rental units make up only 26% of the Region's housing stock. That is a total of XX units. Younger residents, older residents, and one- or two-person households tend to prefer rental units due to their flexibility, lack of maintenance requirements, and absence of a down payment. Rents As of 2019, the average rental rate in the Region was \$1,174 per month. This rate varies by municipality, with Old Saybrook having the highest rate of \$1,631 and Haddam having the lowest rate of \$881. Approximately 31 percent of the Region's rental housing (5,837 units) rented below \$1,000, and about 39 percent (7,224 units) rented between \$1,000 and \$1,500 per month. While these rates are relatively reasonable, the small number of existing rental units across most of the Region skew these numbers. Rental units make up 26 percent of all units in the Region, which indicates that 74 percent – almost three-quarter of all units – are owner-occupied.

Westbrook	35	Available Infrastructure – No mention of CT Water Company Service in the Shoreline Town of Clinton and Westbrook	This has been corrected as follows: Approximately 57 percent (102,741) of residents in the Region are served by public water systems. The main water suppliers in the Region, based on number of people served, are the Middletown Water Department (41,019), Cromwell Fire District Water Department (14,316), and the Connecticut Water Company (CTWC), which supplies 11,714 residents in the towns of Chester, Deep River, East Haddam, East Hampton, Essex, Killingworth, Old Lyme, and Portland. CTWC also provides water service to the shoreline towns of Clinton, Westbrook, and Old Saybrook, as part of the Shoreline Region - Guilford system. Four municipalities have less than 1 percent of their population served by public water systems. These are Killingworth, Haddam, East Haddam, and Lyme. Five municipalities have over 50 percent of their population served by public water systems. These are Chester, Cromwell, Middletown, Old Lyme, and Portland. The remaining municipalities have between 2 percent and 23 percent of their populations served by public water systems.
Westbrook	36	Suitability Map – Is this Map available for review?	Yes. Available on the website here: https://www.rivercog.org/projects/rhp/documents/
Westbrook	42	Vision Map – Is this Map available for review?	Yes. Available on the website here: https://www.rivercog.org/projects/rhp/documents/
Westbrook	55	Points of Commonality – Should the list of % overlap be in descending order?	Change made.
Westbrook		The recommendation for Low Income Tax Credits does not include a responsible agency.	Added Connecticut Housing Finance Authority & Non-Profit Orgs
Westbrook	57	Recommendation 2 TOD, second paragraph – The following sentence should be revised “consider alternative solutions for using those stations to create better access and connectivity in the Region.” Maybe revise to read “consider alternative land use development around these stations to improve access and connectivity in the Region. Otherwise it is unclear as to what this sentence suggests	Change made.
Westbrook	appendix b	Wrong Photo inserted	Change made.
Westbrook	general	Is a copy of the Housing Market Study available?	Yes. Available on the website here: https://www.rivercog.org/projects/rhp/documents/
Old Lyme		1. Old Lyme in particular as well as the other towns included in the “Shoreline Market” have a disproportionately high fraction of seasonal housing in their current housing stock, as shown in Don Poland’s and other research. This should be noted in the Methodology and Capacity sections as context for the other data and analyses that are presented. As an example, Old Lyme has a relatively high proportion of homes served by municipal water systems, but much of this capacity is within the beach communities and does not necessarily translate into capacity for additional development	A note was added on P30 that " A significant portion of this supply, particularly in the shoreline communities, is seasonal housing. " I'd also like to note that, based on our analysis, sensitive areas along the shoreline would not be recommended as places for additional housing development, despite having public water connection, because of environmental concerns, not because the housing is seasonal.
Old Lyme		2. In the Housing Toolkit section, the concept of providing model policy and regulations to assist in the implementation of local Affordable Housing Plans is a very useful one, and could be noted specifically in the “Points of Commonality” table for promoting ADUs and other items in the table in addition to middle density housing	Thank you for your comment. On review, the toolkit cannot go in the points of commonality table directly as it was inferred from the common goals of the municipalities but not explicitly recommended in any of the plans. While we see the toolkit as useful to assist the towns in implementing their shared goals, the table is specifically intended to show direct overlap of stated goals in the municipal plans.
Old Lyme		3. Regarding Recommendation #3 to establish a Regional Housing Commission, we support the aspects of the recommendation around communication, education, and collaboration. We are, however, concerned about the direction being set in Phase 3 toward expanding the proposed commission as a funding and regulatory authority. It is noted parenthetically in the table that fee collection would require authorization by statute, but we would suggest that this is a much broader issue, and that the intent to effectively create an extralegisative layer of authority between the state and municipal governments requires more discussion with local and state officials and the general public before being advanced as part of the regional plan.	Thank you for your comment. This is the reason the plan does not explicitly state that the Regional Housing Commission will take on the role of any of these entities. What we are suggesting is that once formed, the Regional Housing Commission has the potential to expand and should explore the possibility, desirability, and feasibility of these other entities. While preliminary information was gathered on each as part of the RHP, it was certainly not enough to confirm that any would necessarily be the right fit, and if the authority of the commission were to be expanded, it would require further approval of the COG board. It is also possible that the commission would determine that none of these entities is a good fit and it would be better served to partner with existing such entities within the Region. All of these options would require further research and analysis, which was not undertaken as part of this planning effort
Portland	All	I just want to go on record as saying how impressed I am with the quality of this study. Clearly the RiverCOG Staff was attentive to the specifics of each town's present housing condition and managed both the narrative and graphics for clear understanding of the viewer. Really useful data and presentation. Thanks to all involved.	Thank you for your comment.
East Haddam	Page 25-Where Workers Who Commute to East Haddam Live	The table on the left lists Moodus, CT which is in East Haddam. This might be because Moodus has a separate zip code but it probably skews the numbers. People who commute to East Haddam from Moodus are already in East Haddam. There is also a population that live on Lake Hayward that have a Colchester zip code so those are likely excluded from this analysis. This likely affects the other results on other pages if they considered Moodus as not being in East Haddam.	This is in reference to the East Haddam 8-30j plan which has been adopted by the town. Comments on that plan should be directed to East Haddam planning.

Deep River	1	You have missed the most significant resource available for development/growth in the spirit of 30-g. Although you briefly mention Housing Authorities they are the most important existing entity moving forward with significant authority and access to Federal and State resources. Regional application of existing and future resources is available now and since you have identified Middletown as the most significant in terms of numbers and since the Housing Authority is probably the largest, constant, recipient/applicator of Federal housing dollars in the group why not explore Middletown, Deep River, Essex housing authorities that have bonding capabilities and working knowledge of the wheel? Of course you need emphasis the difference between affordable vs. low and moderate income housing.	Thank you for your comment. It is the intention of this plan that the Regional Housing Commission, once established, should act as or partner with housing authorities across the region. Regional recommendation 3 specifically states that the commission should study and consider the feasibility of acting as or partnering with housing authorities.
Essex	Na	Please tell me what happens if we do nothing and let the towns grow organically? In other words we like it just the way it is. This is why we live here. I've lived in Connecticut 62 years and have seen too many government projects that was supposed to help us all and they turned out terrible. However somebody always lines their pockets on our hard earned tax dollars. Leave us alone.	Thank you for your comment. Every municipality in the state is required to prepare Affordable Housing Plans by section 8-30j of the Connecticut General Statutes. This Regional Housing Plan, while not mandated, is an effort of the Region's municipalities to coordinate those 8-30j plans. The research in this plan demonstrates that if the region fails to act, there will be a continued loss of jobs and population and the region will progressively decline over time.
Chester	NA	The plan is comprehensive and the enormous work to complete it is impressive. The only comment I have is, and we have discussed this at our RPC meeting, is to ensure the statistical and demographic data utilized is the most updated to capture the most recent trends given Covid's impact on our area. Thank you for all of the wonderful work completed on this project.	Thank you for your comment. This plan used 2019 census data as the latest reliable and complete data set. There have been documented problems with 2020 and 2021 census data making their viability for analysis questionable. We will continue to monitor data as it is collected for trends coming out of the COVID-19 pandemic.
Chester	NA	Affordable housing in Chester, which is all I can speak to, is an absolute must. Not everyone needs a house for a family of five. We need more than just slim pickings for housing for families w/fewer people. We need a robust market that offers options.	Thank you for your comment. Noted.
Middletown	4	The other section title pages are right justified. this section is left justified.	This version was intended to be viewed online in two page viewer. There will be a print version available once the draft is finalized.
Middletown	6	don't call it "Section 0"	Change made.
Middletown	7	in the population module "1% decline" since when?	Change made.
Middletown	9	first paragraph- change to "lacks, utility infrastructure..." first paragraph- replace "alternative modes of" to "public" first paragraph under Innovative- change to "...appeal to young families and professionals..."	Changes addressed as follows: 1. Change made. 2. "alternative modes" includes bikes and pedestrian access. Change not made. 3. The point of this section is to provide housing for young workers, not necessarily with families. Change not made.
Middletown	13-14	delete duplicate section of "Establish a Regional Housing Commission" and body text	Change made.
Middletown	19	under #1. replace "a housing goal 50. or even 20 years ago" with "the American dream" and replace "consider homeownership" with "desire homeownership" under #2 replace "shrinking" with "declining" under #2, I don't know what you mean by "businesses that can partner with our Region's existing institutions"	Word choice.
Middletown	20	under #4, complete the last sentence... "... and adapt to a variety of household types including but not limited to X, Y, and Z."	Change made.
Middletown	23	in the image change to "1% decline since 2010"	Change made.
Middletown	25	this page is in an awkward spot, especially because the sentence at the end of page 23 continues to page 26	This has been addressed.
Middletown	26	under Age, 1st paragraph change to "The Region's population is aging." Also this paragraph could benefit from adding the region's median age excluding Middletown.	Change made..
Middletown	27	part of the Connecticut image was cut off in the print	This version was intended to be viewed online in two page viewer. There will be a print version available once the draft is finalized.
Middletown	28	the house image is cut off in the print. The contrast between 85-90 and 1990-2020 is lost a bit in the text. Maybe present it in an annual average growth rate in addition to or instead of total numbers.	This version was intended to be viewed online in two page viewer. There will be a print version available once the draft is finalized. Rates were added.
Middletown	29	line spacing issue between Housing Profile and Housing Type	Change made.
Middletown	30	In the Graph, consider comparing 2000 and 2020 instead of even 1990 and 2020. Its hard to see the whole picture comparing 2010 and 2020. A wider time frame can show a generational shift	Thank you for your comment. We generally used a 10 year timeframe throughout, but your point is well taken. We can incorporate this information on the Regional Housing Commission page as part of our effort to provide additional information and education.
Middletown	32	awkward use of em-dashes in the first paragraph	em-dashes were replaced with parenthesis.
Middletown	33	summary of Baseline of Baseline Assessment, 1st paragraph change "stagnant to declining" to "stagnant or declining". Last sentence change the beginning to "The state of the existing housing stock..."	Changes made.
Middletown	35	the two sentences describing the 5 municipalities having over 50% of population is awkward and could be rewritten into one sentence.	Sentences were combined as follows - Chester , Cromwell , Middletown , Old Lyme , and Portland have over 50 percent of their population served by public water systems.
Middletown	37	first paragraph change to "...analysis provides a.... but does not consider..." under sustainable... split the first paragraph into two after "...and quality of life."	Subject/verb agreement is correct. The assessment and analysis are two different subjects, therefore verbs should be singular. The word "they" was added to the second part of the sentence to clarify.
Middletown	38	this might not be the best place but maybe introduce municipalities expanding home business opportunities so young professionals can convert bedrooms in oversized homes into home offices.	Thank you for this comment. This is a great suggestion to be incorporated into the toolkit.

Middletown	39	under Connected, first paragraph change to "... and bike lanes to improve accessibility to a variety of land uses (housing, jobs, services, amenities). Improved connectivity will both lower the impact on the Region's land and resources and be a draw...."	Change made.
Middletown	40	2nd paragraph, change last sentence to "Increasing housing opportunity with access to a broad range of transportation alternatives will be important to attract a wider diversity of residents across a range of incomes." last paragraph, delete the first sentence and modify the second sentence to start "Communities throughout the region have historic...."	Changes made.
Middletown	44	1st paragraph, modify the first sentence to read "The region will largely rely on private..."	Changes made.
Middletown	45	1st paragraph, modify the last sentence to read "...and thereby stimulate population growth and increase the demand for housing." 1st paragraph under Household Formation, modify the first and second sentence to read "or declining due to the increase...." under Income, modify the first and second sentences to read "...wages rise because people are able and willing to spend more money on housing as their incomes increase."	Changes made.
Middletown	46	Generally, I think "trends" works better than "trajectory"	Word choice.
Middletown	51	the whole page seems out of place	Noted.
Middletown	52	On this page and the other Section title pages, some of the works are broke with hyphens. This looks and reads awkwardly when the text is right justified.	Noted.
Middletown	53	1st paragraph, delete the sentence "In terms of sustainability, this makes sense." Later in the paragraph it reads "As stated at the outset, where people live, where they work..." I suggest confirming that this actually states somewhere towards the beginning. I did a couple keyword searches and couldn't find anything.	Changes made.
Middletown	57+	In the recommendations section, all the percent's are shown written as "%" and in the earlier sections they are written as "percent". The usages should be consistent throughout the document.	Change made.
Middletown	58	Possibly propose the Regional Housing Commission to perform the duties of the Fair Rent Commission for member municipalities under PA 22-30. https://www.cga.ct.gov/2022/act/Pa/pdf/2022PA-00030-R00HB-05205-PA.PDF I believe Matt Hart at CRCOG is looking in this.	This is certainly something that we can look at as part of phase 3 during implementation
Middletown	61	under Phase 3 modify a portion of the first paragraph to read "partner with local, municipal, or regional housing authorities."	Change made.
Chester	31-32	I believe a visual and further description as to medium household incomes in the state, region and how that relates to national poverty levels for single and dual income households is pertinent to understanding the need and basis for requiring affordable housing. This assessment needs to much more depth into this issue so it is simple and visual and easy to understand like the visual for age medium by region and town, the need for affordable housing is deepest on these levels and will draw new residents into our areas but if we are not well versed in the national poverty levels is required.	Thank you for your comment. The need for additional research and communication on these issues is acknowledged and will take place in the implementation of this plan under phase 1 of the Regional Housing Commission formation.
Middletown	Recommendations	7/25 RPC Meeting : Sacha Armstrong-Crockett, Middletown resident, a member of their anti-racism task force, and local realtor commented that she was disappointed to see nothing in the affordable housing plan of Middletown or the regional plan about race. She mentioned that Black, Latinx and Indigenous people make up 34% of Middletown's population, but they are missing from the plan. This feels dangerous to her as Black people are still facing the effects of COVID, job loss & insecurity, and housing insecurity, and the tight real estate market. She stated that she contacted Middletown's representative and was told that race has nothing to do with affordable housing. Omitting the current and historical housing experiences of people of color is harmful to that population. She feels Middletown did a poor job of engaging community and people of color for the plan. She suggests not including race in the plan unless we are going to include specific actions to help people effected by systemic racism. Or, to have someone on staff who is well-versed in anti-racism language. She also mentioned feelings of safety in relation to housing being important for all people but particularly people of color in areas such as Essex. She stressed the need for meaningful partnership between communities of color and the housing plan.	These comments were addressed with the addition of the following language: P56. Each municipality in the Region has a unique combination of attributes, values, and constraints. Therefore, while it is imperative that each municipality provide additional housing opportunities, and work to redress negative impacts of past housing policies disproportionately felt by communities of color , the type and amount of housing will vary greatly among them. In terms of sustainability, this makes sense. Type and amount of housing should vary based on projected population growth, access to jobs, available infrastructure, access to transit, and location of important natural resources and constraints. P59. The toolkit could be revised and expanded over time, responding to the needs of the municipalities. In particular, tools for outreach and engagement with communities of color should be incorporated to ensure that people of all races feel safe and welcome in the Region. P61. The RHC should also serve as the primary point of contact for partnering and coordinating efforts with nonprofits like the Homeownership and Opportunity for Everyone (HOPE) Partnership, Habitat for Humanity, and the National Association for the Advancement of Colored People (NAACP) , as well as for developers looking to create affordable housing in the Region. Create an outreach campaign focused on establishing key relationships with local advocates, particularly in communities of color .

Middletown	general	<p>Here is the comment I suggested be removed last Monday in the Housing Draft.</p> <p>The sentences that should be removed from the draft are these:</p> <p>“The Region’s large, old, expensive, single-family units are not well matched to its aging demographic and shrinking household size,” the plan says. “This existing stock is also unlikely to attract or retain the younger population that the Region will need to thrive.</p> <p>As I mentioned, oldness is not something that turns people away. People rent or buy due to price, location- proximity to a job, and access to transit.</p> <p>Also, the statement “large...expensive” is not true. There are many small units - Old Saybrook, Chester, Middletown, Portland and Cromwell come to mind.</p>	<p>Thank you for your comment. Although it was received outside the designated comment period, it was noted from the RPC meeting on 7/25.</p> <p>The statement in the plan, while strong, is true and supported by the document. It will not be removed.</p> <p>To make a blanket assertion that "oldness" does not turn people away from housing is false.</p> <p>What the current statement claims is that the region's housing stock that is old, expensive, and large is unlikely to attract or retain younger people, elderly people, or people with one or two person households.</p> <p>It does not say that all housing in the region is old, expensive, or large, although elsewhere in the plan it is proved to be the dominant typology. It also does not say that there is absolutely no market for these units.</p> <p>In addition, price, location, job proximity, and access to transit are all incorporated into the plan analysis at length.</p>
Middletown	general	<p>I encourage promoting the recent legislation about accessory dwellings the state has passed/supported.</p>	<p>Thank you for your comment. Although it was received outside the designated comment period.</p> <p>This plan was intended to provide an overarching picture of trends and challenges across the region and to form a framework through which municipalities can engage collaboratively to address them. Using the plan as a platform to promote state legislation was not part of that effort.</p> <p>That said, the benefits of ADUs and ADU regulations are discussed in almost all of the town specific 8-30j plans as a tool to promote more affordable and diverse housing opportunities. This was noted in the first regional recommendation (Creation of a Housing Toolkit). The plan states that the housing toolkit will provide background information, best practices analysis, and sample language that the towns can use to implement many of the regulatory changes proposed in their 8-30j plans. ADU regulations were specifically included in the list and will be a part of</p>
Middletown	general	<p>A better statement to make regarding the predominance of SFH’s in the region might be to emphasize the positive developments over the last 2 years at the state level allowing for more density. You might say this instead:</p> <p>“The recent state legislation supporting accessory dwelling units on single-family lots will make inroads into providing much-needed housing for younger residents. Having an additional unit on the same property in those towns that have adopted this legislation will fulfill a number of needs:</p> <ul style="list-style-type: none"> - it will provide units on land already serviced and developed - this will keep the supply of currently undeveloped land (farmland) undeveloped - offer more flexibility on the same site for older residents with larger houses - who may choose, over time, to live in the smaller unit and rent the larger house to a family - create the opportunity for daily contact for older residents with tenants living next door - lots within towns centers will allow more people to live closer to daily needs (groceries, transit and services) without the need to drive to every destination, which can support local economic development and ultimately, attract new employment 	<p>Thank you for your comment. Although it was received outside the designated comment period.</p> <p>Your statements about the benefits of ADUs are well known, often stated, and generally correct. However, the benefits provided by well placed ADUs (and all other types of infill development promoted by the plan) do not negate the truth of the statement that a large portion of the region's housing supply, as it currently stands, is not well suited to changing demographics and shifting needs. It is not a valid replacement for the sentence you would like removed.</p> <p>In addition, I would direct you to the response above regarding the discussion of ADUs in the town specific plans and as a part of the Housing Toolkit.</p>
Middletown	general	<p>Again, we should have a housing committee that meets 2-3 times a year to add things to the Housing Plan.</p>	<p>Thank you for your comment. Although it was received outside the designated comment period, it was noted from the RPC meeting on 7/25.</p> <p>I would direct your attention to Regional Recommendation 3 - Establish a Regional Housing Commission. The formation of this commission, its bylaws, and its representation, will be determined by the Chief Elected Officials of each of the municipalities. However, the Plan does discuss three phases of expanding operations for the Commission, which include being a primary source of information and education on housing in the region, and creating a methodology to assess regional housing needs every five years in coordination with the municipal 8-30j plan updates.</p>

Middletown	general	Without having any zoning analysis of the region, we are without the most important indicator of what is wrong.	<p>Thank you for your comment. Although it was received outside the designated comment period.</p> <p>I will address your comment in a few points, as follows:</p> <ul style="list-style-type: none"> - Because of the regional scale of the plan, a detailed assessment of each town's zoning regulations was not appropriate. - An analysis of current zoning was completed as part of each of the twelve municipal 8-30j plans completed as part of this process. - The Housing Toolkit will give the municipalites in the region many options that can be adopted into their own zoning regulations to allow for more diverse housing. - While zoning is certainly a factor in creating our current housing trends and changing those trends in the future, the statement that zoning is the most important indicator of what is wrong in the region is incorrect. There are many factors that determine where and what kind of housing is built, and the plan endeavors to address many of them. Often overlooked is the importance of the housing market and appetite to build. It is not zoning alone that prevents development in the region, and changing zoning regulations alone will not promote it.
Middletown	general	Regarding small units: what RiverCOG towns allow small units? This is where an analysis of the zoning requirements would reveal what is truly going on in the region. Can small houses like those in a traditional neighborhood say, Cornfield Point in Old Saybrook, be built today elsewhere in town? Often towns have zoning regulations that do not allow what is there today (and beloved) to be built new because the development standards dictate something larger - usually for no reason at all except it was blindly adopted without being tested.	<p>Thank you for your comment. Although it was received outside the designated comment period.</p> <p>I would direct you to the response above.</p>
Middletown	general	Also missing from the plan are examples of What To Do - retrofits for typical parcels or property types	<p>Thank you for your comment. Although it was received outside the designated comment period.</p> <p>This plan was intended to provide an overarching picture of trends and challenges across the region and to form a framework through which municipalities can engage collaboratively to address them.</p> <p>As part of the next steps for implementation of the plan, I would direct you to Regional Recommendation One - Create a Housing Toolkit. This toolkit will give background information, best practices, and sample language that the region's municipalities can use as a resource and/or adopt into their own regulations. The toolkit will be based on the regulatory recommendations contain in the town specific 8-30j plans.</p>
Middletown	general	Would love to start a discussion with fellow commissioners.	<p>Thank you for your comment. Although it was received outside the designated comment period.</p> <p>There is nothing in this plan that would prevent you from having housing discussions with your fellow commissioners.</p>